

[EXTERNAL] I wish to stand up for the Northeast Canyons and Seamounts Marine National Monument

Mon 12/5/2022 8:56 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever. To implement this protection is a step toward the goal of protecting a third of the world's ocean areas in order to protect critical species and habitat, and the Canyons and Seamounts are truly worthy of this permanent protection!

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts

[REDACTED]
via us.advocacymessaging.org

Mon 12/5/2022 9:02 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a RI resident, protecting the health of our ocean and its ecosystem that provide us with important resources is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I want to see it protected and thriving forever.

The Canyons and Seamounts MUST have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts

Mon 12/5/2022 9:14 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

-----I have been to the Cape many times having lived in MA for 46 years. Our oceans and their inhabitants are in trouble and while I applaud the National Monument designation by Obama, it is imperative to do all that is possible to maintain their health. I am not an expert but I know the importance of oceans and all waterways thus I hope you will follow the suggested guidelines listed below. It is a sad thing that nature is required management as it does it so well when left alone but people have interfered and it is now a necessity,----

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts

[REDACTED]
via us.advocacymessaging.org

Mon 12/5/2022 9:40 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

I am also very concerned at the general state of the world's oceans, including New England's waters. Between the impacts of climate change, plastic, chemical, and noise pollution, ghost fishing gear and other human debris, overfishing and bycatch, our oceans are in desperate need of meaningful and effective protections.

The U.S. Fish and Wildlife Service must ensure that these much-needed protections are forthcoming.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth in President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts

[REDACTED]
via us.advocacymessaging.org

Mon 12/5/2022 10:14 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

I grew up in New England, and its natural beauty is in my blood. Protecting it, including our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

In addition to its beauty, New England's oceans are a rich site of biodiversity, which is critical to the survival of the ocean ecosystem, and by extension, all ecosystems in the region. Even our own lives and health depend on it, as all life on Earth is interconnected and interdependent, often in ways we have not yet discovered.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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Thank you,



[EXTERNAL] Northeast Canyons and Seamounts
via us.advocacymessaging.org

Mon 12/5/2022 11:26 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

And please know, I am asking this for all our children and grandchildren. I won't be here, but they will. Your management plan means the world to them.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Mon 12/5/2022 12:08 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

Coming from a family of watermen, a lifelong environmentalist, and a New England resident, protecting our iconic ocean and all of its treasures is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this remarkable place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth by President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Management plan for the Northeast Canyons and Seamounts Marine National Monument

Mon 12/5/2022 12:30 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

As a New Englander, the Atlantic coast and ocean have been a vital part of my life. It is therefore very important to me that we do all that we can to protect as much as we can of this vital resource.

For that reason, I'm writing today to urge you to create the most thorough and comprehensive management plan possible for the Northeast Canyons and Seamounts Marine National Monument - a plan that ensures that this area will be protected for future generations, and one that realizes the vision, mission, and guiding principles set forth in President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
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Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Mon 12/5/2022 12:38 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

We must protect our marine environment for people, wildlife and our planet. We are all inter-related.

As an east coast resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

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Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Mon 12/5/2022 4:08 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

As a concerned environmentalist, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

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Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Strong management plan for the Northeast Canyons and Seamounts Marine National Monument

[REDACTED]
via us.advocacymessaging.org

Mon 12/5/2022 5:44 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI. Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

OUR earth is sick. Very sick and humans are the cause. Every action to stick up for the environment and its non human inhabitants must be taken. If the climate tanks, which is a distinct possibility in too short of time, life for us humans changes in a drastic way and many will be displaced and/or will die. Simple as that. And the scary part is that it is happening now.

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I m writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I m proud of this special place being a part of New England and want to see it protected and thriving forever.

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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



Re: Automatic reply: [EXTERNAL] Canyons ,I believe these should be reopened ,in all the tears I fish those canyons we never caught any coral or reefs, and never intagelled a whale .WE need these grounds we could fish for whiting in the winter months gi...



Mon 12/5/2022 7:34 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

Sorry ,meant to say we gave the haddock ,cod and flounders a break in the winter months .Also the suid fisherman needs these grounds .Also our dragers never rich the depths we onl fished to 660feet the canyons go down to 2000 feet

On Mon, Dec 5, 2022 at 7:25 PM NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov> wrote:

Thank you for contacting the Northeast Canyons and Seamounts Marine National Monument We have received your email. Any comments received through ncsmnm_planning@fws.gov will be taken into consideration for the development of the Monument Management Plan.

If you are inquiring about the Monument Management Plan we will respond to you as soon as possible.

Have a great day,

[Northeast Canyons and Seamounts Marine National Monument - Management Planning](#)
Brittany Petersen,
Superintendent of the Northeast Canyons and Seamounts Marine National Monument

To learn more about the Monument: [Click here](#)

To stay up to date on the Monument Management planning process: [Click here](#)

[EXTERNAL] Canyons ,I believe these should be reopened ,in all the tears I fish those canyons we never caught any coral or reefs, and never intagelled a whale .WE need these grounds we could fish for whiting in the winter months giving cod and haddock

...



Mon 12/5/2022 7:25 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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[EXTERNAL] Strong management plan for the Northeast Canyons and Seamounts Marine National Monument

Mon 12/5/2022 7:38 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

As a family with New England resident friends, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and, we want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

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Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument Management Plan

[REDACTED]

Tue 12/6/2022 10:51 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good Morning,

I am submitting public comment in regards to the Northeast Canyons and Seamounts Marine National Monument Management Plan.

Simply put I'd like to see this area managed for abundance with a very conservative management plan. Changing conditions in our ocean like climate change, varying abundances of forage fish, and commercial fishing pressure have me concerned about our inshore and offshore fisheries. A conservative approach would be appreciated. Access to abundant fisheries truly drives access and a highly economic value. Thanks for your consideration.

Best,

[REDACTED]

MATARONAS LOBSTER CO., INC.

[REDACTED], President

August 10, 2016

To the US Congress & US Senate

Dear Congressmen & Senators,

I have been an Offshore Lobsterman for forty-three years and have been involved with the planning of the management and conservation plan for AREA 3 since 1990. I have owned and operated three different offshore lobster boats in that time.

I am vehemently opposed, along with other fishers, to blatantly designating a Marine Monument for the offshore canyons through the Antiquities Act with no public input from the users of these canyon areas.

I have fished in the offshore canyons (Veatch, Block, & Atlantis) since 1973. I lobster in that area with several other lobstermen and we have held that bottom from other lobstermen, draggers, (foreign & domestic), & scallopers. Most lobstermen do the same thing in the canyons as there is just a sliver of area where jonah crab, lobster, and red crab are found. These depths range anywhere from 100 meters to 900 meters. If any lobster boats are displaced from the designated area, they will move their gear to the Gulf of Maine and create gear conflicts with lobstermen in that area and create more interactions with whales which inhabit the Gulf. If these lobster boats move to the south, instead, they will also create gear conflicts with lobstermen there and put more pressure on an already stressed Area 3 Southern New England lobster resource.

I want to make it clear there is a significant amount of gear fishing in these designated areas and it will be near impossible to move gear anywhere else, never mind the negative financial impact it will have. I, along with many other offshore canyon fishers I have spoken with, have never had any interaction with offshore coral. As was stated by many environmentalist and scientist, the coral in the designated area is pristine, so it bewilders me why

we should be shut out off from these areas after lobstering there for over forty-three years.

I would implore you to allow public input in the process along with NOAA, NMFS, and ASMFC and at the very least move the inside boundary of the designated area outside of 900 meters.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[EXTERNAL] Marine Monument

[REDACTED]

Tue 12/6/2022 11:38 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

Cc: [REDACTED]

📎 1 attachments (30 KB)

Marine Monument.doc;

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Dear NOAA,

Please find the attached letter I previously sent when the NE Seamount closure was being initiated.


Thank you,

[REDACTED]

[EXTERNAL] Commentary
Tue 12/6/2022 12:01 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

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Hello I just wanted to say that I am all for the preservation of this beautiful resource. However I do believe that any rule making that is adopted should in no way impede the ability to fish this resource while following existing federal limitation and size requirements. Under no circumstances should areas of the northeast canyons be restricted, closed, or designated no fishing areas. This is freedom and liberty. Almost all of us out there are cognizant of our responsibilities to our environment and our fisheries. Existing fisheries management protocol should be the only methodology to preserve species etc . Sincerely 

[EXTERNAL] Northeast Canyons management plan
Tue 12/6/2022 12:41 PM

To: NCSMNM Planning, FW5 ncsnmn_planning@fws.gov


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Dear Ms Peterson,

I hope that Offshore Lobstering with traps will be permissible in the monument area . In the mid 70's I owned & operated an Offshore Lobster boat out of Nantucket,MA. The guys with the bigger vessels were heading further East all the time out Lydonia , Welkes & Nygren way . Offshore lobster trapping has zero negative effect on the canyons other than occasional lost trap or trawl. Those traps represent a good deal of investment and lobstermen HATE to loose them so a great deal of effort is put into estimating where bad WX may have dragged them . Point being a lost trap or trawl far from ignored .

I want to make the respectful point that while I am all for National Parks and properly managed conservation lets NOT lock the Offshore Lobstermen out of one of their most productive areas as they pose no risk to conservation of area.

Thank you for your time.

Regards 

Sent from my iPhone

[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Thu 12/8/2022 10:50 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, protecting our ocean is very important to me. I urge you to create a strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I want to see it protected and thriving forever.

Please have a publicly available management plan in place by September 15, 2023, that achieves the guiding principles in President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Comments on the Monument Management Plan

[REDACTED]

Fri 12/9/2022 3:28 PM

To: NCSMNM Planning, FW5 ncsmm planning@fws.gov

This email has been received from outside of DOI Use caution before clicking on links, opening attachments, or responding.

Good day,

Attached are some comments on the Monument Management Plan made w/in the context of the Research and Stewardship themes w/in the Public Engagement Session doc.

Regards, [REDACTED]

[REDACTED]

Comments on Management Plan – [REDACTED]

Exploration & Research:

1. What should we be exploring in the Monument?
2. What should we be monitoring in the Monument?
3. What kind of partnerships would you like to see for research and exploration?
4. How would you like to see the Monument support and share ocean research and exploration?
5. What other thoughts and ideas would you like to share with us?

An answer to 1-5 above would be to recognize (and perhaps reconstitute) that NOAA used to have an undersea research program (NURP), that morphed into the Ocean Exploration and Research (OER) program, that now appears to be only the Ocean Exploration program. A robust, extramural, peer-reviewed undersea research program could address all of the issues above, identify through a public process what are the highest priority research questions in the Monument, and what nature of monitoring could best address those questions and select competitive research projects to answer them. In addition, more fundamental monitoring of the dynamics of this offshore area, (blessed with the Gulf Stream currents, topographically induced upwellings, Taylor cap phenomena around the seamounts etc) could provide insights into the productivity, connectivity and diversity of this area.

So the logical partner on this would be revitalized NOAA undersea research presence.

The results of the research projects would be published in the literature. In addition, following up on a recommendation of the OER Review Summary report Data and Information section would provide real-time access to the monitoring data and research cruises:

“Accelerate Telepresence Deployment with Low-Cost Pilots. OER should pilot low-cost telepresence solutions enabled by low-cost cloud computing and commercially available satellite internet capabilities. Piloting these activities now will inform key risks and acquisition pathways as global connectivity matures, saving time and money before large-scale procurement decisions are made.

This lower-cost telepresence approach could complement the larger, ship-based (Okeanos) activities and utilize some of its infrastructure for data sharing/dissemination.

Stewardship:

1. How would you like to see this place cared for?
2. How would you like to enjoy this place?

See above – greater real-time engagement in the research activities could be a great public engagement activity, as well as a gold-mine for ocean science education. The current Ocean Exploration program telepresence streams from new places, often discovering new species, which is cool. However, a more comprehensive research

telepresence could provide teachers/students/public with the hypotheses being addressed, the standard, and new technologies and methodologies being used in the research, as well as links to a ton of the supporting resources, literature, imagery etc.

3. How should we share the work that is going on in the Monument?

See above

4. Who should we partner with to care for this place?

NOAA, as above, but also perhaps engage the Schmidt, Waite, Dalios etc. – engage them in the research that is important for true ocean stewardship, vs just going after the next shiny object (ie new place).

5. How would you like to be involved in the Monument?

6. What other thoughts and ideas would you like to share with us?

See above

[EXTERNAL] Northeast Canyons and Seamounts Marine Nat'l Monument Management Plan

Sat 12/10/2022 10:16 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear folks -- Some thoughts on your management plan. I am assuming that the draft plan will initially be integrated into a NEPA environmental impact statement report for public [review.as](#) most federal agencies do with their own wildlife refuge, parks and forest plans. This plan should speak in marine scientific and conservation terms NOT uses, traditional or otherwise.

1. The management goals, objectives and strategies should reflect the purposes for which this national ocean monument area was created for. i.e.research, education, unique habitat, marine biodiversity, spawning area, etc.
2. The area should be fully protected from incompatible extractive uses and activities. This would include commercial and recreational fishing and oil and gas drilling, mineral mining and any sediment removal. Ocean disposal of contaminated dredged material and sewage waste should also be prohibited.
3. This designation and creation helps fulfill a national vision and mandate to establish a national marine protected area system;
4. Maintenance of ecological integrity of this unique ecosystem with "sustainability" of marine fish and shellfish stock being one of the major management goals/objectives.
5. Management needs to move from and illustrate a change from economic development in federal waters to one driven by ecosystem conservation Federal statutes may need changing to support this ecosystem-based management.
6. The mission and purposes of our National Marine Protected Area and Sanctuary programs and efforts needs to be emphasized and prioritized over any and all uses.
7. The Northeast Canyons and Hudson Canyon monument designations should be considered a first step to designating the remaining Western Atlantic Canyon areas along our continental shelf from Eastport to Virginia or the Carolinas/Georgia based on the locations of these submerged geological features. Each represents a unique ecosystem.

The role of the national Ocean Council(s) should be explained. Bottoml-lines need to be developed, limits introduced, compatibility and undue degradation policies developed and implemented if needed to ensure MPAs are successful.

The project EIS should explain in detail that the environment and natural resources are the basis of our economy NOT a gross national or domestic product figure.

Thank you for the opportunity to respond and input.



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

[REDACTED]
Thu 12/15/2022 9:56 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

I am a professional boat captain and earn my living on the coastal waters. I urge your Service to develop a comprehensive plan that would establish the Seamounts National Monument. This should establish a permanent and effective protection for this precious resource.

[REDACTED]
I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,

[REDACTED]

1/27/23, 8:56 AM

Mail - NCSMNM Planning, FW5 - Outlook



[EXTERNAL] Strong management plan for the Northeast Canyons and Seamounts Marine National Monument

[REDACTED]
via us.advocacymessaging.org

Thu 12/15/2022 10 54 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI. Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

I grew up in New England and now live in the nearby Maritimes. These are both areas whose livelihoods and cultures are closely intertwined with the health of the ocean, and have been for as long as there have been communities in these regions. The health of the Northeast Canyons and Seamounts Marine National Monument is crucial for protecting those livelihoods and cultures. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England and my adopted Maritimes, and want to see it protected and thriving forever. Oceans do not operate with borders, so what we do "at home" turns tides and currents for vast regions ... our very planet's climates and ecosystems, in point of fact. We are all connected.

I want my children and grandchildren, my neighbours (old and new), and indeed everyone, to be nourished and thrive in tandem with these critical environmental infrastructures. Without them, we all perish.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, to achieve the vision, mission, and guiding principles set forth ensure that the Monument thrives for generations to come

Thank you,

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not

sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and

- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.

[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Thu 12/15/2022 11:08 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, Adjunct Professor and [REDACTED], an Oceanography Professor at the URI GSO who with many graduate students spent many years working to insure the conservation and survival of the declining populations of the of the North Atlantic Right Whales I am protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
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- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

[REDACTED]
via us.advocacymessaging.org

Thu 12/15/2022 11 10 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI. Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, and one who has spent considerable time on or near the Atlantic Ocean, the need to protect our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Thu 12/15/2022 12:00 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident who studied the Northeast Canyons and Seamounts during graduate school and who has spent their career in marine conservation, protecting our ocean and all of the treasures within it is of paramount importance! As a diver and researcher, I have seen the devastation of vital ocean habitat worldwide and feel privileged to be in a part of the world that has the political will to prevent that from happening here. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
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- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the

Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Please Support the Northeast Canyons and Seamounts Marine National Monument

Thu 12/15/2022 9:28 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident and a UNH Marine Docent, protecting our iconic ocean and all of its treasures is very important to me. I urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
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- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Stand up for the Northeast Canyons and Seamounts Marine National Monument

[REDACTED]
via us.advocacymessaging.org

Mon 12/19/2022 2:20 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI. Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a Scuba Diver and New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth in President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Comment



Mon 12/19/2022 5:21 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

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"The management plan for Northeast Canyon and Seamount Marine National Monument should prioritize conservation outcomes that protect biodiversity, address the climate crisis, and provide more opportunities for the public to connect with and understand the vast and inspiring wonders contained within the monument

The Northeast Canyon and Seamount Marine National Monument management plan should include a robust public education and outreach component. It is important to create and share accessible and inclusive educational resources in multiple languages that share the incredible biodiversity of this monument with the public. The Marine National Monument is filled with spectacular wildlife, the like of which are reminiscent of fantastical works of art. The slow-growing deep-sea coral, large marine mammals, majestic seabirds, and the often unseen critters and plankton all make this monument a haven for biodiversity. In recent years, scientists have conducted dives with remotely operated vehicles (ROVs) and aerial surveys; they continue to observe new and rare species with each visit. The Northeast Canyon and Seamount Marine National Monument management plan should include provisions for creating a comprehensive inventory of the monument's natural and cultural resources.

The management plan should include a robust process to ensure effective collaboration and coordination among federal management agencies, and stakeholders. By working collaboratively, we can meet the challenges of the moment and create lasting protection for the Northeast Canyon and Seamount Marine National Monument for generations to come."

Calm Tides,



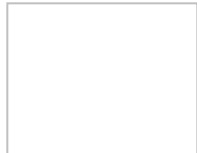
He/him

Executive Director
Inland Ocean Coalition

Mobile:

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[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument Management Plan

[REDACTED]
Tue 12/27/2022 11:24 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To:

Brittany Petersen, Marine Monument Superintendent
USFWS, 300 Westgate Center Drive
Hadley, MA 01035

I am an active USCG Licensed (100-ton Master) captain that has been fishing in the Northeast Canyons both recreationally and commercially for the past 25+/- years, and I am opposed to any management strategy or regulatory action that would negate or restrict fishing activities in the subject area beyond those which would generally apply to the other coastal and off shore waters of New England. This is not an area that receives a great amount of fishing pressure, but for those who get the opportunity to fish in these waters it represents an opportunity that cannot be replicated elsewhere. I would ask that you, Ms. Peterson, and the group making the decisions on the Northeast Canyons and Seamounts Marine National Monument Management Plan give serious consideration to the human experience and refrain from infringing upon the past and present rights of the law-abiding tax paying citizens to fish within the area now designated as the Northeast Canyons and Seamounts Marine National Monument.

