

Northeast Canyons and Seamounts Marine National Monument

Final Management Plan and
Environmental Assessment



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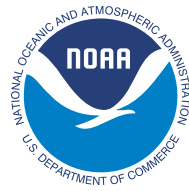


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Appendix A. Presidential Proclamation 9496, September 15, 2016

Administration of Barack Obama, 2016

Proclamation 9496—Northeast Canyons and Seamounts Marine National Monument

September 15, 2016

By the President of the United States of America

A Proclamation

For generations, communities and families have relied on the waters of the northwest Atlantic Ocean and have told of their wonders. Throughout New England, the maritime trades, and especially fishing, have supported a vibrant way of life, with deep cultural roots and a strong connection to the health of the ocean and the bounty it provides. Over the past several decades, the Nation has made great strides in its stewardship of the ocean, but the ocean faces new threats from varied uses, climate change, and related impacts. Through exploration, we continue to make new discoveries and improve our understanding of ocean ecosystems. In these waters, the Atlantic Ocean meets the continental shelf in a region of great abundance and diversity as well as stark geological relief. The waters are home to many species of deep-sea corals, fish, whales and other marine mammals. Three submarine canyons and, beyond them, four undersea mountains lie in the waters approximately 130 miles southeast of Cape Cod. This area (the canyon and seamount area) includes unique ecological resources that have long been the subject of scientific interest.

The canyon and seamount area, which will constitute the monument as set forth in this proclamation, is composed of two units, which showcase two distinct geological features that support vulnerable ecological communities. The Canyons Unit includes three underwater canyons—Oceanographer, Gilbert, and Lydonia—and covers approximately 941 square miles. The Seamounts Unit includes four seamounts—Bear, Mytilus, Physalia, and Retriever—and encompasses 3,972 square miles. The canyon and seamount area includes the waters and submerged lands within the coordinates included in the accompanying map. The canyon and seamount area contains objects of historic and scientific interest that are situated upon lands owned or controlled by the Federal Government. These objects are the canyons and seamounts themselves, and the natural resources and ecosystems in and around them.

The canyons start at the edge of the geological continental shelf and drop from 200 meters to thousands of meters deep. The seamounts are farther off shore, at the start of the New England Seamount chain, rising thousands of meters from the ocean floor. These canyons and seamounts are home to at least 54 species of deep-sea corals, which live at depths of at least 3,900 meters below the sea surface. The corals, together with other structure-forming fauna such as sponges and anemones, create a foundation for vibrant deep-sea ecosystems, providing food, spawning habitat, and shelter for an array of fish and invertebrate species. These habitats are extremely sensitive to disturbance from extractive activities.

Because of the steep slopes of the canyons and seamounts, oceanographic currents that encounter them create localized eddies and result in upwelling. Currents lift nutrients, like nitrates and phosphates, critical to the growth of phytoplankton from the deep to sunlit surface waters. These nutrients fuel an eruption of phytoplankton and zooplankton that form the base of the food chain. Aggregations of plankton draw large schools of small fish and then larger

animals that prey on these fish, such as whales, sharks, tunas, and seabirds. Together the geology, currents, and productivity create diverse and vibrant ecosystems.

The Canyons

Canyons cut deep into the geological continental shelf and slope throughout the mid-Atlantic and New England regions. They are susceptible to active erosion and powerful ocean currents that transport sediments and organic carbon from the shelf through the canyons to the deep ocean floor. In Oceanographer, Gilbert, and Lydonia canyons, the hard canyon walls provide habitats for sponges, corals, and other invertebrates that filter food from the water to flourish, and for larger species including squid, octopus, skates, flounders, and crabs. Major oceanographic features, such as currents, temperature gradients, eddies, and fronts, occur on a large scale and influence the distribution patterns of such highly migratory oceanic species as tuna, billfish, and sharks. They provide feeding grounds for these and many other marine species.

Toothed whales, such as the endangered sperm whale, and many species of beaked whales are strongly attracted to the environments created by submarine canyons. Surveys of the area show significantly higher numbers of beaked whales present in canyon regions than in non-canyon shelf-edge regions. Endangered sperm whales, iconic in the region due to the historic importance of the species to New England's whaling communities, preferentially inhabit the U.S. Atlantic continental margin. Two additional species of endangered whales (fin whales and sei whales) have also been observed in the canyon and seamount area.

The Seamounts

The New England Seamount Chain was formed as the Earth's crust passed over a stationary hot spot that pushed magma up through the seafloor, and is now composed of more than 30 extinct undersea volcanoes, running like a curved spine from the southern side of Georges Bank to midway across the western Atlantic Ocean. Many of them have characteristic flat tops that were created by erosion by ocean waves and subsidence as the magma cooled. Four of these seamounts—Bear, Physalia, Retriever, and Mytilus—are in the United States Exclusive Economic Zone. Bear Seamount is approximately 100 million years old and the largest of the four; it rises approximately 2,500 meters from the seafloor to within 1,000 meters of the sea surface. Its summit is over 12 miles in diameter. The three smaller seamounts reach to within 2,000 meters of the surface. All four of these seamounts have steep and complex topography that interrupts existing currents, providing a constant supply of plankton and nutrients to the animals that inhabit their sides. They also cause upwelling of nutrient-rich waters toward the ocean surface.

Geographically isolated from the continental platform, these seamounts support highly diverse ecological communities with deep-sea corals that are hundreds or thousands of years old and a wide array of other benthic marine organisms not found on the surrounding deep-sea floor. They provide shelter from predators, increased food, nurseries, and spawning areas. The New England seamounts have many rare and endemic species, several of which are new to science and are not known to live anywhere else on Earth.

The Ecosystem

The submarine canyons and seamounts create dynamic currents and eddies that enhance biological productivity and provide feeding grounds for seabirds; pelagic species, including whales, dolphins, and turtles; and highly migratory fish, such as tunas, billfish, and sharks.

More than ten species of shark, including great white sharks, are known to utilize the feeding grounds of the canyon and seamount area. Additionally, surveys of leatherback and loggerhead turtles in the area have revealed increased numbers above and immediately adjacent to the canyons and Bear Seamount.

Marine birds concentrate in upwelling areas near the canyons and seamounts. Several species of gulls, shearwaters, storm petrels, gannets, skuas, and terns, among others, are regularly observed in the region, sometimes in large aggregations. Recent analysis of geolocation data found that Maine's vulnerable Atlantic puffin frequents the canyon and seamount area between September and March, indicating a previously unknown wintering habitat for those birds.

These canyons and seamounts, and the ecosystem they compose, have long been of intense scientific interest. Scientists from government and academic oceanographic institutions have studied the canyons and seamounts using research vessels, submarines, and remotely operated underwater vehicles for important deep-sea expeditions that have yielded new information about living marine resources. Much remains to be discovered about these unique, isolated environments and their geological, ecological, and biological resources.

Whereas, the waters and submerged lands in and around the deep-sea canyons Oceanographer, Lydonia, and Gilbert, and the seamounts Bear, Physalia, Retriever, and Mytilus, contain objects of scientific and historic interest that are situated upon lands owned or controlled by the Federal Government;

Whereas, section 320301 of title 54, United States Code (the "Antiquities Act"), authorizes the President, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Federal Government to be national monuments, and to reserve as a part thereof parcels of land, the limits of which shall be confined to the smallest area compatible with the proper care and management of the objects to be protected;

Whereas, it is in the public interest to preserve the marine environment, including the waters and submerged lands, in the area to be known as the Northeast Canyons and Seamounts Marine National Monument, for the care and management of the objects of historic and scientific interest therein;

Whereas, 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 the United States continues to act with due regard for the rights, freedoms, and lawful uses of the sea enjoyed by other nations under the law of the sea in managing the canyon and seamount area and does not compromise the readiness, training, and global mobility of the U.S. Armed Forces when establishing marine protected areas;

Now, Therefore, I, Barack Obama, President of the United States of America, by the authority vested in me by section 320301 of title 54, United States Code, hereby proclaim the objects identified above that are situated upon lands and interests in lands owned or controlled by the Federal Government to be the Northeast Canyons and Seamounts Marine National Monument (monument) and, for the purpose of protecting those objects, reserve as a part thereof all lands and interests in lands owned or controlled by the Federal Government within the boundaries described on the accompanying map entitled "Northeast Canyons and Seamounts Marine National Monument," which is attached hereto, and forms a part of this proclamation. The Federal lands and interests in lands reserved consist of approximately 4,913

square miles, which is the smallest area compatible with the proper care and management of the objects to be protected.

The establishment of the monument is subject to valid existing rights. All Federal lands and interests in lands within the boundaries of the monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws to the extent that those laws apply, including but not limited to, withdrawal from location, entry and patent under mining laws, and from disposition under all laws relating to development of oil and gas, minerals, geothermal, or renewable energy. Lands and interest in lands within the monument not owned or controlled by the United States shall be reserved as part of the monument upon acquisition of title or control by the United States.

Management of the Marine National Monument

The Secretaries of Commerce and the Interior (Secretaries) shall share management responsibility for the monument. The Secretary of Commerce, through the National Oceanic and Atmospheric Administration (NOAA), and in consultation with the Secretary of the Interior, shall have responsibility for management of activities and species within the monument under the Magnuson-Stevens Fishery Conservation and Management Act, the Endangered Species Act (for species regulated by NOAA), the Marine Mammal Protection Act, and any other applicable Department of Commerce legal authorities. The Secretary of the Interior, through the United States Fish and Wildlife Service (FWS), and in consultation with the Secretary of Commerce, shall have responsibility for management of activities and species within the monument under its applicable legal authorities, including the National Wildlife Refuge System Administration Act, the Refuge Recreation Act, and the Endangered Species Act (for species regulated by FWS), and Public Law 98-532 and Executive Order 6166 of June 10, 1933.

The Secretaries shall prepare a joint management plan, within their respective authorities, for the monument within 3 years of the date of this proclamation, and shall promulgate as appropriate implementing regulations, within their respective authorities, that address any further specific actions necessary for the proper care and management of the objects and area identified in this proclamation. The Secretaries shall revise and update the management plan as necessary. In developing and implementing any management plans and any management rules and regulations, the Secretaries shall consult, designate, and involve as cooperating agencies the agencies with jurisdiction or special expertise, including the Department of Defense and Department of State, in accordance with the National Environmental Policy Act (42 U.S.C. 4321 *et seq.*) and its implementing regulations. In addition, the Secretaries shall work to continue advances in resource protection in the Monument area that have resulted from a strong culture of collaboration and enhanced stewardship of marine resources.

This proclamation shall be applied in accordance with international law, and the Secretaries shall coordinate with the Department of State to that end. The management plans and their implementing regulations shall not unlawfully restrict navigation and overflight and other internationally recognized lawful uses of the sea in the monument and shall incorporate the provisions of this proclamation regarding U.S. Armed Forces actions and compliance with international law. No restrictions shall apply to or be enforced against a person who is not a citizen, national, or resident alien of the United States (including foreign flag vessels) unless in accordance with international law. Also, in accordance with international law, no restrictions shall apply to foreign warships, naval auxiliaries, and other vessels owned or operated by a state

and used, for the time being, only on government non-commercial service, in order to fully respect the sovereign immunity of such vessels under international law.

Restrictions

Prohibited Activities

The Secretaries shall prohibit, to the extent consistent with international law, any person from conducting or causing to be conducted the following activities:

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.

Regulated Activities

Subject to such terms and conditions as the Secretaries deem appropriate, the Secretaries, pursuant to their respective authorities, to the extent consistent with international law, may permit any of the following activities regulated by this proclamation if such activity is consistent with the care and management of the objects within the monument and is not prohibited as specified above:

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 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.

Regulation of Scientific Exploration and Research

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.

Emergencies and Law Enforcement Activities

The prohibitions required by this proclamation shall not apply to activities necessary to respond to emergencies threatening life, property, or the environment, or to activities necessary for law enforcement purposes.

U.S. Armed Forces

1. The prohibitions required by this proclamation shall not apply to activities and exercises of the U.S. Armed Forces, including those carried out by the United States Coast Guard.

2. The U.S. Armed Forces shall ensure, by the adoption of appropriate measures not impairing operations or operation capabilities, that its vessels and aircraft act in a manner consistent so far as is practicable, with this proclamation.

3. In the event of threatened or actual destruction of, loss of, or injury to a monument resource or quality resulting from an incident, including but not limited to spills and groundings, caused by a component of the Department of Defense or the United States Coast Guard, the cognizant component shall promptly coordinate with the Secretaries for the purpose of taking appropriate action to respond to and mitigate any harm and, if possible, restore or replace the monument resource or quality.

4. Nothing in this proclamation or any regulation implementing it shall limit or otherwise affect the U.S. Armed Forces' discretion to use, maintain, improve, manage or control any property under the administrative control of a Military Department or otherwise limit the availability of such property for military mission purposes, including, but not limited to, defensive areas and airspace reservations.

Other Provisions

Nothing in this proclamation shall be deemed to revoke any existing withdrawal, reservation, or appropriation; however, the monument shall be the dominant reservation.

Warning is hereby given to all unauthorized persons not to appropriate, excavate, injure, destroy, or remove any feature of this monument and not to locate or settle upon any lands thereof.

In Witness Whereof, I have hereunto set my hand this fifteenth day of September, in the year of our Lord two thousand sixteen, and of the Independence of the United States of America the two hundred and forty-first.

BARACK OBAMA

[Filed with the Office of the Federal Register, 11:15 a.m., September 20, 2016]

NOTE: This proclamation and its attached annex were published in the *Federal Register* on September 21.

Categories: Proclamations : Northeast Canyons and Seamounts Marine National Monument, establishment.

Subjects: Commerce, Department of : Secretary; Interior, Department of the : Northeast Canyons and Seamounts Marine National Monument, establishment; Interior, Department of the : Secretary; Northeast Canyons and Seamounts Marine National Monument.

DCPD Number: DCPD201600596.

Appendix B. Presidential Proclamation 10287, October 6, 2021

Administration of Joseph R. Biden, Jr., 2021

Proclamation 10287—Northeast Canyons and Seamounts Marine National Monument

October 8, 2021

By the President of the United States of America

A Proclamation

On September 15, 2016, President Barack Obama issued Proclamation 9496 (Northeast Canyons and Seamounts Marine National Monument), which designated approximately 4,913 square miles of waters and submerged lands where the Atlantic Ocean meets the continental shelf as the Northeast Canyons and Seamounts Marine National Monument. This designation represented the culmination of nearly a half-century of conservation efforts to preserve the vulnerable deep marine ecosystems of the Atlantic canyons and seamounts, which are widely known as natural laboratories for the long-term study of benthic ecology due to their rich biodiversity of important deep-sea corals, endangered whales, endangered and threatened sea turtles, other marine mammals, and numerous fish and invertebrate species.

The monument is composed of two units, the Canyons Unit and the Seamounts Unit, each of which showcases unique geological features that anchor vulnerable ecological communities threatened by varied uses, climate change, and related impacts. As described by Proclamation 9496, the Canyons Unit includes three underwater canyons: Oceanographer, Gilbert, and Lydonia. The canyons' hard walls, which range from 200 meters to thousands of meters deep, provide important habitats for, and support the life cycles of, a diversity of ocean life, including sponges, corals, and other invertebrates; larger species such as squid, octopuses, skates, flounders, and crabs; and highly migratory oceanic species, including tuna, billfish, sharks, toothed whales (such as the endangered sperm whale), and many species of beaked whales. The larger Seamounts Unit is home to four extinct undersea volcanoes—Bear, Physalia, Retriever, and Mytilus—that form a portion of an underwater chain of more than 30 extinct volcanoes that runs from the southern side of the Georges Bank to midway across the western Atlantic Ocean. These extinct volcanoes were formed as the Earth's crust passed over a stationary hot spot that pushed magma up through the seafloor, and many of them have flat tops that were created as ocean waves eroded the cooling magma. Geographically isolated from the continental platform and characterized by steep and complex submarine topography that interrupts existing ocean currents and provides a constant supply of plankton and nutrients, the seamounts are biological islands with various substrates that form ocean oases and act as incubators for new life. All four seamounts support highly diverse ecological communities, including many rare and endemic species that are new to science and are not known to live anywhere else on Earth. Together, the monument's submarine canyons and seamounts create the unique ecological conditions necessary to support one of the Atlantic Ocean's most biologically productive and important marine environments and one of science's greatest oceanic laboratories. Proclamation 9496 recognized the undersea canyons and seamounts, the deep-sea, pelagic, and other marine ecosystems they support, and the biodiversity they contain as objects of historic and scientific interest and dedicated the Federal lands and waters within the monuments' boundaries to their protection.

To provide for the proper care and management of the monument's objects of historic and scientific interest, Proclamation 9496 directed the Secretary of Commerce and the Secretary of the Interior (Secretaries) to prepare a joint management plan and promulgate implementing regulations, as appropriate. To the extent consistent with domestic and international law, Proclamation 9496 also directed the Secretaries to prohibit certain activities within the

monument, including mineral exploration and development; the use of poisons, electrical charges, or explosives to collect or harvest monument resources; and drilling into, anchoring, dredging, or otherwise altering submerged lands. Proclamation 9496 also directed the Secretaries to prohibit all commercial fishing within the monument, but allowed the Secretaries to permit a 7 year phase-out for red crab and American lobster commercial fishing.

Despite the monument's ecological importance, wealth of objects of historic and scientific interest, and potential for additional scientific discovery, President Donald Trump issued Proclamation 10049 (Modifying the Northeast Canyons and Seamounts Marine National Monument) on June 5, 2020, to remove the restrictions on commercial fishing. Multiple parties challenged Proclamation 10049 in Federal court, asserting that it exceeded the President's authority under the Antiquities Act. Restoring the prohibition on commercial fishing will ensure that the unique, fragile, and largely pristine canyons and seamounts, and the dynamic ocean systems and marine life they support, identified in Proclamation 9496 as objects of historic or scientific interest requiring protection under the Antiquities Act, will be safeguarded and will continue to provide an important venue for scientific study and research.

The Canyons Unit and Seamounts Unit each contain interconnected oceanographic, geologic, and biologic features that create a unique oceanic system that supports an abundant concentration of biodiversity. These features' close proximity to each other results in an interdependent whole that exceeds the sum of its constituent parts.

In the case of the Canyons Unit, the monument boundary closely corresponds to a contiguous continental shelf break area around the heads of the three canyons, which extend seaward from features that have not yet fully taken on the distinctive canyon shape, to the walls and valleys of the canyons themselves, and out to the start of the outer shelf thousands of meters below. Within this transitional region, the walls of the three closely situated canyons combine with ocean currents, temperature gradients, eddies, and fronts to create significant and complex nutrient cycling and other processes that result in a biologically rich and distinct oceanic system. The Canyons Unit is sized to correspond to and protect these large-scale oceanic processes that provide the foundation for the distinct habitat that supports numerous objects of scientific interest. For example, the shallower depths of the canyons include ecologically significant and vulnerable habitat for tilefish, which function as ecosystem engineers by creating "pueblo" habitat at depths of 100 to 300 meters in the monument's canyons, which in turn supports a diversity of fish and invertebrate species. The Canyons Unit also supports a great abundance of marine mammals and other upper-trophic level predators attracted to the prey abundance fostered by the Canyons Unit's unique marine landscape. Due to the close proximity of the three canyons to one another, congregating marine mammals and pelagic fish species routinely transit the inter-canyon areas while foraging among the biologic abundance found there. This is an example of the important ecological linkages that connect the monument's various topographies, the surrounding shelf, and the water column above them, which necessitate protection of the entire interrelated system.

In the case of the Seamounts Unit, the boundary encompasses the four seamounts and the areas between the edges of Bear and Retriever Seamounts on the north side, Bear and Mytilus Seamounts on the south side, and out to the boundary line of the Exclusive Economic Zone on the east side. These four seamounts, rising thousands of feet from the surrounding seafloor, are the only seamounts located within U.S. Atlantic waters. As with the Canyons Unit, the proximity of these important geologic features to each other influences the currents, upwelling, stratification, and mixing that make the species and habitat within the monument so diverse, abundant, and unique. The seamounts function as oases in the open ocean environment and feature distinct ecological communities as they grade down from the relatively shallow seamount peaks to the abyss below. They are critical to protecting the ecosystem linkages that transport nutrients to the surface through predator-prey interactions and temperature-driven upwelling, and transport

organic carbon to deep-sea ecosystems (corals and benthic communities) through plankton and fecal detritus, downwelling materials, down-slope currents, and animal migration and mortality.

The boundaries of the monument reflect the need to protect the canyons, seamounts, and the attendant deep-sea, pelagic, and other marine ecosystems, which are themselves objects of historic and scientific interest, as well as the complex geologic, oceanographic, and biologic characteristics in the Canyons Unit and Seamounts Unit. The monument ensures these vulnerable marine ecosystems are safeguarded and will remain the great ocean laboratories recognized in Proclamation 9496. The boundaries are closely hewn to prominent geologic objects that form the foundation of closely linked habitats, which support the monument's great abundance and diversity of life. The boundaries are scaled to avoid cascading negative effects from failing to protect parts of these complex and interconnected marine environments and their unique oceanographic processes. In order to ensure effective management and protection of the objects of historic and scientific interest, straight-line coordinates are used where possible to provide clear and enforceable demarcation of this open-ocean monument. For these reasons, Proclamation 9496 found that the lands owned or controlled by the Federal Government within the monument's boundaries were the smallest area compatible with the proper care and management of the objects of historic and scientific interest designated for protection.

