



July 11, 2017

E.O. 13795 Review  
National Oceanic and Atmospheric Administration  
Silver Spring Metro Campus Building 4 (SSMC4)  
Eleventh Floor, 1305 East-West Highway, Silver Spring, MD 20910.

**RE: ID NOAA–NOS– 2017–0066**

Dear Sirs:

I am writing on behalf of the Diving Equipment and Marketing Association (DEMA) to comment on the review of National Marine Sanctuaries and National Marine Monuments pursuant to Executive Order 13795, dated June 26, 2017.

DEMA is a non-profit trade association based in San Diego, California, representing the business and consumer interests of the recreational scuba and snorkel diving industries all over the world. DEMA's mission is to bring businesses together to grow the diving industry worldwide. Protecting our marine and aquatic environments is an issue around which diving businesses around the country can and do come together.

DEMA has been involved with sanctuary development and management issues for more than 20 years, including the development of the plan for the Florida Keys National Marine Sanctuary and the Dry Tortugas. In 2008 DEMA testified before the House Committee on Natural Resources, Subcommittee on Fisheries, Wildlife and Oceans, stating that when scientific need is established and continued accessibility for non-consumptive activities is preserved, the Diving Community wholly supports the reauthorization of the National Marine Sanctuaries Act. National Marine Sanctuaries are favored by the diving community when they remain accessible to non-consumptive activities such as scuba diving and snorkeling, when they are established using the proper administrative procedures and when science supports the need for the Sanctuary and any restrictions or controls put in place.

### **Scuba Divers and Snorkelers Support Protecting the Marine Environment**

Divers have a vested interest in protecting all aquatic environments. The Diving Industry depends on sustainable interaction with the marine environment as well as with certain submerged cultural resources for its very existence. The Industry is aware of the need for long-term sustainability of these resources for all citizens of the U.S. For these reasons, DEMA's goals include an expressed acknowledgment of the need for protecting aquatic environments.

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The Marine Sanctuaries currently under review provide unique environments where protected species and submerged cultural resources can be observed first-hand by divers and snorkelers. Divers have long been concerned with the effects of pollution and other potential sources of damage to these environments – whether from run-off that originates from populated regions in proximity to diving areas, or from other sources.

Scuba divers and snorkelers are stewards of an environment that is unique, and upon which they depend for recreation and study. Today, all scuba divers are educated to maintain proper buoyancy and body-positioning while diving to help prevent accidental damage to natural marine and other aquatic resources. To better understand how they can protect the aquatic environment, many divers seek additional buoyancy training and qualification above their initial diving “certification.” Many divers also seek additional training to better understand the complex nature of coral reef communities, fishery resources and how to contribute to the knowledge base needed to monitor and protect these environments. With their first-hand observation of these protected areas divers can also encourage others to protect these resources. In fact, often divers are called upon to be the “eyes and ears” of both state and federal agencies seeking first-hand information on the impact of certain activities.

There are between 2.7 to 3.5 million active scuba divers and 11 million snorkelers in the U.S. with as many as 6 million active scuba divers and 20 million snorkelers worldwide, (Source: Sports and Fitness Industry Association). Divers in the U.S. today participate in diving activities in many areas of the country, including such locations as the Florida Keys National Marine Sanctuary, Monterey Bay National Marine Sanctuary, and Thunder Bay National Marine Sanctuary. DEMA’s own research indicates that divers travel frequently to dive and National Marine Sanctuaries attract divers from all over the world for their pristine beauty and accessibility to natural and cultural dive settings.

Today’s Open Water Divers\* fit the following profile (Source: Diving Equipment and Marketing Association 2014 Diver Study):

- Participant’s Age: Mean: 33, Median: 30
- Head of Diving Household Age: Mean: 53
- Participant’s Gender: Male: 65%, Females:35%
- Annual Household Income: 64.4% make between \$100,000 & \$150,000
- Occupation: 53.6% are Managerial/Technical/Professional
- Education: 59.2% completed college or grad school
- 91.9% own their home
- 75.9% are married
- 23.7% have children between 11 and 17 years old

\*Open Water Divers are entry-level divers

This rather affluent demographic is generally concerned with the environment and with the sustainable use of natural resources (Source: Murch, Arvin. 1971. "Public Concern for Environmental Pollution." *Public Opinion Quarterly* 35:100-106).

