

United States Senate

WASHINGTON, DC 20510

September 7, 2016

Christy Goldfuss
Managing Director
Council on Environmental Quality
722 Jackson Place NW
Washington, DC 20503

Dear Director Goldfuss:

We understand that President Obama will soon designate the first national marine monument in the Atlantic Ocean. Since the Administration began to discuss an Atlantic monument a year ago, we have urged the Administration to have as open a process as possible. We have also asked the Administration to carefully consider the effects on Rhode Island's fishing industry, which has fished in the New England Coral Canyons for decades while leaving the area in a condition that environmental organizations routinely describe as "pristine".

As the President finalizes the boundaries for a monument, we write to emphasize the opportunity before him to designate an area that protects both New England's unique coral habitats and its proud fishing heritage.

While we would have preferred a more open process, we appreciate CEQ's efforts to speak with our fishermen and state experts through your meetings in Providence earlier this year and additional conversations held in Washington, DC. Over the past few months, our offices have also conducted extensive outreach to fishermen in Rhode Island who will be most significantly affected by a monument designation. The proposal put forward by the Connecticut congressional delegation has generated considerable concern about how a monument could affect the economic viability of fishing in southern New England. Though the seamount portion of the proposal poses limited effect on Rhode Island fishermen, the canyons are very challenging. If this proposal were adopted outright, lobster, squid, butterfish, Jonah crab, whiting, and other segments of Rhode Island's fishing industry would be forced out of a productive and well-managed area without recourse or compensation.

The Rhode Island Department of Environmental Management (RIDEM) estimates that over 20 active fixed gear vessels with homeports in Rhode Island fish in the area proposed by the Connecticut delegation. These vessels lay 1,000 to 2,000 traps each. Each vessel can bring in up to \$1.5 million annually in lobster and crab. In addition, around 22 mobile gear boats docked in Rhode Island fish an average of a quarter of their days at sea in the area proposed by the Connecticut delegation. Each of these boats, which include fishermen harvesting squid, butterfish, and mackerel, can produce approximately \$1 million in landings annually with some boats producing up to \$5 million in a year. Our fishermen estimated the total economic output from direct landings and associated economic activities from fishing in the proposed monument

area to be in the tens of millions of dollars. We understand these data from RIDEM and fishermen have also been shared with CEQ.

Relocation is not a realistic solution to the restrictions that come with a monument designation. Displacement of fishing effort to areas outside the monument is likely to trigger notable increases in conflict with protected species, bycatch, and among fishermen themselves.

As you know, New England's fisheries have been among the most challenged in the nation. Fishermen have contended with depleted and shifting stocks, gear restrictions, difficult quota reductions, and increased monitoring expenses. Though much of the fishing industry's frustrations with these issues has been focused on federal and state regulators, we have still seen progress in building trust between the two sides. Leadership and staff at RIDEM and NOAA's Greater Atlantic Regional Office and our fishermen have worked diligently to rebuild damaged relationships. With an emphasis on process and sound science — tenets of the President's regional ocean planning efforts — some of these wounds have started to heal.

Despite their deep misgivings about the monument designation process, our fishermen came to the table with thoughtful, reasonable ideas to utilize the Antiquities Act to maximize conservation goals while protecting an important segment of our state's economy. We have also witnessed unprecedented cooperation among fishermen and support for the work of the New England Fishery Management Council under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). However, the threat of a monument designation that inadequately reflects the input and concerns of fishermen puts all of this hard work and trust building at risk. It would be unfortunate to let the momentum building among fishermen in support of conservation go to waste by designating a monument that does not balance environmental preservation with fishing interests.

Most recently, fishermen have presented CEQ with isobaths for the coral canyons that they believe would protect deep sea corals while allowing fishermen to sustain their businesses. The proposal includes an understanding that the Massachusetts red crab fishery, which fishes deeper than the other fixed gear or mobile gear fleets, would be considered separately in any designation. It reflects the fishermen's cooperative attempt to find a balance between the MSA and Antiquities Act. Not only would this compromise guarantee limited consequences for New England fisheries, but it would also protect a majority of the marine mammal and biodiversity hotspots as identified by the researchers at the New England and Mystic Aquariums. We urge CEQ to give the revised compromise proposal offered by the fishermen sincere and full consideration.

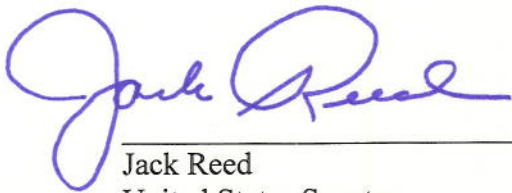
We also want to emphasize that a monument designation that gives deference to our fishermen's recommendations offers President Obama the opportunity to set a positive tone for successful fisheries management and environmental stewardship under the MSA. Indeed, it will bolster industry support for additional protections, such as the New England Fishery Management Council's Deep Sea Coral Amendment process, which the members of the fishing industry have repeatedly supported throughout the discussions of a monument. It could also build support for sustainable fishing in the region through increased investment in cooperative research, new fishermen training, electronic monitoring, and management that is capable of quickly reacting to

the changes we are seeing in our oceans, such as northward shifts in black sea bass and other valuable species.

Finally, responding to the concerns of our fishermen will honor the spirit of the regional planning process under President Obama's National Ocean Policy, which has been so successfully implemented in New England. It will leave this process intact to pay conservation dividends long into the future, producing a better conservation result rather than damaging it with what may look to participants like a breach of faith over a monuments designation.

Thank you for the serious consideration you have given to our fishermen and state experts as you develop a proposal for the President. We look forward to seeing a well-balanced monument that protects corals, marine mammals, and our fishermen for generations to come.

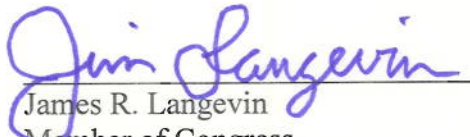
Sincerely,



Jack Reed
United States Senator



Sheldon Whitehouse
United States Senator



James R. Langevin
Member of Congress



David Cicilline
Member of Congress