Commercial fishing activity has the potential to significantly degrade the monument's objects of historic and scientific interest. Bottom-contact fishing gear and fixed fishing gear (for example, traps, gillnets, and bottom and pelagic long-line gear) with buoys, submerged lines, and associated traps, mesh, or hooks, all pose threats to the canyons and seamounts, the ecosystem, and the deep-sea, pelagic, and other marine life they support, as well as the additional objects of historic and scientific interest contained therein. Although statutes such as the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 *et seq.*, the Endangered Species Act, 16 U.S.C. 1531 *et seq.*, the Migratory Bird Treaty Act, 16 U.S.C. 703–712, the National Wildlife Refuge System Administration Act, 16 U.S.C. 668dd–668ee, the Refuge Recreation Act, 16 U.S.C. 460k *et seq.*, the Marine Mammal Protection Act, 16 U.S.C. 1361 *et seq.*, the Clean Water Act, 33 U.S.C. 1251 *et seq.*, the Oil Pollution Act, 33 U.S.C. 2701 *et seq.*, the National Marine Sanctuaries Act, 16 U.S.C. 1431 *et seq.*, and Title I of the Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act), 33 U.S.C. 1401 *et seq.*, provide important safeguards that did not exist prior to the Antiquities Act's passage, these laws do not adequately address the threats facing the canyons and seamounts and their surrounding ecosystem. The prohibition on commercial fishing confers necessary, additional, and lasting protections for the objects of historic and scientific interest in the Northeast Canyons and Seamounts Marine National Monument for current and future generations.

Protection of the Northeast Canyons and Seamounts as a marine national monument preserves significant geological features, marine biota, and deep-sea, pelagic, and other marine ecosystems that the canyons and seamounts create and support as they interact with ocean currents, ensuring that the natural and scientific values of this area are maintained for the benefit of all Americans and for the discovery of new information about living marine resources for years to come.

Whereas, section 320301 of title 54, United States Code (the "Antiquities Act") authorizes the President, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Federal Government to be national monuments, and to reserve as a part thereof parcels of land, the limits of which shall be confined to the smallest area compatible with the proper care and management of the objects to be protected; and

Whereas, Proclamation 9496 designated the Northeast Canyons and Seamounts Marine National Monument in the Atlantic Ocean and reserved approximately 4,913 square miles of water and submerged lands in and around certain deep-sea canyons and seamounts situated upon lands and interests in lands owned or controlled by the Federal Government as the smallest area compatible with the proper care and management of objects of historic and scientific interest; and

Whereas, Proclamation 10049 modified the conditions of the Northeast Canyons and Seamounts Marine National Monument to allow commercial fishing activities, which could impact monument objects; and

Whereas, I find that the resources identified above and in Proclamation 9496 are objects of historic or scientific interest in need of protection under the Antiquities Act; and

Whereas, I find that the unique nature of the waters and submerged lands that make up the marine environment in the Northeast Canyons and Seamounts area and the collection of objects and resources therein make the entire area within the boundaries of the monument an object of historic and scientific interest in need of protection under the Antiquities Act; and

Whereas, I find that there are documented threats to the objects identified above and in Proclamation 9496; and

Whereas, I find that the objects identified above and in Proclamation 9496 are not adequately protected by applicable law and other administrative designations; and

Whereas, I find that the boundaries of the monument reserved by Proclamation 9496 represent the smallest area compatible with the proper care and management of the objects of historic or scientific interest; and

Whereas, it is in the public interest to ensure the preservation and protection of the objects of historic and scientific interest in the Northeast Canyons and Seamounts Marine National Monument;

Now, Therefore, I, Joseph R. Biden Jr., President of the United States of America, by the authority vested in me by section 320301 of title 54, United States Code, hereby proclaim that, in order to provide for the proper care and management of the objects identified above and in Proclamation 9496, management of lands and interests in lands owned or controlled by the Federal Government within the Northeast Canyons and Seamounts Marine National Monument shall be governed by the management provisions of Proclamation 9496. Such provisions include paragraph 6 in the section entitled "Prohibited Activities" and paragraph 5 in the section entitled "Regulated Activities," which provide for the prohibition of all commercial fishing in the monument, except for red crab and American lobster commercial fishing, which may be permitted until September 15, 2023.

The Secretary of Commerce, through the National Oceanic and Atmospheric Administration, and the Secretary of the Interior, through the United States Fish and Wildlife Service, share management responsibility for the monument, as prescribed in Proclamation 9496. Within their respective authorities, the Secretaries shall prepare a joint management plan for the monument by September 15, 2023, and, as appropriate, shall promulgate implementing regulations that address any further specific actions necessary for the proper care and management of the objects and area identified above and in Proclamation 9496.

To the extent any provision of Proclamation 10049 is inconsistent with this proclamation or Proclamation 9496, the terms of this proclamation and Proclamation 9496 shall govern.

Warning is hereby given to all unauthorized persons not to appropriate, excavate, injure, destroy, or remove any feature of this monument and not to locate or settle upon any lands thereof.

If any provision of this proclamation, including its application to a particular parcel of land, is held to be invalid, the remainder of this proclamation and its application to other parcels of land shall not be affected thereby.

In Witness Whereof, I have hereunto set my hand this eighth day of October, in the year of our Lord two thousand twenty-one, and of the Independence of the United States of America the two hundred and forty-sixth.

JOSEPH R. BIDEN, JR.

[Filed with the Office of the Federal Register, 8:45 a.m., October 14, 2021]

NOTE: This proclamation was published in the *Federal Register* on October 15.

Categories: Proclamations : Northeast Canyons and Seamounts Marine National Monument.

Subjects: Environment : Conservation :: Promotion efforts; Northeast Canyons and Seamounts Marine National Monument.

DCPD Number: DCPD202100836.

Appendix C. Joint Statement of Intent for Management of the Northeast Canyons and Seamounts Marine National Monument

Joint Statement of Intent for Management of the Northeast Canyons and Seamounts Marine National Monument

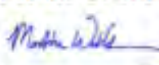
This Joint Statement of Intent will provide a framework for cooperation and coordination between the U.S. Fish and Wildlife Service's National Wildlife Refuge System (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) in the protection, stewardship and associated management of the Northeast Canyons and Seamounts Marine National Monument (NCSMNM). We recognize that the authorities and responsibilities of both agencies are consistent with and supportive of the protection of the NCSMNM. We have reached a mutual understanding and it is our expectation that we will take the following steps:

1. To carry out our mutual intent to establish coordinated management and regulation of the NCSMNM through development of a collaborative and integrated management plan and permitting process for the NCSMNM;
2. To consult with each other on plans and outcomes of science and management activities regarding the species and habitats of the NCSMNM. In the spirit of cooperative management, both parties agree to regularly review and discuss research and management actions, taking into consideration the mission of both agencies, as well as respective compliance and regulatory requirements;
3. To facilitate scientific exploration and research activities within the NCSMNM;
4. To steward the story of the NCSMNM and share it with the American public.
5. To clarify that scientific or management activities undertaken by either party within the Monument are not subject to any additional requirements or authorization from the other agency, except that both parties agree to adhere to agency requirements that pre-date Monument creation.

Nothing herein is intended to conflict with any Federal law, regulation or policy. The signature of this Joint Statement of Intent does not constitute a financial obligation. NOAA and the USFWS will manage and use their own funds in carrying out their responsibilities in the NCSMNM. No funds will be transferred pursuant to this agreement.

This Joint Statement of Intent will become effective upon signature and will remain in effect until terminated by written notice from any party.

For the U. S. Fish and Wildlife Service:


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MARTHA WILLIAMS
Date: 2022.05.11
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Martha Williams
Director U.S. Fish and Wildlife Service

WENDI
WEBER
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For the National Oceanographic and
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Michael Pentony
NMFS Regional Administrator – Greater
Atlantic

Appendix D. Public Scoping Key Takeaways Report

Northeast Canyons and Seamounts Marine National Monument Management Plan Public Scoping Key Takeaways

Prepared by Kearns & West

For the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration

April/2023



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Introduction and Structure of this Report

Kearns & West (K&W) was contracted by the Department of the Interior’s Office of Collaborative Action and Dispute Resolution to facilitate public scoping meetings and assist with coding and categorizing statements received through public scoping sessions and the public written submissions for the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration’s (NOAA’s) [Notice of Intent](#) to draft a management plan for the Northeast Canyons and Seamounts Marine National Monument. The Notice of Intent was published on December 28, 2022. This report integrates two sets of statements from the public scoping process:

- 1) Written submissions in response to the Notice of Intent, published on December 28, 2022, and open until January 31, 2023.
- 2) Oral statements and written comment cards made during the four public scoping sessions that the USFWS and NOAA held on December 6th, 9th, 12th, and 19th of 2022.

Throughout this document, a statement is referred to as a thought expressed by any individual or group through a written letter submitted in response to the Notice of Intent or a verbal statement made in the public scoping sessions. Written letters submitted were comprised of multiple statements. In all, 458 unique statements that expressed a recommendation or suggestion were identified from the written sources and 307 from verbal statements from public meetings. The project team categorized and organized these statements into overarching summaries called key takeaways throughout this document. The table below summarizes the submissions and statements the project team analyzed for this report to develop the key takeaways.

Table 1: Types of Submissions and Statements

Type of Written Submissions and Statements Summarized	Count of Written Submissions and Statements
Form Letter Submissions or largely form letters (Non-Unique Responses)	949
Total Unique Response Letter Submissions (some with attachments): includes individual letters (11), letters with multiple signatories (11)	22
Written Submissions from Comment Cards from Public Scoping Meetings	10
Written Statements Summarized from all written sources	458
Oral Statements Summarized and Public Scoping Attendees	Count of Oral Statements and Participants
Oral Statements Summarized from the Public Scoping Meetings	307

Number of Attendees in Public Scoping Meeting	117 (58 in-person, 59 virtual)
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There are 981 written submissions, including comment cards and written letters responding to the Notice of Intent. These included 949 submissions attributed as form letters (from one master form letter). The USFWS identified these letters as letters with identical content to the master form letter. Next, the project team reviewed 32 written letter submissions and 10 comment card submissions that were filled out at public scoping meetings for any unique statements. From these sources, the project team identified 458 unique written statements and 307 verbal statements that have been summarized into key takeaways in the following sections.

The submissions received were analyzed by identifying individual recommendations or statements, which were then sorted and thematically grouped into the 3 overarching categories that divide this document (Communication and Community Engagement, Monument Uses, and Best Practices for the Management Plan). The K&W project team then grouped similar statements and created descriptive summaries of the statement groupings, called key takeaways. Key takeaways were developed for statement categories with four or more similar statements. When statements related to a key takeaway were diverse in nature, the K&W project team included more detailed lists of suggestions from the written and verbal responses/submissions (for instance, for organizations that respondents suggested partnering with for the Management Plan process, we received many unique suggestions that are included as a list). Under each category, the project team identified key takeaways (39), which are numbered with bulleted examples of quotes that illustrate the takeaway.

While this report focuses on capturing recommendations for the Management Plan heard throughout the public scoping process, individuals also shared ideas, opinions and analyses that were not themselves recommendations. This report does not reference every statement included in every written or verbal response in this report. This report is meant to summarize the key takeaways and recommendations from the written submissions and verbal statements and provide examples that illustrate them. To read the verbatim written submissions and paraphrased verbal statements, please see the Scoping Meeting Supporting Documentation.

Key Takeaways: Recommendations and Suggestions from the Public Scoping Process

Communication and Community Engagement:

Communication

Key takeaways and example statements on how to communicate about the Monument Management Plan or how to distribute new information about the Monument (including research findings, etc.)

- 1) **Social media should be used as a platform for sharing visuals, videos, and stories to more effectively connect with a broad audience who may not be able to access the Monument directly.**
 - *[From an oral statement]: More social media content – a creature of the week, space for people to upload photos from the Monument (citizen science), think social media is a way to interact with younger audiences.*

- **[From an oral statement]:** Connect with the audience through social media - use visuals to draw people in, then connect them to a website or similar page with more in-depth information.
 - **[From an oral statement]:** Volunteer conservation is difficult for people to understand. What can work? Featuring the Monument on mainstream social media and involving celebrities like Ariana Grande. Using social media like reels featuring visuals, and submersible footage, creating quick viral clips like the Alvin remotely operated vehicle (ROV), or Ocean X which featured an octopus feeding.
- 2) Research findings and visuals should be made publicly accessible.**
- **[From a written submission]:** "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."
 - **[From a written submission]:** "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."
 - **[From an oral statement]:** Perhaps dispersing the videos and photos to universities to assist in education? Possible partnership opportunity.
 - **[From an oral statement]:** GIS information to be shared for grad students and other scientific projects.
 - **[From an oral statement]:** Photos and videos will be the way to connect people to the Monument and conduct research. Having plans in place for how to share photos and videos publicly.
 - **[From an oral statement]:** Transparency about who is funding the research.
 - **[From a written submission]:** "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."
- 3) The Management Plan should use a variety of communication methods to share information, especially regularly distributed newsletters.**
- **[From an oral statement]:** Use e-mail and newsletters to contact people interested in hearing about the Monument.
 - **[From an oral statement]:** Getting on different newsletter lists. This has worked for SubCom to reach out to a broader audience. Attend public/community events/tabling.
 - **[From an oral statement]:** Monthly update or newsletter on Management Plan changes and important topics discussed about the Monument.
 - **[From an oral statement]:** Connect through as many avenues as possible. Newsletters, news articles, social media outlets, blogs, archive information that is shared, it's easily found. Newspapers...short attention span of people, short films...almost like click bait to get people to visit your website. Short so they don't overwhelm people.

4) **The Management Plan should consider integrating the following key messages:**

- **[From a written submission]:** “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.”
- **[From a written submission]:** “I am assuming that the draft plan will initially be integrated into a NEPA Environmental Impact Statement (EIS) for public review, most federal agencies do with their own wildlife refuge, parks, and forest plans. 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.”
- **[From a written submission]:** “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.”
- **[From an oral statement]:** Communicate its preservation. Promoting healthy species, fishes, etc.
- **[From an oral statement]:** Explaining the Monument in a more public understandable aspect, like comparing it to a "national park."
- **[From a written submission]:** “This plan should speak in marine scientific and conservation terms NOT uses, traditional or otherwise.”
- **[From an oral statement]:** The current conditions are not a baseline; what it's like now has already been affected by fishing, climate change, etc. Need to convey that message. But more of how we can move forward from now.

Community Engagement

Key takeaways and supporting statements on engaging, educating, and conducting outreach with the public about the Monument.

1) **Because the Monument is physically inaccessible to most people, the Management Plan should develop creative ways for the public to visualize the wonders of this place and create a sense of connection to it. Ideas for creative engagement include publicly available live streams, virtual reality, podcasts, online videos, and webinars.**

- **[From a written submission]:** “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.”
- **[From a written submission]:** “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, developing virtual reality field trips 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.”

- **[From a written submission]:** “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.”
- 2) **In addition to social media and virtual engagement opportunities, the Management Plan should create in-person, physical spaces that people can visit to connect with the Monument, including permanent and pop-up exhibits and in-person lecture series.**
- **[From a written submission]:** “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.”
 - **[From a written submission]:** “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 the Monument, as if they were visiting it in person. Even though the experience would not be physically located in the Monument, it would help people understand the value of protecting a nearby ecosystem intimately connected to the species found in more familiar coastal waters. Finally, the agencies should promote existing Monument exhibits and encourage or support the creation of additional exhibits in informal and formal education settings alike (e.g., Aquariums, public schools).”
 - **[From an oral statement]:** Offering free, pop-up experiences that are accessible, like being free for the public. Somewhere where people can walk in and walk out, nice and easy.
 - **[From an oral statement]:** Different footage displays located for people around the city. Travel exhibits at Train Stations like Penn Station or South Station.
 - **[From a written submission]:** “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.”
 - **[From an oral statement]:** Going in person to fishery management councils, schools, and interested organizations and answering questions is the most effective way to reach people. Provide information and let them voice their opinion. Two-way conversations.
- 3) **The Management Plan should use public art to inspire a sense of connection to this special place. This can include art content, public art installations, and traveling art exhibits.**
- **[From an oral statement]:** Art Community – example – NH artist displayed Gulf of Maine Habitat through art. Another art example – A local sanctuary showed a habitat through music via orchestra mimicking whale movement.
 - **[From an oral statement]:** Also, do a kid’s art/poetry contest to engage the next generation in the beauty of the ocean. Traveling art exhibit that goes to aquariums, thinking outside the box, and maybe even hair studios to talk about plastic reductions (Oceana example). Go way beyond the regular partners; we always tap into the same ocean-loving groups.
- 4) **The Management Plan should educate people on the natural and archeological history of the Monument.**
- **[From an oral statement]:** Very interested in video (especially for things like the mammoth skull found in the Monument). Has other archaeological/historical seafloor seabed

exploration been contemplated? Is there a way to connect these places with things people are familiar with on land?

- **[From a written submission]:** “I want a video that turns back time to see the mammoths walk the Earth in the Monument.”
- **[From an oral statement]:** Need to recognize the amount of history related to the Monument. The Soundings author (Maria ?) is a geologist associated with mapping the deep sea. Connecting the discovery and mapping of canyons and their history of it needs to be brought to life. Connect with schools and students to ensure history is not forgotten.

5) Engagement efforts should reach youth and the next generation of leaders through educational curriculums and other methods.

- **[From an oral statement]:** Create formal and informal education content - have students learn about Monuments in their courses.
- **[From a written submission]:** “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 expedition live streams, post-expedition educational videos, cultural awareness and connection activities, creation of curriculum and outreach materials, and storytelling.”
- **[From an oral statement]:** Youth groups and youth climate change groups, especially high school students, to champion and support climate change goals. Public and next generations' support is crucial.
- **[From an oral statement]:** Also, do a kid’s art/poetry contest to engage the next generation in the beauty of the ocean.
- **[From written submission]:** “Develop marine science education for younger grade students K-12.”
- **[From an oral statement]:** Create formal and informal education content - have students learn about Monuments in their courses.
- **[From a written submission]:** “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.”

6) The Management Plan should take proactive steps to ensure that engagement reaches traditionally excluded communities. This includes developing accessible, multi-lingual materials, ensuring that engagement opportunities are well publicized, and ensuring that low-income communities are served.

- **[From a written submission]:** “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.”
- **[From an oral statement]:** Going into lower-income schools they don't get the chance to see places like this. Have someone be the face of it. Have it where you can spark that interest.

- **[From written submission]:** “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.”
- **[From a written submission]:** “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. Education and outreach programs should also prioritize serving communities that have historically not had access to nature and open spaces, and the ocean in particular.”
- **[From a written submission]:** “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. 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. We recommend that the Management Plan prepare accessible public education initiatives like the examples in the Papahānaumokuākea Marine National Monument (PMNM) and associated funding mechanisms to support these education and outreach initiatives... The agencies must ensure 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. 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 live streaming or tracking of research cruises.”
- **[From a written submission]:** “Engage under-represented communities of color in Monument focused activities and in all opportunities to enhance perspectives on management, research, education, and stewardship.”
- **[From a written submission]:** “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 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.”

Potential Partnerships

Statements on potential partnerships for managing the Monument.

1) **The Management Plan should develop partnerships with schools, universities, and aquariums to develop a robust public education component.**

- **[From a written submission]:** “Work with schools, aquariums, and universities to make this part of the curriculum.”
- **[From a written submission]:** “CLF recommends the Management Plan contain: 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.”
- **[From a written submission]:** “The Northeast Canyons and Seamounts Marine National Monument Management Plan should include a robust public education and outreach component.”
- **[From an oral statement]:** Regarding physical exploration. There was huge support for the Monument; keep up the support by engaging the public physically in science communities, schools, aquariums, videos, exhibits, and research trips for students potentially using retired functioning vessels.
- **[From an oral statement]:** New England has so many universities. You could get a lecture tour going as an initial public outreach to get to college students. Include stunning visuals and stories from the scientists. Reach out to those college students. There is also the Massachusetts Marine Educators Association - is there a New England or National counterpart or similar organization?
- **[From a written submission]:** “The New England and Mystic aquariums have already been engaged in the Monument for years and provide ideal opportunities for education and outreach partnerships.”
- **[From an oral statement]:** Additional partnerships should include universities to help with research activities and use their facilities for education and outreach.
- **[From an oral statement]:** High school/middle schools from more landlocked areas could visit Monuments or nearby areas.
- **From an oral statement]:** New England has an unparalleled number of academic institutions with environmental science programs, if not marine science programs. Monument should connect with those programs, so they know about this asset in their backyard.
- **[From an oral statement]:** Partnerships with regional aquariums should be amplified and formalized.
- **[From an oral statement]:** The small and large marine research facilities in New England should be included as partners. Examples are the Gulf of Maine Research Institute, Bigelow Laboratory for Ocean Sciences, Seacoast Science Center, and Manomet. If not research then public education and outreach, aquariums (like New England Aquarium and Mystic). Partners to bring the Monument alive to the public.
- **[From a written submission]:** “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.”

