

From: <Catherine_Callaway@ios.doi.gov>
To: Randal_Bowman@ios.doi.gov
Subject: DCN: EST-00003541 - Antiquities Act
Date: Monday, July 24, 2017 3:53:01 PM
Attachments: [3541 in.pdf](#)
[SurnameLog_EST-00003541.pdf](#)

FYI



The Honorable Ryan Zinke
Secretary
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

July 5th, 2017

Dear Secretary Zinke,

Many thanks for your visit to the New England Aquarium last month. We really appreciated the opportunity to discuss with you some of the important features of the Atlantic Canyons and Seamounts Marine Monument. We are especially mindful of your concerns about what the monument is protecting ("the objects of historic or scientific interest"), and of the potential economic losses to fishermen and the U.S., and would like to address those specifically.

The canyons and seamounts monument area encloses an unusual combination of topography, bottom animals, corals, and oceanography, which combine to create an extraordinary abundance and diversity of marine mammals, sharks, and seabirds at the surface. The most important deepwater objects are probably the thousand year old coral forests, which are the cornerstones of what is likely a thousand year old ecosystem. This is equivalent to forests of Giant Sequoia trees, long lived plants that support entire ecosystems around them. The area is also home to rare species, some discovered on recent scientific expeditions to the area, and many others likely to be found in the future. Therefore, we find the combination of old-coral ecosystem, the diversity of upper trophic level predators, and the opportunities for continuing scientific discovery, all meet the definition of an object of scientific interest.

We are sympathetic to the fishermen of New England, who have seen fisheries collapse, been subject to increasing regulations, and have to deal with both a changing environment and changing management schemes. However, the large economic losses claimed by the fishing industry due to the monuments are not supported by any of the data, including the recent analysis by the New England Fishery Management Council (letter dated June 29, 2017 to Secretary Zinke), which states, "the percentage of revenue and effort, assessed at the owner and permit level respectively, consistently indicate a low level of fishing activity for the vast majority of individuals estimated to use these waters". From their analysis, most of the 90 fishermen who claimed to fish in the monument area can attribute less than 1% of their annual revenues to the monument region. For the remaining 8 or so fishermen, the Council's estimates indicate less than 10% of their annual revenues are due to the monument region. The Monument protects just three canyons out of many similar canyons along the Northeast continental slope, all of them open to most fishing activities. What the science from other marine monuments and protected areas around the world shows very convincingly is that no-fishing zones become nursery grounds and

009266

RECEIVED
2017 JUL 11 AM 11:00
EXECUTIVE SECRETARIAT
U.S. DEPARTMENT OF THE INTERIOR

feeders for improved fishing in the surrounding areas. In most areas where these have been in place for more than 5 years, fishermen are their greatest supporters.

Reducing the Monument size, or allowing commercial fishing won't provide much economic gain, but it will risk a lot. Contrary to the claims of the New England Fishery Management Council, even a small shift of the western boundary would endanger the upper canyon corals (See figure 1 at the end of this letter). Damage to those coral ecosystems from traps, pots, and bottom longlines will take hundreds of years to repair, as the corals are very slow growing. Further, entanglement in commercial bottom-deployed fishing gear remains a major cause of death for endangered whales and sea turtles in the Northeast, and the monument will provide the only refuge from accidental entanglements in the entire Atlantic EEZ (See figure 2 at the end of this letter, which shows the "hot-spots" for whales and dolphins in the Monument). In sum, we do not see a scientific or economic justification for changing the Monument boundaries, or for relaxing fishing restrictions within the Monument.

In representing institutions that serve both science and education for the public, we can attest to a great popular hunger for ocean discovery and learning. Our concept for bringing information, videos, and live feeds from ocean observatories and expeditions in the Monument to the public is entirely feasible. Such a plan, with multiple outlets, and appropriate distribution strategies, could easily create more economic value than all the fishing in the Monument ever will. Between the New England Aquarium and Mystic Aquarium alone, our visitors number over 2.1 million people annually. Teaming with the Woods Hole Oceanographic Institution (the largest private marine research organization in the world) would be a winning combination. There is no reason that such a network could not expand to other Aquaria, Science Centers, and Museums around the country, thus making this Monument accessible to all Americans. (Without the expense of public bathrooms!)