Best Regards,

[REDACTED]

[EXTERNAL] NE Canyons & Seamounts Marine Management Management Plan[REDACTED]
Thu 12/29/2022 1:10 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

Cc: [REDACTED]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Brittany Petersen:

I am a retired marine scientist and grassroots environmental activist living on Cape Cod who opposed the Trump Administration's efforts to restrict the Northeast Canyons and Seamounts Marine Management designation/goals established during the Obama Administration. I find it encouraging that NOAA and the US FWS are developing a management plan for this unique national marine monument at the edge of the Continental Shelf off of New England. I gather that the Management Plan is at Step #1: Foundation and Problem Analysis. I'm an Emeritus Sierra Club activist and senior advisor to frontline activists. In recent years I have taken the Biodiversity for a Livable Climate online courses on: "Ecological Economics" and "Systems Thinking and Scenario Analysis". When I worked at NOAA Fisheries Northeast Fisheries Science Center- Woods Hole Laboratory, I supported some endeavors focused on an "Adaptive, Ecosystems-based Management Approach" to manage living marine/protected/natural trust resources. I also served on the New England Fishery Management Council's Habitat Plan Development Team which helped develop Omnibus Habitat Amendment 2 which was issued by NOAA in 2018. When I worked at NASA's Earth Resource Laboratory, I worked on the Productive Capacity of Wetlands project which linked wetland primary production with shrimp yield in the northern Gulf of Mexico. Between 1995-2006 I participated in EPA Headquarters Waquoit Bay Watershed Ecological Risk Assessment project which identified nutrients as the major human stressor in the watershed.

The following suggestions are drawn from these experiences. Since the NE Canyons & Seamounts Marine Monument is a long way from the New England coast I will leave it up to the Federal staff involved in developing the Management Plan to judge the relevance of these ideas.

* The Waquoit Bay Watershed Ecological Risk Assessment project used an Exposure/Stress/Response Conceptual model to identify "Nitrogen" as the major stressor in Waquoit Bay and "Phosphorus" as the culprit in Ashumet pond. Cape Cod Towns are developing Comprehensive Wastewater Management Plans to reduce "N" loading from septic systems to improve water quality and restore habitats in > 52 coastal embayments. A similar approach could be utilized in the problem formulation component for the upcoming Management Plan for the National Marine Monument.

* Ocean climate change effects could be explored by scenario analysis with the NOAA Fisheries/Mid-Atlantic Fishery Management Council Atlantic Seaboard Climate Change Scenario Planning project providing a good case study. I used this as an example for my class scenario project on "N" loading from septic systems and climate change on the Pleasant Bay Watershed Area of Critical Environmental Concern on Outer Cape Cod.

* When I participated in the EMAX (Energy Modeling and Analysis Exercise) for the Northeast Continental Shelf Ecosystem, we had to add the "Microbial Food Web" for rapidly warming places to balance primary production

estimates with the yield of LMRs/PRs/NTRs in the Gulf of Maine. When I studied at the University of Georgia under Dr. Lawrence Pomeroy, he identified the importance of the microbial food web in the open ocean food web. I conducted studies in the Antarctic ocean on community respiration associated with the microbial food web. Increased community respiration from the microbial food web in the Gulf of Maine helps balance primary production with the yield of LMRs/PRs/NTRs.

* At the Woods Hole Oceanographic Institution they are studying the ocean twilight zone (200-1000 meter depth) which is important in ocean storage of greenhouse gases from surface primary production passing through the permanent thermocline for storage in benthic sediments. This may be relevant to the deep sea canyons as a pathway for particulate organic carbon and nitrogen and delayed release of methane/carbon dioxide back into the atmosphere. This topic was discussed in the Ecological Economics course.

* An Adaptive, Ecosystems-based Management approach could address changes in prey and predators in space and time from climate change and alterations in biodiversity on the seamounts from changes in ocean circulation and human stressors. Ecological Economics has techniques for estimating natural capital and ecosystem services to supplement Natural Resources Economics. Socioeconomics is an important parameter in scenario analysis. My Ecological Economics class project involved Adaptive Ecosystem-based Management in New England Waters.

* The Productive Capacity of Essential Fish Habitat concept should be extended to seabirds; sea turtles; marine mammals; and support for biodiversity on the seamounts/deep sea corals in the canyons. The NOAA Fisheries Northeastern State of the Ecosystem report released in 2020 provides background to support this concept.

* The Management Plan should include science translation to convert research and monitoring into NOAA/US FWS policies/regulations that are accessible to the concerned public and ocean users. This can overcome the tendency to be data rich, but information poor. In 2021 I participated in an NEFSC webinar where they sought information from saltwater anglers and commercial fishers on the distribution of Black Sea Bass in coastal ocean waters north of Chesapeake Bay (since they were not measured very well in COVID-19 limited bottom trawl surveys". This species is a voracious predator which can alter the "natural mortality" of fisheries stock assessments. I don't know what kinds of changes species distribution have occurred at the edge of the continental shelf where the seamounts & deep sea canyons occur. Thus non-peer reviewed journal data might be useful in developing the Management Plan.

* I don't know if Indigenous knowledge would be useful in developing the Management Plan, but it is important in the state/Federal Environmental Justice dialog.

Thanks for considering these comments.



[EXTERNAL] Comment on Joint Monument Management Plan

[Redacted]

Wed 1/18/2023 8:07 AM

To: NCSMNM Planning, FW5 ncsmm planning@fws.gov

This email has been received from outside of DOI Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

Thank you for the opportunity to provide comment on management plan development for the Northeast Canyons and Seamounts Marine National Monument. A letter with detailed comments is attached. I would greatly appreciate a brief confirmation the attachment arrived in good order. Thank you, in advance, for your consideration.

Sincerely,

[Redacted]

[Redacted]



17 January 2023

USFWS
Hadley, MA 01035

Subject: Proposed Joint Monument Management Plan

Dear Superintendent Petersen:

Thank you for the opportunity to provide scoping comments to guide USFWS in development of a draft management plan for the Northeast Canyons & Seamounts Marine National Monument. Here we provide four broad areas for your consideration, realizing the plan development process will evolve and produce a document that is both aspirational and fit within the resources expected to be available to the agency and its partners. The focus areas we raise for your consideration are:

1. Facilitate and support a robust research program to understand the dynamics and distribution of biodiversity at all levels (genes, species, communities), within habitats (canyons, seamounts, abyss, midwater), and across depth zones (epipelagic to abyss). This should include simple inventory of biodiversity, targeted studies on the role of species interactions (predator-prey, competition, mutualisms), effects of variation in oceanographic conditions (including links to climate change), and movement patterns of vagile fauna (especially those that cross monument boundaries, from seabirds to deep-sea sharks). Especially important is to include studies that contrast status and dynamics of diversity both inside and outside the boundaries of the Monument.
2. Monitor distribution, intensity, and effect of allowable human activities in and around the Monument.
3. Communicate the wonder of this place to the wider public, in both formal and informal settings, using multiple approaches including exhibits (permanent and traveling), education packages (for classrooms across grade levels), and both live and recorded events that reach across the Nation.
4. Engage underrepresented communities of color in Monument focused activities and in all opportunities to enhance perspectives on management, research, education, and stewardship.

We would be happy to discuss any of these with you in more detail. Thank you, in advance, for your consideration.

Sincerely,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

[REDACTED]
via us.advocacymessaging.org

Wed 1/18/2023 3 14 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI. Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

UNLESS YOU REALLY REALLY really FEEL THE NEED TO KILL OFF ANOTHER PATCH OF NATURAL LIFE WONDER AND BEAUTY FOR NO REASON AT ALL , I OFFER THE FOLLOWING
As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I m writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I m proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama s 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument s natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Strong management plan for the Northeast Canyons and Seamounts Marine National Monument

Wed 1/18/2023 3:38 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As an environmentalist and life-long New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it conserved, protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Wed 1/18/2023 3:44 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument. Our lives depend upon healthy oceans with abundant aquatic life, plants and fish. It's critical to our survival to safeguard fragile and interconnected ecosystems and improve ocean resilience to warming temperatures.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Wed 1/18/2023 4:46 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

Please create a management plan for our offshore waters. Many New Englanders rely on these waters for their livelihoods. And we all benefit from this being a clean water resource.

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument
Wed 1/18/2023 5:34 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,


As a Yankee, protecting our iconic ocean and all of the treasures within it is very important to me, even if Vermont is landlocked. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,


1/27/23, 9:23 AM

Mail - NCSMNM Planning, FW5 - Outlook



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Wed 1/18/2023 5:42 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

Please protect this treasure! A strong management plan is needed.

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

[REDACTED]
Wed 1/18/2023 8:48 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

I have spent my life sailing off Cape Cod, Boston, and Cape Ann with my parents and now with our children. Respecting and protecting our ocean, both above the surface and below, is very important to me. I urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I want to see it protected and thriving forever and for all.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,

[REDACTED]

1/27/23, 9:24 AM

Mail - NCSMNM Planning, FW5 - Outlook



[EXTERNAL] Strong management plan for the Northeast Canyons and Seamounts Marine National Monument

Wed 1/18/2023 10:16 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

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Dear Superintendent Petersen,

I am a science teacher who has created hands-on lessons to explain how the rising levels of CO₂ in the air lead to ocean acidification. I am very aware of the impending degradation of our oceans with the consequence-- an enormous loss of species /biodiversity

I completely support and I agree with the following Conservation Law Foundation letter . The following letter includes their recommendations and actions. It sounds like big undertaking, but I know we need to take this deep dive and try our best! :) Thank you very much for taking this on.

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality,

habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Thu 1/19/2023 1:20 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

It has already been demonstrated that protecting important areas in the oceans ends up increasing populations of fish surrounding it as well which is good environmentally and economically.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
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- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument management plan

Thu 1/19/2023 2:08 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New Englander (even with CA address), protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
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- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument; Proposed Joint Monument Management Plan Comment

[REDACTED]

Fri 1/20/2023 1:39 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To whom it may concern,

Creation Justice Ministries has drafted a comment on the proposed management plan attached below.

--

In faith and truth,

[REDACTED]



CREATION JUSTICE MINISTRIES

Justice for God's planet and God's people.

Subject: Northeast Canyons and Seamounts Marine National Monument Management Plan Organizational Comment

Document ID: 2022-28203

Federal Register #: 87 FR 79901

Creation Justice Ministries represents the creation care and environmental justice policies of major Christian denominations throughout the United States. We work in cooperation with 38 national faith bodies including Protestant denominations and Orthodox communions as well as regional faith groups, and congregants to protect, restore, and rightly share God's Creation.

Since its establishment in 2016, the Northeast Canyons and Seamounts National Marine Sanctuary has been the first and only marine national monument in the Atlantic Ocean, and thus an invaluable refuge for an incredible array of ecosystems and species. This national treasure currently spans 3.1 million square miles and boasts seamounts higher than any mountain east of the Rockies and depths deeper than the Grand Canyon. The divine uniqueness and significance of this area is visible in the rare and endangered species found only here and not in any other national monument, sanctuary, or park, and new species are constantly being discovered.

God's handprint is seen in the rainbow of deep-sea corals, sponges, and sea anemones, the dancing pods of dolphins, the swoop of puffins, and the ripple of giant manta ray. Its moniker, "the Serengeti of the Sea," is well-deserved, and its extreme importance for ocean and human health is even greater than its land-based referent. The coldwater coral communities form the foundation of countless ocean ecosystems, whose fish find in them shelter, food, and nesting grounds. The wealth of information gleaned from multiple expeditions has generated intense scientific

interest, and we will learn even more as we continue to preserve ecosystem health throughout the region.

Our country has a long tradition of valuing and protecting our public lands and waters. Support for protecting the Canyons and Seamounts Monument is just as strong, evidenced by the positive outpouring from the everyday citizens, faith leaders, business owners, scientists, elected officials, outdoor recreation groups, and more. The monument's creation has benefitted all these groups. One example is the increased catch of certain species such as lobsters in areas adjacent to the monument following the implementation of protections. New England relies on its waters to generate billions of dollars a year in tourism and recreation and to support hundreds of thousands of jobs. Protecting the Canyons and Seamounts means protecting the culture and vitality of the Northeast for both its inhabitants and the millions of visitors from across the U.S. and around the world who come to pay homage year-round.

Despite its clear importance, the Canyons and Seamounts Monument is under threat on multiple fronts. The prior administration proposed removing the crucial protections put in place by the original proclamation that established the monument and opening it up to commercial fishing - a proposition that was vehemently opposed by the myriad stakeholders who benefit from its continued vitality. Many species found within the monument are vulnerable to pelagic fishing, including squid, mackerel, and butterfish, and the many species that feed on them. Deepwater fishing and bottom trawling gear also pose a major threat to the delicate balance of ecosystems found in the Canyons and Seamounts, whose species like deepwater corals and sponges have low resilience and a long recovery time from human damage. Even without officially allowing commercial fishing, the wide-reaching threats of fishing gear, human debris and pollution, and climate change invade the monument from every angle. The Gulf of Maine is one of the regions most severely impacted by warming ocean temperatures, and we must use every conservation tool at our disposal to preserve its richness.

The Northeast Canyons and Seamounts display the majesty and beauty of this section of God's creation in a unique manner like nowhere else on Earth. God formed this ancient underwater mountain range over 100 million years ago, long before humans walked the earth. As Christians, we know that we are called to care for this creation for generations to come. We are blessed to not only benefit from the climate stability and marine biodiversity of this place, but also to be able to explore and marvel at its beauty with modern technology and inclusive museum exhibits. Our faith calls us to ensure these blessings are as abundant for future generations as they are today and to use all the tools at our disposal to do so. Creation care is a dynamic and nuanced act of balancing the many needs of our human and non-human communities, and our lawmakers and elected officials have taken oaths to safeguard

the interests of their many constituents whose natural heritage this monument constitutes.

We applaud NOAA Fisheries for seeking to develop and implement a comprehensive management plan that addresses the threats to the Canyons and Seamounts and the government's legal mandate to protect the monument. Honoring this unique region requires that the final management plan prioritize ecosystem health and long-term preservation, specifically by incorporating the following elements:

- **Invest in expanded, real-time monitoring of the monument to ensure no commercial-scale extractive industrial activity is occurring within its bounds**
- **Make information gleaned from expeditions to the monument accessible and relevant to a broad and diverse range of stakeholders**
- **Conduct regular updates to monument regulations and management plans and utilize adaptive management to respond to urgent needs;**
- **When considering proposed activities in adjacent or nearby areas, consider the potential effects on the monument in assessing total impact**
- **Take immediate action to reduce greenhouse gas emissions, in light of the high generalized threat they pose to the monument**

The Canyons and Seamounts have been under human stewardship for just a small fraction of their millennia of existence, and effective management could mean preserving God's creation for millennia to come. Our community celebrates the strong support for monument stewardship from the public and appreciates the agencies responding to such support via this comment period. For the sake of God's creation, we ask you to create a management plan that truly respects and protects the Canyons and Seamounts.

[EXTERNAL] Letter from The Pew Charitable Trusts on management plan

[Redacted]

Wed 1/25/2023 12:22 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

Cc: [Redacted]

1 attachments (142 KB)

NECSM Management Plan_Pew Scoping Letter_FINAL.pdf;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

Attached please find a letter from The Pew Charitable Trusts regarding the open public comment period for the Northeast Canyons and Seamounts Marine National Monument management planning.

We look forward to engaging in the process as it unfolds.

Sincerely,

[Redacted]

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Brittany Petersen,
Marine Monument Superintendent, USFWS,
300 Westgate Center Drive,
Hadley, MA 01035
ncsmnm_planning@fws.gov

January 25, 2023

Re: Comments on the Notice of Intent to Prepare a Management Plan for the Northeast Canyons and Seamounts Marine National Monument, FWS–R5–NWRS–2022–N062, 87 Fed. Reg. 79,901 (Dec. 28, 2022).

Dear Superintendent Petersen,

On behalf of The Pew Charitable Trusts, please accept these comments on the Notice of Intent to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument (NOI) and accompanying environmental assessment. Pew worked in coalition with scientists, business leaders, faith leaders, conservation groups, aquariums, and local government officials to support President Obama’s designation of the Monument in 2016. We worked with our partners to mitigate the rollbacks to the monument’s protections proposed in 2020. Pew and its partners worked again to fully restore the Monument’s protections through President Biden’s 2021 Proclamation, which also charged the Departments of the Interior and Commerce to prepare a joint management plan for the Monument by September 15, 2023. Pew supports your efforts to develop a management plan that ensures the proper care and management of the Monument and the scientific and historic objects it contains so that the full intent to preserve these invaluable resources is realized. The Pew Charitable Trusts would like to participate as a member of the planned Stakeholder Focus Groups, designed to further consider the public’s ideas to form a foundation and framework to care for the Monument.

As human activities reach deeper into the sea, it is important to have places that serve as reservoirs of genetic diversity for the future. Scientific studies have proven that protections can improve the health and productivity of marine areas¹ and that species in protected areas spread, or "spill over," beyond their borders to repopulate nearby areas.² Protected places can also act as

¹ Sarah Lester et al., [Biological Effects Within No-Take Marine Reserves: A Global Synthesis](#), *Marine Ecology Progress Series* 384: 33-46 (2009); Ellen Pikitch, [A Primer on Marine Protected Areas: Background for the 10x20 Conference](#), Ocean Sanctuary Alliance (2016).

² See, e.g., Sala et al., [A General Business Model for Marine Reserves](#), *PLOS One* 8:e58799 (2013); R. Gofii et al., [Net Contribution of Spillover From a Marine Reserve to Fishery Catches](#), *Marine Ecology Progress Series* 400: 233-43 (2010); F. Vandeperre et al., [Effects of No-Take Area Size and Age of Marine Protected Areas on Fisheries](#)

reference areas for how ecosystems function in the absence of human disturbance and boost climate change mitigation and adaptation.³ An effective management plan will help ensure important opportunities to study and mitigate the impacts of climate change to the Northwest Atlantic, and to educate the public about the wonders the Monument contains.

The NOI provides an excellent summary of the natural resources that formed the strong scientific foundation justifying establishment of the Monument. These include the Monument's exceptional geologic features and unique ecosystem that supports an incredible abundance and diversity of corals, seabirds, highly migratory fish, sea turtles and marine mammals, many of which are rare or are previously undiscovered species not found elsewhere in the world. These natural resources were recognized by federal courts in resoundingly rebuffing legal challenges seeking to overturn the Monument or weaken its protections.⁴ The courts also affirmed prior law supporting the President's authority under the Antiquities Act to establish marine monuments in the Exclusive Economic Zone, and recognized that other statutes such as the National Marine Sanctuaries Act, the Magnuson-Stevens Fisheries Conservation and Management Act, the Outer Continental Shelf Lands Act, and other statutes do not provide the same protections as those provided under the Antiquities Act.⁵

Further, as Pew previously detailed in a letter to then Secretary of Commerce Ross,⁶ the Monument was created after an extensive 18 month public process that included well attended public events, a public hearing with over 300 participants, submission of more than 300,000 public comments supporting the Monument's designation, including a letter signed by 145 marine scientists, and meetings between the Executive Branch and New England elected officials, commercial and recreational fishing businesses, fishing industry lobbyists and government relations specialists, fish processors, and other stakeholders. During the review of the Monument by the Department of Interior (DOI) in 2017, another 225,000 Americans expressed their support for the Monument.⁷

Recent studies affirm prior scientific opinion that protecting the Monument area will make a significant contribution to the overall health and productivity of the Northwest Atlantic, with a minimal economic cost.⁸ A peer-reviewed study published in March 2022 by scientists from the

[Yields: A Meta-analytical Approach](#), *Fish and Fisheries* 12(4): 412-26 (2011); Hilborn, R. et al. When can marine reserves improve fisheries management? *Ocean & Coastal Management*, 47(3-4), 197-205 (2004); Murawski, S.A. et al. [Effort Distribution and Catch Patterns Adjacent to Temperate MPAs](#), *ICES Journal of Marine Science*, 62: 1150e 1167 (2005).