2) **The Management Plan should develop a multi-stakeholder advisory council.**

- **[From a written submission]:** “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 promote further opportunities for communities to help guide management. Such an advisory body should have term limits and convene on a regular basis, with all meetings well publicized and open to the public.”
 - **[From an oral statement]:** Office of National Marine Sanctuaries have advisory bodies - it would be helpful to have an advisory body to help inform management and partnerships.
 - **[From an oral statement]:** A shareholder advisory body or council. One where individuals serve terms and have max terms to promote more representation of all communities. Giving communities voices who historically had no access to planning.
 - **[From a written submission]:** “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.”
- 3) The Management Plan should explore partnerships with commercial fishermen to support research.**
- **[From an oral statement t]:** Potential partnership with commercial fishermen; downtime vessels collect offshore wind data. The Monument could use fishing vessels for oceanographic or biological research.
 - **[From an oral statement]:** Collaborative studies are happening with the fishing industry. When fishing is pushed out, collected data will be lost (NOAA holding).
 - **[From an oral statement]:** Commercial Fisheries Research Foundation RI (CFRF) & Cornell Extensive Group, NMFS cooperative research.
 - **[From an oral statement]:** Use the ecological knowledge from the fishermen and continue a working relationship with NMFS to help with research.
 - **[From an oral statement]:** John Williams has been there for a while. Not unusual for a fishery to do its own science. You can't do science without the fishing.
 - **[From an oral statement]:** I advocate for healthy ecosystems and oceans. Company wise: Fishermen want healthy ecosystems; we believe in balance. The ocean is getting so much smaller and so fast. We should look at how we can work together (companies, NGOs, and fishery management councils).
 - **[From an oral statement]:** Anna Mercer is heavily involved with the Northeast Region's cooperative research. The application and process are easy as vessels apply through and involve SK Grant or bycatch reductions.
- 4) The Management Plan should ensure inter-agency coordination and collaboration, including with enforcement agencies.**
- **[From a written submission]:** “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 protections for the Northeast Canyons and Seamounts Marine National Monument for generations to come.”

- **{From an oral statement}**: Do the agencies have to reimburse each other for activities/monitoring, etc.? There needs to be partnerships and clarity for budgetary development for research and stewardship of this place. Need to build the program from a project management perspective and identify the costs needed to implement activities.
- **[From a written submission]**: “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.”
- **[From a written submission]**: “Further, the Co-Trustees should identify strategic partnerships with local enforcement agencies to coordinate enforcement actions and share resources and information.”
- **[From a written submission]**: “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.”
- **[From a written submission]**: “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.”

5) The Monument Plan should consider developing partnerships with the following specific participant named organizations and stakeholder groups:

- National Science Foundation
- Center for Coastal Studies (Providence, RI)
- Woods Hole Oceanographic Institute
- Ocean Life Institute at Woods Hole
- University of Rhode Island Marine program
- Conservation Law Partners
- Massachusetts Environmental Justice Councils
- National Marine Life Center
- New England Aquarium
- National Marine Life Center
- Commercial Fisheries Research Foundation
- Cornell Cooperative Extensive
- Gulf of Marine Research Institute
- Bigelow Laboratory for Ocean Sciences
- Seacoast Science Center
- Manomet
- Gulf of Maine Research Institute
- Joint Area of Operations (JAO) Offices

Uses of the Monument:

Suggested Uses

Statements concerning currently prohibited uses that respondents would like to see revised or reconsidered in the Management Plan.

1) The commercial fishing industry believes that the Monument Plan should include commercial fishing as a permitted use.

- **[From a written submission]:** "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 lose them so a great deal of effort is put into estimating where bad weather may have dragged them. Point being a lost trap or trawl is far from ignored. I want to make the respectful point that while I am all for National Parks and properly managed conservation, let's NOT lock the Offshore Lobstermen out of one of their most productive areas as they pose no risk to conservation of area."
- **[From a comment card]:** Are you allowed to reconsider prohibited activities or further restrict activities in the Monument? Or if it's found that fishing does not impact certain activities, could that be allowed in the future? There are a lot of needs that need to be balanced and need to be scientific about determining future prohibitions/allowances.
- **[From a written submission]:** "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."

Recreation

Statements on the role of recreation, needs for recreation planning in the Monument.

1) The Management Plan should consider the impacts of recreational fishing compared to commercial fishing. The Management Plan should include, at minimum, a monitoring plan for recreational fishing, but may consider banning recreational fishing entirely.

- **[From an oral statement]:** It would be nice to know what recreational fishers are taking... Volume, species, frequency, sizes, bycatch, bycatch mortality.
- **[From an oral statement]:** Can stop dragnets, pull traps, everything will be more abundant - if you stop all of that, you have to stop it for everyone, all or nothing ban on fishing.
- **[From an oral statement]:** Concerns about the impact of recreational fishing (tying up to the commercial buoys, big carbon footprint, debris in the water, engine noise/air pollution, etc.). Specifically, from tournament weekends and the big boats that come along with that. Consider prohibiting recreational fishing as well.
- **[From an oral statement]:** If it can't be phased out - could there be observers, especially on for-profit fleets... could look at hooking

Exploration

Statements on what should be explored in the Monument.

- 1) **The Management Plan should inventory, identify, and minimize impacts on cultural, historical, archaeological, and natural resources within the Monument.**
 - **[From a written submission]:** *“The Co-Trustees should undertake comprehensive inventories of the natural, historic, and cultural resources contained in the Monument.... 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.”*
 - **[From a written submission]:** *“The Monument Management Plan should include research and planning to encompass any historical and cultural heritage both in educational initiatives and in permitted uses of the Monument 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.”*
 - **[From a written submission]:** *“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 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.”*
 - **[From a written submission]:** *“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.”*
- 2) **The Management Plan should include exploration resources and a plan for surveying and mapping the topography and other geological features of the Monument.**
 - **[From an oral statement]:** *There is lots to explore with the unique topography of major geological features and the canyon’s drop off areas.*
 - **[From a comment card]:** *Seamounts may be viewed differently than canyons.*
- 3) **The Management Plan should explore identifying and mitigating impacts to the Monument, including impacts from climate change, and exploring long-term benefits to this protection.**
 - **[From a written submission]:** *“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.”*
 - **[From a written submission]:** *“[Organization] 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; Protecting the health and integrity of the Monument's resources should be a Management Plan priority."

Research

Statements on what should be researched in the Monument/what has already been researched and should be used to support Management Plan.

- 1) The Monument is a "living laboratory" and should be used as a control group for marine research, which will especially be relevant to spillover effects.**
 - *[From an oral statement]: Is it a nursery ground? I would like to know. Only done 9 or 10 surveys. Surveys are expensive and time inducing to run. They only cover a tiny snapshot of time. It would be great to survey an undisturbed place.*
 - *[From a public meeting participant]: Climate change impacts – migration into different thermal habitats. Treat the area as a baseline ecological zone to track over time – treat as an experiment over time.*
 - *[From an oral statement]: Exploration of spillover – enrich neighboring areas for fishing grounds – connectivity to neighboring areas.*
 - *[From an oral statement]: By protecting this area, does that increase the fishing success outside of the protected area? That could be interesting to see and may help make the fishermen advocates of the Monument if they see the benefit. Specifically, spillover at the boundaries should be monitored and explored.*
- 2) Monument research should consider the historical data available and be ongoing and long-term to ensure historical research is available in the future.**
 - *[From an oral statement]: The impact of climate change, fisheries, biodiversity hotspots, ocean life in general, new organisms, especially new corals. Long-term monitoring will be good to understand all effects, including activities usages, permitting, vessel monitoring, operation plans, and collaboration among locals.*
 - *[From a written submission]: "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 Monument. The data collected by the Aquarium and others represent valuable assets that can be used to assess threats to the Monument 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."*
 - *[From an oral statement]: Research still undergoing on plastic microplastic. We do not know the overall effects of plastic yet, in humans, wildlife and plants. Keep researching over time.*
- 3) A baseline environmental assessment of the Monument should ensure long-term ecological and geographical monitoring accuracy. The baseline should assess health, biodiversity, species richness, and effects of human impacts.**
 - *[From an oral statement]: Also, develop a set of metrics or indicators of the health of the Monument and collect it and observe it over time. Get an idea on how the Monument looks now and how that change over time. Data such as temperature, etc.*

- **[From an oral statement]:** Exploring biodiversity; trying to ID as much as possible; understanding known/unknown species, ecosystems, the status of populations; impacts, and research.
 - **[From a written submission]:** “A plan for conducting a comprehensive inventory of the Monument’s natural and cultural resources and for assessing the activities occurring in the Monument.”
- 4) **Research should focus on assessing the impacts of human interference, particularly climate change, on species richness and geology.**
- **[From an oral statement]:** Other geological monitoring should include measuring temperature, salinity, CO2 level, dissolved oxygen measurements. Another big concern is food chains, the Gulf of Maine food webs are shifting based on availability and global change.
 - **[From a written submission]:** “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.”
 - **[From an oral statement]:** Monitoring: study contaminants in the area, what comes through now that it is not disturbed and if there are contamination events from recreational fishing. Marine traffic can still deposit waste (nuclear) - how is this being monitored, tied together both from a research area and from a commercial aspect. Are military vessels discharging nuclear waste or other waste into Monument waters?
- 5) **Monitoring species such as seabirds, marine mammals, and corals should be a priority research effort.**
- **[From a written submission]:** “Would be great to research: endangered species, marine mammals, abundance of species fished outside the Monument, connectivity to other canyons.”
 - **[From an oral statement]:** Beyond the research that fishermen do, there isn't a lot of research that is specific to the Monument. I recommend that more research/monitoring be done in the area that's not just on an annual basis (such as the aerial survey) to truly understand what is using the Monument.
 - **[From an oral statement]:** Acidity and how that affects shellfish and coral are things we need to monitor in the Monument.
- 6) **Aerial monitoring should be used to monitor species.**
- **[From an oral statement]:** Great amount of information of aerial survey and information, make sure to use that data to its max so we don't lose that info. Try to track things important...species composition, abundance of indicator species particular to shelf areas. Does it indicate the canyons are a refuge for species?
 - **[From an oral statement]:** Aerial tracking - monitoring needs to make sure usage including vessels is carefully monitored because of migrations.
- 7) **The Management Plan should explore ways for the fishing community to use their knowledge to support research in the Monument.**

- **[From an oral statement]:** Potential for partnerships for the fishing industry. Does that amount for physical offset? Core values are "collaboration." It is preferred if fishers are not alienated.
 - **[From an oral statement]:** Partnerships could be devoted to working with the fishing industry to help strengthen stewardship moving forward. Important to reach out to folks that may not be fully on board with the Monument to engage as partners in new ways.
 - **[From an oral statement]:** Prior to the Monument being declared, most research in this area was related to commercial fisheries. Are there plans to continue commercial fisheries research in the area? A lot of existing information comes from surveys conducted for commercial fishing purposes. How will we know if the Monument protections are working in their mission to protect species? There is healthy debate on whether marine areas lead to spillover effects.
- 8) **The Management Plan should include a scientific monitoring, exploration, and research strategy that seeks to safeguard the biodiversity in the Monument. It should facilitate and support a robust research program to document the dynamics and distribution of biodiversity at all levels, within habitats, and across depth zones.**
- **[From an oral statement]:** Census of biodiversity in regard to human uses over time including shipwrecks, water health, plastic pollutions, on species especially endangered or threatened species.
 - **[From a written submission]:** "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."

Enforcement

Statements on how to enforce and what should be enforced in the Monument.

- 1) **The Management Plan should establish an effective monitoring and enforcement program to ensure compliance with Monument rules and regulations of permitted and prohibited activities. There is a need to clarify the resources available to ensure the safety of the Monument and ensure a publicly available comprehensive plan. Periodic updating of the assessment should be required during the life of the Management Plan.**
- **[From a written submission]:** "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. 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.”*
- **[From an oral statement]:** *Assessment of the extent of allowable activities or assessment of permitted activities occurring in the Monument - getting a better handle on the extent and use of the area by activities that are allowed under the Proclamation.*
- 2) **The Management Plan should establish procedures to ensure effective collaboration and coordination among all Federal agencies regarding enforcement activities. Collaboration should also be done with locals and Co-Trustees.**
- **[From a written submission]:** *“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.”*
 - **[From a written submission]:** *“The action plan [to inventory the Monument's resources] should also assess current impacts to the Monument and address how the Co-Trustees will minimize such impacts.”*
- 3) **The Management Plan should adopt strong and clear regulations that protect the Monument from harmful industrial activities or commercialism, including commercial fishing or oil industry activities.**
- **[From an oral statement]:** *Monitoring recreational fishing, enforcement, keep an eye on level of fishing happening.*
 - **[From a written submission]:** *“Please keep the Monument free of any commercialism whatsoever... no energy companies, no oil companies... keep all those leeches away from it.”*
- 4) **All vessels operating within or near the Monument should be required to operate with AIS for real-time monitoring.**
- **[From an oral statement]:** *Vessels should have AIS on if they are traveling through the Monument. The public and agencies need to be able to monitor their presence. They need to be able to be identified.*
 - **[From a written submission]:** *“Need to have good monitoring and enforcement so there are not illegal activities going on in the Monument. So as was mentioned AIS being turned on would be really important. And back to the research, even having a solid research plan so that it gets executed and we know how the monument functions is critical to stewardship.”*
- 5) **The Management Plan should provide permitting or other regulatory controls of activities where necessary to protect Monument resources. A permitting system for allowable activities should be established.**
- **[From a written submission]:** *“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.”*
 - **[From a written submission]:** *“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.... 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... 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).... 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 application should also be made available for public comment 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.”

Best Practices for the Management Plan:

Planning Resources

Statements on legal considerations, lessons learned from other Management Plans and documents.

- 1) **The Management Plan should utilize other Marine National Monuments as examples to inform the Management Plan.**
 - **[From an oral statement]:** Looking at the research from the Papahānaumokuākea Marine National Monument regarding spillover effect. The anglers there seem to not be thrilled, but it has improved fishing in areas around the Monument.
 - **[From a written submission]:** “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. 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.”

- **[From a written submission]:** " In particular, activities and outcomes associated with the Fifth International Marine Protected Areas Congress, IMPAC5, may benefit the Management Plan. For example, incorporating Indigenous ways of knowing, learning from 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 Management Plan."
- 2) **The Management 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.**
- **[From a written submission]:** "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. President Biden embraced this call when he restored protections to the Monument in 2021, and the Management Plan should likewise prioritize conservation outcomes 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, and the canyons and seamounts provide strong and permanent protection to their highly vulnerable species and ecosystems."
 - **[From a written submission]:** "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. President Biden embraced this call when he restored protections to the Monument in 2021, 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 counterparts—a strong Management Plan will be essential to support the permanent protection of these offshore marine wonders.... The Co-Trustees must develop a Management Plan necessary for the proper care and management of the Monument. The Management Plan should thus clearly define the prohibited and regulated activities."

Responsive Management Practices

Statements regarding how to actively manage environmental quality issues, such as restoration activities, marine debris, or other remediation activities.

- 1) **The Management Plan should utilize adaptive management strategies and complete regular updates to Monument regulations and plans.**
- **[From a written submission]:** "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 five 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.”

- **[From a public meeting participant]:** Encourage adaptive management based on scientific findings.

2) The Monument should be managed to ensure its preservation and protection.

- **[From a written submission]:** “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.”
- **[From a written submission]:** “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.”

Management Plan Updates

Statements on when or how to update the Management Plan.

1) The Management Plan should establish a formal process to update the Management Plan periodically, at least every ten years. A comprehensive assessment of human uses, water quality, habitat, living marine resources, cultural resources, and ecosystem services of the Monument should precede such a review.

- **[From a written submission]:** “[Organization] recommends the Management Plan contain: A requirement to review and update the Management Plan periodically, at least every 10 years, if not sooner. 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 commentary 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.”
- **[From a written submission]:** “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.”

Economic Impacts

Economic development, financial compensation, livelihoods.

1) The Management Plan should compensate fishermen who will lose their livelihood following the Monument designation. There is a need to undertake additional research

surrounding fishing, including analyzing the influence of fishing in the Monument, understanding the economic tradeoff, and how these changes will impact local communities.

- *[From an oral statement]: If we are interested in supporting those impacted by the Monument, consider compensating those who will be unemployed due to not being able to fish in the area anymore (as well as making it not feasible to fish east of the Monument, as it doesn't make sense to transit that far if they can't fish within the Monument).*
- *[From an oral statement]: This is a matter of Survival. We depend upon it. We have a life of our own and it is being challenged.*

Appendix: Written Comments Received During Public Scoping

All written comments received during the public scoping for the Northeast Canyons and Seamounts Marine National Monument Management Plan.

[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,

1/27/23, 8:27 AM

Mail - NCSMNM Planning, FW5 - Outlook



[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
via us.advocacymessaging.org

Mon 12/5/2022 9:02 AM

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

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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:

- 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 9:14 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.

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:

- 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 9:40 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:

- 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 10:14 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,

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:

- 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
via us.advocacymessaging.org

Mon 12/5/2022 11:26 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.

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:

- 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

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:

- 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] 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>

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, 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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- 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 12:38 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,

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.

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 4:08 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 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.

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


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.

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,



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...

[REDACTED]

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>

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

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.

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

[Redacted]

Tue 12/6/2022 10:51 AM

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

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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 signature block]

MATARONAS LOBSTER CO., INC.

[REDACTED], President
[REDACTED]
[REDACTED]
[REDACTED]

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.

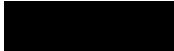
Thank you,

[REDACTED]

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

To: NCSMNM Planning, FW5 ncsmnm_planning@fws.gov

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

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 ncsmnm_planning@fws.gov

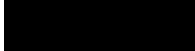
This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Ms 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

[REDACTED]
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;
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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,

[REDACTED]



[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 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 achieves 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 e ploration and research plan that includes research on the impacts of climate change on the monument;
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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,

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>

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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;
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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

[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:

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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:

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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] 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:

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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] 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:

- A plan for a comprehensive public education and outreach program;
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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 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:

[Schedule a meeting with me](#)

[Donate to win a vacation!](#)



[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]

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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:

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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

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:

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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

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:

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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] 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>

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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>

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 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;
- 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 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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- 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; 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 millenia 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 signature]

[Redacted signature block]

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

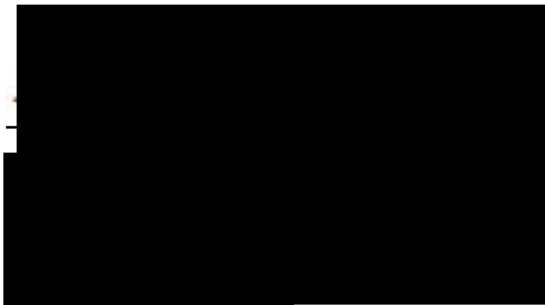
¹² See e.g., Mystic Aquarium, [Our Blue Park: Northeast Canyons and Seamounts Marine National Monument](#), Exhibit (2023).

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 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 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

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

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.

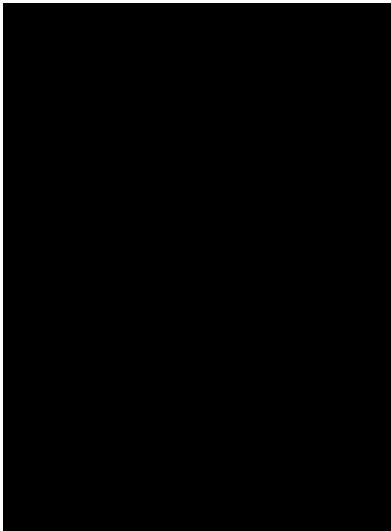
Additionally, FWS and NOAA should consider forming partnerships with groups like the Gulf of Maine Research Institute (GMRI) and other institutions that have connections with public school networks. They should seek opportunities to share with students, information about the monument, including live 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 signature block]

[Redacted signature block]

[Redacted signature block]

[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]



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]

[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.A black rectangular redaction box covering the name 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

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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 of 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.



Licensed in CT & RI

RENE, ABR, CCIM, CRS, CBR

William Raveis Real Estate

39 East Main Street, Mystic Ct 06355

Like my work? Please refer me to your family, friends and colleagues!

[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,



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"

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 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



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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:

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.

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



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Name:

Email:

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

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: [REDACTED]

Email: [REDACTED]

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 mammoths walk the earth at the monuments.

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

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



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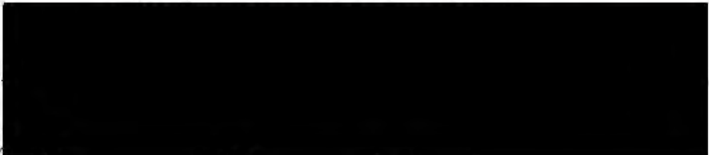
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What are your ideas or comments for the future management of the Monument?

Name:



Email:



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

NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT



FAST FACTS

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

Name: _____

Email: _____

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.

Appendix E. Focus Group Report

Northeast Canyons and Seamounts Marine National Monument Management Plan

Focus Group Summary Report

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For the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration

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Overview and Background

Located 130 miles east-southeast off the coast of Cape Cod, the Northeast Canyons and Seamounts Marine National Monument was established by Presidential Proclamation in 2016 to protect and conserve its unique and pristine habitats, historic objects, and features of high scientific interest for current and future generations of Americans. As the first marine monument in the Atlantic, it is renowned for its rich and unique biodiversity, including deep-sea coral communities and concentrations of marine wildlife.

The U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration (NOAA) invited public input on Northeast Canyons and Seamounts Marine National Monument Management Plan through a series of public scoping meetings and a series of focus groups from December 2022 through April, 2023.

The public's engagement will help guide the creation of the Northeast Canyons and Seamounts Marine National Monument Joint Management Plan—a long-term vision and framework to provide proper care for the Monument's ecosystem, marine life, and natural and historical resources, as well as set priorities and goals for management in the future.