Finally, we recognize the concerns about the process by which a President can designate monuments of any type. In the case of the Canyons and Seamounts, we were pleased that the federal agencies did reach out to many stakeholders (including ourselves), hold several public meetings, and offer extensive public comment periods. Input from these processes clearly affected the eventual boundaries of the Monument. We are confident that the resulting Monument designation is a fair balance of scientific and economic interests that clearly meets the criteria of the Antiquities Act. We strongly recommend that its current and future scientific and educational value remain protected within the current boundaries and restrictions.

With our best regards,



Scott D. Kraus, PhD.

Vice President, Senior Science Advisor

Cabot Anderson Center for Ocean Life, New England Aquarium

Boston, MA 02110



Laurence P. Madin

Deputy Director, Vice President for Research

Woods Hole Oceanographic Institution

Woods Hole, MA 02543

Figure 1. Confirmed coral occurrence in the Canyons and Seamounts Monument

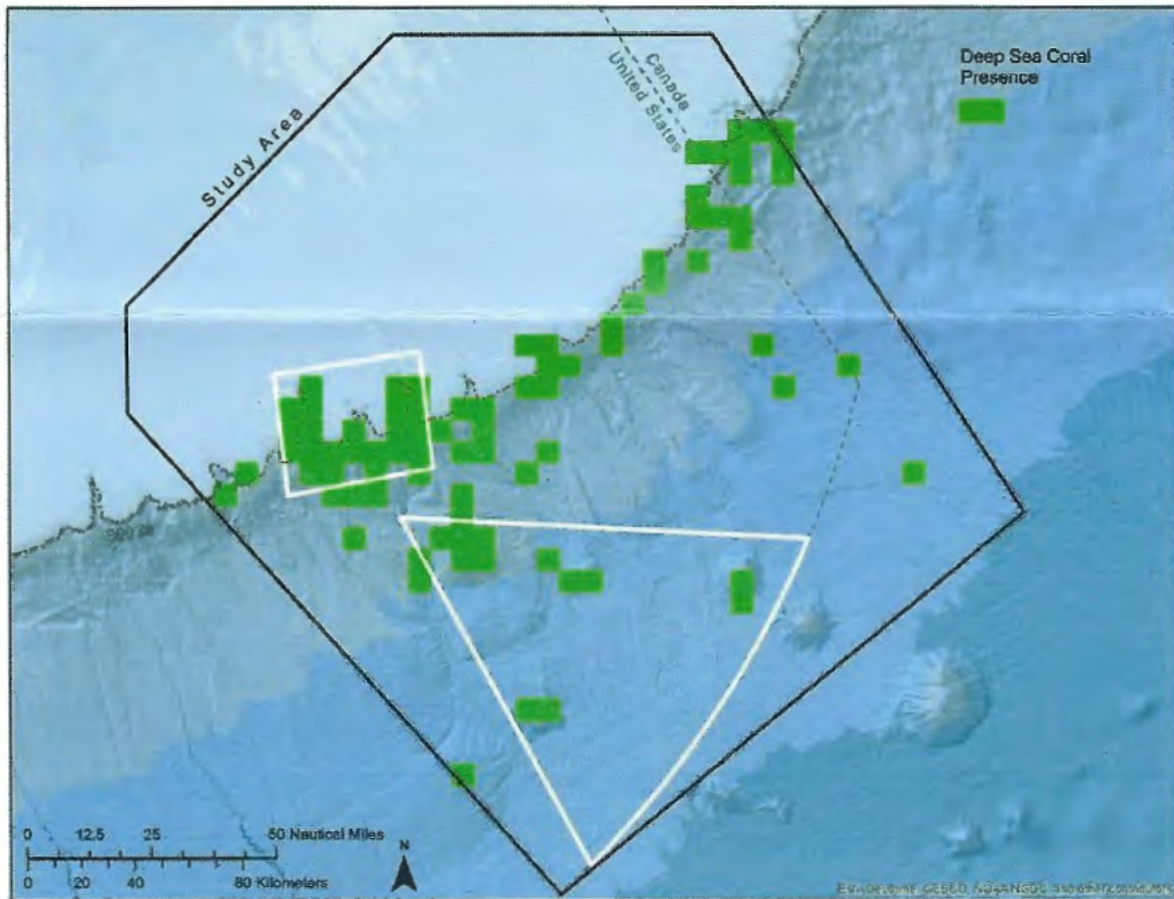


Figure 2. Hot spot analysis of marine mammal species diversity and abundance in the Monument area.