³ Juliette Jacquemont et. al., [Ocean Conservation Boosts Climate Change Mitigation and Adaptation](#), *One Earth*, 5 no. 10, 1126-1138 (2022); Duffy et al., [Biodiversity Enhances Reef Fish Biomass and Resistance to Climate Change](#), *Proc Natl Acad Sci USA* 113(22):6230-5 (2016).

⁴ See *Mass. Lobstermen's Ass'n v. Ross*, 349 F. Supp. 3d 48 (D.D.C. 2018), aff'd as modified 945 F.3d 535 (D.C. Cir. 2019).

⁵ See Id.

⁶ Letter from Thomas A. Wathen, Vice President, Environment Americas, The Pew Charitable Trusts to Wilbur L. Ross Jr., Secretary of Commerce (July 27, 2017).

⁷ Id.

⁸ S.D. Kraus, et al., [Scientific Assessment of a Proposed Marine National Monument off the Northeast United States](#), *Science briefing for press and interested parties*, Final Version 31 (March 2016).

New England Aquarium showed that the Monument is a hotspot of marine mammal diversity.⁹ Based on an analysis of sightings of more than 1 million marine mammals along the Atlantic Coast, including in the Monument, these scientists found that the Monument contained more marine mammal species diversity than virtually any other comparably sized area. Further, the biodiversity protections provided by the monument are having little economic impact to New England's commercial fishing industry. A January 2022 peer-reviewed study analyzed the areas fished, catch levels, and distance traveled to fish before and after the 2016 proclamation as well as before and after the 16 month reopening of the Monument in June 2020 and found no evidence that the Monument has harmed the commercial fishing industry.¹⁰ This conclusion was recently affirmed by NOAA Fisheries in a November 2022 analysis that concluded that any economic losses associated with the monument are expected to be small, and that affected vessels may be able to relocate to minimize losses.¹¹

The Northeast Canyons and Seamounts Marine National Monument is a unique and highly valuable national treasure. We urge you to develop a robust and comprehensive management plan that effectively protects its natural and cultural resources, promotes the research opportunities it provides to study these resources and the impacts of climate change to the larger Northwest Atlantic Ocean ecosystem, and educates and engages the public to ensure the Monument and our oceans are protected for generations to come. Pew is pleased to provide the following recommendations for your consideration in setting the Monument's long-term vision and guiding stewardship of the Northeast Canyons and Seamounts Marine National Monument.

1. Duty of Care, Goals and Objectives

Effectively Managing a National Treasure

- The management plan for Northeast Canyons and Seamounts Marine National Monument should prioritize conservation that protects the Monument's unique ecosystem and biodiversity, provides opportunities to study its natural and cultural resources and climate impacts, and proactively engages the public to connect with and understand its wonders.
- The plan should establish a duty of care, goals, and objectives necessary to meet the public interests and purposes of the Monument articulated in the 2016 and 2021 Proclamations.

⁹ Brooke C. Hodge, et. al., [Identifying predictors of species diversity to guide designation of marine protected areas](#), *Con Sci & Pract.*, 1 (2022); see also Peter J. Auster, et. al., [A Scientific Basis for Designation of the Northeast Canyons and Seamounts Marine National Monument](#), *Front. Mar. Sci.*, (2020).

¹⁰ Lynham, J. [Fishing activity before closure, during closure, and after reopening of the Northeast Canyons and Seamounts Marine National Monument](#). *Sci Rep* 12, 917 (2022).

¹¹ NOAA Fisheries, [Public Hearing Document: An Omnibus Amendment to the Fishery Management Plans of the Mid-Atlantic and New England Regional Fishery Management Councils to incorporate the Northeast Canyons and Seamounts Marine National Monument](#), p. 12 (November 1, 2022).

- Related to the duty of care, consistent with the 2016 and 2021 Proclamations the plan should clearly state for easy reference the activities that cannot be conducted inside the Monument, or considered in future iterations of the management plan, including the following:
 - Commercial fishing
 - Exploration or extraction of energy, oil, gas and/or minerals
 - Releasing or introducing species into the Monument
 - Altering the submerged lands, except for anchoring research equipment or maintaining submarine cables
- The management plan should include provisions for researching, characterizing, and monitoring the potential threats to the Monument in order to help anticipate and address such threats should they arise.

2. Characterizing the Monument’s Natural and Cultural Resources

Inventory of the Monument’s Natural and Cultural Resources

- The unique ecosystem of the Northeast Canyons and Seamount Marine National Monument supports an incredible level of biodiversity including seemingly countless species of corals, seabirds, highly migratory fish, sea turtles, marine mammals, and many other species. In recent years, as scientists have conducted aerial surveys and dives with remotely operated vehicles, they have continued to observe new, rare, and endemic species. The management plan’s early stages should provide for a broad range of research activities needed to assess and characterize a baseline of ecosystem health and biodiversity for the Monument and surrounding area including, but not limited to, the following:
 - The first systematic effort to comprehensively inventory of the monument’s natural and cultural resources.
 - Continued study of the deep-sea coral ecosystem, including oceanographic measurements, and bathymetric and habitat mapping.
 - Research focused on characterizing other habitats including the pelagic ecosystem as well as the deep-benthic areas.

Scientific Exploration and Research Program

- The Monument can play an important role in furthering our understanding of climate change impacts to our oceans. The management plan should include a scientific exploration and research plan that enables both government scientists and private researchers to study the impacts of climate change in and around the monument. Marine protected areas are an important tool for maintaining, restoring, and enhancing ecosystem resilience in a changing climate. The Northeast Canyons and Seamounts Marine National

Monument with its large size and protected status is a living laboratory that can contribute to our understanding of climate change impacts on ocean wildlife and habitats.

- A clear, research permitting system should be established and all research conducted within and around the Monument should be documented and made available to inform management decisions for both the Monument and the greater Northwest Atlantic Ocean ecosystem.
- To achieve the purposes for which the Monument was created, additional funding and logistical support is needed to improve the ability of agency personnel and scientists, as well as private researchers, to visit, study, and monitor the Monument on a regular basis.

3. Important Management Plan Components

Process for Collaboration

- The management plan should include a robust process to promote effective collaboration and coordination among federal management agencies and stakeholders in order help meet the challenges of managing and protecting the Northeast Canyons and Seamounts Marine National Monument.
- The plan should establish a Resource Advisory Council (RAC) composed of volunteers and citizens representing a variety of local interests and expertise including marine science, state and local government, tribal government, cultural resources, commercial and recreational fishing, ecotourism and recreation, local businesses, conservation, and the public at large. The RAC should include a youth representative to help ensure young voices are represented in guiding the ongoing management of the Monument and development of education/outreach initiatives.

Monitoring and Enforcement Program

- The management plan should include a permitting system for all allowable public activities as well as an effective monitoring and enforcement program to ensure compliance with the Proclamations' prohibitions, agency rules and regulations, and the plan itself to ensure the public's interest and purposes of the Monument are protected as intended.
- Beyond the current permitting system, the management plan should include a non-commercial fisheries management strategy and additional regulatory requirements that actively ensures that any recreational fishing is consistent with care and management of the Monument's scientific and historic resources. To the extent permitted, all vessels operating within or near the Monument should be required to operate with AIS, to record

and submit all catch data (including bycatch), and to make all retained catch available for analysis.

Management Plan Review and Update

- The management plan should provide managers with an iterative and adaptive management framework, based on regular evaluation of management efforts and tactics towards meeting the plans' goals and objectives.
- The management plan should include the requirement to review and update the management plan periodically — at minimum every 10 years given rapidly changing ocean conditions due to climate change. We recommend that the first review and update occur within 5 years of plan adoption in order to adapt the plan to the first data and research results under the plan, including first systematic efforts to inventory the natural and cultural resources contained in the monument.

4. Education and Community Engagement

Public Education and Outreach Program

- While the Northeast Canyons and Seamounts Marine National Monument itself is not physically accessible to most people, its incredible biodiversity and, in many cases unique and spectacular creatures and other features, present an unparalleled opportunity to engage the public and educate them about both the Monument itself and the importance of our oceans to life on Earth.
- The management plan should thus approach its public education and outreach components with a broad and creative lens, creating engagement and collaboration opportunities for communities that would foster their connection with the Monument and ocean environment.
- The plan should establish Monument educational centers and/or exhibits in coastal states, including population centers such as Boston and New York City, as well as areas that see high tourism volumes, such as National Parks or Seashores in Maine and Cape Cod. The New England and Mystic aquariums have already been engaged in the Monument for years and provide ideal opportunities for education and outreach partnerships.¹²
- Offer virtual classroom and outreach opportunities for schools and the public to help educate children and the public about the Monument, which could include scientific

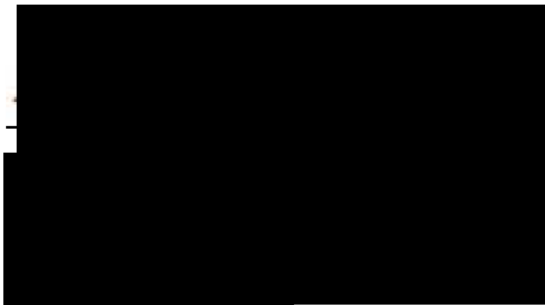
¹² See e.g., Mystic Aquarium, [Our Blue Park: Northeast Canyons and Seamounts Marine National Monument](#), Exhibit (2023).

expedition livestreams, post-expedition educational videos, cultural awareness and connection activities, creation of curriculum and outreach materials, and storytelling.

- Engage government scientists and private researchers in sharing open-source data collected from the Monument for students to use for real world science projects and learning opportunities in order to help build connections to the monument.
- The education and outreach component of the plan should also place priority on reaching communities that have historically had limited access to oceans, nature, and outdoor spaces.

Thank you for considering The Pew Charitable Trusts recommendations for developing the Northeast Canyons and Seamounts Marine National Monument Management Plan. Please contact me with any questions and regarding our participation as a member of the Stakeholder Focus Groups.

Sincerely,



[EXTERNAL] Comments re FWS & NOAA's intent to prepare draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument

[Redacted]

Thu 1/26/2023 3:37 PM

To: NCSMNM Planning, FW5 ncsmmn planning@fws.gov

Cc: [Redacted]

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

Attached, please find comments presented by Conservation Law Foundation on behalf of 949 members of the public regarding the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration's intent to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument.

Thank you,

[Redacted]

[Redacted] (she/her)
Ocean Associate Attorney
Conservation Law Foundation

[Redacted]

[Redacted]

For a thriving New England





For a thriving New England

CLF Massachusetts 62 Summer Street
Boston, MA 02110
P: 617.350.0990
F: 617.350.4030
www.clf.org

Conservation Law Foundation presents this document on behalf of 949 members of the public.

January 26, 2023

Comments on: The U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration's intent to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument

Docket No: FWS-R5-NWRS-2022-N062 FF05R00000 FXRS12610500000

Document Number: 2022-28203

Dear Brittany Petersen, Marine Monument Superintendent,

As New England residents, protecting our iconic ocean and all of the treasures within it is very important to us. We write today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because we are proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

We urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Sincerely,
949 members of the public

[EXTERNAL] NRDC Scoping Comments on Proposed Joint Management Plan for the Northeast Canyons and Seamounts Marine National Monument

[Redacted]

Thu 1/26/2023 6:28 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

Cc: Petersen, Brittany L <brittany_petersen@fws.gov>; Marianne.ferguson@noaa.gov
Marianne.ferguson@noaa.gov

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Brittany and Marianne,

Attached are NRDC’s Scoping Comments on the Proposed Joint Management Plan for the Northeast Canyons and Seamounts Marine National Monument We appreciate this opportunity to comment and look forward to engaging in the next steps in this process.

Yours Sincerely,

[Redacted]

[Redacted]

Senior Strategist, Ocean Nature Program

**NATURAL RESOURCES
DEFENSE COUNCIL**

[Redacted]

[Redacted]

[Redacted]

[Redacted]

NRDC.ORG

Please save paper



January 27, 2023

Brittany Peterson, Marine Monument Superintendent, USFWS

ncsmnm_planning@fws.gov

Marianne Ferguson, Greater Atlantic Regional Fisheries Office, NOAA

marianne.ferguson@noaa.gov

Re: Scoping for Proposed Joint Management Plan for the Northeast Canyons and Seamounts Marine National Monument

Dear Ms. Peterson and Ms. Ferguson,

On behalf of our more than half a million members and online activists, the Natural Resources Defense Council (NRDC) submits the following comments on the scope of issues that U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration (NOAA) should address as these agencies develop a joint management plan for the Northeast Canyons and Seamounts Marine National Monument. These comments are submitted in response to the agencies' request for comments that was published in the Federal Register on December 28, 2022. See 87 Fed. Reg. 79901.

The Northeast Canyons and Seamounts Marine National Monument (NECSMNM or the monument) is a unique national treasure that contains highly valuable and vulnerable species and ecosystems. President Biden's Proclamation requires the development of a joint Interior/NOAA management plan by September 15, 2023. We strongly urge the development of a robust, effective, and comprehensive management plan to ensure that this national treasure is protected and thrives for generations to come.

The management plan for the Northeast Canyons and Seamounts Marine National Monument should prioritize conservation outcomes that protect biodiversity, address the climate crisis, and provide opportunities for the public to connect with and understand the vast and inspiring wonders contained within the monument. To that end, we recommend that the management plan address the following key issues in the following manner.

Scientific Exploration and Research Program

The monument management plan should include a scientific exploration and research plan for expanding our understanding of the many diverse forms of ocean life in the monument, from the surface of the ocean to the seafloor and in the water column in-between. The research plan should also provide for the study of the impacts of climate change in the monument. Marine protected areas are a key tool for maintaining, restoring, and enhancing ecosystem resilience in a changing climate. The monument's large size and protected status help make it an incredible living laboratory that can contribute to society's understanding of both the rich biodiversity of the deep sea, as well as the impacts of climate change on ocean wildlife

and habitats. Research conducted within the monument also should be designed to inform future monument management decisions.

Inventory of the Monument's Natural, Historic and Cultural Resources

Slow growing deep-sea corals, large and rare marine mammals, seabirds, fish and rich array of other creatures all make this monument a haven for biodiversity. In recent years, as scientists have conducted dives with remotely operated vehicles (ROVs) and aerial surveys, they have observed new species with each visit. The Northeast Canyons and Seamounts Marine National Monument management plan should include a comprehensive inventory of these natural resources, as well as of historic or prehistoric remains (like those of the woolly mammoth at the head of one of the canyons) and any relevant cultural resources. It should also include a plan for periodically updating this inventory as scientific research results in greater understanding of the resources within the monument.

Assessment and Management of Activities in the Monument

The management plan should include an assessment of the type, extent and impact of activities that are allowed in the monument as of September 15, 2023. Periodic updating of the assessment should be required during the life of the management plan. Moreover, the plan should provide for the use of permitting or other regulatory controls of such activities where necessary to protect monument resources.

Monitoring and Enforcement

Pursuant to the Biden Proclamation, the Northeast Canyons and Seamounts Marine National Monument is off limits to the following activities: commercial fishing (with the exception of red crab and lobster fishing which are required to phase out operations by September 15, 2023); exploration or extraction of energy, oil, gas and/or minerals; releasing or introducing species; altering the submerged lands, except for anchoring of research equipment or maintaining submarine cables.

The management plan should include a list of these specifically prohibited activities, so it is absolutely clear to the public, the private sector and enforcement entities that these activities are not allowed.¹ The management plan also should include an effective monitoring and enforcement program to ensure compliance with the proclamation prohibitions and any agency regulations governing monument activities. To aid in this monitoring and enforcement system, the management plan should require that all vessels have their AIS turned on at all times while transiting through or operating within the monument. In addition, all commercial fishing vessels should have their VMS systems operating when transiting through the monument. This will assist the Coast Guard and NOAA in monitoring activity to help ensure that monument prohibitions and regulations are complied with. The availability of AIS data specifically will serve public transparency about the use of this national treasure.

Public Education and Outreach

The monument management plan should include a robust public education and outreach component. It is important to create and share accessible and inclusive educational resources in multiple languages that convey the incredible biodiversity of this monument to the public. In addition, the outreach and education

¹ The Secretaries of Commerce and Interior who share management responsibility for the Monument also have experience issuing joint implementing regulations, under their respective statutory authorities, to codify the prohibitions and management measures set forth in a Presidential Proclamation establishing a Marine National Monument. *See e.g.*, Northwestern Hawaiian Islands Marine National Monument, 50 CFR Part 404.

should not be limited to New England or the Northeast. This is a national, not just a regional treasure, and people all over the country should be made aware of it.

The education and outreach component of the management plan should prioritize serving communities that have historically not had access to nature and outdoor spaces. While the monument itself is not physically accessible to most people, we encourage NOAA and FWS to approach access to nature with a broader lens and create engagement and collaboration opportunities for communities that would foster a virtual connection with this area.

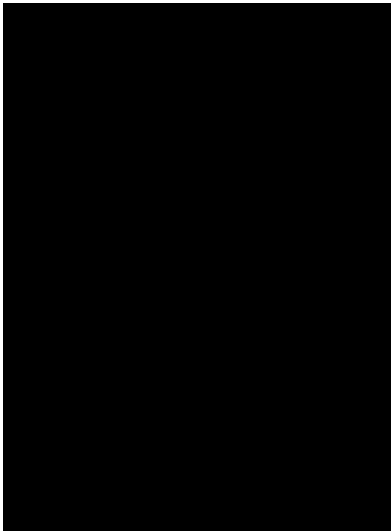
Additionally, FWS and NOAA should consider forming partnerships with groups like the Gulf of Maine Research Institute (GMRI) and other institutions that have connections with public school networks. They should seek opportunities to share with students, information about the monument, including live dive footage and information about new discoveries, inspiring young people with the beauty and richness of the deep sea.

Management Plan Review and Update

The management plan should include a requirement to review and update the management plan periodically, at least every 10 years, and preferably sooner.

Thank you for this opportunity to comment.

Yours Sincerely,



[EXTERNAL] NEAq Comments Docket 2022 28203

[Redacted]

Thu 1/26/2023 8:29 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

Cc: [Redacted]

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Dear Superintendent Petersen,

Attached please find the New England Aquarium's comments on the Intent to Prepare a Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument. Please confirm receipt, and we look forward to reviewing the Draft Management Plan once released

Best,

[Redacted]

Director of Ocean Policy
Anderson Cabot Center for Ocean Life
New England Aquarium

[Redacted]

(she/her/hers)



This electronic message contains information from the New England Aquarium which may be privileged and confidential. The information is intended to be for the use of the addressee only. If you have received this communication in error, do not read or circulate it. Please delete it from your system without copying it or saving any attachments and notify the sender by reply e-mail. Thank you.



Protecting the blue planet

January 26, 2023

Brittany Petersen
Marine Monument Superintendent
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035
ncsmnm_planning@fws.gov

Re: Comments on U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration's Intent to Prepare a Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument

Dear Superintendent Petersen,

The New England Aquarium (Aquarium) appreciates the opportunity to provide input on the Northeast Canyons and Seamounts (NCSM) Marine National Monument (Monument) Joint Management Plan. We applaud the United States Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) for taking a thoughtful and comprehensive approach to creating the NCSM Marine National Monument Management Plan (Management Plan). The intent to prepare a draft monument management plan for the Monument is an exciting and necessary step forward for the protection of this diverse area.