The Management Plan will consider the Monument's potential for research, exploration, conservation, learning, engagement, and more. We invite the public to share their ideas and suggestions to help set the Monument's long-term vision and guide stewardship priorities.

Kearns & West was contracted by the Department of the Interior's Office of Collaborative Action and Dispute Resolution to facilitate public scoping meetings, and assist with coding and categorizing comments received through public scoping comment period for the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) [Notice of Intent](#) to develop a management plan for the Northeast Canyons and Seamounts Marine National Monument (Monument), published on December 28, 2022. This report follows the Public Comment Report, which summarizes the public comments received through the public scoping process. Kearns & West was also contracted to conduct focus groups as follow-up to the public comment period in order to gather additional information from interested parties needed to inform the Monument Management Plan.

The Kearns & West project team (hereafter "Project Team") produced two separate reports: one which summarized the recommendations that were received through public comments, and this report summarizing the information gathered during a series of seven focus group sessions conducted from February and March of 2023.

Approach to Focus Groups

The objective of the focus groups was to gather additional information on four topics developed by the Project Team, USFWS, and NOAA: research and exploration, communication and community engagement, best management practices, and stewardship. An additional goal was to engage a large group of people who could collaboratively inform the Management Plan process.

The seven focus groups covering the four topic areas (research and exploration (2), communication and community engagement (1), best management practices (2) and stewardship (2) aimed to gather information for the Management Plan from several stakeholder and underrepresented groups. These groups included people involved in research and exploration (marine mammals, seabirds, geology, marine conservation, baseline monitoring and data development, etc.), communication and engagement (environmental education, outreach programming, community engagement, etc.), recreation and other user groups (recreational fishing, sailing, whale watching, bird watching, etc.) and marine protected area managers from both the USFWS and NOAA. The seven focus group conversations represented a mix of participants from various organizations, geographic areas, and interests surrounding the Monument, and will help inform the Management Plan and planning activities.

With review from the USFWS and NOAA tribal liaisons, the Project Team reached out to representatives from 14 state and federally recognized tribes to invite them to attend one of eight potential dates for focus groups with various topic area focus. With NOAA and USFWS input and recommendations, the Project Team also reached out to 105 individuals from 68 organizations who are researchers, environmental education professionals, government, recreational users, and the commercial fishing industry who may have interest in the Monument due to their professional associations and regional interest. Forty-two (42) individuals responded, and subsequently 35 attended a focus group. The focus groups were held virtually and scheduled at various times to accommodate schedules and time zones. Each focus group lasted 90 minutes. The Project Team facilitated the discussions based on a series of questions relevant to each focus group topic and developed a guide to structure the conversation. While the focus group guide provided structure for the conversations, each group varied in terms of interests and the Project Team made space for conversation to move in multiple directions during the focus groups. This guide, which was developed with USFWS and NOAA, can be found in the Appendix of this document.

This report summarizes the focus group discussions by organizing participant input according to the specific questions asked in the focus groups. For each question, the Project Team grouped and then summarized responses, preserving the original comments where needed for clarity in italics to represent direct quotes. Lists were used to summarize the responses in multiple instances for brevity.

Objectives for the Focus Groups

The objectives, which were developed with USFWS and NOAA, for the focus group conversations included the following:

- Gather input on specific topics related to the Management Plan, including these broad categories
 - Stewardship
 - How to care for this space (the Monument)
 - Communication and Community Engagement
 - Communication planning for research and other news related to the Monument
 - Visual elements that would help people understand the Monument without going there
 - Engaging communities upstream on integrated management practices
 - Research and Exploration of the Monument
 - How to engage and connect researchers
 - Where to share research
 - Management Strategies and Approaches
 - Monitoring and enforcement
 - Marine-specific management best practices (lessons, advice, examples of great plans)
- Integrate suggestions from these focus groups that will aid in developing the Management Plan focus areas and approach (not covered in this report).

Invitees and Participants

The Project Team initially developed a database of potential participants for the focus groups, aiming to include invitees from these groups:

- Researchers (biological, physical, socio-economic)
- Tribes (federal and state recognized)
- Environmental education professionals
- Marine management and monitoring/enforcement professionals
- Recreational users
- Fishing community (commercial and recreational)

The Project Team reviewed the potential participant list with USFWS and NOAA, refined the list, and sent out individualized invitations to attend focus groups to specific people in each of these groups. Invitees were asked to sign up for one focus group only and the Project Team encouraged invitees to select a focus group that centered on a topic of interest (General Stewardship, Communication and Community Engagement, Research and Exploration, and Management Strategies and Approaches). Forty-two (42) of 114 invited participants signed up to attend a focus group and 35 ultimately attended a focus

group. There were no responses or attendees from the 14 state and federally recognized tribes. This could be because this is the first time the Monument team had reached out to them, and the team is working on meeting with tribes individually ahead of asking them to take part in group activities.

Key Topics and Schedule

- General (including Stewardship topics):
 - March 7th from 11am-12:30pm ET
 - March 10th from 11:30am-12pm ET
- Communication and Community Engagement:
 - Feb 21st from 11am-12:30pm ET
- Research and Exploration of the Monument:
 - Feb 23rd from 4pm-5:30pm ET
 - Feb 28th from 2pm-3:30pm ET
- Management Strategies and Approaches:
 - March 1 from 3:30pm-5pm ET
 - March 16th from 4pm-5:30pm ET

Topics Covered by Question

General Questions

When you think of this Monument what comes to mind?

Participants from the Communication and Community Engagement (February 21st), Research and Exploration (February 23rd), Research and Exploration (February 28th), Management Strategies and Approaches (March 1st), and General topics (March 7th) focus groups shared the following insights:

- Biodiversity
- Ocean preservation
- Conflict with the fishing industry
- Protection from the fishing and extractive industries
- Representation of the whole water column, from corals to the surface with marine mammals
- Connectivity and dynamisms
- Abundance of wildlife
- Remoteness
- Awe, wonder, and hope
- Ocean wilderness
- Unique ecosystems, oceanographic features, and attributes to the Northeast region

What do you think is the role of a monument?

Participants from the Communication and Community Engagement (February 21st), Research and Exploration (February 23rd), Management Strategies and Approaches (March 1st), and General topics (March 7th) focus groups shared the following insights:

- Scientific value; an important living lab and a refuge for wildlife
- Biodiversity protection
- A source of pride for all Americans
- To educate people on what is happening with the oceans and the planet
- To protect the unique resources permanently
- As a reference for the other areas around it. As a unique deepwater habitat, it can serve as a reference area for similar deepwater similar habitats along the Eastern seaboard
- An ambassador for ocean conservation, the deep sea, and the Northeast region of the ocean
- A channel in which humans can communicate about the ocean and help the public recognize the ocean's value
- A way the public can appreciate the ocean and ocean conservation
- The challenges of connectivity specifically arose in response to this question in the Research and Exploration (February 23rd) focus group; Remotely Operated Vehicle trips were suggested as potential solutions

Have you had experience with other types of monuments? This Monument is 130 miles offshore – how does that change what you expect or how your experience may change? How does that change management practices? Should people be able to access this place? How or within what bounds?

Participants from the Communication and Community Engagement (February 21st), Research and Exploration (February 23rd), Research and Exploration (February 28th), Management Strategies and Approaches (March 1st), and General topics (March 7th) focus groups shared the following suggestions and insights:

- The biggest challenges of the Monument will be public interaction, access, and engagement.
 - A challenge of managing this Monument is ensuring people feel connected to this place, understand its importance, and have a sense of pride and ownership.
- The fact that the Monument is so far offshore poses a challenge and may make it difficult to manage because building a constituency is important to Marine Protected Areas; it would be beneficial to provide people with remote access in addition to images collected.
 - The Monument will require different strategies than land-based Monuments for ensuring that people feel involved and may also necessitate a different level of involvement.

- The remoteness of the Monument presents opportunities for virtual reality experiences which can engage members of the public regardless of their location. This could be combined with educational and outreach efforts.
- Though the distance is great, there are still tangible ways to connect people to what the Monument entails such as developing citizen science programs, setting up a live stream so people can see creatures swim by, or developing an art competition where children can create art inspired by the Monument.
- The Monument represents a challenge with conservation biology in general as people feel it is an important thing to protect even though it cannot be visited, and the remoteness keeps it protected.
- The Monument will be managed under the Antiquities Act unlike other Marine Protected Areas and will be the first that will have a management plan.
- The Monument will be unique as it plans to prohibit all commercial extractive activities.
- It should be restricted to educational, research, or recreational uses.
 - There should always be some kind of access for research or scientific purposes, even if limited. Managers should determine what “reasonable research” would be defined as.
 - Must reiterate the importance of permits in ensuring the Monument is used in a way that still ensures its protection.
- Looking to remote wildlife refuges as models for connecting people with isolated places.
- The remoteness of the Monument ensures minimal inherent conflicts because there will be minimal use of the Monument. Conversely, enforcement against unauthorized uses and monitoring for allowed uses will be challenges for the management team.
- From the Research and Exploration (February 23rd) focus group meeting, one participant shared a conversation with a close friend who is part of the Narragansett Tribe, regarding the Monument’s expansion and what that means for the Tribe. The individual hoped that that the Monument would reach the shores, and they could continue their practices of hunting and gathering.

Where would you like to go to for information about the Monument and the Management Plan?

Participants from the Communication and Community Engagement (February 21st), Research and Exploration (February 23rd), Research and Exploration (February 28th), Management Strategies and Approaches (March 1st), and General topics (March 7th) focus groups shared the following suggestions:

- Digital outreach such as websites and social media that are updated frequently

- Websites would be useful in advertising what kind of research is taking place, who are the partners, what are the publicly available reports, publications, etc.
- A multi-layered internet presence including a permanent website combined with the use of social media platforms, especially Instagram.
- Specifically, the management plan should be on different agencies' websites, such as the USFWS webpage, clearinghouse websites, and the Federal Register.
 - The management plan must be publicly available and then translated and structured in a way that is engaging to the public.
- Innovative forms of technology
 - Virtual reality experiences to ensure accessibility to the Monument
 - In some states, teachers struggle to meet state requirements around incorporating a certain amount of virtual learning into their curriculum in a meaningful way. Developing an app around the Monument could be a way to help bridge this gap and provide a useful resource.
- Periodic email updates/newsletters such as those done by Woods Hole Oceanographic Institute which includes a list of talks being given
- Sister programs with sanctuaries or other Monuments
- Integrated interdisciplinary study program
- Forum for scientists
- Establishing regular meetings where people are being convened to talk as part of the Monument management plan
- The U.S. Regional Fishery Management Council is a valuable resource for information for the fishing public.
- The NOAA Fisheries Management Council: personnel should share information through their already established networks.
- Aquariums and museums
 - Physically through exhibits as well as digitally through existing aquarium/museum Instagram accounts
 - The Ocean Portal as part of the Smithsonian Institution's Ocean Initiative
- Work with the public-school systems to build curriculums around the Monument with children.
- A citizen-led group such as "Friends of"
- Management should map out the different audiences the Monument will serve and work on understanding the varied outreach avenues for different stakeholder groups. The best mechanism for communication may depend on the type of audience.
 - It is important to understand who are the groups that will potentially use the Monument and figure out how to reach them to provide relevant information. It will be important to identify what people want to know

about the Monument and then understand how to convey that information to them.

Stewardship Questions

How would you like to see this place (the Monument) cared for?

Participants from the General topics (March 7th) focus group shared the following suggestions and insights:

- Prioritizing deepening and maintaining understanding of the Monument in a host of ways should be a priority.
- Focus on monitoring such as inventorying the Monument's biodiversity, ecosystems, and ecological processes.
- Give precedence to protecting the Monument and shepherding it for future generations
- Outreach can also be a form of care as outreach allows more people to care for the Monument.

How would you like to enjoy this place (the Monument)?

Participants from the General topics (March 7th) focus group shared the following insights:

- Because there is an extensive range of values on how people enjoy natural systems, expanding the ways in which the Monument can engage the widest range of human values regarding wilderness presents a holistic strategy.
- Conducting outreach to educational institutions, including children and parents is important.
- Engaging with religious groups are a pathway to fostering nontraditional engagement in the Monument.
- The Monument should become a source of regional pride.
- Engaging with the region's native Tribes and different groups that may have had historical connections with the Monument
- Ensuring Monument imagery, such as photos and videos, is available on social media and other technology platforms will be critical for engagement.

How should we share about progress made in caring for this Monument?

- From the General topics (March 7th) focus group, two participants recommended focusing on science in sharing progress and updates on the Monument. One participant suggested creating a social science program to understand people's attitudes and values about the Monument over time and across the country, and economic surveys wherein NOAA and NIMS could engage their expertise in analyzing spillover effects. Furthermore, another participant suggested focusing on what is possible and tracking what has been accomplished in the Monument

i.e., keeping tabs on the number of internships placed, number of research projects done, number of animals sighted.

How can the Monument support ocean literacy?

- From the General topics (March 7th) focus group, one participant suggested hiring an education coordinator on staff. Access to *ad hoc* data and materials that link to ocean literacy criteria would allow individual teachers to pull material for their classrooms and design effective curriculum.

Who should we partner with to care for this place (the Monument)?

Participants from the General topics (March 7th) focus group offered the following recommendations:

- Partnering with scientific resources, specifically regional aquariums such as the Mystic Aquarium and New England Aquarium, as they have access to diverse audiences
- Revisiting the comment leaders (from the public scoping process) received as a foundation for potential contacts for partnerships
- Creating a formal partnership in the form of a Stakeholder Advisory Council for the preservation of the Monument

How would you like to be involved in the Monument?

- From the General topics (March 7th) focus group, participants agreed they would like to be involved in the Monument in at least some capacity. One participant mentioned that time commitment is always a challenge.

What other thoughts or concerns would you like to share with us?

- From the General topics (March 7th) focus group, participants agreed that any vessel that transits through the Monument should have their Automatic Identification System turned on. Transparency is critical to the preservation of the Monument.

Communication and Community Engagement Questions

Where would you like to go to for information about the Monument and the Management Plan?

Participants from the General topics (March 7th and 10th) focus groups shared the following responses:

- Web presence is needed.
- Podcasts
- Videos highlighting biological and geological uniqueness
- USFWS webpage
- Federal Register Notice webpage: *Identifying which items are important and frequently updated on the website such as marine mammal siting or links to ongoing research. More than an annual update, there need to be updates showing the activities ongoing in the Monument. There are also opportunities to utilize ships traveling through the Monument to ensure people are vigilant about collecting images or videos and narratives that could be linked to the page.*
- A clearinghouse website
- Social Media
- Public signage on the value of the ocean and the Monument
- A participant suggested developing a [Facebook? "Friends of" the Monument] Friends Group for the Monument.

What partnerships would be helpful in sharing information about the Monument?

Participants from the General topics (March 10th) focus group made several potential partnership suggestions:

- Fisheries groups and commercial fishing community
- Commercial Fisherman's Research Fund
- Ocean Conservancy
- National Marine Educators Association
- NY State Marine Education Association
- Southeast New England Marine Educators Association (SENEMEA)
- American Fisheries Society – Southern New England chapter
- Professional groups and organizations
- Universities, research institutions, and specific professors
- Academic professional organizations
- NGOs involved in the marine sphere
- Industry including wind
- Nature-based tourism
- Whale watching
- Environmental organizations
- Political leadership in every area where there's going to be a national monument designation

What is the potential for community engagement and collaboration with citizen science groups, community and arts organizations, educational institutions, local governments, tribes?

Participants from the Communication and Community Engagement (February 21st) focus group made several suggestions for groups to engage and collaborate with:

- Scuba diving groups
- Sailing groups and conferences
- National Marine Educators Association
- Climate change focused partnerships
- Stone Living Lab Conference
- Align with existing national efforts like America the Beautiful
- National Network for Ocean and Climate Change Interpretation

Have you experienced any unexpected challenges or opportunities partnering with any groups?

Participants from the Communication and Community Engagement (February 21st) focus group made several comments on the challenges and opportunities associated with partnership:

- Competing priorities create challenges for making time for partnering
- Funding and compensation for partner's time – invest in those relationships
- *We have to operate in structures that demand funding and deliverables on specific timelines, which do not allow for relationship building the right way. How can we get people to realize the importance of investing in building partnerships and understating communities' priorities?*

What tools/strategies have you used to better enable meaningful partnerships with these groups?

Participants from the Communication and Community Engagement (February 21st) focus group made several suggestions for creating meaningful partnerships:

- *NOAA Ocean Exploration put out an RFP for community grants that allowed us to feature the Monument with certain districts in Rhode Island to do targeted programming, including bringing in a speaker from NOAA. It would be helpful to have more mechanisms like that to create opportunities for developing programming that reaches communities directly.*
- *There are various steppingstones of engagement. In my work, I need to convince people that investing in a child learning about science in kindergarten will make them a more invested citizen by the time they are ready to choose careers. However, it can be really hard to fund early education engagement.*
- *We have just begun a journey of better engaging diverse communities. We received a small grant focused on engaging BIPOC groups around MPAs. Through that, we created a series of listening sessions in order to hear from communities first, rather than make assumptions about what they care about. It was critical that we provided*

food, stipends for participation, and that we had someone on staff who was well connected with BIPOC leaders in the region.

What would community engagement look like or involve?

Participants from the Communication and Community Engagement (February 21st) focus group made several suggestions for community engagement:

- *'Friends of' the Monument group*
- *Storytelling is very important to me. We could identify and highlight weird animals of the Monument, which would get kids and teachers really excited about the Monument and create a connection to the place in a fun way. You could highlight the unique adaptations these creatures have.*
- *You could invest in a high-quality podcast. I have been wanting to create a podcast where Peter Auster discusses the weird creatures in the Monument.*
- *Another way to give people a sense of ownership is developing an "adopt a reef" or "adopt a funny species" program. Every six months they can get updates on how the area is growing, or facts about the animal. This is also a great way to get funding.*

Do you have any specific suggestions for how to best engage with teachers?

Participants from the Communication and Community Engagement (February 21st) focus group made several suggestions on how to engage with teachers:

- *It is very helpful to connect any content to the Next Generation Science Standards. Teachers are often excited by material but in order to get their principals on board, they need to show how content will help reach goals around meeting those standards.*
- *It would be good to partner with museums and aquariums to hold information on the Monument on their own websites, since those are places teachers are already used to going to.*
- *Suggest developing relationships with the National Marine Educators Association and NOAA Ocean Exploration, who already do educator workshops and have existing curriculum on things like canyons and seamounts.*
- *Can also explore working with the ocean exploration vessels. They fund teachers to come out which makes the teacher feel very excited about the topic and bring back pictures and experiences into the classroom.*
- *In some states, schoolteachers struggle to meet state requirements around incorporating a certain amount of virtual learning into their curriculum in a meaningful way. Developing an app around the Monument could be a way to help bridge this gap and provide a useful resource.*

What are your thoughts on the use of symposiums, speaking events, or other in-person events?

Participants from the Communication and Community Engagement (February 21st) focus group made several suggestions for events to consider presenting at or taking part in:

- *A symposium would need to be a collaboration with an existing symposium or event, where one talk is dedicated to the Monument. There is a small, self-selecting group of people who are specifically interested in this Monument, but collaboration can help expand people's awareness and interest.*
- *Relevant symposiums and events include: Impac5, Capitol Hill Ocean Week, World Ocean Day. We can also find local events and opportunities.*

Research and Exploration Questions

What should we be exploring in the Monument?

Participants from the Research and Exploration (February 23rd) and Research and Exploration (February 28th) focus groups suggested exploring the following items:

- How the Monument can serve as a 'baseline' or reference point for comparing data coming from areas being more actively used vs. areas that are conserved: *This can take the form of comparing use of passive acoustic monitoring systems between the Monument and busier areas to explore the natural variability of underwater soundscapes and how they are changing due to climate change; comparing wildlife surveys between the Monument and areas experiencing resource extraction.*
- Integrating visual and acoustic observation of marine mammals.
- Developing co-located studies, correlation studies, and connectivity studies.
- Coupling connectivity studies with genetic information and larval dispersal monitoring.
- Placing long-term observatories in the Monument.
- Shipwrecks and archeological assets.
- Conducting direct surveys on fish and invertebrates, as well as marine mammals and seabirds.
- Disentangling the effects of shipping by monitoring spaces inside, outside, and adjacent to the Monument.
- Ghost fishing; specifically understanding if ghost gear is functioning as it should
- Recreational fishing and shipping.
- Categorizing shipping in the area: where it's going, where it's coming from, are there alternative routes?
- The potential impacts of extraction in adjacent canyons.
- Dark skies: *what they might look like in places like the Monument, whether that's for cultural practices, like celestial navigation out in the Pacific, or for bat and bird communities.*

- Potential for replicating some of the research being done by David Robinson and The Narragansett Tribe closer to shore around paleo-habitats, and evidence of people living there.

What should we be monitoring in the Monument?

Participants in the Research and Exploration (February 23rd), Research and Exploration (February 28th) and General topics (March 7th) focus groups shared the following suggestions and insights on monitoring:

- The Monument should list and categorize activities taking place and have mitigation strategies for those that pose the highest level of threat. The Management Plan should have a feedback loop and set a time for updating the Management Plan, such as every 10 years.
- Those managing the Monument should determine what would be considered 'reasonable research' that would be allowed to happen in the Monument.
- Certain types of crafts should not be allowed in the Monument so that the Monument can be more of a quiet space for the species that need sound and communication for their life history.
- Should gather data that shows how stopping pot or crab fishing has benefits, to use as evidence for restricting fishing.
- Should set up a longer monitoring network within the Monument to facilitate long-term data collection to understand climate-based change. The network can be set up for a lot of different types of baseline biological and chemical information. There may be ways to do this remotely.
- Should use monitoring to determine if models are correct -- are we able to find highly diverse areas where we expect them to be?
- Note that there are considerable economies of scale that can be achieved by doing monitoring as part of a broader system. For example, the cost of a buoy network can be steep but it has been shown that a buoy network, originally set up by and for physical oceanographers, has been very valuable for biological and ecological research as well.