Scuba divers and snorkelers regularly participate in such activities as underwater photography, observing and counting fish, reporting environmental concerns to state and

federal authorities, and beach and submerged coastal clean-up activities. Non-profit, U.S. based organizations, such as The Reef Environmental Education Foundation (REEF), the Project AWARE Foundation and the Green Diver Initiative, provide many opportunities for divers and others to understand more about reefs, ecosystem management, sustainable tourism, coral reef restoration, and how to become effective environmental advocates.

To date, for example, REEF has involved divers in thousands of surveys of aquatic life, contributing to the knowledge base in areas of fish populations and invasive species. Over the past 25 years, Project AWARE Foundation has completed thousands of beach and underwater clean-up activities involving divers and non-divers with an interest in protecting the marine and aquatic environments.

Divers, diving professionals and all of those connected with the Diving Industry actively observe and protect the environment on which they depend for recreation and for their livelihoods. Perhaps John J. Cronin, one of the founders of PADI, said it best: "If divers do not take an active role in preserving the aquatic realm, who will?"

### **The Diving Industry's Suggestions for Review of National Marine Sanctuaries and Monuments**

**Suggestion A:** DEMA recognizes that when marine sanctuaries are designated under the *National Marine Sanctuaries Act*, each is designated because of specific conservational, recreational, ecological, historical, research, educational or aesthetic values. In addition to these designation criteria, during this review process, DEMA suggests that the process for designation of these areas should also:

1. Include input from all user groups.
2. Provide for a clear balance between access and use by interested parties, and health of the resource.
3. Recognize that diving and snorkeling are not inherently consumptive activities.
4. Avoid unnecessarily restricting non-consumptive activities.
5. Not include fees for users when involved in non-consumptive activities.

**Suggestion B:** While recreational scuba diving and snorkeling are not inherently consumptive in nature, DEMA suggests that the review of Marine Sanctuaries include support for such consumptive activities as spear fishing within the boundaries of a given sanctuary when the following criteria are met:

1. Hook-and-line fishing activities within the sanctuary are allowed and supported by sound science and sanctuary policy.
2. Sound science exists to support consumptive activities such as spear fishing.
3. Sanctuary policy supports such consumptive activities.

**Suggestion C:** DEMA also suggests that non-consumptive, low-intensity level activities, such as recreational scuba diving and snorkeling, should be allowed to continue and should not require permitting.

**Suggestion D:** When designated, Sanctuaries should consistently include the establishment of research areas that are no-take zones which restrict hook-and-line

fishing, spear fishing and other consumptive activities, but do not exclude non-consumptive activities.

**Suggestion E:** DEMA suggests that decisions regarding fisheries issues within sanctuary systems remain within the authority of the *National Marine Sanctuaries Act*.

### **Conclusion**

DEMA appreciates the need to review those National Marine Sanctuaries and Monuments which have been created or expanded during the preceding 10-year period. The Diving Industry hopes that such a review will result in a clearer understanding of the need for on-going scientific analysis of natural and cultural resources in these designated areas, as well as the need for utilizing the established administrative procedures for creating such a Sanctuary. Importantly, DEMA and the Diving Industry support such a review so that these areas remain accessible for non-consumptive activities such as scuba diving and snorkeling.

Thank you for the opportunity to comment on the current review of National Marine Sanctuaries and National Marine Monuments pursuant to Executive Order 13795, dated June 26, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Ingram', with a stylized, cursive flourish extending to the right.

Tom Ingram  
President and CEO  
Diving Equipment and Marketing Association