As a global leader in applied marine research and conservation practice, and a longtime research hub for Atlantic marine species, the Aquarium has been deeply involved with studying the NCSM region and its species for many years. The Monument contains some of the highest marine mammal [diversity](#) along the entire east coast.¹ We have observed a variety of species through aerial surveys in this area (e.g., Sperm Whales, Whale Sharks, Chilean devil rays).² We will continue to advocate for protecting this region of high marine mammal diversity, and look forward to supporting USFWS and NOAA ("the agencies") as the Management Plan takes shape so that it reflects the intent of Proclamation [9496](#), and provides for stewardship, access and care of this incredible area.³ We submit our recommendations in the spirit of creating a strong, holistic Management Plan that will effectively steward this environment long after designation. We provide four recommendations below on what the Management Plan should include and prioritize.

¹ Hodge, B. C., Pendleton, D. E., Ganley, L. C., O'Brien, O., Kraus, S. D., Quintana-Rizzo, E., & Redfern, J. V. (2022). Identifying predictors of species diversity to guide designation of marine protected areas. *Conservation Science and Practice*, 4(5), e12665. <https://doi.org/10.1111/csp2.12665>.

² Available at <https://www.andersoncabotcenterforoceanlife.org/blog/jan-2021-aerial-monument-survey/>; <https://www.andersoncabotcenterforoceanlife.org/blog/reflections-on-my-first-survey-marine-national-monument/>; <https://www.andersoncabotcenterforoceanlife.org/blog/high-biodiversity-seen-in-monument/>.

³ Presidential Proclamation 9496 (81 FR 65161, September 21, 2016). See <https://www.federalregister.gov/d/2016-22921>

I. The Management Plan should prioritize public education and equitable access to the Monument.

As the first and only Monument in the Atlantic Ocean, it offers a unique opportunity to educate the public on the importance of protecting marine spaces. While the public can visit National Monuments found on land and observe firsthand why certain distinct ecosystems are worth protecting, access is not as easy for a marine area located 130 miles offshore. Therefore, building opportunities for people of all backgrounds and circumstances to learn about and interact with the Monument holds a heightened necessity. Equitable access must include educational, language and cultural, and physical access. The prioritization of public education and equitable access is a great opportunity to meet the goals of President Biden's Justice40 initiative to move forward equity concerns.⁴ The Management Plan should focus on identifying and engaging groups that have not had an opportunity to interact with marine monuments before, and enhancing interactive opportunities with those groups that are/were already engaged. For both, the Management Plan should consider a group's ability to interact given their cultural and geographical heritage.

Papahānaumokuākea Marine National Monument (PMNM) provides an effective example of how to carefully consider public access in Marine Monument planning. PMNM has a [webpage](#) specifically dedicated to public access.⁵ Within this page, there is a virtual tour that takes participants through the uniqueness of the geography and the biodiversity housed within its boundaries. This page also promotes aquariums, museums, and learning centers that teach about PMNM or relevant pieces of the PMNM. Finally, Hawaii houses multiple outdoor experiences that highlight information about PMNM, including interactive signs and apps in other related outdoor regions.

We recommend that the NCSM Management Plan prepare accessible public education initiatives like the examples in PMNM, and associated funding mechanisms to support these education and outreach initiatives. The agencies should create a virtual tour using aerial and underwater photos and videos of marine life, seamounts, and canyons. This tour would allow the public to visit the Monument virtually and gain an understanding of the importance of protecting this area. The agencies should create an outdoor experience in the New England region with signs, walking tours, QR codes, and more to help the public interact with NCSM Monument, as if they were visiting the Monument. Even though the experience would not be physically located in the Monument, it would help people understand the value of protecting a nearby ecosystem that is intimately connected to the species found in more familiar coastal waters. Finally, the agencies should promote existing NCSM exhibits and encourage or support the creation of additional exhibits in informal and formal education settings alike (e.g., Aquariums, public schools).

The agencies must assure multi-lingual translation of signage and verbiage related to the Monument, culturally appropriate storytelling as informed by relevant groups, and diverse demographics of staff conducting these operations.⁶ Additionally, if public excursions to the Monument are ever provided, equity concerns need to be considered and addressed in how those excursions are carried out, and scientific excursions would benefit from livestreaming or tracking of research cruises. All research related initiatives in the Monument should be open and available for public viewing, with associated plans to translate scientific results into communication and outreach materials as well as curriculum-based opportunities.

⁴ For detailed guidance visit <https://www.doi.gov/justice40-initiative>

⁵ Available at https://www.papahanaumokuakea.gov/access/public_access.html.

⁶ <https://www.doi.gov/justice40-initiative>

Protecting the blue planet

As an educational institution, in its daily operations, the Aquarium witnesses, and assesses how thoughtful marine education and outreach creates a more informed citizenry, motivates action on behalf of the planet, and inspires the next generation of ocean leaders. Due to the remote nature of the Monument, public education and access is especially crucial and therefore must be central to the Management Plan. Aquarium programming related to the Monument will include both on-site and off-site messaging intended to bring awareness to the Monument and involve people in the processes related to Monument designation and maintenance. The Aquarium will continue to serve as a convening space for conversations about the Monument, including focus groups, lectures, and discussions. Language about the Monument will be integrated where applicable into educational signage and interpretation within the building. Additionally, the Aquarium will seek out partnerships with people and groups who can offer access to or information on the Monument for Aquarium guests.

II. The Management Plan should amplify the voices and needs of those for which the Monument holds historical and cultural value, and incorporate their feedback into the education and management planning of the Monument.

Inclusion of cultural knowledge and practices in the future planning of marine spaces is requisite for a comprehensive, equitable and lasting management strategy.⁷ The agencies must consider and incorporate the cultural and historical significance of the NCSM area into the Management Plan, as the agencies did with PMNM and the Marianas Trench Marine National Monument (MTMNM).

Both PMNM and MTMNM demonstrate consideration of cultural heritage and historical relevance of the Monuments. PMNM's cultural heritage [webpage](#) details the history of the area, the cultural significance of the region to native Hawaiians, and the cultural uses that take place in the area.⁸ It also describes how important cultural activities for native Hawaiians continue to be permitted within the site regardless of its designation as a Marine Monument. There is also a maritime heritage [page](#) that outlines native seafaring and ecological knowledge, archeological resources, and history of passage.⁹ MTMNM's 2021 [Draft Management Plan](#) outlines that indigenous and local communities will help guide research and activities, and incorporate indigenous and local knowledge into Monument management.¹⁰

The NCSM Management Plan should include research and planning to encompass any historical and cultural heritage both in educational initiatives and in permitted uses of the NCSM area. Indigenous Peoples have always held important roles in protecting and stewarding the ocean. The Management Plan should reflect and uphold Indigenous perspectives, voices and knowledge. In particular, activities and outcomes associated with the Fifth International Marine Protected Areas Congress, IMPAC5, may benefit the Management plan.¹¹ For example, incorporating Indigenous ways of knowing, learning from

⁷ Bennett, N. J., Katz, L., Yadao-Evans, W., Ahmadi, G. N., Atkinson, S., Ban, N. C., Dawson, N.M., de Vos, A., Fitzpatrick, J., Gill, D., Imirizaldu, M., Lewis, N., Mangubhai, S., Meth, L., Muhl, E.K., Obura, D., Spalding, A.K., Villagomez, A., Wagner, D., White, A., & Wilhelm, A. (2021). Advancing social equity in and through marine conservation. *Frontiers in Marine Science*, 8, 994. <https://doi.org/10.3389/fmars.2021.711538> ; Zafra-Calvo, N., et al. "Towards an indicator system to assess equitable management in protected areas." *Biological Conservation* 211 (2017): 134-141; Zafra-Calvo, Noelia, et al. "Progress toward equitably managed protected areas in Aichi target 11: a global survey." *BioScience* 69.3 (2019): 191-197.

⁸ For detailed guidance visit <https://www.papahanaumokuakea.gov/heritage/>.

⁹ For detailed guidance visit <https://www.papahanaumokuakea.gov/maritime/>.

¹⁰ For detailed guidance visit <https://media.fisheries.noaa.gov/2021-02/mtmnm-draft-management-brochure-final-web.pdf?null=>.

¹¹ Indigenous Experience at IMPAC5 available at <https://www.impac5.ca/indigenous/>.

indigenous protected and conserved areas, and understanding the connections between art, culture and ocean are a few of the planned priority areas of discussion for the Congress and will yield opportunities to bring the best in marine protected area design to the NCSM Management Plan.¹²

The agencies should seek input from a myriad of groups, including but not limited to, Indigenous groups, those with maritime history knowledge, archeologists, and all others in the region that can help inform the history and cultural significance of the area and integrate cultural and natural heritage approaches for the management of the area.¹³ Then, the agencies should incorporate this information and feedback into the Management Plan. The agencies should continue collaboration with such groups throughout the process to develop and implement the Management Plan. Through our work with communities in Boston we understand the critical importance and value of engaging stakeholders and incorporating local knowledge, and we recognize how much work remains to be done. Amplifying voices of those with a cultural and historical relationship with the NCSM Monument is critical to long-term success of the Management Plan.

III. The Management Plan should identify other potential threats to the ecosystem that are not currently considered, and incorporate those threats into management strategies.

The Aquarium has been deeply involved in [research](#) and data collection in the NCSM since before its original designation as a Monument in 2016.¹⁴ We have seen firsthand how diverse this environment is for marine species through our [aerial surveys](#) and associated research.¹⁵ But this ecosystem, like all ecosystems, is fragile. For example, submarine canyons face pressure from fishing, dumping of land-based mine tailings, oil and gas extraction, and climate change.¹⁶ Climate change could modify the intensity of currents, which could result in changes in nutrient supply to the deep-ocean ecosystem and changes in the structure and functioning of canyon communities.¹⁷

The health of the NCSM ecosystem requires identification of all potential threats and a management plan that addresses them. The Management Plan needs to address overlapping activities, their associated stressors, and the interactions between these stressors, holistically.¹⁸ The abundant species and habitat

¹² Indigenous Peoples Leadership at IMPAC5 available at <https://www.impact5.ca/congress-details/program/themes-and-streams/streams/indigenous-leadership/>.

¹³ Breen, Colin, et al. "Integrating cultural and natural heritage approaches to Marine Protected Areas in the MENA region." *Marine Policy* 132 (2021): 104676.

¹⁴ Auster, P. J., Hodge, B. C., McKee, M. P., & Kraus, S. D. (2020). A scientific basis for designation of the northeast canyons and seamounts marine national monument. *Frontiers in Marine Science*, 7, 566. <https://doi.org/10.3389/fmars.2020.00566>.

¹⁵ Hodge, B. C., Pendleton, D. E., Ganley, L. C., O'Brien, O., Kraus, S. D., Quintana-Rizzo, E., & Redfern, J. V. (2022). Identifying predictors of species diversity to guide designation of marine protected areas. *Conservation Science and Practice*, 4(5), e12665. <https://doi.org/10.1111/csp2.12665>.

¹⁶ Fernandez-Arcaya, U., E. Ramirez-Llodra, J. Aguzzi, A. L. Allcock, J. S. Davies, A. Dissanayake, P. Harris, K. Howell, V. A. I. Huvenne, M. Macmillan-Lawler, J. Martín, L. Menot, M. Nizinski, P. Puig, A. A. Rowden, F. Sanchez, and I. M. J. Van den Beld. 2017. Ecological role of submarine canyons and need for canyon conservation: a review. *Frontiers in Marine Science* 4.

¹⁷ Fernandez-Arcaya, U., E. Ramirez-Llodra, J. Aguzzi, A. L. Allcock, J. S. Davies, A. Dissanayake, P. Harris, K. Howell, V. A. I. Huvenne, M. Macmillan-Lawler, J. Martín, L. Menot, M. Nizinski, P. Puig, A. A. Rowden, F. Sanchez, and I. M. J. Van den Beld. 2017. Ecological role of submarine canyons and need for canyon conservation: a review. *Frontiers in Marine Science* 4.

¹⁸ For more information on multiple interacting stressors and place-based approaches refer to Wedding et al., Linking multiple stressor science to policy opportunities through network modeling available at

diversity of the NCSM ecosystem depends on taking into account all existing and potential threats and plans for how to combat them now and into the future.

IV. The Management Plan should utilize existing data on the Monument when considering future data collection.

Scientific organizations have conducted consequential research on the Monument, and together this research led to the original designation of the area as a Monument.¹⁹ The Aquarium has been a participant in data collection in the NCSM ecosystem for many years, and looks forward to providing scientific advice during the planned focus group phase of the Management Plan scoping process in 2023 and beyond. The Aquarium has collected aerial survey data in the NCSM since 2017. These data are critically important for understanding the effects of climate change and other potential threats to the NCSM ecosystem. In July [2021](#), the Aquarium published a study evaluating how reopening the NCSM to commercial fishing compromised species protections.²⁰ Data from the aerial surveys was used to compare effort corrected estimates of the exposure of marine mammals to commercial fishing under the protections provided by the original Monument designation and under existing fisheries management regulations.²¹

To ensure the Management Plan reflects accurate and comprehensive data on the NCSM ecosystem, we recommend that the agencies assess all previous data collection efforts in this region and work from this foundation to design future data collection efforts. We also recommend that the agencies prioritize obtaining and allocating the resources needed for data collection via various methods (e.g., aerial survey, boat-based, remotely operated, passive acoustics, etc.) in the NCSM. The data collected by the Aquarium and others represent valuable assets that can be used to assess threats to the NCSM ecosystem. Ongoing and future research can help us understand ecosystem features that support areas of elevated biodiversity and how to protect these areas in a changing climate.

The Aquarium recognizes that in order to implement the proposed initiatives these efforts must be adequately funded. Executive Order 14008 which was signed by President Biden in 2021 states a goal that 40 percent of certain Federal investments should flow towards communities of color and frontline communities.²² The Aquarium is hopeful that funding opportunities associated with H.R. 2617, the “Consolidated Appropriations Act, 2023,” can support the development and implementation of both the Management Plan and environmental stewardship for generations to come.

The New England Aquarium continues to study the Monument, and we are committed to collaborating on effective management of this rich and diverse area of the ocean. We believe our recommendations will

<https://www.sciencedirect.com/science/article/pii/S0308597X22003542>; Mach et al., Assessment and management of cumulative impacts in California’s network of marine protected areas *available at* <https://www.sciencedirect.com/science/article/abs/pii/S0964569116303647>; Prahler et al., It All Adds Up: Enhancing Ocean Health by Improving Cumulative Impacts Analyses in Environmental Review Documents, vol 33 *Stanford Environmental Law Journal* 351 (2014).

¹⁹ See for example, Auster, P. J., Hodge, B. C., McKee, M. P., & Kraus, S. D. (2020). A scientific basis for designation of the northeast canyons and seamounts marine national monument. *Frontiers in Marine Science*, 7, 566. <https://doi.org/10.3389/fmars.2020.00566>.

²⁰ Redfern, J. V., Kryc K. A., Weiss L., Hodge B. C., O’Brien O., Kraus, S. D., Quintana-Rizzo E., & Auster, P. J. (2021). Opening a Marine Monument to Commercial Fishing Compromises Species Protections. *Frontiers in Marine Science*, 8, 2296-7745. <https://doi.org/10.3389/fmars.2021.645314>.

²¹ Redfern, J. V., Kryc K. A., Weiss L., Hodge B. C., O’Brien O., Kraus, S. D., Quintana-Rizzo E., & Auster, P. J. (2021). Opening a Marine Monument to Commercial Fishing Compromises Species Protections. *Frontiers in Marine Science*, 8, 2296-7745. <https://doi.org/10.3389/fmars.2021.645314>.

²² <https://www.whitehouse.gov/environmentaljustice/justice40/>.



**New England
Aquarium**

Protecting the blue planet

help support our joint goal of protecting the Monument, its unique features, and associated species for many years to come. We thank the agencies for the opportunity to comment on the Management Plan, and we hope you will consider our recommendations.

Sincerely,

[Redacted signature block]

[Redacted contact information]

[Redacted contact information]

[Redacted contact information]

[EXTERNAL] Recommendations for the Northeast Canyons and Seamounts Monument Draft Management Plan

[REDACTED]
Fri 1/27/2023 9:30 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good Morning,

Please find attached recommendations on behalf of 41 organizations to inform the creation of Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument (Docket Number: 2022-28203).

We thank FWS and NOAA for the opportunity to provide these comments.

Sincerely,

Azul

Blue Planet Strategies

Californians for Western Wilderness

Coalition to Protect America's National Park

Conservation Law Foundation

Creation Justice Initiative

Defenders of Wildlife

EarthEcho International

Earthjustice

Endangered Species Coalition

Environment America

Environment Connecticut

Environment Maine

Environment Massachusetts

Environmental League of MA

Friends of the Earth US

Healthy Ocean Coalition

Hispanic Access Foundation

Inland Ocean Coalition

International Fund for Animal Welfare

Jenkinson's Aquarium

League of Conservation Voters
Marine Conservation Institute
Mass Audubon
Menunkatuck Audubon Society
Mystic Aquarium
National Aquarium
National Ocean Protection Coalition
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
Oceana
Patagonia
Santa Barbara Zoo
Surfrider Foundation
The Connecticut Audubon Society
The New England Aquarium
The Ocean Project
The Wilderness Society
Virginia Aquarium & Marine Science Center
WILDCOAST

Best,

[Redacted]

Government Relations Manager
National Ocean Protection Coalition
www.oceanprotectioncoalition.org

[Redacted]

[Redacted]

January 27, 2023

Brittany Petersen
Marine Monument Superintendent
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035
ncsmnm_planning@fws.gov

Re: Comments on U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration's Intent to Prepare a Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument

Dear Ms. Petersen,

On behalf of the 41 undersigned organizations, we submit these comments to the U.S. Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) ("Co-Trustees") regarding their intent to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument ("Monument").¹

President Obama designated the Monument in 2016 to safeguard fragile and interconnected ecosystems, improve ocean resilience, and sustain tourism, recreation, fishing, and other sectors of the New England economy that depend upon a healthy marine ecosystem.² Located about 130 miles off the coast of Cape Cod and encompassing three undersea canyons deeper than the Grand Canyon and four seamounts rising higher than any mountain east of the Rockies, the Monument is recognized as "one of the Atlantic Ocean's most biologically productive and important marine environments, and one of science's greatest oceanic laboratories."³ The Monument spans only 1.5% of the Atlantic region of the U.S. Exclusive Economic Zone (EEZ) and 0.11% of the entirety of the U.S. EEZ, yet its diversity of topography, depths, and substrates protects a diverse array of marine life including deep-sea corals, fishes, sea turtles, whales, and seabirds.

The Monument is a national treasure that must now have a clearly defined and comprehensive management plan. As the Co-Trustees embark on the development of a management plan, it is critical to keep front of mind the recent recommendation from scientists worldwide: We must set aside at least 30% of land and ocean by 2030 to stem biodiversity loss and build resilience against climate change.⁴ President Biden embraced this call when he restored protections to the Monument in 2021,⁵ and the management plan should likewise prioritize conservation outcomes

¹ See 87 Fed. Reg. 79,901 (Dec. 28, 2022).

² See Presidential Proclamation No. 9496, 81 Fed. Reg. 65,161 (Sept. 15, 2016) (the "2016 Proclamation").

³ U.S. Department of the Interior, *Administration Leaders Applaud President Biden's Restoration of National Monuments*,

<https://www.doi.gov/pressreleases/administration-leaders-applaudpresident-bidens-restoration-national-monuments> (updated Oct. 8, 2021).