What kind of partnerships would you like to see for research and exploration?

Participants in the Research and Exploration (February 23rd), Research and Exploration (February 28th) and General topics (March 7th) focus groups suggested developing partnerships with:

- A neighborhood regional ocean observing system.
- Groups similar to Brookline Bird Club but for marine mammals.
- Tribes: *for example, Mashantucket Pequot Research Center.*
- Museums in Newport, RI doing historical research in the area, including the travel of slave ships from Africa and the Caribbean to Newport.
- Groups similar to seabird groups that focus on sea turtles or marine mammals.

- Various government agencies including NOAA, BOEM, and NASA.
 - They shared that these partnerships can facilitate greater connectivity between research projects within and outside of the Monument, and greater cost effectiveness.
 - For example, BOEM is interested in setting up a coast-wide passive acoustic monitoring system that could allow work being done in the Monument to be connected to a larger system.
- Agencies such as Coast Guard, Department of Defense, and Homeland Security
 - From the General topics (March 7th) focus group, one participant shared that an automatic identification system (AIS) is needed but also partnerships with the Coast Guard and the National Incident Management System (NIMS) are critical. They suggested that for enforcement, the Coast Guard could make the Monument part of their overflight tracks and have a list of items to look out for on their flights then report back. They also recommended that the Monument partner with the Coast Guard for patrol and NIMS for research cruises to be able to collect data, such as on marine debris.

Additional insights around partnerships included:

- From the Research and Exploration (February 23rd) focus group, one participant suggested developing collaborative research partnerships across organizations and disciplines. Given cost and difficulty of going out into the Monument, it would be valuable if one research trip could include people from across disciplines, i.e., a trip including an oceanographer, someone sampling whaling breath, a bird observer, all on the same boat.
- From the Research and Exploration (February 28th) focus group, a participant shared that to build capacity for enforcement, we should try to engage people who are there for other purposes involved in research. For example, leveraging recreational fisherman that are allowed there to do some kind of research, to get invested in the Monument and be looking out for its best interests.
 - Could consider allowing a small group of commercial fishermen in and use that data scientifically.

How would you like to learn about the Monument's research and exploration?

Participants from the Research and Exploration (February 23rd) and Research and Exploration (February 28th) focus groups shared the following suggestions:

- Should find a way to easily share about the Monument, without making people feel bad about its general inaccessibility.
- Should connect what is happening in the Monument to what is happening in people's communities.

- Should establish a dedicated website for information on the Monument.
- Need to be creative in thinking how to connect people to a place that is hard to get to. Should invest in camera systems and a mooring cable that shoots satellites.
- Should share live recordings when people do deep dives.
- Scientists (like themselves) need to share more to get newer scientists excited about these efforts.
- Should effectively communicate the intrinsic value of the Monument to people who may never see it.
- Should use press coverage (like morning talk shows) to get people excited about the Monument.

Management Strategies and Approach Questions

What are the best management practices you would suggest we take into account?

Participants from the Management Strategies and Approaches (March 1st) and Management Strategies and Approaches (March 16th) focus group shared several suggestions:

- Basic best management practices include transparency and consistent communication. This entails ensuring all documentation related to the Monument is easily accessible and digestible.
- Management should create a scientific monitoring and research plan. Establishing an inventory of the Monument's resources then monitoring those resources will be essential to the management of the Monument.
- There is a need to assess the kinds of activities going on in the Monument to understand how the Monument is being used and the extent of those activities overtime.
- Review the work of the California Network of Marine Protected Areas as a beneficial resource. Best management practices should be inclusive of an array of stakeholders, including Tribes, and be built on resources that are products of good, peer-reviewed science.
- Tapping into local communities and advisory groups can cause burnout among a small number of volunteers who are frequently consulted for guidance by many different agencies. A barrier to engagement for community members has been an interest in being compensated for their time. Capacity building throughout local communities is crucial; this can be achieved through connection and knowledge sharing.
- Staff must be deliberate and intentional about bringing in groups of people interested in these places and asking for their help. The more managers continue to reach out, the more people will start to get engaged.

Regulations that help shape management of vessels in the Monument?

Participants from the Management Strategies and Approaches (March 1st) focus group made the following suggestions and insights:

- All vessels should always have AIS on while transiting or operating in the Monument.
- Noting that the Monument's location on the border of the exclusive economic zone boundaries will make it unique in terms of ships traveling from international waters. Should condense any vessel traffic into a shipping lane to minimize the impacts of shipping on the environment.
- Partnerships with the Coast Guard and the National Incident Management System (NIMS) are critical to enforcement in addition to AIS tracking. There needs to be a way to identify and track AIS through radar or a visual camera, such as installing real time cameras on monitoring buoys.
- Should explore traffic management methods, rooted in understanding the potential impacts to marine resources from vessel traffic. This underscores the value of writing monitoring assessments into the Management Plan to understand how much vessel traffic is in or around the Monument.

What models for ethical guidelines for using the Monument – such as Leave No Trace – would be helpful to use in the Monument?

Participants from the Management Strategies and Approaches (March 1st) focus group offered the following suggestions:

- “Stay the Trail” initiative as used in Colorado.
- Using signage to alert people that they are entering a Marine National Monument and create accessible lists of what is allowed and what is not allowed in the area. Communication is a key success strategy.
- Collaborating with the recreational fishing community on how to operate carefully in a special place like the Monument as recreational fishing has a long history of working with conservation initiatives.
- There needs to be a clear, concise explanation in the Management Plan of the applicable regulations that will affect the activities allowed in the Monument. What additional regulations will be needed in the Monument, and further clarification on which existing rules apply to the different uses of the Monument in the Management Plan. Considerations should be made for additional proposals that would strength monitoring and enforcement. Developing a comprehensive use assessment is critical in helping understand where to best utilize resources for Monument management.
- It would also be beneficial to consider joint regulations among all agencies involved, particularly DOI and NOAA as done in Hawaii. It would be helpful to bring together both agencies’ legal authority and management capabilities on the full suite of activities.

How do we create access to the monument to communities equally?

Participants from the Management Strategies and Approaches (March 1st) focus group shared several insights:

- Should reach out to traditionally disadvantaged or overlooked communities. One participant noted that it is critical to reach out to underserved communities directly and ask what access means to them.
- Should utilize real time data stream acoustics to allow visually impaired people to experience the Monument.
- Should target different audiences of the different uses of the Monument.
- Keeping tech outlets updated will help with equitable access, whether that be social or websites, newsletters, etc.
- Need to discuss cable laying. NOAA and NMFS have designated coral protection areas and there is an ongoing discussion regarding whether offshore wind should be able to lay cable through them. Allowing any more cable laying or extraction in the Monument should not be allowed.

What was your role during the Management Plan process for your Monument?

- From the Management Strategies and Approaches (March 16th) focus group meeting, participants noted that several marine Monuments do not yet have Management Plans in place and are in the process of writing them. Some plans have been repeatedly put on hold.

What were the challenges during the drafting of your Management Plan?

- From the Management Strategies and Approaches (March 16th) focus group meeting, one participant noted that the Rose Atoll Marine National Monument shared areas designated as marine sanctuaries. Sanctuaries became a new stakeholder involved in the management process; the coming together of many new players posed a significant challenge. However, partnerships also enable staff to accomplish more work.

How did you incorporate an Environmental Assessment into your plan?

Participants from the Management Strategies and Approaches (March 16th) focus group shared the following insights:

- One of the biggest challenges is understanding the ways in which different agencies handle the National Environmental Policy Act (NEPA). Managers should ensure the plan gives the needed coverage for the activities proposed.
- Although most activities should be done jointly, past experiences have prompted staff to allow the agency that can complete the necessary work faster to lead the effort.

What role did enforcement have in your Management Plan?

Participants from the Management Strategies and Approaches (March 16th) focus group shared the following insights:

- All participants agreed that enforcement is one of the biggest challenges faced by Marine Monuments. The Coast Guard is an extremely valuable resource in enforcement alongside NMFS law enforcement.
- Managers utilize many different types of technology and satellites to track vessels throughout the Monument.
- Suggested reaching out to nonprofit groups such as Global Fishing Watch for applicable data.
- Recommended contacting the New England Regional Fishery Council as an avenue to stay in tune with any updates.

What partners did you engage in developing the plan?

Participants from the Management Strategies and Approaches (March 16th) focus group shared the following responses:

- Department of Defense, particularly the Coast Guard. The Coast Guard has some interest in relation to enforcement and they may provide comments on documents. Consistency in relationship building is key.
- Local Indigenous groups, communities, and advocacy associations.
- Relevant local communities of the Northeast, such as fisherman from Rhode Island.

Other insights on partnerships included:

- The importance of collaborative, multi-stakeholder committees such as intergovernmental working groups, joint management teams, community groups, and Monument Management Board to more effectively facilitate collaboration.
- The hardest part of co-management can be meeting all the requirements and statutes of all different agencies. The best solution is to try to write the plan that is needed for the place and think about how we best collectively manage the area.
- Partners engaged in developing a plan and managing a Monument are highly variable to the local area and the stakeholders involved.

How do you plan to engage the public in on-going Management Plan processes/programs that come after the establishment of the Plan?

Participants from the Management Strategies and Approaches (March 16th) focus group shared the following insights:

- It is important to have a liaison on staff.

- Continuity is critical when there are events out of a manager's control. Reaching out to people and forming consistent relationships is crucial.
- Community groups as well as advisory groups are critical in keeping management accountable.
- It is valuable to form community groups and hold forums to accommodate different cultural perspectives. Managers of monuments must navigate the different approaches that various authorities have in engaging the public. Specifically in the Northeast, co-stewardship and co-management will involve engaging local communities in their knowledge and understanding of the ocean.
- It is valuable to create a "Friends of" the Monument group in an informal collaborative advisory way.

Is there anything else about your experience developing a Management Plan that you think would be helpful to share?

Participants from the Management Strategies and Approaches (March 16th) focus group shared the following insights:

- Bringing people to these remote places is important and is the responsibility of managers.
- Although formal groups do have a role in community outreach, the main task of managers should be to bring the Monument to the people through social media and other outreach efforts.
- There is immense value in bringing many different types of people to engage with Monuments, such as teachers, artists, and members of the public. It is the most effective way to spread the message to the larger community as a more informal method of community outreach.
- Indigenous groups, community members, and teachers continue to help create new ambassadors that can spread information throughout local communities.
- For the Northeast Canyons and Seamounts Marine National Monument, Monument staff should work to bring the history of the Northeast to local people.

Appendix A

Kearns & West

Northeast Canyons and Seamounts National Marine Monument Management Plan

Focus Group Guide

This guide was developed with input from USFWS and NOAA to structure the focus group conversations. The Project Team developed questions related to several topics, knowing that not all questions would be addressed by each focus group. This document was used by the Project Team, and not distributed to focus group participants.

Overview and Background:

The Northeast Canyons and Seamounts Marine National Monument (NCSMNM) was established in 2016 by President Obama encompassing 3.1 million acres in two units 130 miles southwest of Cape Cod, MA. The NCSMNM is the first marine monument in the Atlantic Ocean and the closest marine monument to 25% of the United States of America's population. The Monument contains unique features that hold international scientific interest and will serve as a site to further deepen our understanding of climate change, ocean habitat management, and the exploration of our worlds least explored habitats. Drafting of the marine Monument Management Plan started in 2017 following the designation of the NCSMNM. The foundations of the affected environment were described – that draft will be used for engagement materials during the planning process.

The Monument's management responsibilities are shared by the United States Fish and Wildlife Service (USFWS) and the National Atmospheric and Oceanic Administration (NOAA) through the following regulations:

- USFWS- National Wildlife Refuge System Administration Act, the Refuge Recreation Act, and the Endangered Species Act (for species regulated by FWS), and Public Law 98-532 and Executive Order 6166 of June 10, 1933.
- NOAA- Magnuson-Stevens Fishery Conservation and Management Act, the Endangered Species Act (for species regulated by NOAA), the Marine Mammal Protection Act.

USFWS and NOAA were charged by President Biden to develop a joint Management Plan for the NCSMNM by September 15, 2023, building on the 2016 Proclamation establishing the Monument, for the proper care and management of the objects of historic and scientific significance found within the Monument's boundaries.

Focus Groups:

The objective of these focus groups is to engage the Monument's community in a collaborative planning process that would inform the Monument's management within the bounds of its guiding Proclamations and engages the community on planning efforts. The project seeks to engage Monument community members including underrepresented groups and Tribal Nations. Management Planning topics would include but not limited to research, community engagement and outreach, environmental education, and recreation.

These focus groups aim to collect suggestions for the Management Plan from several participant groups, including people involved in research and exploration (marine mammals, seabirds, geology, marine conservation, baseline monitoring and data development, etc.) , communication and engagement (environmental education, outreach programming, community engagement, etc.), recreation and other user groups (recreational fishing, sailing, whale watching, bird watching trips, etc.).

The Project Team has identified 6-8 participants for 7 separate **focus group invitations**. These conversations represent a cross-section of organizations, geographic areas, and interests within the NCSMNM, and will help inform the Management Plan and planning activities.

Objectives for the Focus Groups:

Gather input on specific topics related to the Management Plan, including three broad categories:

Communication and Community Engagement

Communication planning for research and other news related to the Monument

Visual elements that would help people understand the Monument without going there

Engaging communities upstream on integrated management practices

Research and Exploration of the Monument

How to engage and connect researchers

Where to share research

Management Strategies and Approaches

Monitoring and enforcement

Marine specific management best practices (lessons, advice, examples of great plans, ect)

Integrate suggestions from these focus groups that will aid in developing the

Management Plan focus areas and approach

Participants:

- Researchers (biological, physical, socio-economic)
- Tribes
- Environmental Education professionals
- Marine management and monitoring/enforcement professionals
- Recreational users
- Fishing community (commercial and recreational)

Key Topics and Schedule:

- Communication and Community Engagement
- Research and Exploration of the Monument
- Management Strategies and Approaches

Key Concerns:

- Equitable participation and engagement in the planning process
- Integrating any guidance that would be helpful in developing the Management Plan

Next Steps:

- Once the Project Team has compiled a list of possible participants, K&W will extend invitations, draft agendas for each focus group, and advance materials preparation and other planning.

Interview Process/Semi-structured script:

*****Please remember to hit record before the group starts chatting (Notetaker's role).**

(A Note to Interviewers: this introduction is meant to be semi-structured, so please introduce yourself and don't feel you have to read this word for word. It is a guide only. Do, however, use the questions we developed as consistently as possible.)

Thank you for agreeing to be part of this conversation about the Northeast Canyons and Seamounts National Marine Monument Management Plan. I appreciate your willingness to take part, and to offer constructive suggestions for the team to inform their planning process.

For Everyone in every Focus Group: start with these questions first in every focus group and then find the topic area below for the focused questions on that topic

Opening framing: "we will start with a few framing, exploratory/visioning questions...to help understand what this Monument means to you. Then we will follow up with more questions specific to the Management Plan."

When you think of this Monument, what comes to mind?

What do you think the role of a monument is?

Have you had experience with other types of monuments? This Monument is 130 miles offshore – how does that change what you expect or how your experience may change? How does that change management practices? Should people be able to access this place? How or within what bounds?

- Do you have experience with other monuments? How might this one be different given its 130 miles away? How does that impact the Management Plan?
 - Should people be able to access this place? How or within what bounds?

Where would you like to go to for information about the Monument and the Management Plan? (specific examples if possible)

- Social media
- Websites
- News/other media
- Refuges, aquariums (exhibits, displays, partnering on communication efforts, events)
- Other

Community Engagement and Communication:

Where would you like to go to for information about the Monument and the Management Plan? (specific examples if possible)

- Social media
- Websites
- News/other media
- Refuges, aquariums (exhibits, displays, partnering on communication efforts, symposium and speaking events)

What resources exist that you would find useful to consult/integrate into our communication and community engagement strategy?

- For cultural and historic preservation, are there any best practices for gathering, storing, and archiving these materials?

What partnerships would be helpful in sharing information about the Monument?

- Partnering with: refuges, aquariums, schools, citizen science groups, influencers, industry, research centers, archives, environmental/conservation organizations, national ad council
- *Are some of these groups better positioned to support certain communications goals than others?*
- *Have you experienced any unexpected challenges or opportunities partnering with X group?*

What is the potential for community engagement and collaboration with citizen science groups, community and arts organizations, educational institutions, local governments, tribes?

- *Have you experienced any unexpected challenges or opportunities partnering with X group?*
- *What tools/strategies have you used to better enable meaningful partnerships with these groups?*

Are there other groups we've left out of this list that you think should be included in collaborative or community engagement activities?

What would community engagement look like or involve?

- Storytelling/oral history
- List of important species to tribes (sharing locations of importance?)
- Online library or hub for management activities/details important to the groups above

Exploration and Research:

Exploration: the action of traveling in or through an unfamiliar area in order to learn about it.

Research: to study something in detail in order to learn more about it.

What should we be exploring in the Monument? (e.g.)

- Open ocean- how things move through the ocean system: Whales, migratory fish, wintering habitat for sea birds
- Geological Features -Canyons Seamounts(e.g.)
- Objects of historic interest- mammoths, ship wrecks, and cultural artifacts
- Threats (e.g.)
 - Marine debris
 - Climate change- ocean acidification, temperature rising
 - Invasive species – ballast water, pollution
 - Ghost fishing- any discarded, lost, or abandoned, fishing gear in the marine environment.
 - Boat traffic

What should we be monitoring in the Monument? (e.g.)

- Geological Features -Canyons Seamounts
- Open ocean- how things move through the ocean system: Whales, migratory fish, wintering habitat for sea birds
- Human uses
- Knowledge transfer – Monument Awareness
- Enforcement and compliance
- Approaches on mitigating bad behavior within the Monument: current allowable and non-allowable uses
- Apps for people to share their location/activity with the Monument?
- Potential Threats (e.g):
 - Noise – approaches, best practices?
 - Light – approaches, best practices?
 - Recreational fishing impacts
 - Marine debris
 - Climate change- ocean acidification, temperature rising
 - Invasive species – ballast water, pollution

- Ghost fishing
- Boat traffic

What kind of partnerships would you like to see for research and exploration? (e.g.):

- Aquariums
- Schools
- Citizen science
- Research institutes
- Other Marine Protected areas
- Regional Ocean working groups and Alliances
- How would you like to learn about the Monument's research and exploration? (e.g.):
- Exhibits
- Digital communications
- Events
- Coordination

Stewardship Approaches:

Stewardship: *noun:* the careful and responsible management of something entrusted to one's care

How would you like to see this place cared for?

- Leave open ended

How would you like to enjoy this place? (e.g.)

- Recreational fishing
 - *What should the Management Plan consider including to ensure accessibility of the Monument by recreational fishermen?*
- Sailing
 - *What should the Management Plan consider including to ensure accessibility of the Monument by recreational sailors?*
- Wildlife watching
- Education and outreach
- Existence value – Knowing that it is there and protected

How should we share about progress made in caring for this Monument?

How can the Monument support ocean literacy? (e.g.)

- Outreach and education events
- Exhibits
- Digital communications – website posts, social media, newsletters, media library, educational materials
- Events

Who should we partner with to care for this place?

- Other Marine Protected areas
- Citizen science groups
- Community working groups
- Friends group

How would you like to be involved in the Monument?

- Volunteer – digital content creation, data support, content creation
- Friends groups
- Education and outreach opportunities

What other thoughts or concerns would you like to share with us?

Building on Successful Management Practices:

What are the best management practices you would suggest us take into account?

How do we use the available resources/best practices on managing a space like this?

- For cultural and historic preservation, are there any best practices for gathering, storing, and archiving these materials?
 - *Who do we need to bring in to make sure this type of preservation is done well? What partnerships are needed?*

Regulations that help shape management of vessels in the Monument? (Coast guard question)

- *Does anyone have knowledge of regulations used in other marine protected areas that have worked well? That have not?*
- *Which agencies/stakeholders need to be further engaged in shaping these regulations and ensuring enforcement?*

What models for ethical guidelines for using the Monument/like Leave No Trace would be helpful to use in the Monument?

How do we create access to the Monument to communities equally?

- What are practices for allowing people into the area without damage?

Superintendent Specific:

- Welcome and Introductions

** explain that we will be recording*

Primary Questions

- What was your role during the Management Plan process for your Monument?
- How was the role of your Monument defined as per the Management Plan?
 - *May need to reign this question in if its getting into tangents.*

- What were the challenges during the drafting of your Management Plan?
 - i.e. challenges around inter-agency coordination, challenges around abiding by regulatory processes;
 - How did you resolve these issues?
 - What would you have done differently in the drafting of the plan?
- How did you incorporate an Environmental Assessment into your plan?
 - What elements of the Environmental Assessment made it into your plan?
 - Specifically, how did you determine the alternatives structure / decision points?
 - If you could do it again, would you have set up the alternative differently?
- **What role did enforcement have in your Management Plan?**
 - **What partnerships were formed to facilitate enforcement?**
- What partners did you engage in developing the plan?
 - Other agencies?
 - NGOs?
 - Friends Group/Advisory Committee?
 - How is this structured?
 - What was the process to build it?
 - How do they interact with the managers, etc.
- How do you plan to engage the public in on-going Management Plan processes/programs that come after the establishment of the Plan?
 - Where do you share information about your Monument?
 - What engagement methods have you found most effective?
 - How did you approach Tribal engagement?
- Is there anything else about your experience developing a Management Plan that you think would be helpful to share?

