

From: [Jim R](#)
To: atlanticconservation@noaa.gov
Subject: Canyon and Seamount management
Date: Tuesday, September 15, 2015 2:52:00 PM

We, the undersigned, object to any attempt to manage New England's offshore marine habitats through the use of the Antiquities Act and the designation of National Monuments. Doing so undermines the public and democratic processes that are now in place to manage these areas, shuts out important stakeholders, and prevents meaningful outside input. Considering that the current public process has led to the substantial habitat protections already in place throughout the region, such a designation is both unnecessary and damaging to the long-term management of these areas.

New England's marine habitats are currently managed through a consultative process that considers the experience and input of expert scientists, fishermen, environmentalists, and regulators. It is where the best available science and analytical approaches are vetted in an open and transparent venue. Large-scale closures, enacted by executive fiat and not based in science, are not only undemocratic but they can have substantial unintended adverse impacts on bycatch composition, region-wide habitat, and the economies of coastal communities.

Recent actions by the New England Fishery Management Council (NEFMC), specifically the recently passed Omnibus Habitat Amendment 2 (OHA2) reinforce habitat protections in New England waters into the foreseeable future.

In addition to protecting features such as the kelp forests on Cashes Ledge under OHA2, the regional management councils have gone to great lengths to further safeguard essential habitats such as corals. The NEFMC is considering the Deep-Sea Coral Amendment, which would preserve the coral habitats in the New England Canyons and Seamounts, areas that have also been frequently under discussion for National Monument designation. The Mid-Atlantic Fishery Management Council (MAFMC) also recently acted to protect over 38,000 square miles of deep-sea coral. These are clear demonstrations that current habitat management is remarkably sensitive to conservation and the need to protect unique habitats.

Replacing this collaborative, open management with top-down Presidential action undermines these successful efforts. It makes it less likely that local voices are heard in the deliberations, narrows the decision-making process from broadly democratic to single-handed, and in consequence disregards crucial stakeholder input and expertise. It ultimately results in a regulatory process that is not responsive to feedback and is not accountable to the people who are most affected by it.

As members of the fishing communities whose livelihoods depend on inclusive, responsive management we recognize that such a fundamental altering of the regulatory process is unacceptable. Any management of public resources needs to preserve public input and involvement, not disregard it. We oppose unilateral Executive Action to declare marine National Monuments in New England.

F/V Whiskey Girl
E&J Fish Corp Inc.
Jim Reilly
Erin Coyle Reilly
Rockaway Park, NY