⁴ See E. Dinerstein et al., "A Global Deal for Nature: Guiding Principles, Milestones, and Targets," *Science Advances* 5, no. 4 (April 2019): eaaw2869, <https://doi.org/10.1126/sciadv.aaw2869>.

⁵ See Presidential Proclamation No. 10287, 86 Fed. Reg. 57,349 (Oct. 15, 2021) (the "2021 Proclamation").

that protect biodiversity and address the climate crisis to ensure the area will flourish. Marine protected areas are a key tool for maintaining, restoring, and enhancing ecosystem resilience in a changing climate,⁶ and the Canyons and Seamounts provide strong and permanent protection to their highly vulnerable species and ecosystems. A successful management plan will guide future stewardship of this national treasure and ensure sufficient investment in safeguarding and sharing the story of this important place. To effectively manage the Monument and to achieve the goals, vision, and guiding principles of the 2016 and 2021 Presidential Proclamations, we offer the following recommendations.

The management plan should include an action plan to inventory the Monument's resources and identify and minimize any impacts to those resources. As the only marine national monument in the U.S. Atlantic Ocean, the Monument provides refuge for spectacular wildlife and habitats. Among other things, the slow-growing deep-sea corals, large marine mammals, apex predator fish, migratory seabirds, and unseen critters make this area a biodiversity hotspot. Some of these deep-sea organisms are highly vulnerable to human disturbance.⁷ To sufficiently protect these unique and fragile ecosystems, the Co-Trustees should undertake a comprehensive inventory of the natural and cultural resources contained in the Monument. Such an assessment will facilitate resource protection and provide a baseline for monitoring the area's health and productivity. The action plan should also assess current impacts to the Monument and address how the Co-Trustees will minimize such impacts.

The management plan should establish a scientific monitoring, exploration, and research plan. It is estimated that only 50 percent of the potential species in the Monument have been discovered to date; much remains to be uncovered about these unique, isolated environments and their geological, ecological, and biological resources.⁸ In recent years, scientists from government and academic oceanographic institutions have conducted limited research within the Monument using remotely operated vehicles (ROVs), airplanes, research vessels, and submarines—such research should be expanded to yield important new information about living marine resources. But beyond learning about what the Monument contains, scientists can also use this critical living laboratory to study the impacts of climate change and provide strategic information to managers. Therefore, the management plan should include a scientific monitoring, exploration, and research plan that seeks to document the biodiversity in the monument and answers pressing questions about the impacts of climate change on our ocean.

The management plan should include a comprehensive public education and outreach program. The Monument is a public resource that serves as a unique opportunity for the public to

⁶ See Jenna Sullivan-Stack et al., *A Scientific Synthesis of Marine Protected Areas in the United States: Status and Recommendations*, Front. Mar. Sci. Sec. Ocean Solutions (May 18, 2022), <https://doi.org/10.3389/fmars.2022.849927>.

⁷ See Risk, M.J., et al., *Lifespans and growth patterns of two deep-sea corals: *Primnoa resedaeformis* and *Desmophyllum cristagalli**, *Hydrobiologia* 471, no. 1-3 (2002): 125–131; see also Roark, E.B., et al., *Extreme Longevity in proteinaceous deep-sea corals*, *Proceedings of the National Academy of Sciences of the United States* 106, no. 13 (March 23, 2009): 5204–5208.

⁸ See Kelly NE, Shea EK, Metaxas A, Haedrich RL, Auster PJ. 2010. Biodiversity of the Deep-Sea Continental Margin Bordering the Gulf of Maine (NW Atlantic): Relationships among Sub-Regions and to Shelf Systems. *PLoS ONE* 5(11): e13832.

connect with and build an appreciation for our deep-sea ocean ecosystems. Because the Monument itself is not physically accessible to the public, the Co-Trustees should provide creative ways to connect the public to this special place. For example, previously live streamed research expeditions led to massive public engagement with the Monument, and similar events would provide a great opportunity for future engagement. It is important that such programs create and share accessible and inclusive educational resources in multiple languages. Additionally, education and outreach programs should prioritize serving communities that have historically not had access to nature and outdoor spaces.

The Monument's management plan should include monitoring and enforcement programs to effectively protect the unique ecological resources within the Monument. When President Obama designated the Monument, his presidential proclamation identified numerous prohibited activities within the Monument's boundary.⁹ The management plan should clearly define the prohibited activities within the Monument. Successful protection and maintenance of the Monument's ecosystems and biological diversity will require adequate monitoring and enforcement to prevent unlawful activities. The management plan should therefore include strategies to ensure adequate year-round monitoring and enforcement programs. Further, the Co-Trustees should identify strategic partnerships with local enforcement agencies to coordinate enforcement actions and share resources and information.

The Monument's management plan should include the development of an effective permitting program to ensure compliance with Monument rules and regulations. The management plan should clearly set forth management measures for the activities permitted within the Monument (e.g., research and scientific exploration, sailing or bird and marine mammal watching).¹⁰ It is essential that the Co-Trustees ensure permitted activities are performed consistently with care and management of the objects within the Monument. In addition to establishing monitoring and enforcement plans, the Co-Trustees should develop an effective permitting program. Such a program, including the permit application, evaluation, and granting process, should allow opportunity for public participation and be based on the best available science.

The management plan should include a robust process to ensure effective collaboration and coordination among the Co-Trustees, stakeholders, and additional relevant agencies. As Co-Trustees of this remarkable area, FWS and NOAA must successfully coordinate to effectively manage the Monument. Additionally, to date, thousands of people from across the nation have raised their voices in support of the Monument. The management plan should include a robust process for continued engagement of the public and stakeholders in management of this extraordinary public resource. Finally, it is not only important for the Co-Trustees to successfully coordinate; they must also coordinate with the numerous other relevant federal agencies.

⁹ See 81 Fed. Reg. at 65,164-65.

¹⁰ See 81 Fed. Reg. at 65,165.

Finally, the management plan should include a requirement to review and update the plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of the status of human uses, water quality, habitat, living marine resources, cultural resources, and ecosystem services of the monument and enforcement of the monument's regulations. The management plan should then be revised to address issues that surface in the assessment.

We thank FWS and NOAA for the opportunity to provide these comments.

Sincerely,

Azul
Blue Planet Strategies
Californians for Western Wilderness
Coalition to Protect America's National Parks
Conservation Law Foundation
Creation Justice Ministries
Defenders of Wildlife
EarthEcho International
Earthjustice
Endangered Species Coalition
Environment America
Environment Connecticut
Environment Maine
Environment Massachusetts
Environmental League of MA
Friends of the Earth US
Healthy Ocean Coalition
Hispanic Access Foundation
Inland Ocean Coalition
International Fund for Animal Welfare
Jenkinson's Aquarium

League of Conservation Voters
Marine Conservation Institute
Mass Audubon
Menunkatuck Audubon Society
Mystic Aquarium
National Aquarium
National Ocean Protection Coalition
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
Oceana
Patagonia
Santa Barbara Zoo
Surfrider Foundation
The Connecticut Audubon Society
The New England Aquarium
The Ocean Project
The Wilderness Society
Virginia Aquarium & Marine Science Center
WILD Coast

[EXTERNAL] Northeast Canyons and Seamounts Marine National Monument Proposed Joint Management Plan - Docket No. FWS-R5-NWRS-2022-N062

[Redacted]

Fri 1/27/2023 5:02 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

Cc: NCSMNM, FW5 <ncsmnm@fws.gov> [Redacted]

1 attachments (1 MB)

NASCA NCSMNM Comment with Exhibit A (27Jan2023) pdf

This email has been received from outside of DOI Use caution before clicking on links, opening attachments, or responding.

Good afternoon, Ms. Petersen:

On behalf of the North American Submarine Cable Association ("NASCA"), attached please find NASCA's comments on the proposed joint management plan for the Northeast Canyons and Seamounts Marine National Monument.

Thank you for your consideration, and please let us know if you have any questions.

Sincerely,

[Redacted Signature]

[EXTERNAL] Earthjustice scoping comments for Management Plan

[REDACTED]
Fri 1/27/2023 6:26 PM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI Use caution before clicking on links, opening attachments, or responding.

Dear Ms. Petersen:

Please find attached comments from Earthjustice regarding the Co-Trustees Notice of Intent to Prepare a Draft Management Plan for the Northeast Canyons and Seamounts Marine national Monument

Best,

[REDACTED]
(he/him)

Managing Attorney for Oceans

[REDACTED]
earthjustice.org



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January 27, 2023

VIA EMAIL

Brittany Petersen
Marine Monument Superintendent
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035
ncsmmm_planning@fws.gov

Re: Comments on U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration's Intent to Prepare a Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument

Dear Ms. Petersen:

We appreciate the opportunity to provide these comments to the U.S. Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) ("Co-Trustees") as they begin to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument.

The Monument safeguards irreplaceable features, unique habitats, and both threatened and abundant marine biodiversity at a time when our oceans are undergoing rapid changes from climate change and suffering from the biodiversity crisis. In addition to providing a critical refuge for marine wildlife affected by these changes, the Monument can inspire generations of Americans with an example of what functioning ecosystems look like and what healthy and biodiverse marine habitat can be. A strong, clear, and effective plan that prioritizes conservation is essential to protecting this place for those generations. Earthjustice joined a host of partners on a separate letter detailing comprehensive recommendations for the plan and write separately to emphasize several of the foundational steps that should guide the Co-Trustees in fashioning that plan.

First, it's difficult to effectively protect what you do not know about or understand, so the plan should prioritize the research and exploration necessary to inventory the full extent of the Monument's unique physical, biological, and historical resources. Every research expedition to the Monument documents new discoveries and brings home new information and insights critical to protecting these waters. The plan should prioritize prompt and systematic collection of this information. This initial inventory and ongoing research should be paired with a robust monitoring plan that can provide meaningful and timely data to managers over time so they can

react and adjust management measures if/as conditions change or new science becomes available. At a minimum, the Co-Trustees should comprehensively revisit the management plan at least every 10 years to ensure that the assumptions and conditions animating its initial measures are still relevant and based on the best available scientific information.

Second, the full promise of the Monument depends on sharing its wonders, benefits, and inspiration with everyone. This includes thoughtful preparation of multi-lingual materials as well as ensuring that meetings, outreach, presentations, programs, and opportunities to visit the monument are well-publicized and occur at times and places where everyone can access them. This also includes consideration of ways to provide equitable access to funding and other resources to engage and enable ocean justice communities to experience the Monument.

Finally, it is vitally important that the Co-Trustees work together to adopt strong and clear regulations that enforce the regulations and the prohibitions governing harmful industrial activities, including commercial fishing, within the Monument. These joint regulations should prioritize clear definitions of prohibited activities and include robust and detailed monitoring and enforcement measures; allocating and providing the resources and funding to carry them out. We urge the Co-Trustees to work closely together and, as appropriate, adopt joint regulations that leverage the expertise and enforcement authority of each agency.

Thank you for the opportunity to provide these comments. We look forward to providing additional input as the Co-Trustees draft and finalize the management plan.

Sincerely,

A large black rectangular redaction box covering the signature of the sender.

Managing Attorney, Oceans

[EXTERNAL] FWS National Marine Monument Designation Public Comment

Mon 1/30/2023 9:45 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI Use caution before clicking on links, opening attachments, or responding.

Dear Brittany Peterson,

After sitting in on public comment session this fall it seems quite likely that FWS will not consider any exemption for pot/trap fishing within the monument area. After the board finalizes its decision, please consider the following. Without any government mandate Atlantic Red Crab took its own preventative measure year ago to mitigate the impact its fishing operation have on the environment. By switching to 150 trap trawl they dramatically reduced the amount of surface to ground line in their fishing area in one of the most radical industry driven measure to date in the fixed gear space. Also keep in mind that fixed gear pot fishing is far less impactful on the marine environment compared to mobile fishing strategies such as bottom trawl and dredge.

For the last year ARC has collaborated with our company, Ocean Data Network, to become the leading source of temperature/depth profile data collection along the New England shelf break. The data collected by the ARC vessel has been utilized by IOOS, WHOI, the U.S. Navy, Rutgers University, and various branches of NOAA to improve ocean models, weather forecasts, and contribute to research. The data collected by the ARC fleet is helping make the east coast EEZ safer and better understood ocean space for all stakeholders operating in the region.

We have built our business by forging strong relationships between historically divergent communities, the fishing industry, and the research community. We pride ourselves on finding the middle ground in which the two groups can have a mutually beneficial relationship. Unfortunately, the action taken by FWS, placing sweeping commercial fishing closures in the proposed national marine monument area without evidence of adverse impact on the region is working to completely undo the work we have accomplished in conjunction with NOAA led programs such as Study Fleet and eMOLT to build a trusting and collaborative narrative between the two communities. In many ways the divide this mandate creates mirrors the greater public discourse being waged between political parties in the U.S. In such a politically polarized climate we, along with NOAA researchers who have been conducting similar projects throughout the northeast for over twenty years, work hard to bridge cultural gaps and build positive relationships between the communities. Closing off this particular region to all commercial fishing is the exact kind of governmental overreach without full understanding of the issue that has fueled conflict between industry and science in the past.

Please consider learning more about the collaborative projects being conducted in this area, and their tremendous value to the scientific community. Also, take the time to properly educate yourselves on the wide variation in fishing methods and thus the minimal negative impacts fixed gear pot fishing imposes on the marine environment. Oftentimes people outside the fishing industry perceive all commercial fishing practices as equally destructive and exploitative. The reality is that there are a multitude of gear types and approaches to fishing that vary widely in their impacts on the environment, with pot fishing being a low impact fishery. In fact, the ARC crab fleet earned the recommendation of the Monterey Bay Aquarium's SeaFood Watch and the New England Aquarium.

Allowing this data collection project to continue, even in some limited capacity, is in the best interest for all who utilize the northeast U.S shelf sea, as the data is creating a more informed, safer ocean space. Perhaps you would consider allowing just a select number of crab boats to continue fishing the region for continuous data coverage under some sort of provisional regulation for the good of science?

Thank ,



[Ocean Data Network](#)

[EXTERNAL] N'est Canyon & Seamount



Mon 1/30/2023 10:09 AM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To whom it may concern, please keep the northeast canyons and see Mount free of any commercialism whatsoever... no energy companies, no oil companies... keep all those leches away from it.

Thank you.



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William Raveis Real Estate

39 East Main Street, Mystic Ct 06355

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[EXTERNAL] NCSMNM

Mon 1/30/2023 10:51 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI Use caution before clicking on links, opening attachments, or responding.

Dear FWS,

I would like to express my sincere disappointment with the closure of the canyons to fixed gear fishing. It appears that the agencies implementing these closures do not understand the difference between types of fishing, and just follow uninformed stereotypes and assume all fishing is bad. These are undoubtedly tricky issues, but I expect more from my government

I have reviewed the peer reviewed scientific publications around this marine monument extensively to ensure that I am indeed advocating for the right thing. From whales to corals, there is no documented negative impact of fixed gear fishing in this region Plus, most of the coral is deeper than any fishing occurs (we have the data)

Furthermore, excluding fishing will shut down the only sustained oceanographic data collection right along the shelf break. This region is the confluence of many different ocean feature, making it critical to monitor for climate change impacts locally and with the Gulf Stream which have global implications There is no other sustained subsurface observation nearby. This is effectively putting on a blindfold from an oceanographic perspective.

I have strived to understand this issue from an unbiased and educated perspective, and I expect the government to attempt to do the same

Thank you for your consideration,



[Ocean Data Network](#)

[EXTERNAL] Northeast Canyons and Seamounts

Mon 12/5/2022 8:50 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

I am a New England resident but protecting our iconic ocean and all of the treasures within it should be very important to all of us. For much too long we have taken the ocean and the life within it for granted. Most of us are not knowledgeable about its creatures or aware of the great destruction already perpetrated on this vital part of the earth.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,



[EXTERNAL] Northeast Canyons and Seamounts

Mon 12/5/2022 8:34 AM

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Superintendent Petersen,

As a New England resident, protecting our iconic ocean and all of the treasures within it is very important to me. I'm writing today to urge you to create a comprehensive and strong management plan for the Northeast Canyons and Seamounts Marine National Monument because I'm proud of this special place being a part of New England, and want to see it protected and thriving forever.

The Canyons and Seamounts must have a clearly defined, publicly available management plan in place by September 15, 2023, that achieves the vision, mission, and guiding principles set forth President Obama's 2016 proclamation designating the Monument.

I urge you to develop and adopt a strong and effective management plan that will ensure that Northeast Canyons and Seamounts Marine National Monument and the diverse and abundant wildlife that call it home flourish for generations to come. The management plan should include the following key elements:

- A plan for a comprehensive public education and outreach program;
- A scientific exploration and research plan that includes research on the impacts of climate change on the monument;
- A plan for conducting a comprehensive inventory of the monument's natural and cultural resources and for assessing the activities occurring in the monument;
- An effective monitoring and enforcement program to ensure compliance with Monument rules and regulations;
- A permitting system for allowable activities;
- A requirement to review and update the management plan periodically, at least every 10 years if not sooner. Such a review should be preceded by a comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources and ecosystem services of the monument; and
- Procedures to ensure effective collaboration and coordination among federal management agencies.

Please do everything in your power to develop a clear and comprehensive management plan for the Northeast Canyons and Seamounts. New England is counting on you.

Thank you,

Submitted via electronic mail

January 31, 2023

Brittany Petersen
Marine Monument Superintendent
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035
ncsmnm_planning@fws.gov

Re: Comments on the U.S. Fish and Wildlife Service’s and National Oceanic and Atmospheric Administration’s Intent to Prepare a Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument

Dear Superintendent Petersen,

Conservation Law Foundation (CLF) submits these comments to the U.S. Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) (“Co-Trustees”) regarding their intent to prepare a draft monument management plan (“Management Plan”) for the Northeast Canyons and Seamounts Marine National Monument (“Monument”).¹ Founded in 1966, CLF is a non-profit, member-supported organization with offices located in Massachusetts, Rhode Island, Maine, New Hampshire, Vermont, and Connecticut. CLF’s advocates use the law, economics, science, and policy to design and implement strategies that conserve natural resources, protect public health, and promote vital communities in our region. CLF and its members are fighting for a better future for all New Englanders. To that end, we are dedicated to the protection of New England’s ocean ecosystem and have long advocated for strengthened protection of its rich and diverse wildlife and habitats.

Using the authority of the Antiquities Act of 1906, 54 U.S.C. § 320301, President Obama established the Monument in 2016 to safeguard fragile and interconnected ecosystems, improve ocean resilience to warming temperatures and other threats, and to help sustain tourism, recreation, fishing, and other sectors of the New England economy that depend upon abundant fish and wildlife and a healthy marine ecosystem.² The 2021 Proclamation issued by President Biden set a deadline of September 15, 2023, for the Secretary of Commerce, through NOAA, and the Secretary of the Interior, through FWS, to develop a joint management plan.³ The Management Plan should be comprehensive, clearly defined, and must achieve the purpose of Presidential Proclamations 9496 and 10287.

¹ See Northeast Canyons and Seamounts Marine National Monument; Proposed Joint Monument Management Plan, 87 Fed. Reg. 79,901 (Dec. 28, 2022).

² See Presidential Proclamation No. 9496, 81 Fed. Reg. 65,161 (Sept. 15, 2016).

³ See Presidential Proclamation No. 10287, 86 Fed. Reg. 57,349 (Oct. 15, 2021).