Secondary questions (time permitting)

- Was there specific rulemaking you needed to do regarding management? For instance...
 - rules around ships' sensors
- How often do you update your plan?
 - Why is that the case? How did you arrive at that decision?
- What were the **key components** of the initial plan for your Monument?
 - Permitting, enforcement, research priorities, etc?
 - What components did you build upon later on in the management process/once a management structure was set up?
 - How were these structured? Step down plans? Appendix?

*ask Brittany for values question **

Closing Questions for All Focus Groups: to end the conversation in each focus group

Is there anyone you would recommend getting in touch with for additional approach, best practice, or management ideas? We welcome all ideas here!

Are there any partnerships you could see evolving to ensure that this place is cared for?
How can NOAA and FWS develop these partnerships? What are they?

Appendix B

Focus Group Invitees (105 people invited from 68 organizations)

American Sports Fishing Association
Anderson Cabot Center for Ocean Life
Association to Preserve Cape Cod
Black in Marine Science
Channel Islands National Marine Sanctuary
Commercial Fisheries Center of Rhode Island
Commercial Fisheries Research Foundation
Conservation Law Foundation
Dark Sky International
Deep Sea Explorers
Fagatele Bay National Marine Sanctuary
Florida Keys Sanctuary
Friends of Plumas Wilderness
Graves Light and Fog Station
Gulf of the Farallones National Marine Sanctuary
Harvard University
Hawaiian Island Humpback Whale National Marine Sanctuary
Housatonic Community College
Hudson Canyon proposed Sanctuary
Inland Ocean Coalition
Jones River Watershed Association
Maine Coastal National Wildlife Refuge
Manomet

Mariana Trench Marine National Monument
Marine Campaign Manager International Fund for Animal Welfare
Maritime Aquarium at Norwalk
Massachusetts Citizen Science Programs
Massachusetts Institute of Technology Sea grant Citizen Science Programs
Monterey Bay National Marine Sanctuary
Mystic Aquarium
National Marine Protected Areas Center
National Museum of Natural History (Smithsonian)
Natural Resources Defense Council
Northeastern Regional Association of Coastal Ocean Observing Systems
New England Aquarium
New England Basking Shark Project
National Oceanic and Atmospheric Administration
National Oceanic and Atmospheric Administration Fisheries Office of Law Enforcement
New York State Citizen Science projects
Ocean Alert
Ocean Data Network
Oceana
Office of National Marine Sanctuaries
Olympic Coast National Marine Sanctuary
Papahāumokuākea National Marine Monument
Port of New Bedford
Providence Parks Urban Wildlife Refuge Partnership
Reef Check
Refuge Law Enforcement
Regional Historic Preservation Officer
Rhode Island Saltwater Anglers Association
River Museum

Rose Atoll National Marine Monument
Salem State University
Sea Going Green
Stellwagen Bank National Marine Sanctuary
The Nature Conservancy
The Pew Charitable Trusts
The Town Dock
The University of Rhode Island
University of Connecticut
University of Massachusetts Boston
University of New Hampshire
Urban Ocean Lab
United States Coast Guard
United States Fish and Wildlife Service
Woods Hole Oceanographic Institute
Yale University

Appendix F. Written and verbal comments received on Draft Management Plan and Environmental Assessment

U.S. Fish and Wildlife Service

Draft Management Plan and Environmental Assessment for the Northeast Canyons and
Seamounts Marine National Monument

Public Comments Received on Document ID FWS-R5-NWRS-2023-0154-0001

Note: Minor formatting changes have been made to comments to make this appendix accessible, in line with Section 508 of the Rehabilitation Act of 1973. Comments received as PDF attachments have been extracted and reformatted. Links have been renamed to avoid use of full URLs. Images provided as part of comments have not been altered but have been provided with alternative text and, where possible, links to accessing the data are provided. All original comments can be accessed [here](#), at Regulations.Gov in response to Docket FWS-R5-NWRS-2023-0154. Specific comments can be accessed by clicking the linked Document ID.

Document ID	FWS-R5-NWRS-2023-0154-0003
Title	Comment from maglio, domenic
Duplicates	0
Signatories	1

I recently received and reviewed the draft management and environmental assessment ""booklet"" .and i believe with this great and continuing effort started by president Barack Obama ,SO MUCH HAS BEEN DONE AND THIS IS JUST IN THE INFANT STAGES and its only the beginings of grater thinks to come for preservation and exporation of the northeast ocean floors

Document ID	FWS-R5-NWRS-2023-0154-0610
Title	Comment from CT League of Conservation Voters
Duplicates	13
Signatories	13

Brittany Petersen
Marine Monument Superintendent
U.S. Fish and Wildlife Service
300 Westgate Center Drive

Hadley, MA 01035

Re: Comments on U.S. Fish & Wildlife Service and National Oceanic and Atmospheric Administration's Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument (FWS-R5-NWRS-2023-0154-0001)

Dear Superintendent Petersen:

On behalf of the 13 undersigned organizations and others from the State of Connecticut, we submit these comments to the U.S. Fish & Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) regarding the Draft Management Plan for the Northeast Canyons and Seamounts Marine National Monument. The development of the draft plan demonstrates the continued commitment of the Biden-Harris Administration to secure the Monument's extraordinary biodiversity and cultural resources and advance the goal to conserve and restore at least 30% of U.S. lands and waters by 2030.

The Northeast Canyons and Seamounts National Monument was established in 2016 and stands to this day as the first and only Marine National Monument in U.S. Atlantic Waters. Situated approximately 130 miles off Cape Cod, the area was designated in the interest of preserving the unique ecological resources found within its boundaries, including its fragile, yet dynamic underwater landscape and stunning array of rare and threatened marine species. The Canyons and Seamounts are a genuine biodiversity hotspot, supporting a multitude of marine species including ancient corals, bottlenose dolphins and endangered sperm whales. The area plays a critical role in bolstering marine wildlife populations in the northeast region, including humpback whales, rare seabirds, and loggerhead sea turtles.

The Canyons and Seamounts also work to fight climate change and its impacts on ocean ecosystems. One of the single most important actions the U.S. can take to combat

climate change impacts on our oceans (in addition to aggressively reducing greenhouse gas emissions) is to increase resiliency of our marine ecosystems. This can be accomplished by protecting substantial areas of ocean habitat where marine life can thrive. The Canyons and Seamounts are the only protected area of their kind in U.S. Atlantic waters.

While this letter's signatories each work in different ways to protect and restore Connecticut's environment, we all share the strong view that the ocean is critical not only to our shared ecological health but to our common cultural heritage. The Northeast Canyons and Seamounts National Monument fits squarely in this vision and bolsters these values. The Monument has overwhelming public support, including in the State of Connecticut. The State's federal elected leaders including U.S. Senators Richard Blumenthal and Chris Murphy, Congresswoman Rosa DeLauro and other members of the Connecticut delegation were integral in the effort to establish the monument and have continued since to support its protection and management, and to advance monitoring and research initiatives. Connecticut's research institutions and aquariums have also been on the forefront of scientific research in the Monument since even before its designation.

A strong management plan that ensures this underwater treasure is effectively safeguarded is vital. Such a plan should call for effective regulatory, monitoring and enforcement regimes to protect the unique ecological resources; robust scientific programs, including for inventorying Monument resources and minimizing potential impacts, and for exploration and research; regular reporting to the public; periodic review and updating of the plan; and strong and inclusive public education and outreach activities that include engagement opportunities for underserved communities. Each of these essential components should be detailed in the plan.

We greatly appreciate the opportunity to comment on the Draft Management Plan and urge that it be finalized as soon as possible.

Sincerely,

Clean Water Action
Connecticut Citizen Action Group
The Connecticut Audubon Society
Connecticut League of Conservation Voters
Connecticut Land Conservation Council
Citizens Campaign for the Environment

Housatonic Valley Association
Interreligious Eco-Justice Network
Norwalk River Watershed Association
Park Watershed
Rivers Alliance of Connecticut
Save the Sound
Sierra Club

Comment ID	FWS-R5-NWRS-2023-0154-0583
Title	Comment from Dannies, Priscilla
Duplicates	589
Signatories	1

I live in Connecticut and protecting our oceans is important to me. I'm asking you to set up a strong management plan for the Northeast Canyons and Seamounts Marine National Monument. We need to do more to ensure the long-term protection of this national treasure.

I am happy the Biden-Harris Administration fulfilled a key requirement of the Monument's Presidential Proclamations – the development of a management plan to ensure that this special place is protected and thrives for generations to come. I urge NOAA and the U.S. Fish & Wildlife Service to take additional steps to strengthen the management plan and to finalize it as soon as possible and not later than the first quarter of 2024. I ask that the plan:

- Prioritizes adaptive management strategies that address climate change impacts in annual management planning;
- Develops regulations to implement all prohibitions consistent with the governing Presidential Proclamations;
- Includes an effective monitoring and enforcement program to ensure compliance consistent with the Presidential Proclamations;
- Requires all vessels in the Monument to have automated identification systems (AIS) turned on at all times to ensure effective tracking of activities in the monument and enforcement and compliance with Monument rules and regulations;
- Improves the permitting program with the use of a joint-agency access permit for all activities in the Monument to effectively track and manage the uses of the Monument;
- Speeds up the inventory of the Monument's resources and uses, including developing a baseline assessment of natural, historical, and cultural resources as soon as possible;
- Requires the plan to be reviewed and revised at least every 10 years, and preferably sooner, given the immense ecological importance of the monument.

Please take these steps to safeguard the Northeast Canyons and Seamounts Marine National Monument. We're all counting on you.

Comment ID	FWS-R5-NWRS-2023-0154-0349
Title	Comment from Letendre, Ann
Duplicates	0
Signatories	1

At 84 years of age, I have the long view of the destruction taking place in our oceans. The loss of so many of the ocean's natural resources, including the coral reefs, is appalling and frightening. I urge that we move quickly to implement the Administration's Management Plan to protect Canyons and Seamounts. Thank you.

Document ID	FWS-R5-NWRS-2023-0154-0603
Title	Comment from Creation Justice Ministries
Duplicates	0
Signatories	1

Dear Superintendent Petersen and Monument Management Team,

Creation Justice Ministries has been supportive of the first and only marine national monument in the Atlantic Ocean, since its designation in 2016. The Northeast Canyons and Seamounts National Marine Monument was designated 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]

God's people and planet are depending on us to not only reduce the harm that we perpetrate against God's creation, but to also ensure that we have the correct boundaries in place to safeguard this incredible marine monument for generations to come. Finalizing a strong management plan that ensures this underwater treasure is effectively safeguarded is vital.

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:

We urge that the final plan include an effective monitoring and enforcement program to ensure compliance consistent with the Presidential Proclamations. In recognition of its unique ecological resources, the Northeast Canyons and Seamounts is off limits to industrial activities.[6] Successful protection and maintenance of the Monument's ecosystems and biological diversity will require adequate monitoring and enforcement to prevent unlawful activities.

We acknowledge the draft plan's permitting goals and urge improvements in the proposed permitting program to ensure compliance with the Monument's rules and regulations. (Draft Plan at 41). We urge the agencies to improve the proposed permitting program for the activities permitted within the Monument (e.g., research and scientific exploration, sailing or bird and marine mammal watching)[7] through the implementation of a joint-agency access permit.

The final management plan must include actions to develop the regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations. As with the forthcoming regulations addressing prohibitions to commercial fishing which we recommend be finalized as soon as possible, additional regulations will be necessary to effectively enforce the remaining prohibited activities. (Draft Plan at 22).

The final plan should include a requirement to review and update the plan periodically, at least every 10 years if not sooner.

Additionally, we support the following objectives and actions outlined in the draft plan: We support the draft plan's actions to engage with Native American communities. (Draft Plan at 16, 27, 29, 33).

We support the draft plan's actions to evaluate shipping vessel traffic. (Draft Plan at 21, 26, 56).

We support the draft plan's inclusion of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces. (Draft Plan at 36).

We support the draft plan's inclusion of an exploration and research plan aimed at improving understanding of biological, physical, cultural, and historical resources in the Monument. Specifically, we support the plan's commitment to support research that undertakes filling in the gaps in knowledge regarding species, habitats, ecosystem processes, as well as physical, chemical, geologic, and oceanographic processes in the Monument. (Draft Plan at 33-34).

We support the draft plan's efforts to inventory the Monument's resources and urge the final plan to expedite such efforts, as well as identify and minimize any impacts to those resources.

We support the plan's efforts to collaborate and coordinate among the relevant 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. We acknowledge the thorough efforts FWS and NOAA have outlined to rely on strategic partnerships and effectively coordinate across agencies to manage this area. We encourage additional efforts to include critical stakeholders in the caretaking of this public resource.

We support the issuance of an annual report that summarizes key accomplishments and activities, provides information on staffing and budgeting, and a summary of permitting information. (Draft Plan at 29, and 39).

Creation Justice Ministries appreciates your continued work on this draft management plan. We are excited to work together for a better God's creation for all.

With gratitude and hope,

Creation Justice Ministries

Document ID	FWS-R5-NWRS-2023-0154-0002
Title	Comment from Eubanks, Charlotte
Duplicates	0
Signatories	1

Good draft management plan.

Please, consider using this tool developed by 6 land management agencies including NOAA and Fish.

[NPS Visitor Use Management Framework](#)

[NPS Visitor Use Management Resources](#)

Note: Original link provided is broken. Other resource material from the same website have been provided.

Document ID	FWS-R5-NWRS-2023-0154-0621
Title	Comment from Anonymous
Duplicates	0
Signatories	1

Hello, I support the plan to protect the Northeast Canyons and Seamounts National Monument. It is an invaluable source of biodiversity and deserves protection.

Sincerely,
Amanda Ingrassia
Fairfield, CT

Document ID	FWS-R5-NWRS-2023-0154-0400
Title	Comment from Robinson, David
Duplicates	0
Signatories	1

I fully recognize the need for regulations and support of the Northeast Canyons and Seamounts Draft Management plan. The plan is in depth but not specific. As they say the devil is in the details. I fully support the Draft Plan. What would be most helpful would be a Budget for the implementation of the plan. I have been a Profession Engineer, Commercial Diver for the past 50 years. I served six years in the US Navy on both submarines and Salvage vessels (in the Vietnam conflict-DaNang) I am a Board Member of Save the Rive-Save the Hills (a non-profit 501c3 consecration group in Connecticut.

Document ID	FWS-R5-NWRS-2023-0154-0351
Title	Comment from Amari, Jill
Duplicates	0
Signatories	1

I fully support the Draft Management Plan and encourage its speedy finalization.

Document ID	FWS-R5-NWRS-2023-0154-0619
Title	Comment from Bunnell, Becky
Duplicates	0
Signatories	1

I support the plan to protect the Northeast Canyons and Seamounts National Monument.

Document ID	FWS-R5-NWRS-2023-0154-0355
Title	Comment from Viandier, Jamila
Duplicates	0
Signatories	1

I think this Draft Management Plan should be approved, since it will help safeguard our marine monuments from harmful things, whether on purpose or by accident. It will keep the ecosystem intact and help the underwater wildlife flourish. With climate change affecting everything, we need more protections like this, not less.

Document ID	FWS-R5-NWRS-2023-0154-0363
Title	Comment from Caelin, Derek
Duplicates	0
Signatories	1

I'm excited for this plan to be finalized and accepted. We need to safeguard this area for the long term!

Document ID	FWS-R5-NWRS-2023-0154-0365
Title	Comment from Koepfer, Adelheid
Duplicates	0
Signatories	1

Please approve and adopt the Northeast Canyons and Seamounts, the Atlantic Ocean's ONLY marine monument and vibrant ocean ecosystem, to ensure the prevention of any harmful activities within the monument's boundaries. This is crucial for preserving the health of our planet and all its inhabitants.

The development of the Draft Management Plan aligns perfectly with the Biden Administration's commitment to conserve and restore at least 30% of U.S. lands and waters by 2030.

Document ID	FWS-R5-NWRS-2023-0154-0352
Title	Comment from Okula, Carlene
Duplicates	0
Signatories	1

Please continue to support the responsible management of the Northeast Canyons and Seamounts Marine National Monument. Thanks for all the good work you do to support nature and the environment.

Document ID	FWS-R5-NWRS-2023-0154-0353
Title	Comment from ROE, DEBORAH
Duplicates	0
Signatories	1

Protecting the help of marine ecosystems is vital to the health of the planet. I'm writing to support the speedy completion and implementation of the management plan for Northeast Canyons and Seamounts Marine National Monument.

Document ID	FWS-R5-NWRS-2023-0154-0618
Title	Comment from Hogue, Mary
Duplicates	0
Signatories	1

The development of the draft plan demonstrates the continued commitment of the Biden-Harris Administration to secure the Monument's extraordinary biodiversity and cultural resources and advance the goal to conserve and restore at least 30% of U.S. lands and waters by 2030.

The Northeast Canyons and Seamounts National Monument, established in 2016, is uniquely the only Marine National Monument in US Atlantic Waters. The Canyons and Seamounts are a lesson in biodiversity with a multitude of marine life and plays a critical role in bolstering marine wildlife populations in the northeast region. Just over 100 miles off Cape Cod, the area is an irreplaceable habitat, with its complex and vibrant world of rare and threatened marine species.

The Canyons and Seamounts are the only protected area of its kind in US Atlantic waters and are a means of ensuring our planet's ecological well-being. They work to fight climate change and its impacts on ocean ecosystems by protecting this large area of ocean habitat where marine life can thrive. As a proud Nutmegger, I'm happy to report that our Connecticut research institutions have been working and the Monument even before the 2016 designation.

A strong management plan that ensures this underwater treasure is safeguarded is vital. Such a plan should call for effective regulatory, monitoring and enforcement regimes to protect the unique ecological resources; robust scientific programs, including inventorying resources and minimizing potential impacts, and exploration and research; regular reporting to the public; periodic review and updating of the plan; public education and outreach activities that include engagement opportunities for underserved communities. Each of these essential components should be detailed in the plan.

Thank you for your writing this plan to safeguard this special place,

Mary Hogue
Fairfield, CT

Document ID	FWS-R5-NWRS-2023-0154-0360
Title	Comment from Anonymous
Duplicates	0
Signatories	1

The Draft Management Plan and Environmental Assessment for the Northeast Canyons and Seamounts Marine National Monument must be approved and adopted to ensure the prevention of any harmful activities within the monument's boundaries. This is crucial for preserving the health of our planet and all its inhabitants.

The development of the Draft Management Plan aligns perfectly with the Biden Administration's commitment to conserve and restore at least 30% of U.S. lands and waters by 2030.

Document ID	FWS-R5-NWRS-2023-0154-0213
Title	Comment from Hall, Grace
Duplicates	0
Signatories	1

The Northeast Canyons and Seamounts Marine National Monument is clearly a treasure. My main concern is that allowing commercial fishing has a negative impact on its use by many species of fish and other aquatic creatures. With the stress of a warming ocean, it is even more important to have a sanctuary for breeding. Therefore, I would like to see the terms governing the Monument be returned to the initial proclamation issued by President Obama.

Document ID	FWS-R5-NWRS-2023-0154-0384
Title	Comment from Anderson, Dorothy
Duplicates	0
Signatories	1

The public needs to know more about the Monument. It is good it is protected but more information must be provided. School children can be educated through videos and projects. Posters on public boards can inform the public as can special programs on TV.

Document ID	FWS-R5-NWRS-2023-0154-0375
Title	Comment from Greenstein, Mark Stewart
Duplicates	0
Signatories	1

The seamount is beautiful and important. And this organization, regulations.gov, is CORRECTLY going to citizens first. I'm not a fan of big government, but when real people are behind movements (not just bureaucrats and insider corporations), and government is the best method to make helpful change, then it's worthy. Environmental protection is one of just two areas to which the Constitution's power deserves specific expansion, and thus I am on board.

Document ID	FWS-R5-NWRS-2023-0154-0004
Title	Comment from Quinn, Patricia
Duplicates	0
Signatories	1

The U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration jointly developed the Monument Management Plan to guide the work of the Monument for the next 15 years and provide a framework for stewardship and management of this special place.

This Plan establishes the long-term vision and framework needed to provide proper care for the Monument's unique ecosystem, marine life, and natural and historical resources, as well as set priorities and goals for managing the Monument into the future. I believe the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration will do a great job.

Document ID	FWS-R5-NWRS-2023-0154-0533
Title	Comment from Wiley, Marie
Duplicates	0
Signatories	1

The United States must continue to protect our pristine oceans, or what's left of them!
This includes the canyons in the seamount. Do your job. Do what is right.

