



August 3, 2022

Ms. LeAnn Hogan
NOAA Office of National Marine Sanctuaries
1305 East-West Highway, SSMC4
Silver Spring, MD 20910

RE: NOAA-NOS-2022-0053, Proposed Hudson Canyon National Marine Sanctuary Notice of Intent

Dear Ms. Hogan:

We write on behalf of America's millions of recreational anglers and boaters, along with the fishing tackle and boat manufacturing industries. Thank you for the opportunity to comment on the proposed Hudson Canyon National Marine Sanctuary (Hudson Canyon NMS). After careful review of the National Marine Sanctuary Act and supporting documents associated with the nomination, we provide the following comments to be considered by the National Oceanic and Atmospheric Administration (NOAA) when determining the boundaries and draft management plan for the proposed designation of Hudson Canyon NMS.

We strongly support marine fisheries conservation and recognize National Marine Sanctuaries as an important program to both conserve natural resources and promote recreation. Recreational fishing is an ideal way to connect the public with the marine environment, improving environmental education and stewardship. Furthermore, recreational anglers and boaters contribute the vast majority of funding for conservation of our nation's marine habitats and marine life.

The Hudson Canyon represents one of the most important and productive recreational fishing grounds on the Eastern Seaboard. We have been pleased with the track record of allowing recreational fishing within National Marine Sanctuaries, with 98 percent of Sanctuary waters open to recreational fishing, and we firmly believe that fisheries management jurisdiction must remain with the regional fishery management councils.

To that end, we offer our preliminary support for a marine sanctuary designation at the Hudson Canyon with the following requests:

1. Conform sanctuary boundaries to the definition of a submarine canyon defined as a steep-sided valley cut into the seabed of the continental shelf. Consistent with this definition and the bathymetry of the Hudson Canyon, we support delineating the sanctuary boundaries as follows:

72'30" to the west,
72'00" to the east,
39'45" to the north and
39'20" to the south.

Our proposed demarcation of sanctuary boundaries acknowledges the physical characteristics of the Hudson Canyon while also establishing a geometric sanctuary boundary to facilitate enforcement.

2. Assign no less than three seats on the pre-designation sanctuary advisory council (SAC) to the recreational fishing community. The recreational fisheries that are pursued at the Hudson Canyon are diverse in how they operate and which species are targeted. This diversity cannot be captured through a single recreational seat on the pre-designation SAC. The pre-designation SAC will play a key role in drafting the organizational documents for the sanctuary, and with recreational anglers being the largest stakeholder group in the Hudson Canyon, SAC composition must reflect the magnitude of our sector. (Precedent for multiple recreational angler seats on an SAC can be found most recently in the Florida Keys National Marine Sanctuary.)
3. Retain management jurisdiction with the regional fishery management councils and avoid including any management of recreational fishing and those species of fish targeted by recreational fishing in the sanctuary Terms of Designation.
4. Include in the sanctuary management plan a clear statement within the goals and/or objectives that supports the continuation of recreational fishing within the sanctuary. This statement would be consistent with the position on recreational fishing submitted in the Hudson Canyon Sanctuary Nomination and with management in existing sanctuaries that currently allow recreational fishing in the vast majority of sanctuary waters. Recreational fishing must be identified as a compatible activity within the proposed sanctuary.
5. Allow recreational fishing in any areas within the sanctuary established for research purposes unless there is a clearly defined, science-based need for fishing closures and a timeline for recreational fishing to resume. We also believe collaborative research that uses the expertise of recreational anglers and their vessels would add significant value to the goals and objectives of the sanctuary.

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Our organizations recognize the significant environmental, ecological and economic value that the Hudson Canyon provides to recreational fishing and coastal communities. For generations, the Hudson Canyon has been an exceptional fishing destination for saltwater anglers across the country. We also recognize a marine sanctuary designation can afford protections that may safeguard the Hudson Canyon from catastrophic impacts thereby preserving the area for future generations. It has been demonstrated that recreational fishing and boating within the Hudson Canyon are sustainable activities and consistent with the long-term goals as outlined in the National Marine Sanctuary Act. With these requests considered, we offer our preliminary support for the designation of the Hudson Canyon as a National Marine Sanctuary.

Sincerely,

Glenn Hughes, President
American Sportfishing Association

Dr. Guy Harvey, Ph.D., Chairman Emeritus
Guy Harvey Ocean Foundation

Chris Edmonston, VP Government Affairs
BoatU.S.

Jason Schratwieser, President
International Game Fish Association

Jim McDuffie, President
Bonefish and Tarpon Trust

Matt Gruhn, President
Marine Retailers Association of the Americas

Jeff Angers, President
Center for Sportfishing Policy

Frank Hugelmeier, President
National Marine Manufacturers Association

Patrick Murray, President
Coastal Conservation Association

Rob Nixon, Executive Director
Recreational Fishing Alliance

Jeff Crane, President
Congressional Sportsmen's Foundation

Whit Fosburgh, President and CEO
Theodore Roosevelt Conservation
Partnership