Specifically, CLF recommends the Management Plan contain:

- An inventory of the Monument’s resources with a plan to identify, avoid, and minimize any impacts to those resources;
- A scientific research, exploration, and monitoring plan;
- A comprehensive public education and outreach program;
- An effective monitoring and enforcement program;
- An effective permitting program;
- A robust process for collaboration and coordination among the Co-Trustees, stakeholders, and additional relevant agencies; and
- A requirement to review and update the management plan periodically, at least every 10 years, if not sooner.

CLF urges the Co-Trustees to develop and adopt a strong and effective management plan that ensures that the Northeast Canyons and Seamounts Monument and its diverse and abundant wildlife flourish for generations to come.

I. The Northeast Canyons and Seamounts Marine National Monument is a unique national treasure

The Biden-Harris Administration recently called the Monument “one of the Atlantic Ocean’s most biologically productive and important marine environments and one of science’s greatest oceanic laboratories.”⁴ Located about 130 miles off the coast of Cape Cod and approximately the size of Connecticut, it is the first and only marine national monument in the U.S. Atlantic Ocean.⁵

The Monument comprises a cluster of undersea canyons and seamounts and the exceptionally diverse ocean ecosystems in and around them.⁶ The Canyons Unit includes three underwater canyons that are deeper than the Grand Canyon—Oceanographer, Gilbert, and Lydonia—and covers approximately 941 square miles. The Seamounts Unit includes four seamounts (extinct volcanoes) that rise higher than any mountain east of the Rockies—Bear, Mytilus, Physalia, and Retriever—and covers 3,972 square miles. The Monument spans only 1.5% of the U.S. Atlantic Ocean and 0.11% of the entirety of the U.S. Exclusive Economic Zone, but the varied habitats and strong and complex currents there support significant and diverse concentrations of marine life within this small area.⁷ In fact, some of the species and habitat types found in the Monument are not found in any other sanctuary, national park, or monument.⁸

⁴ U.S. Department of the Interior, *Administration Leaders Applaud President Biden’s Restoration of National Monuments*, <https://www.doi.gov/pressreleases/administration-leaders-applaud-president-bidens-restoration-national-monuments> (updated Oct. 8, 2021); *see also* U.S. Fish & Wildlife Serv., *Northeast Canyons and Seamounts Marine National Monument*, <https://www.fws.gov/national-monument/northeast-canyons-and-seamounts-marine> (last visited Jan. 31, 2023) (describing “rich and unique” biodiversity).

⁵ *See* 81 Fed. Reg. at 65,161.

⁶ *See* Peter Auster et al., *A Scientific Basis for Designation of the Northeast Canyons and Seamounts Marine National Monument*, *Frontiers in Marine Science* 10, no. 566 (July 2020), <https://doi.org/10.3389/fmars.2020.00566>.

⁷ *See* Peter Auster et al. (July 2020).

⁸ *See* Peter Auster et al. (July 2020).

Upwelling along the steep canyon walls brings nutrients to shallower waters and supports this “biodiversity hot spot.”⁹ On cliffs and crags, colonies of vivid cold-water corals grow—some the size of small trees, centuries old, and as thick as forests. Scientists have even referred to seamount hard corals as the “old-growth redwoods of the deep ocean.”¹⁰ As many as 73 coral species have been identified in the Monument including two new species discovered recently on a 2018 expedition.¹¹ Given their distribution in all ocean basins, and the fact that they can live for centuries, deep-sea corals have been used to reconstruct past changes in global climate and oceanographic conditions.¹² In addition to slow growing deep-sea corals, the Monument offers food, shelter, and nursery habitat to a diverse range marine life, including seabirds, whales, sea turtles, and a multitude of fish species such as sharks, tuna, and billfish.¹³



Some of the diverse wildlife in the Monument: 1. bamboo coral, Mytilus Seamount; 2. Spotted dolphin, Physalia Seamount; 3. porcupine crab, Lydonia Canyon; 4. lizard fish, Mytilus Seamount; 5. sea spider, Oceanographer Canyon; 6. chimera fish, Lydonia Canyon; 7. sperm whales; 8. corals, Oceanographer Canyon. *Images 1-6, 8*

⁹ See Peter Auster et al. (July 2020).

¹⁰ See Guilderson, TP, et al., *Deep-dwelling Creatures Hold Clues to Climate Change*, NOAA Ocean Explorer (May 16, 2022), http://oceanexplorer.noaa.gov/explorations/02alaska/background/corals_cli/corals_cli.html.

¹¹ See K. Pierre-Louise, *Dr. Seuss’s Garden’ Yields a Deep-Sea Discovery, but It Already Faces Threats*, New York Times (Apr. 9, 2019), <https://www.nytimes.com/2019/04/09/climate/coral-atlantic-warming.html>.

¹² See e.g., Smith, J., Risk, M., Schwarcz, H. et al., *Rapid climate change in the North Atlantic during the Younger Dryas recorded by deep-sea corals*, Nature 386, 818–820 (1997), <https://doi.org/10.1038/386818a0>.

¹³ See 81 Fed. Reg. at 65,162-63; see also Kelly, N.E., et al., *Biodiversity of the Deep-Sea Continental Margin Bordering the Gulf of Maine (NW Atlantic): Relationships among Sub-Regions and to Shelf Systems*, Public Library of Science ONE 5, no. 11 (Nov. 19, 2010), <https://doi.org/10.1371/journal.pone.0013832> (More than 320 marine species have been identified in the region’s canyons and another 630 on the seamounts).

adapted from NOAA Okeanos¹⁴

As the Co-Trustees embark on the development of a management plan, it is critical to keep front of mind the recent scientific recommendation to set aside at least 30% of land and ocean by 2030 to stem biodiversity loss and build resilience against climate change.¹⁵ President Biden embraced this call when he restored protections to the Monument in 2021,¹⁶ and the Management Plan should likewise prioritize conservation outcomes that safeguard biodiversity and build climate resilience. Particularly given the highly vulnerable nature of some organisms found in the Monument—that frequently have long recovery times and extremely low resilience because of their longer lifespans, later sexual maturity, and slower growth rates relative to their shallow-water counterparts¹⁷—a strong management plan will be essential to support the permanent protection these offshore marine wonders.

II. The Management Plan should be consistent with Presidential Proclamations 9496 and 10287

The Co-Trustees must develop a management plan necessary for the proper care and management of the Monument.¹⁸ The Management Plan should thus clearly define the prohibited and regulated activities.¹⁹

¹⁴ See NOAA, *Deep Sea Coral Research & Technology Program 2014 Report to Congress* (2014), <https://coralreef.noaa.gov/featuredstories/2014apr/welcome.html>.

¹⁵ See E. Dinerstein et al., *A Global Deal for Nature: Guiding Principles, Milestones, and Targets*, *Science Advances* 5, no. 4 (Apr. 2019): eaaw2869, <https://doi.org/10.1126/sciadv.aaw2869>.

¹⁶ See 86 Fed. Reg. 57,349.

¹⁷ See Morato, T., Cheung, W.W.L., and Pitcher, T.J., *Vulnerability of seamount fish to fishing: fuzzy analysis of life-history attributes*, *Journal of Fish Biology* 68, no. 1 (2006): 209–221; see also Risk, M.J., et al., *Lifespans and growth patterns of two deep-sea corals: *Primnoa resedaeformis* and *Desmophyllum cristagalli**, *Hydrobiologia* 471, no. 1-3 (2002): 125–131; see also Roark, E.B., et al., *Extreme Longevity in proteinaceous deep-sea corals*, *Proceedings of the National Academy of Sciences of the United States* 106, no. 13 (March 23, 2009): 5204–5208..

¹⁸ See 81 Fed. Reg. at 65,164; see also 86 Fed. Reg. at 57,352.

¹⁹ 81 Fed. Reg. at 65,164-65 (The proclamations prohibit the following activities within the Monument: 1) “Exploring for, developing, or producing oil and gas or minerals, or undertaking any other energy exploration or development activities within the monument;” 2) “Using or attempting to use poisons, electrical charges, or explosives in the collection or harvest of a monument resource;” 3) “Introducing or otherwise releasing an introduced species from within or into the monument;” 4) “Removing, moving, taking, harvesting, possessing, injuring, disturbing, or damaging, or attempting to remove, move, take, harvest, possess, injure, disturb, or damage, any living or nonliving monument resource, except as provided under regulated activities below;” 5) “Drilling into, anchoring, dredging, or otherwise altering the submerged lands; or constructing, placing, or abandoning any structure, material, or other matter on the submerged lands, except for scientific instruments and constructing or maintaining submarine cables;” 6) “Fishing commercially or possessing commercial fishing gear except when stowed and not available for immediate use during passage without interruption through the monument, except for the red crab fishery and the American lobster fishery as regulated below;”); 81 Fed. Reg. at 65,165 (The proclamations regulate the following activities within the Monument: 1) “Research and scientific exploration designed to further understanding of monument resources and qualities or knowledge of the North Atlantic Ocean ecosystem and resources;” 2) “Activities that will further the educational value of the monument or will assist in the conservation and management of the monument;” 3) “Anchoring scientific instruments; 4) “Recreational fishing in accordance with applicable fishery management plans and other applicable laws and other requirements;” 5) “Commercial fishing for red crab and American lobster for a period of not more than 7 years from the date of this proclamation, in accordance with applicable fishery management plans and other regulations, and under permits in effect on the date of this proclamation. After 7 years, red crab and American lobster commercial fishing is

Similar to existing monuments, the Management Plan should identify a combination of management measures including monitoring, enforcement, zoning, permit authorization, regulations, and conservation plans to manage human activities.²⁰ Further, “[t]he Proclamations require the Secretaries to promulgate and implement regulations that address specific actions necessary for the proper care and management of the Monument.”²¹ The Secretaries have experience issuing joint implementing regulations, under their respective statutory authorities, to codify the prohibitions and management measures set forth in a presidential proclamation establishing a marine national monument.²²

III. The Management Plan should include an inventory of the Monument’s resources with a plan to identify, avoid, and minimize any impacts to those resources

Protecting the health and integrity of the Monument’s resources should be a Management Plan priority. To accomplish this, the Co-Trustees should undertake comprehensive inventories of the natural, historic, and cultural resources contained in the Monument. Establishing a baseline inventory of the biological resources and documenting the biodiversity of the Monument will inform actions for resource protection, research and exploration, climate change analysis, and education and outreach. Further, conducting a baseline inventory of the Monument’s cultural and historic resources will guide actions to preserve and expand awareness of the maritime heritage associated with the Monument. Such baseline inventories should also include a plan to track changes occurring among the Monument’s resources, and identify, avoid, and minimize threats to those resources.

IV. The Management Plan should include a scientific research, exploration, and monitoring plan

As the only permanently protected area in the U.S. Atlantic, the Monument provides a critical living laboratory and reference site for scientists to study our ocean ecosystem from surface waters to seafloor, improve our understanding of climate change impacts, and provide critical insights into ecosystem function and resource conservation. Accordingly, the Management Plan should set forth a comprehensive scientific research, exploration, and monitoring plan that includes provisions for associated funding.

This biodiversity hot spot has been a site of some exploration, investigation, and discovery for

prohibited in the monument;” 6) “Other activities that do not impact monument resources, such as sailing or bird and marine mammal watching so long as those activities are conducted in accordance with applicable laws and regulations, including the Marine Mammal Protection Act. Nothing in this proclamation is intended to require that the Secretaries issue individual permits in order to allow such activities;” 7) “Construction and maintenance of submarine cables.”); *id.* (“The prohibitions required by this proclamation shall not restrict scientific exploration or research activities by or for the Secretaries, and nothing in this proclamation shall be construed to require a permit or other authorization from the other Secretary for their respective scientific activities.”).

²⁰ See NOAA, FWS, *Hawai’i Department of Land and Natural Resources, Papahānaumokuākea Marine National Monument Management Plan, Papahānaumokuākea Marine National Monument*, 232 (Dec. 2008), <https://www.papahanaumokuakea.gov/management/mp.html>.

²¹ See 87 Fed. Reg. at 79,902.

²² See e.g., Presidential Proclamation No. 8031, 71 Fed. Reg. 36,441 (June 26, 2006) (“[T]he Secretaries . . . shall promulgate any additional regulations needed for the proper care and management of the [Monument].”); Northwestern Hawaiian Islands Marine National Monument, 50 CFR Part 404.

many years, and there is tremendous opportunity to expand upon this work.²³ In recent years, scientists from government and academic oceanographic institutions have conducted research within the Monument using remotely operated vehicles (ROVs), airplanes, ocean-going vessels, and submarines. These expeditions have confirmed the ecological significance of the canyons and seamounts and affirmed how much remains to be uncovered about these unique environments. It is estimated that only 50% of the potential species in the Monument have been documented to date.²⁴ As recently as February 2020, New England Aquarium researchers spotted two blue whales in the Monument for the first time.²⁵ This remarkable sighting occurred after three years' worth of surveys over the Monument. Such an encounter is just one example of how much more can be discovered with proper investment in research resources.



Blue whale, courtesy of Orla O'Brien, Anderson Cabot Center for Ocean Life²⁶

The Management Plan should also address the impacts of climate change on the Monument, which is a major threat to these resources.²⁷ The Management Plan should seek to identify both

²³ See e.g., U.S. Fish & Wildlife Service, *Monument-Research-and-References*, (Dec. 2, 2017), <https://www.fws.gov/media/monument-research-and-referencesxlsx>.

²⁴ See Kelly NE, et al. (Nov. 2010).

²⁵ See Orla O'Brien, Aquarium Scientists Spot Blue Whales in Monument, NEAq Aerial Survey Team (Feb. 21, 2020), <https://www.andersoncabotcenterforoceanlife.org/blog/aquarium-scientists-spot-blue-whales-in-monument-2/>.

²⁶ See *Id.*

²⁷ See e.g., Marianas Trench Marine National Monument, *Draft Marianas Trench Marine National Monument Management Plan and Environmental Assessment*, NOAA, US FWS, CNMI Department of Lands and Natural Resources, 20 (Nov. 2020), <https://www.regulations.gov/document/NOAA-NMFS-2021-0003-0001>.

direct and indirect climate change effects including increases in water temperature, ocean acidification, changes in primary productivity, sea level rise, and changes in precipitation.

Co-Trustees should ensure public access to any science, research, exploration, and monitoring conducted in the monument. Such data and discovery should be housed in a centralized location like a dedicated webpage that could serve as a repository as well as promote the dissemination of research to the public. As appropriate, the Northeast Data Portal should be among the publicly accessible portals where Co-Trustees publish Monument data and discoveries.²⁸

V. **The Management Plan should establish a comprehensive public education and outreach program**

The Monument should serve as an educational resource to connect the public with our ocean, build appreciation for its special places, and foster a sense of ocean stewardship.²⁹ The Monument offers myriad education opportunities to build on existing efforts and programs from NOAA or FWS—whether through citizen science, educational programs, volunteer opportunities, social media involvement, or more.³⁰ Because the Monument itself is difficult to physically access, the Co-Trustees should provide creative ways to connect the public to this special place. Distance learning opportunities that bring the Monument *to* communities may include live streams of future expeditions, such as replicating the viral success of the 2013 live video feed from the NOAA Ship Okeanos Explorer,³¹ developing virtual reality fieldtrips to the Monument, and sharing stories via social media. Virtual exploration could bring together scientists and the public to participate remotely and in near-real time.

The Co-Trustees should also consider how to provide for equitable opportunities to experience the Monument. It is important that any public outreach and education program be accessible and inclusive, at a minimum providing educational resources in multiple languages.³² Education and

²⁸ See Northeast Ocean Data, *Maps and Data for Ocean Planning in the Northeastern United States*, <https://www.northeastoceandata.org/> (last visited Jan. 31, 2023).

²⁹ See e.g., NOAA, *Stellwagen Bank National Marine Sanctuary; Learn*, <https://stellwagen.noaa.gov/education/> (last visited Jan. 23, 2023). (The Stellwagen Bank National Marine Sanctuary provides a regional example of a comprehensive education and outreach program.)

³⁰ See e.g., R. E. S. Reed, D. L. Payne and I. G. Babb, *Advancing Collaboration: Analysis of the Effectiveness of Research and Education Partnerships at Sea using Real-Time Technology and Professional Development*, Proceedings of OCEANS 2005 MTS/IEEE, Washington, DC, USA, 2005, pp. 1-8, doi: 10.1109/OCEANS.2005.1639973.; see also Day-Miller, E, and Payne, D., *Final Evaluation Report for NOAA Ocean Exploration and Research Professional Development Institutes*, NOAA Ocean Exploration and Research, 67 (2009); see also Martin, MJ, *Living Classrooms: Teaching ocean education through National Marine Sanctuaries*, AGU Annual Meeting, Fall, Abstract with Program ED22A-06 (2007); see also Cooper, SK, et al., *Pushing the Envelope: Ship to Shore Events and High-Bandwidth Telepresence Engages Scientists and the Public*, AGU Annual Meeting, Fall, Abstract with Program ED51E-07 (2013); see also NOAA Ocean Exploration, *Our Deepwater Backyard: Exploring Atlantic Canyons and Seamounts* (2014), <https://oceanexplorer.noaa.gov/okeanos/explorations/ex1404/background/edu/edu.html>; see also Mystic Aquarium, *Ocean Solutions*, <https://www.mysticaquarium.org/animals-and-exhibits/our-exhibits/ocean-solutions/> (last visited Jan. 23, 2023).

³¹ See NOAA, *Deep Sea Coral Research & Technology Program, 2014 Report to Congress* (2014), <https://coralreef.noaa.gov/featuredstories/2014apr/welcome.html>.

³² To ensure inclusive public access to the Management Plan, the Co-Trustees should, at a minimum, provide the Management Plan in multiple languages.

outreach programs should also prioritize serving communities that have historically not had access to nature and open spaces, and the ocean in particular.

VI. The Management Plan should establish an effective monitoring and enforcement program

The Co-Trustees should establish an effective monitoring and enforcement program to successfully protect and maintain the Monument and to ensure compliance with applicable rules and regulations. Such a program should deter unlawful activities—including through the development of significant penalties—and address any challenges in patrolling a large, remote, and ecologically sensitive area. The Management Plan should include strategies to ensure adequate year-round monitoring and enforcement across all four seasons.

To aid monitoring and enforcement efforts, Co-Trustees should utilize data collected through vessel traffic systems and other relevant technology. Importantly, vessels should be required to have automated tracking systems (AIS) turned on when transiting throughout the Monument. Co-Trustees should also establish below-surface monitoring plans to ensure successful resource protection, such as with acoustic buoys (e.g., alerting vessels of below-surface marine mammal presence).

Additionally, education and outreach are essential to achieve compliance with rules and regulations. Therefore, Co-Trustees should regularly disseminate information about the Monument, including its boundaries, monitoring and enforcement programs, and the consequences of violating the rules and regulations of the Monument (e.g., significant penalties). Further, the Co-Trustees should identify strategic partnerships with enforcement agencies such as NOAA Office of Law Enforcement, FWS Office of Law Enforcement, the U.S. Coast Guard, and any other relevant state or federal agencies to coordinate enforcement actions and share resources and information. Any existing interagency enforcement agreements should incorporate Monument rules and regulations.

VII. The Management Plan should establish an effective permitting program

The Presidential Proclamations 9496 and 10287 permit certain regulated activities to occur within the Monument (e.g., research and scientific exploration, sailing, or bird and marine mammal watching).³³ An effective permitting program for these activities, coupled with robust monitoring and enforcement programs, will help ensure compliance to effectively safeguard the Monument.