Document ID [FWS-R5-NWRS-2023-0154-0623](#)
Title Comment from The Undersigned 61 Organizations
Duplicates 0
Signatories 61

Submitted via regulations.gov

October 26, 2023

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

Re: Comments on U.S. Fish & Wildlife Service and National Oceanic and Atmospheric Administration’s Draft Monument Man¹agement Plan for the Northeast Canyons and Seamounts Marine National Monument (FWS-R5-NWRS-2023-0154-0001)

Dear Superintendent Petersen and Monument Management Team,

On behalf of the 61 undersigned organizations, we submit these comments to the U.S. Fish & Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) regarding the Draft Management Plan (“draft plan”) for the Northeast Canyons and Seamounts Marine National Monument (“Northeast Canyons and Seamounts” or “Monument”).¹

President Obama designated the Monument—the first and only marine national monument in the Atlantic Ocean—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, the Monument protects three deep-sea canyons and four underwater seamounts whose depths rival the Grand Canyon and whose mountains rise higher than New England’s Presidential Range. The Monument is recognized as “one of the Atlantic Ocean’s most biologically productive and important

¹See U.S. Fish & Wildlife Service, *Northeast Canyons and Seamounts Marine National Monument Draft Management Plan and Environmental Assessment*, (Sept. 12, 2023), <https://www.fws.gov/media/northeast-canyons-and-seamounts-marine-national-monument-draft-management-plan-and>

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

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. Atlantic puffins winter in these waters, to feed on small fish and krill. Thousand-year-old corals—some the size of small trees, in vibrant shades of orange, pink, and yellow—are home to numerous fish species. This summer scientists conducted an aerial survey of the Monument and documented over 700 ocean animals, including fin whales, pilot whales, and bottlenose, striped, and Risso's dolphins, as well as Chilean Devil Rays, manta rays, sunfish, and a hammerhead shark.⁴ Finalizing a strong management plan that ensures this underwater treasure is effectively safeguarded is vital.

Presidential Proclamations 9496 and 10287 require the development and implementation of a Management Plan for the Northeast Canyons and Seamounts to ensure the proper care and stewardship of this national treasure.⁵ The development of the draft plan demonstrates the continued commitment of the Biden-Harris Administration to secure the Monument's extraordinary biodiversity and cultural resources and advance the goal to conserve and restore at least 30% of U.S. lands and waters by 2030. Our organizations applaud the thoughtful, extensive goals laid out in the draft plan, as well as the clear focus and priority placed on protecting biodiversity and understanding climate change impacts. We urge the development of a final plan that details actions that will be taken to achieve each of these objectives. While we recognize there are funding challenges associated with managing this unique area, our community will support efforts by FWS and NOAA to increase and ensure adequate funding to achieve the plan's goals in their entirety. We urge that the plan be finalized as soon as possible in light of the 2021 Proclamation's deadline for the development of a joint management plan by September 15, 2023—to ensure that this national treasure is protected and thrives for generations to come.

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

³ See 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).

⁴ See New England Aquarium, *More than 700 animals seen during Aquarium's aerial survey of marine protected area*, Press Release (Aug.10, 2023), <https://www.neaq.org/about-us/press-room/press-releases/more-than-700-animals-seen-during-aquariums-aerial-survey/>.

⁵ See 81 Fed. Reg. 66,161; See 86 Fed. Reg. 57,349.

recommendations:

We urge that the final plan include an effective monitoring and enforcement program to ensure compliance consistent with the Presidential Proclamations. In recognition of its unique ecological resources, the Northeast Canyons and Seamounts is off limits to industrial activities.⁶ Successful protection and maintenance of the Monument's ecosystems and biological diversity will require adequate monitoring and enforcement to prevent unlawful activities. It is imperative that the final plan require all vessels transiting through or operating in the Monument to have automated identification systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned on at all times to ensure the effective tracking of activities in the Monument and enforcement and compliance with Monument rules and regulations. We ask that the agencies make it a priority to actively monitor activity in the monument using satellite data to track use of the Monument to ensure compliance with monument prohibitions, prevent illegal, unreported, and unregulated fishing in the Monument, and aid in the evaluation of vessel traffic activity in the Monument. (Draft Plan at 26). Where appropriate, we encourage the use of remote technologies including below surface buoy systems and drones to ensure successful resource protection of this remote area. This is essential to ensure effective protection of the Monument.

We acknowledge the draft plan's permitting goals and urge improvements in the proposed permitting program to ensure compliance with the Monument's rules and regulations. (Draft Plan at 41). We urge the agencies to improve the proposed permitting program for the activities permitted within the Monument (e.g., research and scientific exploration, sailing or bird and marine mammal watching)⁷ through the implementation of a joint-agency access permit. Key to effectively protecting the Monument's resources is the ability to track and monitor all permitted activities to evaluate potential impacts to Monument resources. Requiring a monument-specific permit, in addition to the required existing permits, will enable the agencies to better track and understand the uses of the Monument, and ensure compliance with the proclamation prohibitions and agencies' rules and regulations. In the absence of a monument-specific permit, the management team should establish a clear, comprehensive process to regulate, track, understand, and share information surrounding the usage of the Monument to enable effective management. We would support a final permitting program that ensures the detailed tracking of permitted activities and sharing of information among management agencies to enable monument managers to make necessary, informed management decisions.

⁶ See 81 Fed. Reg. at 65,164-65.

⁷ See 81 Fed. Reg. at 65,165.

The final management plan must include actions to develop the regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations. As with the regulations addressing prohibitions to commercial fishing⁸, additional regulations will be necessary to effectively enforce the remaining prohibited activities. (Draft Plan at 22).

The final plan should include a requirement to review and update the plan periodically, at least every 10 years if not sooner. We are encouraged by the draft plan's objectives to adaptively manage the Monument, including through annual management team meetings that could include modifying the plan based on the development of new information (Draft Plan at 28), as well as the objective to undertake a condition report that will summarize the current status and health of resources in the Monument in order to inform the next management plan review process. (Draft Plan at 34). However, given uncertainties surrounding timelines and funding to achieve the long-term proposed goals, we urge the final plan be reviewed every ten years or sooner.

Additionally, we support the following objectives and actions outlined in the draft plan:

We support the draft plan's actions to engage with Native American communities. (Draft Plan at 16, 27, 29, 33). We encourage those efforts to begin early and often as a high priority for the Monument management team to inform the successful management of the Northeast Canyons and Seamounts.

We support the draft plan's actions to evaluate shipping vessel traffic. (Draft Plan at 21, 26, 56). We support the draft plan's actions related to assessing shipping vessel traffic impacts on the Monument, including understanding the potential interaction with marine mammals. As part of this, and as emphasized above, use of satellite data to better understand shipping vessel traffic patterns and amount should be prioritized.

We support the draft plan's inclusion of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces. (Draft Plan at 36). Creating equitable, accessible engagement opportunities for the public to connect with the vast and inspiring wonders contained within the Monument is imperative. We therefore applaud the agencies' plan to create and share accessible and inclusive educational resources that share the incredible biodiversity of this monument with the diverse U.S. public and including in partnership

⁸ See Magnuson-Stevens Act Provisions; Prohibition of Commercial Fishing in the Northeast Canyons and Seamounts Marine National Monument, 88 Fed. Reg. 72,038 (Oct. 19, 2023).

with educational institutions and aquariums. This includes the agencies' efforts to develop outreach materials in multiple languages and establish educational curricula and programming to be disseminated broadly throughout FWS's Urban Wildlife Conservation Partnership, as well as connecting with schools that serve communities with environmental justice concerns in the Northeast. (Draft Plan at 36-37). We urge a commitment to ensure the completion of the plan's important goals that are presently contingent on additional funding. (Draft plan at 37).

We support the draft plan's inclusion of an exploration and research plan aimed at improving understanding of biological, physical, cultural, and historical resources in the Monument.

Specifically, we support the plan's commitment to support research that undertakes filling in the gaps in knowledge regarding species, habitats, ecosystem processes, as well as physical, chemical, geologic, and oceanographic processes in the Monument. (Draft Plan at 33-34). 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 geologic, ecological, and biological resources.⁹ We encourage assembling a working group of experts that can help develop a research needs assessment. (Draft Plan at 33). We support the draft plan's actions to share the research findings including by hosting research symposia. (Draft Plan at 34). We also commend the plan's objectives to use Monument research to inform management decisions. (Draft Plan at 28, 34). The Monument, with its size and protected status, is an incredible living laboratory that can contribute to society's understanding of climate change impacts on ocean wildlife and habitats. Therefore, we urge the agencies to articulate steps to ensure that goals to research climate change impacts in the Monument and to develop a long- term climate change monitoring plan materialize early. (Draft Plan at 34).

We support the draft plan's efforts to inventory the Monument's resources and urge the final plan to expedite such efforts, as well as identify and minimize any impacts to those resources.

The Monument is filled with spectacular wildlife. The slow growing deep-sea coral, the diversity of marine mammals, majestic seabirds, sharks, rays and other fish, and the often- unseen base of the marine food web, plankton, all make this monument a haven for biodiversity. In recent years, as scientists have conducted dives with remotely operated vehicles and aerial surveys, they continue to observe new and rare species with each visit. We support the agencies' efforts to inventory the resources contained within the Monument, including by developing a comprehensive species list to be updated

⁹ 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): e13

annually. In particular, we urge the agencies to complete a baseline assessment of the area's health and productivity as soon as possible so as to assess and adaptively address current impacts to the Monument. (Draft Plan at 34). We also support the plan's objective of completing an assessment of all major uses of the Monument (Objective 1.4) as a detailed understanding of human uses of the Monument is essential to effective stewardship.

We support the plan's efforts to collaborate and coordinate among the relevant 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. We acknowledge the thorough efforts FWS and NOAA have outlined to rely on strategic partnerships and effectively coordinate across agencies to manage this area. We encourage additional efforts to include critical stakeholders in the caretaking of this public resource. 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.

We support the issuance of an annual report that summarizes key accomplishments and activities, provides information on staffing and budgeting, and a summary of permitting information. (Draft Plan at 29, 39).

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

Sincerely,

Alliance of Nurses for Healthy Environments
Azul
Biodiversity First!
Blue Atlas Project
Blue Ocean Society for Marine Conservation
Brian Skerry Photography
Californians for Western Wilderness
Center for Biological Diversity
Center for Coastal Studies
CleanEarth4Kids.org
Coastal Research & Education Society of Long Island, Inc.
Connecticut Ornithological Association
Conservation Law Foundation

Creation Justice Ministries
Culver City Presbyterian Church
EarthEcho International
Earthjustice
Endangered Habitats League
Endangered Species Coalition
Environment America
Environment Connecticut
Environment Maine
Environment Massachusetts
FLUKES: International Whale Tours
Friends of Animals
Friends of Ruth B. Swann Park
Friends of the Mariana Trench
Gotham Whale
Great Old Broads for Wilderness
Greenpeace USA
Gulf Reach Institute
Gundalow Company
Healthy Ocean Coalition
HECHO Hispanics Enjoying Camping Hunting and the Outdoors
Hispanic Access Foundation
International Marine Mammal Project of Earth Island Institute
IUCN North America
League of Conservation Voters
Marine Conservation Institute
Mass Audubon
Mystic Aquarium
Mysticetus Consulting Group
National Ocean Protection Coalition
National Parks Conservation Association
Natural Resources Defense Council
North Atlantic Whale Watch Naturalists Association (NAWWNA)
North County Watch
Nuestra Tierra Conservation Project
NY4WHALES
Plastic Free Future
Rivers Alliance of Connecticut
Samahan Filipino Cultural Arts & Education Center

Save Our Shores
Seacoast Science Center
Southern Steelhead Coalition
Surfrider Foundation
The Coastal Commons
The Ocean Project
The Wilderness Society
Whale and Dolphin Conservation
Wild Cumberland

Document ID	FWS-R5-NWRS-2023-0154-0628
Title	Comment from The Undersigned 61 Organizations
Duplicates	0
Signatories	61

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 laboratories¹⁰.

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

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

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 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,

Doug Piekarz
Chief Executive Officer
Akron Zoo

Craig Ivanyi
Executive Director
Arizona-Sonora
Desert Museum

Tom Schmid
President And Ceo
Columbus Zoo And Aquarium

Jon Dohlin
CEO And Director
Fresno Chaffee Zoo

Bill Street
Senior Vice President
Indianapolis Zoo

Cynthia Claus
Director
Jenkinson's Aquarium

Sean Putney
Executive Director & CEO
Kansas City Zoo

Jason Patlis
President And CEO
The Maritime Aquarium at Norwalk

Katie Cubina
Senior Vice President, Mission Programs
Mystic Aquarium

Tim Tetzlaff
Director Of Conservation
Naples Zoo At Caribbean Gardens

John Racanelli
Chief Executive Officer
National Aquarium

Vikki Spruill
President & CEO
New England Aquarium

Dwight Lawson, PhD
Chief Executive Officer
Oklahoma City Zoo

Dennis Pate
Chief Executive Officer
Omaha's Henry Doorly Zoo & Aquarium

Alan Varsik
Director
Point Defiance Zoo and Aquarium

Robert Davidson
Chief Executive Officer
Seattle Aquarium

Bridget C. Coughlin, PhD
President And CEO
John G. Shedd Aquarium

Keith Sanford
President And CEO
Tennessee Aquarium

Tim Brown
President And CEO
Tracy Aviary

Cynthia Whitbred-Spanoulis
Executive Director
Virginia Aquarium & Marine Science Center

Greg Bockheim
Executive Director
Virginia Zoo

Leigh Ann Clayton, DVM, eMBA
Director
Wildlife Conservation Society's New York Aquarium

John Linehan
President & CEO
Zoo New England – Franklin Park Zoo & Stone Zoo

Document ID [FWS-R5-NWRS-2023-0154-0616](#)
Title Comment from American Sportfishing Association
Duplicates 0
Signatories 1



October 24, 2023

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

Dear Superintendent Petersen,

The American Sportfishing Association (ASA) is the nation's recreational fishing trade association and represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 54.5 million recreational anglers. ASA also safeguards and promotes the social, economic, and conservation values of sportfishing in America, resulting in a \$148 billion annual impact on the nation's economy.

ASA appreciates the opportunity to comment on the Draft Management Plan for the Northeast Canyons and Seamounts Marine National Monument, an important offshore recreational fishing area.

Offshore recreational fishing is a tremendous economic driver for coastal communities throughout New England. According to NOAA Fisheries, private recreational fishermen targeting highly migratory species contribute \$266 million annually in total economic output to the economy of the Northeast and Mid-Atlantic regions, supporting 1,824

jobs¹¹. For-hire and tournament trips for highly migratory species, for which economic expenditure data are not available currently, also contribute significantly to the region's economy.

We would like to express our gratitude to the Monument management team for their commitment to the principles outlined in Presidential Proclamation 9496. They have created a Draft Management Plan that allows for regulated recreational fishing, in line with the responsible stewardship and preservation of the Monument's resources.

Recreational fishing within the three deep-sea canyons – Oceanographer, Gilbert, and Lydonia Canyons – targets numerous migratory species, including yellowfin tuna, marlin, swordfish, mahi mahi, wahoo, and many others. However, it's important to note that this type of fishing primarily occurs near the ocean's surface and does not involve any contact with the seabed. Consequently, the Draft Management Plan recognizes that recreational fishing aligns with the objectives of preserving the Monument, particularly regarding the deep-sea coral communities.

As detailed in the Monument's Draft Management Plan, the fish stocks targeted by recreational fishermen in the monument areas are closely regulated by the International Commission for the Conservation of Atlantic Tunas (ICCAT) NOAA Fisheries, the Regional Fishery Management Councils and the states. Additionally, NOAA Fisheries already has an effective permitting system in place, utilizing existing authority and established programs to permit recreational fishing within the Monument. Therefore, we agree that Alternative 2, which leverages this existing infrastructure, is the best direction for the Monument's Management Plan.

The recreational fishing community is a valuable partner when it comes to sharing information on how best to manage the Monument's resources for all stakeholders. Specifically, ASA remains committed to partnering with the Monument Management Team to achieve its goals and objectives of the Management Plan. As a first step, we offer the following specific recommendations for the goals and objectives of the plan.

Goal 1

Objective 1.1: We recommend reprioritizing funding resources to include the following two bullets considering the 2023 FY budget directs most funds towards research and

¹¹ Hutt, Clifford, Sabrina Lovell, and George Silva. 2014. The Economic Contributions of Atlantic Highly Migratory Species Anglers in New England and the Mid-Atlantic, 2011. U.S. Department of Commerce, NOAA Tech. Memo. NMFS-F/SPO-147, 34 p.

education. Although NOAA fisheries has a robust permitting system, additional education and outreach to anglers who fish within the Monument is important.

- Public a user-friendly, online permitting guide for the Monument
- Improve awareness about the Monument's location and management measure by ensuring that its boundary is represented on nautical charts, maps, and ocean-related apps such as WhaleAlert.

Objective 1.3: The following bullet is too vague. What does the word significant mean in the context of abandoned, lost, discarded fishing gear? The scientific process associated with achieving objective 1.3 must be clarified.

- Should significant marine debris or ALDFG issues be found, evaluate their impacts, and explore management options for mitigating, replacing, or restoring injured Monument resources.

Objective 1.4: For "Recreational Uses", we recommend partnering with recreational fishing and boating associations to advance this objective. We appreciate being recognized as a potential partner for Goal 2 and suggest adding the National Marine Manufacturers Association and the International Game Fish Association as relevant partners. Additionally, we suggest integrating partnerships to achieve all the Goals of the Management Plan.

Objective 1.8: We offer help in developing a monument stewardship program. ASA worked collaboratively with partners of the Florida Keys National Marine Sanctuary to establish the Blue Star Program which aims to achieve similar objectives.

Objective 1.9: The following bullet needs more clarification and an example of "adaptive management toolkits".

- Implement adaptive management toolkits to assess monument resource management needs.

Goal 2

Objective 2.4.: We recommend working with the recreational fishing and boating industry to advance an education and outreach plan that would serve as a solid foundation for industry and angler engagement in the monument's management plan. This suggestion can be incorporated into the execution of Goal 4, which focuses on engagement and education.

Goal 3

Objective 3.3: We recommend coordinating with the Atlantic States Marine Fisheries Commission and the Mid-Atlantic and New England Fishery Management Councils as all three bodies have a research planning process that would integrate well with achieving Goal 3. Also, we suggest that the diverse interdisciplinary working group of experts includes representatives who have conducted scientific research cooperatively with the recreational fishing community.

Goal 4

Many of goal 4's objectives align with the recreational fishing community's existing efforts to educate our diverse anglers on various fishery topics. We see the opportunity to leverage our industry membership to assist the Monument Management Team in meeting the objectives under Goal 4, especially the ones not currently expected to be funded under existing funding levels.

Thank you for considering our comments as you finalize the Monument's Management Plan. We look forward to continuing our work together to recognize the importance of recreational fishing as a sustainable use of the Monument.

Sincerely,



Michael Waine
Atlantic Fisheries Policy Director

Document ID [FWS-R5-NWRS-2023-0154-0613](#)
Title Comment from National Audubon Society
Duplicates 0
Signatories 1



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

October 26, 2023

Dear Superintendent Petersen,

On behalf of the National Audubon Society's, and our 1.6 million members, we write to support the draft management plan for the Northeast Canyons and Seamounts Marine National Monument. The National Audubon Society works to protect birds and the places they need, and the 3.1 million acres designated to the monument site remains a pristine area for birds, fish, and wildlife. We would like to express our support for language reinstating the commercial fishing ban within the site and strongly encourage continuing that ban into the future.

Ensuring the monument continues to be free from commercial fishing is not a threat to the well-being of commercial fishing communities. The monument has not historically been heavily fished due to remoteness and depth. Additionally, protecting coral habitats far out in the ocean actually benefits fishermen, because it allows fish populations to thrive and eventually spill out into areas that are more easily accessible by boat. Banning commercial fishing was meant to protect this important habitat from future fishing, when new technology developments would allow more boats to fish at the distance and depth of the monument.

Globally, seabird populations have declined by 70 percent since 1950, and in North America alone, shorebird populations have decreased by 70 percent since 1973.^{12,13,14} Sea- and shorebirds are threatened by oil spills, environmental contaminants, habitat disturbances and disruption, incidental take (“bycatch”), and/or overfishing. Marine protected areas are important, now more than ever, to provide habitat free from these disturbances. The Northeast Canyons and Seamounts Monument has been proven to be of key importance to seabirds. Commercial fishing has the potential to irrevocably disrupt the Northeast Canyons and Seamounts. Audubon has been vocal in its defense of the monument, and we are overjoyed with the decision to revert the language which would have allowed commercial fishing.

It is encouraging that the draft management plan included 4 comprehensive goals to ensure the health of the Monument into the future. I would like to highlight the extensive care taken in drafting these goals, in particular sub sections 1.3, 1.6, and 3.3.

Objective 1.3: Assess potential impacts of marine debris and abandoned, lost, or otherwise discarded fishing gear (ALDFG) on Monument resources.

Marine debris and stray fishing gear poses a grave and relatively unknown risk to shorebirds and seabirds. According to Roman et. al, “There is a 20.4% chance of lifetime mortality from ingesting a single debris item, rising to 100% after consuming 93 items”.¹⁵ Analyzing sea debris in the monument and finding ways to reduce its presence with a community focused approach is key to ensuring the health of the Northeast Canyons and Seamounts. Finding ways of encouraging recreational fishers, ecotourists, researchers, and boaters to participate and be a part of the protection of the monument will bring a community approach that has been proven to be effective.

Objective 1.6: Identify, nurture, and honor Native American cultural connections to the Monument.