Those seeking to conduct a regulated activity within the Monument should be required to apply through the permitting program; prior to approval, Co-Trustees should demonstrate that permits will not cause significant harm to the Monument and its resources. Permit applications should also be made available for public comment for at least 15 days. Not only is a detailed, integrated permit program critical to ensure the long-term protection of the Monument, but public participation in the permitting process including permit application, evaluation, and granting is both necessary and routine.

³³ See 81 Fed. Reg. at 65,165.

VIII. The Management Plan should include a robust process for collaboration and coordination of management

As Co-Trustees of this remarkable area, FWS and NOAA must successfully coordinate to effectively manage the Monument and ensure all activities are lawfully conducted. Further, it is not only important for the Co-Trustees to successfully coordinate with each other, they must also coordinate with the numerous other relevant state and federal agencies and councils. Such coordination must address interagency coordination, including federal-agency coordination and federal-state coordination.

The Management Plan should also include a robust process for continued engagement of the public and stakeholders in management of this extraordinary public resource. The Co-Trustees should establish a multi-stakeholder Northeast Canyons and Seamounts Monument Advisory Council similar to advisory councils established for national marine sanctuaries to further promote opportunities for communities to help guide management.³⁴ Such an advisory body should have term limits and convene on a regular basis, with all meetings well publicized and open to the public.³⁵

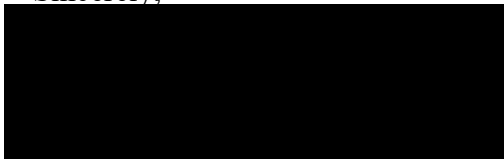
IX. The Management Plan should include a requirement to review and update the plan

An integral part of any management process is the routine review and evaluation of the Management Plan itself to ensure progress towards its goals and objectives. A formal review should occur at least every 10 years with such a review preceded by a comprehensive assessment of the status of human uses, water quality, habitat, living marine resources, cultural resources, and ecosystem services of the monument as well as enforcement of the monument's rules and regulations. This assessment should be used to inform a new draft plan that addresses the issues and threats that surface, and the draft plan should be made available for public comment before any final revisions are made. Such a review enables adaptive management and will ensure the Co-Trustees are able to nimbly address impacts from regulated activities, climate change, or other to-be-identified stressors.

* * *

We thank FWS and NOAA for the opportunity to provide these comments on the agencies' intent to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument. Thank you for considering these comments.

Sincerely,



Vice President and Director of Ocean Conservation
Conservation Law Foundation

³⁴ See NOAA, *National Marine Sanctuary Advisory Council*, <https://sanctuaries.noaa.gov/management/ac/> (last visited Jan. 31, 2023).

³⁵ See *Id.*

[EXTERNAL] Comments re intent to prepare draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument

[REDACTED]
Tue 1/31/2023 7:29 PM

To: NCSMNM Planning, FW5 <ncsmnm_planning@fws.gov>
[REDACTED]

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Dear Superintendent Petersen,

Attached, please find comments from Conservation Law Foundation regarding the U.S. Fish and Wildlife Service's and the National Oceanic and Atmospheric Administration's intent to prepare a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument.

Thank you,
[REDACTED]

[REDACTED]
Ocean Associate Attorney
Conservation Law Foundation

62 Summer Street
Boston, MA 02110

P: 617 850 1730
[REDACTED]

For a thriving New England



1/27/23, 8:27 AM

Mail - NCSMNM Planning, FW5 - Outlook



From: [REDACTED]
Sent: Tuesday, December 27, 2022 11:25 PM
To: ncsmmn_planning@fws.gov
Subject: [EXTERNAL] Northeast Canyons and Seamounts Marine National Monument Management Plan

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To:
Brittany Petersen, Marine Monument Superintendent
USFWS, 300 Westgate Center Drive
Hadley, MA 01035

I am an active USCG Licensed (100-ton Master) captain that has been fishing in the Northeast Canyons both recreationally and commercially for the past 25+/- years, and I am opposed to any management strategy or regulatory action that would negate or restrict fishing activities in the subject area beyond those which would generally apply to the other coastal and off shore waters of New England. This is not an area that receives a great amount of fishing pressure, but for those who get the opportunity to fish in these waters it represents an opportunity that cannot be replicated elsewhere. I would ask that you, Ms. Peterson, and the group making the decisions on the Northeast Canyons and Seamounts Marine National Monument Management Plan give serious consideration to the human experience and refrain from infringing upon the past and present rights of the law-abiding tax paying citizens to fish within the area now designated as the Northeast Canyons and Seamounts Marine National Monument.

Best Regards,

[REDACTED]

January 27, 2023

VIA ELECTRONIC FILING

Ms. Brittany Petersen
Marine Monument Superintendent
Northeast Canyons and Seamounts Marine National Monument
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, Massachusetts 01035

*Re: In the Matter of Northeast Canyons and Seamounts Marine National Monument;
Proposed Joint Monument Management Plan, Docket No. FWS-R5-NWRS-2022-
N062*

Dear Ms. Petersen:

We submit these comments on behalf of the North American Submarine Cable Association (“NASCA”) to urge the U.S. Fish and Wildlife Service (“FWS”) and the National Oceanic and Atmospheric Administration (“NOAA”) to propose a draft monument management plan for the Northeast Canyons and Seamounts Marine National Monument (“Monument”) that adheres to the key principles articulated in Proclamation 9496, as updated by Proclamation 10,287.¹ These principles focus on providing environmental protection for significant marine resources, recognizing that “the well-being of the United States, the prosperity of its citizens and the protection of the ocean environment are complementary and reinforcing priorities,” and further acknowledging that the U.S. continues to acknowledge the “rights, freedoms, and lawful uses of the sea” afforded under the law of the sea.² Consistent with these governing principles, the Proclamation expressly excludes from the list of prohibited activities constructing or maintaining submarine cables,³ identifying such activity as “regulated.”⁴

¹ See generally Northeast Canyons and Seamounts Marine National Monument; Proposed Joint Monument Management Plan, 87 Fed. Reg. 79,901 (Dec. 28, 2022); Proclamation No. 9496, 81 Fed. Reg. 65,159 (Sept. 15, 2016) (“Proclamation 9496”); Proclamation No. 10,287, 86 Fed. Reg. 57,349 (Oct. 18, 2021) (“Proclamation 10,287”).

² Proclamation 9496 at 65,163.

³ Proclamation 9496, “Prohibited Activities” at ¶ 5.

⁴ Proclamation 9496, “Regulated Activities” at ¶ 7.

As NASCA has demonstrated in numerous proceedings to date,⁵ and again herein, the freedoms protected under the law of the sea include the freedom to lay and maintain submarine telecommunications cables.⁶ Moreover, submarine telecommunications cables are critical infrastructure that support key economic and national security interests. As such, submarine telecommunications cables are just as essential to the well being of the United States and the prosperity of its citizens as is the protection of the ocean environment. Such cables and related activities are also intrinsically compatible with that environment goal, as telecommunications cables are environmentally neutral-to-benign, and submarine cable installation and repair activities have only negligible and transitory impacts on the marine environment and on other ocean uses. These undisputed facts should be reflected in the management plan proposed by NOAA and FWS, which should ensure that submarine telecommunications activity—which is already highly regulated—is not subject to unnecessary and burdensome regulations that prohibit, restrict, or delay related activities.

A. NASCA Represents Significant Submarine Cable Infrastructure Landing on the Atlantic Coast, Including Within the Monument Boundaries

NASCA is a nonprofit association of the principal submarine cable owners, submarine cable maintenance authorities, and prime contractors for submarine cable systems operating in North America.⁷ NASCA members' cables land in seventeen U.S. states and territories, with thousands of kilometers of installed cable traversing the Outer Continental Shelf ("OCS") on both coasts, and many more under construction or in the planning stage. Notably, NASCA's members currently own and operate trans-Atlantic submarine cables terminating on the East Coast, several of which are deployed within the monument boundaries or are immediately adjacent:

⁵ See, e.g., Comments of the North American Submarine Cable Association, Docket No. NOAA-NOS-2022-0053 (filed Aug. 8, 2022) ("Hudson Canyon Comments").

⁶ United Nations Convention on the Law of the Sea, art. 58(1), *opened for signature* Dec. 10, 1982, 1833 U.N.T.S. 397 (entered into force on Nov. 16, 1994) ("UNCLOS"). See also Proclamation No. 5030, 48 Fed. Reg. 10,605 (Mar. 10, 1983) ("Proclamation 5030") (establishing the U.S. EEZ); Proclamation No. 7219, 64 Fed. Reg. 48,701 (Aug. 2, 1999) ("Proclamation 7219") (establishing the U.S. contiguous zone).

⁷ NASCA's members include Alaska Communications System; Alaska United Fiber System Partnership; Alcatel Submarine Networks; AquaComms; AT&T Corp.; C&W Networks; Edge Network Services; EXA Infrastructure; Global Cloud Xchange; Global Marine Systems Ltd.; GlobeNet; Lumen Technologies UK, Ltd; OPT French Polynesia; PC Landing Corporation; Rogers Communications; Seaborn Networks; Southern Caribbean Fiber; Southern Cross Cable Network; Tampnet Group; Tata Communications (Americas); SubCom; Verizon; Vodafone; and Zayo Group Ltd. See Member Companies, North American Submarine Cable Association, <https://www.n-a-s-c-a.org/member-companies/>.

- ***Atlantic Crossing 1 (Segments A and C)***: connecting Germany, the Netherlands, the United Kingdom, and the United States;
- ***FLAG Atlantic-1 (North and South)***: connecting France, the United Kingdom, and the United States;
- ***Havfrue***: connecting Denmark, Ireland, Norway, and the United States;

Please refer to Exhibit A for a depiction of these cables within and near the monument boundaries. As Exhibit A demonstrates, each of these cables transit *around* the Bear, Physalia, Retriever, and Mytilus seamounts. This is consistent with submarine cable routing priorities, which seek to avoid uneven and rough terrain that can increase the risk of cable damage due to cable suspensions and abrasion. These submarine telecommunications cables are critical infrastructure, providing vital connectivity to the Eastern Seaboard and beyond.

B. Submarine Cables are Vital for the U.S. Economy, Society, and National Security

The treatment of submarine cables as a “regulated activity” in Proclamation 9496 reflects the importance of submarine cables to the U.S. economy and U.S. national security. Submarine cables, which carry approximately 99 percent of the world’s Internet, voice, and data traffic,⁸ provide higher-quality, more reliable and secure, and less expensive communications than do communications satellites. Demand for submarine cable capacity has increased considerably in recent years and continues to increase alongside the myriad activities it supports, including from global payment and financial transactions, to remote work and video conferencing, distance education, telemedicine, and government and military communications—not to mention essential social connectivity.⁹ The global nature of the Internet and the networks that operate over it mean that even communications within a domestic or local area (such as communications up and down the Eastern Seaboard) rely on submarine cable infrastructure to deliver communications and services. The mid-Atlantic and Northeast regions, moreover, serve as a vital communications hub, originating and terminating submarine cable traffic to and from more distant locations.

⁸ Doug Brake, *Submarine Cables: Critical Infrastructure for Global Communications*, Info. Tech. & Innovation Found., at 1 (Apr. 2019), <https://www2.itif.org/2019-submarine-cables.pdf>.

⁹ See e.g., Peter Neff *et al.*, *Antarctic Subsea Cable Workshop Report: High-Speed Connectivity Needs to Advance US Antarctic Science* 4–8 (Oct. 21, 2021), <https://drive.google.com/file/d/1Ao4Hz6-bBheFMpGSR4nMvSZJ9kHpjj0o/view>; International Cable Protection Committee, *ICPC Calls on Governments and Industry to Facilitate and Expedite Submarine Cable Installation and Repair During the COVID-19 Pandemic in Order to Protect Internet Connectivity and Critical Communications* 1 (Apr. 3, 2020), <https://www.iscpc.org/documents/?id=3299>.

Damage to submarine cables can pose grave risks to U.S. national security and the U.S. economy, given (a) the U.S. Government's reliance on such cables to communicate with its civilian and military personnel worldwide and with other governments and to deliver services to U.S. residents; and (b) the dollar-value of commerce conducted using submarine cables. Timely repairs are therefore critical, and maintenance providers and cable ships must be prepared to respond rapidly, with vessels on standby with qualified personnel and appropriate equipment.¹⁰

Because of the importance of submarine cables to U.S. commercial and national security interests, submarine cables have long been designated as critical infrastructure by the U.S. Government.¹¹ And, as noted above, the freedoms to install and maintain submarine cables are well-established by treaty and customary international law¹² and are protected under U.S. law.¹³ In other words, the freedoms to install and maintain submarine cables clearly are among the "rights, freedoms, and lawful uses of the sea" afforded under the law of the sea, as recognized in Proclamation 9496.¹⁴ These freedoms should be reflected in any draft management plan

¹⁰ See Kent Bressie *et al.*, Working Group 4A, Communications Security, Reliability, and Interoperability Council, Federal Communications Commission, Final Report – Protection of Submarine Cables Through Spatial Separation, at 1–2 (2014) ("CSRIC Spatial Separation Report").

¹¹ Presidential Policy Directive – Critical Infrastructure Security and Resilience, PPD-21 (Feb. 12, 2013), <http://www.whitehouse.gov/the-press-office/2013/02/12/presidential-policy-directive-critical-infrastructure-security-and-resil>; see Department of Homeland Security, Communications Sector-Specific Plan 12–14 (2010), <http://www.dhs.gov/xlibrary/assets/nipp-ssp-communications-2010.pdf>. See also Michael Matis, *The Protection of Undersea Cables: A Global Security Threat* (Jul. 3, 2012) (M.S.S. Strategy Paper, U.S. Army War College: Carlisle, PA), <https://apps.dtic.mil/sti/pdfs/ADA561426.pdf>.

¹² See UNCLOS arts. 58(1) ("[I]n the exclusive economic zone, all States . . . enjoy, subject to the relevant provisions of this Convention, the freedoms referred to in article 87 of . . . the laying of submarine cables and pipelines.") and 79(1) ("[A]ll States are entitled to lay submarine cables and pipelines on the continental shelf, in accordance with the provisions of this article."). The United States has recognized UNCLOS (other than the original deep seabed mining regime) as customary international law since 1981. Presidential proclamations by two different U.S. presidents expressly stated that the establishments of an Exclusive Economic Zone ("EEZ") and a contiguous zone, respectively, did not infringe on the high-seas freedoms to lay and repair submarine cables. See Proclamations 5030 and 7219.

¹³ U.S. law provides that damaging a submarine cable—whether deliberately or through negligence—is a federal offense punishable by fine, imprisonment, or both. 47 U.S.C. §§ 21 (willful damage), 22 (negligent damage). Submarine cable owners also have a statutory right under U.S. law to sue for damage to their cables. 47 U.S.C. § 28.

¹⁴ Proclamation 9496 at 65,163.

proposed by NOAA and FWS—not by imposing additional regulations that simply serve to hinder operations or future deployments—but by recognizing that submarine cable infrastructure and related activities are not only protected under international law, but are also compatible with the environmental protection goals of Proclamation 9496.

C. Submarine Cables are a Sustainable Ocean Use and are Neutral to Benign in the Marine Environment

The treatment of submarine cables as a “regulated activity” in Proclamation 9496 reflects that submarine cable installation and repair are compatible with a marine protected area such as a marine national monument or national marine sanctuary. Submarine telecommunications cables are a sustainable use of the oceans—and should be acknowledged as such by FWS and NOAA. As demonstrated through extensive peer-reviewed scientific research, submarine cable materials and installation and repair methods are environmentally benign and do not pose a threat to the flora and fauna of the proposed sanctuary. The submarine cable industry also has a long history of working to protect underwater cultural resources and of identifying and avoiding sensitive sites (particularly as such sites pose a risk of damage to the cables themselves), consistent with the National Historic Preservation Act.¹⁵ This would include environmentally sensitive areas, like the seamounts and canyons themselves, as is evident from the deployment of existing submarine telecommunications cables within the Monument boundaries.¹⁶

Peer-reviewed scientific research conducted by leading academic and government scientists confirms that submarine cables are neutral to benign in the marine environment. Key overview reports have consistently concluded that the environmental impact of cables is very limited and outweighed by the economic, societal, and governmental benefits they provide:

- ***UNEP-WCMC-ICPC Report 2009***: “The weight of evidence shows the environmental impact of fibre-optic cables is neutral to minor.”¹⁷

¹⁵ See generally 54 U.S.C. § 300101.

¹⁶ See also Hudson Canyon Comments at 10–14.

¹⁷ L. Carter *et al.*, *Submarine Cables and the Oceans—Connecting the World*, 30 UNEP-WCMC Biodiversity Series, ICPC and the United Nations Environment Program-World Climate Monitoring Centre at 54 (2009), https://www.unep-wcmc.org/system/dataset_file_fields/files/000/000/118/original/ICPC_UNEP_Cables.pdf?1398680911.

- ***U.N. Secretary General’s UNCLOS Report 2015***: “Submarine cables themselves are considered to have a low-carbon footprint and a small relative impact on the environment”¹⁸
- ***U.N. World Ocean Assessment 2016***: Submarine telecommunications cables “have very limited environmental impacts.”¹⁹ “A large body of knowledge already exists about the construction and operation of submarine communication cables, including how to survey environmentally acceptable routes and allow for the submarine geology.”²⁰

Ocean observatories—such as NOAA’s own MARS system, Oregon’s Ocean Observing Initiative, and Neptune in Canada—use submarine cables made from the same materials and installed using the same methods as commercial submarine telecommunications cables.²¹ Most recently, a 2020 study conducted by the Monterey Bay Aquarium Research Institute concluded that the MARS cable system in Monterey Bay “has had little detectable impact on seabed geomorphology, sediment qualities, or biological assemblages.”²²

Other research into the specific characteristics of submarine cables and related activities confirms their compatibility with environmental protection goals. Key characteristics include:

- ***Small footprint; inert materials***: Submarine telecommunications cables—which typically have the diameter of a garden hose—are made from chemically inert materials,

¹⁸ U.N. Secretary-General, *Oceans and the Law of the Sea, Seventieth Session*, ¶¶ 53–55, U.N. Doc. A/70/74 (2015), <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N15/093/76/PDF/N1509376.pdf?OpenElement>.

¹⁹ U.N. Group of Experts on the Regular Process for Global Reporting and Assessment of the State of the Marine Environment, including Socioeconomic Aspects, *World Ocean Assessment I: The First Global Integrated Marine Assessment*, pt. V, ch. 19 at 3–4 (2016) (“World Ocean Assessment I”), https://www.un.org/depts/los/global_reporting/WOA_RPROC/Chapter_19.pdf.

²⁰ *Id.* at 6.

²¹ See e.g. *Sustainable Development: Submarine Cables In The Marine Environment*, ECO Mag. (January 19, 2017), <https://www.ecomagazine.com/in-depth/featured-stories/sustainable-development-submarine-cables-in-the-marine-environment>; World Ocean Assessment I, pt. V, ch. 19 1–2; Int’l Seabed Authority (“ISA”), *Submarine Cables and Deep Seabed Mining*, 14 ISA Technical Study, 47–49 (2015), https://isa.org/jm/files/files/documents/techstudy14_web_27july.pdf.

²² L.A. Kuhn et al., *MARS Biological Survey Report: Potential Impacts of the Monterey Accelerated Research System (MARS) Cable on the Seabed and Benthic Faunal Assemblages*, Monterey Bay Aquarium Rsch. Inst., at i (2020), <http://dx.doi.org/10.13140/RG.2.2.12907.57122>.

including glass fibers, a copper core for conducting power, high-grade polyethylene sheathing, and steel wire rod for armoring in shallow-water areas. When a cable is damaged or breaks, no polluting material is released, as the cable is transmitting light on the fiber.²³ The electrical fields of submarine telecommunications cables are shielded, emitting a smaller electromagnetic field than that of a laptop computer, and do not cause disturbance to marine fauna.²⁴

- ***Minimal impact on seabed and marine fauna:*** In deep-sea areas, such as within the Monument boundaries, submarine cables rest on the surface of the sea floor. Scientific studies of submarine telecommunications cables on the continental shelf and slope have shown that there is no difference in faunal abundance and diversity near and distant from cables.²⁵ The frequencies of acoustic instruments used during submarine cable route surveys are directional and/or low energy,²⁶ and the frequency and acoustic output of instruments used for surveying in deep water are all-directional and above the hearing range of most animals. Additionally, sound from such instruments naturally attenuates over modest distances. Animals that can hear these sounds (particularly *Odontoceti*) have highly directional hearing.
- ***Low maintenance:*** Once a cable is installed, a cable operator rarely needs to access it, except in the event of a repair. The capacities of existing cables are increased by changing the electronics on shore, rather than with any new marine construction. *Nevertheless, when maintenance is required, rapid access is essential to restoring connectivity.*

²³ See, e.g., Lionel Carter *et al.*, Chemical and Physical Stability of Submarine Fibre-Optic Cables in the Area Beyond National Jurisdiction (ABNJ), Presentation at SubOptic 2019 (Mar. 3, 2019).

²⁴ See, e.g., Luana Albert *et al.*, *A current synthesis on the effects of electric and magnetic fields emitted by submarine power cables on invertebrates*, 159 *Marine Env't Rsch.* 104,958, 104,962 (2020).

²⁵ See, e.g., Lionel Carter *et al.*, Chemical and Physical Stability of Submarine Fibre-Optic Cables in the Area Beyond National Jurisdiction (ABNJ), Presentation at SubOptic 2019 (Mar. 3, 2019); Christoph Kraus and Lionel Carter, *Seabed recovery following protective burial of subsea cables - Observations from the continental margin*, 157 *Ocean Engineering* 251 (2018), <https://doi.org/10.1016/j.oceaneng.2018.03.037>.

²⁶ Richard Hale, Director, EGS Survey Group, Sounds from Submarine Cable & Pipeline Operations, Presentation before the United Nations Open-Ended Informal Consultative Process on Oceans and the Law of the Sea (Mar. 13, 2020), https://www.un.org/depts/los/consultative_process/icp19_presentations/2.Richard%20Hale.pdf.

- ***Designed to Avoid Sensitive Ecosystems:*** Submarine telecommunications cable operators prefer to install cables on flat sandy seabed and avoid natural and archaeological features that might entangle, abrade, or suspend cables or expose them to great heat and thereby increase the risk of damage.

D. Submarine Telecommunications Cable and Related Activities Are Already Regulated, and Any Management Plan Should Facilitate Submarine Telecommunications Activities Compatible with Environmental Goals

Submarine telecommunications cables are already subject to numerous federal statutes and permitting processes that ensure they are installed, operated, repaired, and maintained consistent with environmentally sound practices. Therefore, there is no need for the management plan adopted for the Monument to impose additional restrictions on the submarine cable industry—and indeed, as noted above, such restrictions would be inconsistent with the freedoms afforded under international law, confirmed by Proclamation 9496 itself. Accordingly, any regulations adopted through a management plan pertaining to submarine cable activities should facilitate those activities consistent with Proclamation 9496’s environmental goals.

A comprehensive network of federal laws operate today to protect the Atlantic Ocean’s marine environment, in particular laws such as the Endangered Species Act, the Fisheries Conservation and Management Act (the “Magnuson-Stevens Act”), the Marine Mammal Protection Act, the Migratory Bird Treaty Act, the Rivers and Harbors Act (as amended by the Outer Continental Shelf Lands Act), the National Environmental Policy Act, the National Historic Preservation Act, as well as the Antiquities Act itself.²⁷

Submarine cable owners and operators must install and repair submarine cables in compliance with these laws. Moreover, a number of these laws are implicated in submarine cable permitting processes. Such laws and processes ensure that submarine cable projects mitigate any potential impacts on fish and wildlife resources, marine mammals, endangered species, the benthic environment, cultural and archeological sites, water quality, air quality, navigation, shoreline erosion and accretion, and water supply, among other considerations. In fact, submarine cable projects are routinely authorized under these laws and regulations.

In short, submarine cable installation and repair procedures are already subject to extensive regulation and oversight, notwithstanding the fact that peer-reviewed scientific

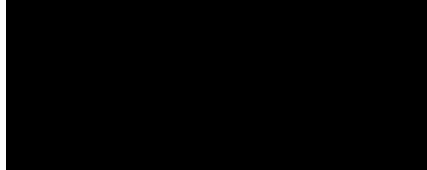
²⁷ Fishery Conservation and Management Act, 16 U.S.C. §§ 1801–1891(d); Marine Mammal Protection Act of 1972, Pub. L. No. 92-522, 86 Stat. 1027 (codified as amended in scattered sections of 16 U.S.C.); Migratory Bird Treaty Act, 16 U.S.C. §§ 703–708, 711–712; Rivers and Harbors Appropriations Act of 1899, 33 U.S.C. § 403 (amended by the Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. § 1333(e)) (“Rivers and Harbors Act”); National Environmental Policy Act, 42 U.S.C. §§ 4321–4347 (“NEPA”); Antiquities Act, 54 U.S.C. §§ 320301–320303.

U.S. Fish and Wildlife Service
January 27, 2023
Page 9

research indicates that there is little environmental impact to regulate. Consequently, NASCA believes that the need for burdensome regulation adopted pursuant to a monument management plan is neither necessary nor appropriate. Indeed, any additional regulation—to the extent it adds barriers and delays to the deployment and maintenance of submarine cables—would unnecessarily undermine the broad public interests identified in part A above. Additionally, unwarranted regulation could also deter the deployment of new submarine telecommunications cables, forcing submarine cable owners and operators to lay cables along crowded routes, as more and more areas of the OCS are designated for national marine sanctuaries (e.g., Hudson Canyon), for renewable energy leases, or other competing uses. Such cable clustering increases the risk that an incident damaging one cable—such as a cargo ship dragging an anchor, an underwater landslide triggered by an earthquake, or a malicious attack—would very likely damage multiple cables. This, of course, increases the amount of repair activity conducted in the marine environment.

For the foregoing reasons, NASCA strongly urges FWS and NOAA to propose a management plan for the Monument that does not impose unnecessary regulatory burdens on submarine cable activities within and near the Monument boundaries.

Yours sincerely,

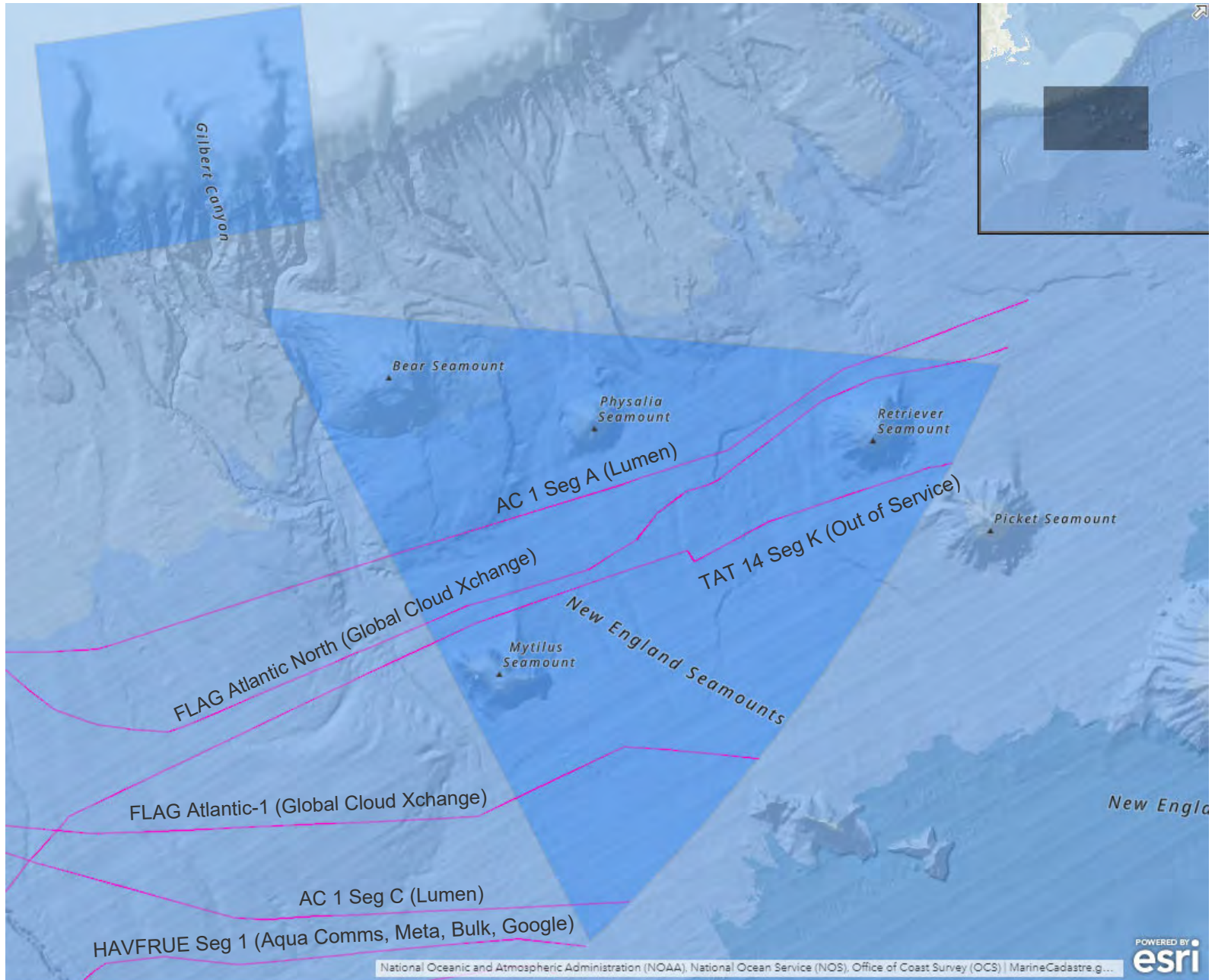


Counsel for the North American Submarine Cable Association

Attachment

EXHIBIT A:

M M Subsea Cable Overlap e



January 31, 2023

Brittany Petersen
Marine Monument Superintendent, USFWS
300 Westgate Center Drive
Hadley, MA 01035

VIA Email: ncsmnm_planning@fws.gov

Dear Ms. Peterson,

On behalf of the nation's leading zoos and aquariums, we thank you for the opportunity to comment on the intent to create a management plan for the Northeast Canyons and Seamounts. From the designation through the restoration of protections, our community has supported the conservation of this biologically productive and important marine environment, and one of science's greatest oceanic laboratories¹.

As trusted, science-backed institutions that welcome millions of visitors each year, aquariums are uniquely positioned to engage in conservation as science educators, scientific researchers, and trusted stewards. We are business leaders in our communities and help drive regional economies. We have joined together to improve the health of our nation's aquatic resources across many conservation issues, including reducing plastic pollution; protecting ecosystems and wildlife; and combating climate change while working to ensure the resilience of our communities. We are also place-based institutions connected to our communities and are mindful of the challenges we all face together.

The Northeast Canyons and Seamounts Marine National Monument is a biodiversity hot-spot, home to a diverse array of wildlife, including endangered sperm whales, sea turtles, swordfish, sharks, and colorful deep-sea corals, some of which are estimated to be centuries old. The high biodiversity is due to the spectacular geologic features of this area – canyons deeper than the Grand Canyon and seamounts higher than any mountains east of the Rockies. All of this richness is found within the boundaries of an area representing just 1.5% of the U.S. Atlantic exclusive economic zone.

When developing the management plan for this special area, we urge the Fish and Wildlife Service (FWS) and the National Oceanic Atmospheric Administration (NOAA) (referred to here as the co-trustees) to act in accordance with the principles of the America the Beautiful initiative, as described in the 2021 report, "Conserving and Restoring America the Beautiful". In particular, we recommend:

- **The management plan should include a comprehensive public outreach and education program.** The Monument is a public resource that serves as a unique opportunity for the public

¹<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/10/08/a-proclamation-on-northeast-canyons-and-seamounts-marine-national-monument/>

to connect with and build an appreciation for our deep-sea ocean ecosystems. Because the Monument itself is not physically accessible to the public, the co-trustees should provide creative ways to connect the public to this special place. For example, Mystic Aquarium is home to a replica of the monument and 3-D deepwater marine life depictions and the New England Aquarium has [hosted “virtual visits” to the Monument](#), including aerial and underwater surveys, both allowing guests to experience and be inspired by the Monument. It is important that such programs create and share accessible and inclusive educational resources in multiple languages. Additionally, education and outreach programs should prioritize serving communities that have historically not had access to nature and outdoor spaces.


- **The management plan should include a thorough process to ensure effective collaboration and coordination among the co-trustees, interested communities, and additional relevant agencies.** As co-trustees of this remarkable area, FWS and NOAA must coordinate not only with one another, but also with the communities and organizations locally and across the country that want to see robust protection of the Monument. The management plan should include a thorough process for continued engagement of the public in management of this extraordinary public resource. This engagement must include underrepresented communities of color to enhance perspectives on management, research, education, and stewardship.

Additionally,


- The management plan should include a plan to inventory the Monument’s resources as well as a monitoring, exploration and research plan.
- The Monument’s management plan should include monitoring and enforcement programs to effectively protect the unique ecological resources within the Monument, and
- The Monument’s management plan should include the development of an effective permitting program to ensure compliance with Monument rules and regulations.


We appreciate the opportunity to comment on the intent to create a management plan for the Northeast Canyons and Seamounts Marine National Monument and look forward to working with you throughout the management plan process.

Sincerely,


Chief Executive Officer
Akron Zoo


Executive Director
Arizona-Sonora Desert Museum


President And Ceo
Columbus Zoo And Aquarium


CEO And Director
Fresno Chaffee Zoo

[REDACTED]
Senior Vice President
Indianapolis Zoo

[REDACTED]
Executive Director & CEO
Kansas City Zoo

[REDACTED]
Senior Vice President, Mission Programs
Mystic Aquarium

[REDACTED]
Chief Executive Officer
National Aquarium

[REDACTED]
Chief Executive Officer
Oklahoma City Zoo

[REDACTED]
Director
Point Defiance Zoo and Aquarium

[REDACTED]
President And CEO
John G. Shedd Aquarium

[REDACTED]
President And CEO
Tracy Aviary

[REDACTED]
Executive Director
Virginia Zoo

[REDACTED]
President & CEO
Zoo New England – Franklin Park Zoo & Stone Zoo

[REDACTED]
Director
Jenkinson's Aquarium

[REDACTED]
President And CEO
The Maritime Aquarium at Norwalk

[REDACTED]
Director Of Conservation
Naples Zoo At Caribbean Gardens

[REDACTED]
President & CEO
New England Aquarium

[REDACTED]
Chief Executive Officer
Omaha's Henry Doorly Zoo & Aquarium

[REDACTED]
Chief Executive Officer
Seattle Aquarium

[REDACTED]
President And CEO
Tennessee Aquarium

[REDACTED]
Executive Director
Virginia Aquarium & Marine Science Center

[REDACTED]
Director
Wildlife Conservation Society's New York
Aquarium

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



FAST FACTS

Where is the Monument located?

130 miles off the coast of Cape Cod, Massachusetts

How large is the Monument?

3.1 million acres, approximately the size the state of Connecticut

When was the Monument established?

In 2016 through Presidential Proclamation by President Obama

What is the Monument protecting?

Four underwater seamounts & three submarine canyons

What species live in the Monument?

Sharks, whales, dolphins, jelly fishes, sea turtles, anemones, crustaceans, deep-sea fish, corals, and many more

What are your ideas or comments for the future management of the Monument?

Name:

Email:

- Research on changes in biomass within the monument and in adjacent areas, i.e. spillover
- Observers on rec fishing boats, collect data; species, size
- Monitor changes over time, changes of climate
- Enforcement needed
- Data Portal - open to public
- Education important: only Monument in NW Atlantic; amazing species in our "back yard"

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What are your ideas or comments for the future management of the Monument?

Name:



Email:

Handwritten text on lined paper:

LIMIT Recreational to
Non commercial vessels.
NO PARTY BOATS.

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



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What are your ideas or comments for the future management of the Monument?

Name: _____

Email: _____

Would be great to research:

1. endangered species

2. marine mammals

3. abundance of species

fished Outside monument

4. connectivity to other canyons.

monitoring:

1. ships & potential fishing boats in area

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



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What species live in the Monument?

Sharks, whales, dolphins, jelly fishes, sea turtles, anemones, crustaceans, deep-sea fish, corals, and many more

What are your ideas or comments for the future management of the Monument?

Name:

Email:

So great to have this special place protected!

Thank you P. Obama & P. Biden.

A handwritten signature in blue ink, appearing to be "P. Biden".

A handwritten signature in blue ink, appearing to be "P. Biden".

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



FAST FACTS

Where is the Monument located?

130 miles off the coast of
Cape Cod, Massachusetts

How large is the Monument?

3.1 million acres,
approximately the size the
state of Connecticut

When was the Monument established?

In 2016 through
Presidential Proclamation
by President Obama

What is the Monument protecting?

Four underwater
seamounts
& three submarine
canyons

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Hey instead of flying those planes,
Why not try using satellite images
to check on stuff? I know
the Ukrainians are using Maxar
technology to spot Russian positions
So maybe you can spot whales.

And why not just close it to
commercial fishing?

Oh - these Plastic Mechanical
pencils are pretty lame.
Plastic and they break when you
use them.

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Research

↳ How can we establish that the area is a nursery for marine mammals?

↳ Regular condition reports / science monitoring updates every 5 years

↳ Using this area as a control to understand fisheries pressure on unprotected Northeast Canyons

↳ surveys of Seamounts

↳ more underwater explorations

Outreach

↳ work w/ schools, aquariums & universities to make this part of the curriculum

↳ art contests

↳ social media bracket

↳ local group lecture series

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VR Technology. Record whale
sounds and put them Spotify.
The Monuments podcast.
Live stream salt water tanks.
I would like to see a live
seahorse birth. I would
like ~~some~~ someone to create
a game, similar to subnautica,
but with the monuments.
I would like a scanner
tool to discover seafloor.

I want a video that turns
back time to see the
mammoth walk the earth
at the monuments.

I think a documentary voiced
by "Halle Bailey", aka the
little mermaid, is necessary.

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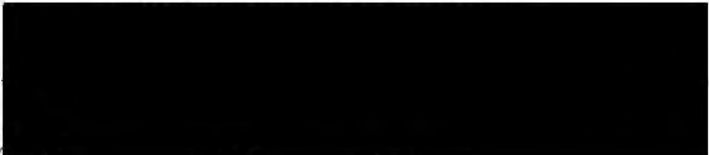
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" It is critical to provide a finer description of biodiversity, define its importance and list from smallest to largest. The seals & plants are interdependent upon each other.

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Sponsorships:

Mc Monument: A big mac w/ a fish fillet in it.

Monument Mobile: A large whale or Jellyfish car or a cellphone service

Monument Mocha: Drink at Starbucks

Monumental: Craft beer w/ Seaweed.