¹² Michelle Paleczny, Edd Hammill, Vasiliki Karpouzi, Daniel Pauly. Population Trend of the World’s Monitored Seabirds, 1950-2010. PLOS ONE, 2015; 10 (6): e0129342 DOI: 10.1371/journal.pone.0129342

¹³ Munro, Margaret 2017 What’s killing the world’s shorebirds? Nature 541, 16–20 (05 January 2017) doi:10.1038/541016a <https://www.nature.com/news/what-s-killing-the-world-s-shorebirds-1.21232>

¹⁴ North American Bird Conservation Initiative. The State of North America’s Birds 2016 (Environment and Climate Change Canada, P2016).

¹⁵ Roman L, Hardesty BD, Hindell MA, Wilcox C. A quantitative analysis linking seabird mortality and marine debris ingestion. Sci Rep. 2019 Mar 1;9(1):3202. doi: 10.1038/s41598-018-36585-9. PMID: 30824751; PMCID: PMC6397299.

The National Audubon Society is thrilled to see collaboration between native populations is a priority of the management plan. We would like to encourage this partnership and hope it will serve as an example of the potential and benefits native inclusion has on marine protected areas. Indigenous partnership and leadership are essential to the success of the management plan, and the inclusion of native knowledge has been a detail that has been historically overlooked in conservation. Fostering these relationships will bridge the cultural gap between science and community and hopefully expand our views and relationships, creating new areas of collaboration and income.

Objective 3.3: Identify gaps in knowledge regarding species, habitats, ecosystem processes, as well as physical, chemical, geologic, and oceanographic processes in the Monument.

Audubon has an extensive history in writing to support the monument and providing information to help close some of the gaps in knowledge described in objective 3.3. In particular, we track and have submitted data which shows how the monument's 38 species of seabirds use the protected area.¹⁶ To that end, we are excited to share new data that shows Leach's storm petrels nesting in Maine have been foraging in the monument while actively nesting – a first for the monument. Every day, we find new ways that birds, fish, and other wildlife are utilizing the monument. We would also like to stress the importance of continuing to involve our native communities in identifying these knowledge gaps.

¹⁶ Birds of Conservation Concern, U.S. Fish & Wildlife Service, <https://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>

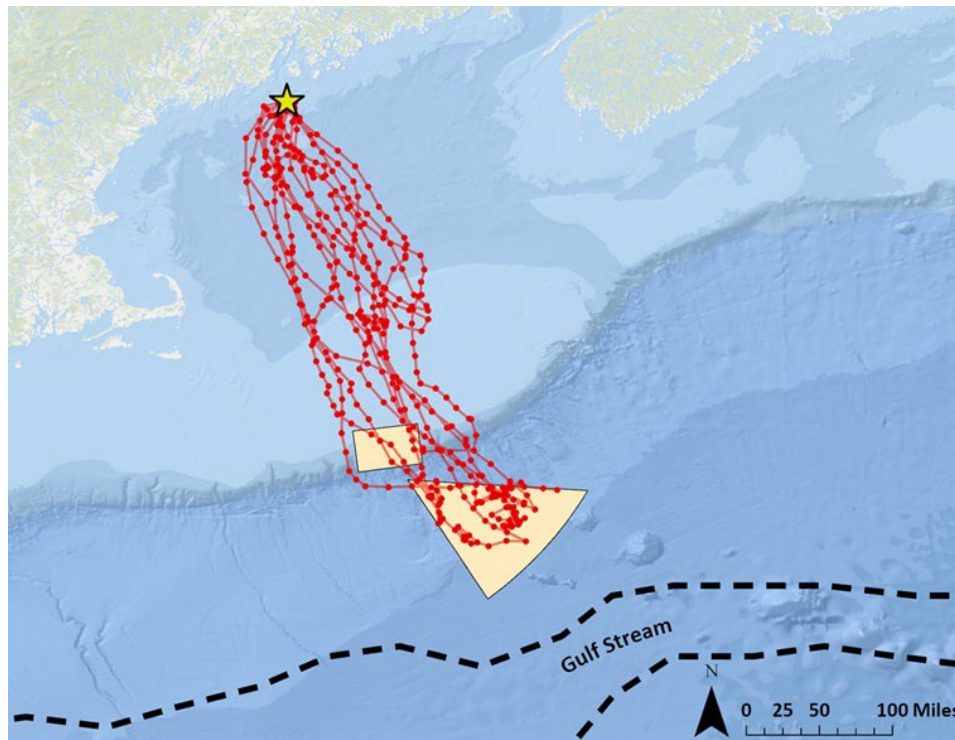


Image 1. Tracking information shows that leach's storm-petrels nesting in Maine forage in the monument while actively nesting.

The National Audubon Society's previous engagement in advocating for the Northeast Canyons and Seamounts Marine National Monument:

Audubon has been a vigorous advocate for the Monument's designation and its continued existence. After Audubon discovered this wintering home of Atlantic Puffins, we used this data to join scientists, conservationists, politicians and others urging President Obama to designate this area as the first national marine monument on the Atlantic Coast. Audubon also issued an "Action Alert" to its members urging them to ask President Obama to permanently protect the canyon and seamount area. Approximately 21,000 Audubon members sent emails to the President through this alert. Audubon applauded President Obama when he used the Antiquities Act to do so in 2016.

In 2017, when President Donald Trump ordered a review of certain national monument designations, including the Monument, Audubon urged the Secretary of Commerce to maintain the Monument's designation and its critical protections for seabirds and other wildlife. Audubon submitted public comment in support of retaining prohibitions and limits on certain activities in the Monument area. Through another "Action Alert,"

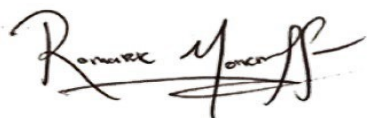
Audubon enlisted the participation of nearly 27,000 individuals to articulate the reasons for their support for the Monument.

When commercial fishing groups filed a lawsuit challenging the boundaries of the monument in 2019 (Massachusetts Lobstermen's Association, et. Al. v. Wilbur J. Ross, Jr.), Audubon filed an amicus brief with information on the importance of the monument for seabirds.

Conclusion:

The Northeast Canyons and Seamounts Marine National Monument is important not just to conservation, but to the culture and economic livelihoods of all that live on the New England coast. Society, we thank you for your time and look forward to working with you on the implementation of the draft management plan and on other issues that impact birds and the places they need.

Sincerely,

A handwritten signature in black ink, appearing to read "Romaric Moncrieffe". The signature is written in a cursive style with a horizontal line underneath.

Romaric (Remy) Moncrieffe
Marine Conservation Policy Manager
National Audubon Society

APPENDIX

Table 1. Bird species found in and around the Monument and their conservation statuses. Shaded species are more commonly observed in the area. ¹⁷

Species	Scientific Name	FWS Birds of Conservation Concern	FWS Birds of Management Concern	Bird Conservation Region Priority	ESA Listed
American Herring Gull	<i>Larus smithsonianus</i>				
Atlantic Puffin	<i>Fratercula arctica</i>			x (high)	
Audubon's Shearwater	<i>Puffinus lherminieri</i>	Yes	Yes	x (high)	
Band-rumped Storm-petrel	<i>Oceanodroma castro</i>			x (medium)	
Black-legged Kittiwake	<i>Rissa tridactyla</i>			x (medium)	
Common Murre	<i>Uria aalge</i>			x (high)	
Cory's Shearwater	<i>Calonectris borealis</i>			x (medium)	
Greater Shearwater	<i>Ardenna gravis</i>	Yes	Yes	x (medium)	
Leach's Storm-petrel	<i>Hydrobates leucorhous</i>			x (medium)	
Long-tailed Jaeger	<i>Stercorarius longicaudus</i>				

¹⁷ This was a draft list received by Steve Kress from the Northeast Canyons and Seamounts Marine National Monument's Interim Superintendent on 2/14/18.

Manx Shearwater	<i>Puffinus puffinus</i>			x (medium)	
Northern Gannet	<i>Morus bassanus</i>			x (high)	
Parasitic Jaeger	<i>Stercorarius parasiticus</i>				
Razorbill	<i>Alca torda</i>			x (high)	
Red Phalarope	<i>Phalaropus fulicarius</i>			x (medium)	
Red-necked Phalarope	<i>Phalaropus lobatus</i>			x (high)	
Sooty Shearwater	<i>Ardenna grisea</i>				
South Polar Skua	<i>Stercorarius maccormicki</i>				
Thick-billed Murre	<i>Uria lomvia</i>				
Wilson's Storm Petrel	<i>Oceanites oceanicus</i>				
Arctic Tern	<i>Sterna paradisaea</i>	Yes	Yes	x (medium)	
Bermuda Petrel	<i>Pterodroma cahow</i>			x (high)	
Black-capped Petrel	<i>Pterodroma hasitata</i>		Yes	x (high)	
Black Scoter	<i>Melanitta americana</i>			x (medium)	
Common Loon	<i>Gavia immer</i>			x (high)	
Double-crested Cormorant	<i>Phalacrocorax auritus</i>				
Dovekie (Little Auk)	<i>Alle alle</i>				
Great Black-backed Gull	<i>Larus marinus</i>				
Great Cormorant	<i>Phalacrocorax carbo</i>	Yes	Yes	x (medium)	

Great Skua	<i>Catharacta skua</i>				
Laughing Gull	<i>Larus atricilla</i>			x (low)	
Northern Fulmar	<i>Fulmarus glacialis</i>				
Pomarine Jaeger	<i>Stercorarius pomarinus</i>				
Red-throated Loon	<i>Gavia stellate</i>	Yes	Yes	x (high)	
Ring-billed Gull	<i>Larus delawarensis</i>				
Roseate Tern	<i>Sterna dougallii</i>		Yes	x (high)	Yes
Surf Scoter	<i>Melanitta perspicillata</i>			x (medium)	
White-winged Scoter	<i>Melanitta deglandi</i>			x (rare)	

Document ID [FWS-R5-NWRS-2023-0154-0005](#)
Title Comment from Auster, Peter
Duplicates 0
Signatories 1



11 October 2023

Subject: Draft Management Plan and Environmental Assessment for the Northeast Canyons and Seamounts Marine National Monument

I commend the USFWS and NMFS for developing a joint management plan for the Northeast Canyons and Seamounts Marine National Monument, the only marine monument in the Federal waters of the Atlantic Ocean. The draft plan includes an extensive set of goals and sets a high bar for enhancing knowledge to assess and ensure the Monument's extraordinary biodiversity is conserved in perpetuity with a focus on research, education, and outreach. Efforts to share new and existing knowledge about this extraordinary ocean wilderness and engage with a public that stretches across our Nation is both critical and laudable.

Comprehensive regulations and permitting will ensure that Monument resources are safeguarded for current and future generations.

The services should set a timeline to finalize the plan no later than early 2024 to ensure that there is a clear path for engaging in the diversity of stewardship activities for this natural treasure and the management program goals and pathways are transparent to all.

My review of the research related elements of the plan has identified several issues that would benefit from additional clarification. In no particular order, these are:


1. Time series studies are necessary for assessing the status and trends of species and habitats in the monument. Identifying existing data sets can provide historic trends and current status, while enhancing and expanding those efforts now and into the future can target elements of biodiversity specific to the Monument. Focused partnerships with NOAA to utilize existing northeast regional monitoring efforts could identify patterns and trajectories based on, for example, seasonal trawl surveys, ecosystem monitoring studies (ECOMON), satellite oceanography, and passive acoustics are among the

- many regional efforts that could provide insight when examined through the lens of the Monument and adjacent areas (e.g, for example, see Pittman, S.J., 2019. Relevance of the Northeast Integrated Ecosystem Assessment for the Stellwagen Bank National Marine Sanctuary Condition Report 2007-2017. Marine Sanctuaries Conservation Science Series ONMS-19-08).
2. While the benthic elements of the plan seem to focus extensively on deep-sea corals and coral habitats, it would be useful to indicate that Monument management interests are spatially expansive, including other seafloor communities (e.g., tilefish grottos in the canyon heads, xenophyophore communities on and around the seamounts) as well as the water column from the surface to the bottom (diel vertical migrators).
 3. Understanding the ecological linkages from surface waters to the deep sea should be a priority research topic. Pelagic predators can exert top-down control of prey species and cascade through both direct and indirect species interactions. While commercial fishing for pelagic predators is banned from the monument, understanding the ecological linkages of apex pelagic predators with the local food web would allow a comparison with historic effort within the monument region as well as contrast with contemporaneous effort outside the boundaries. A collaborative research project with recreational fishers could identify a suite of species interactions, responses of prey species, and space-time variability over the precipitous landscape of the monument.
 4. Regarding marine debris, note that Quatrini et al. (2015), working in the canyon regions along the northeast continental margin including the Monument, indicated that 81% of dives revealed marine debris, with at least 12 coral colonies entangled in debris (see: Quattrini, A. M., et al. 2015. Exploration of the canyon-incised continental margin of the northeastern United States reveals dynamic habitats and diverse communities. PLoS One, 10(10), e0139904).
 5. The draft plan identified major issues and efforts needed for assessing status of the Monument and for focusing research and exploration. This could serve as a basis for developing a science advisory committee or hosting a meeting/workshop to identify potential partnerships, collaborations, and synergies.

6. The issue of coral restoration is interesting but puzzling. What elements of coral communities would serve as targets for restoration? How would success be measured (i.e., restoration to what state)? Where would such a restoration effort be implemented? Can we predict direct and indirect ecological effects? In any case we should avoid introducing genetically modified organisms. While restoration may ultimately be a fine idea, a good deal of homework should be necessary before embarking on such a program.

Again, I want to emphasize my support for the draft plan and the need to keep moving forward to have, at a minimum, a framework in place to guide efforts as funds, resources, partners, and collaborators become available. Thank you, in advance, for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter J. Auster', with a long horizontal line extending to the right.

Peter J. Auster, PhD
Senior Research Scientist

Document ID [FWS-R5-NWRS-2023-0154-0617](#)
Title Comment from Azul
Duplicates 0
Signatories 1



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

Dear Superintendent Petersen and the Monument Management Team,

On behalf of Azul, a Latinx led and serving environmental justice organization focused on marine conservation and ocean stewardship, I'm writing to provide comments on the Draft Management Plan and Environmental Assessment for the Northeast Canyons and Seamounts Marine National Monument. Azul commends the commitment the Administration has demonstrated to secure the Monument's biodiversity and cultural resources to advance the goal of conserving and restoring at least 30% of U.S. lands and waters by 2030.

Given the unique ecological value of the Northeast Canyons and Seamounts Monument, we strongly advocate for the inclusion of a robust monitoring and enforcement program in the final plan consistent with the Presidential Proclamations. Effective monitoring and enforcement is imperative to ensure compliance with the prohibited activities declared under Presidential Proclamation 9496 and to prevent illegal, unregulated, and unreported (IUU) fishing in the Monument. As such, we urge that the final plan mandates all vessels transiting through or operating in the Monument to have automated identification systems (AIS) and Vessel Monitoring Systems (VMS) turned on at all times. Additionally, we believe that the final management plan must specify actions to develop the regulations necessary to implement all prohibitions declared under the Presidential Proclamations.

Azul recognizes the permitting goals outlined in the draft plan. However, to better understand the uses of the Monument, we strongly recommend enhancing the proposed permitting program for various activities within the Monument through the establishment of a joint-agency access permit, similar to permits used in other Monuments. The introduction of Monument-specific permits would significantly bolster the agencies' capacity to oversee Monument utilization and guarantee strict adherence to the proclamation's prohibitions and the agencies' established rules and regulations.

We fully support the draft plan's objectives to adaptively manage the Monument and intent for condition reports to inform the next management plan review process. However, we think it is critical that the final plan include a requirement to develop and publish a condition report sooner than 15 years so that the review and update of the management plan can occur at least every 10 years.

Finally, we respectfully urge the prompt finalization of the management plan to ensure that the rich biodiversity which calls the Monument's three deep-sea canyons and four underwater mountains home are protected for generations to come.

Sincerely,

Karla Garibay Garcia
Senior Conservation Manager
Azul

Document ID [FWS-R5-NWRS-2023-0154-0625](#)
Title Comment from Conservation Law Foundation
Duplicates 0
Signatories 1



Submitted via regulations.gov

October 26, 2023

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

Re: Comments on U.S. Fish & Wildlife Service and National Oceanic and Atmospheric Administration's Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument (FWS-RS-NWRS-2023-0154-0001)

Dear Superintendent Petersen and Monument Management Team,

Conservation Law Foundation (CLF) is pleased to submit these comments to the U.S. Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) regarding the Draft Monument Management Plan ("draft plan") for the Northeast Canyons and Seamounts Marine National Monument ("Northeast Canyons and Seamounts" or "Monument").¹⁸ With the development of the draft plan, CLF commends the Biden-Harris Administration's continued, demonstrated commitment to secure the Monument's extraordinary biodiversity and cultural resources and advance the goal to conserve and restore at least 30 percent of U.S. lands and waters by 2030.

¹⁸ U.S. Fish & Wildlife Service, Northeast Canyons and Seamounts Marine National Monument Draft Management Plan and Environmental Assessment, (Sept. 12, 2023), <https://www.fws.gov/media/northeast-canyons-and-seamounts-marine-national-monument-draft-management-plan-and>. ("Draft Plan" or "Draft Environmental Assessment").

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 thriving, resilient 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 wanning 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.¹⁹ 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.²⁰ CLF applauds the thoughtful, extensive goals laid out in the draft plan, as well as the clear focus and priority placed on protecting biodiversity and understanding climate change impacts. While we recognize there are funding challenges associated with managing this unique area, our community will advocate strongly to ensure adequate funding to achieve the plan's goals in their entirety. In response to the 2021 Proclamation's September 15, 2023, deadline to develop a joint management plan, **CLF urges that the plan be finalized as soon as possible, and not later than the first quarter of 2024.**

In addition, we make the following recommendations:

1. Draft regulations and implement all prohibitions consistent with the governing Presidential Proclamations 9496 and 10287;
2. Implement Alternative 3 and a comprehensive permitting process that allows the Monument management team²¹ and the public to fully understand the activities occurring within the Monument;
3. Implement an effective monitoring plan that requires all vessels transiting through or operating in the Monument to have automated identification

¹⁹ Presidential Proclamation No. 9496, 81 Fed. Reg. 65,161 (Sept. 15, 2016).

²⁰ Presidential Proclamation No. 10287, 86 Fed. Reg. 57,349 (Oct. 15, 2021).

²¹ The Monument is managed jointly by FWS and NOAA, which are referred to as the "Monument management team." Draft Plan at 8.

- systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned on at all times; and
4. Require the plan to be reviewed and updated at least every 10 years and revised sooner if actions that jeopardize the immense ecological importance of the Monument

CLF also supports the following objectives and actions outlined in the draft plan:

1. Actions to engage with Native American communities;
2. Actions to complete an assessment of all major uses of the Monument;
3. Development of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces;
4. Development of an exploration and research plan aimed at improving understanding of biological, physical, cultural, and historical resources in the Monument;
5. Efforts to inventory the Monument's resources;
6. Efforts to collaborate and coordinate among the relevant Co-Trustees, stakeholders, and additional relevant agencies; and
7. The issuance of an annual report that summarizes key accomplishments and activities in the Monument.

CLF urges the Monument management team to take the necessary next steps to finalize a strong and effective management plan that ensures that the Northeast Canyons and Seamounts Marine National 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.

Located about 130 miles off the coast of Cape Cod, the Monument protects a cluster of three deep-sea canyons—Oceanographer, Gilbert, and Lydonia—and four underwater seamounts— Bear, Mytilus, Physalia, and Retriever. These underwater features are equal in wonder to and rival the depths of the Grand Canyon and the heights of New England's Presidential Range. These canyons and seamounts are home to “one of the Atlantic Ocean's most biologically productive and important marine environments and one of science's greatest oceanic laboratories.”²² The Monument spans only 1.5% of the U.S.

²² 86 Fed. Reg. at 57349.

Atlantic Ocean and 0.11% of the entirety of the U.S. Exclusive Economic Zone, yet its varied habitats and strong and complex currents support a biodiversity hotspot.²³ In fact, some of the species and habitat types found in the Monument are not found in any other sanctuary, national park, or monument.²⁴ At the heads of the canyons, layers of krill can be found over a hundred feet thick, extending for miles out from the canyon wall—rendering an ideal feeding ground for marine life. Forage species such as these krill draw Atlantic Puffins out from their rocky nesting sites on land to winter in the waters. Deeper below the surface, thousand-year-old corals—some the size of small trees, in vibrant shades of orange, pink, and yellow—are home to numerous fish species. As many as 73 coral species have been identified in the Monument including two new species discovered on a 2018 expedition.²⁵ Just this summer scientists conducted an aerial survey of the Monument and documented over 700 ocean animals, including fin whales, pilot whales, and bottlenose, striped, and Risso’s dolphins, as well as Chilean Devil Rays, manta rays, sunfish, and a hammerhead shark.²⁶ Yet, the scientific discovery in the area has just scratched the surface.²⁷ 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.²⁸

The Monument’s protections are vital for its biodiverse marine life. Limiting human activity in the area protects the fragile, vibrant ecosystems where threatened and endangered species take refuge; safeguards this living laboratory for scientific discoveries, enabling the study of climate change impacts on marine resources; bolsters the resilience of these ecosystems and species to warming ocean temperatures and other climate change impacts; and more. This otherworldly underwater landscape deserves protections that will allow it to thrive as intended. In the face of a biodiversity and climate crisis, scientists have urgently called for protections to at least 30 percent of

²³ P.J. Auster et al., *A Scientific Basis for Designation of the Northeast Canyons and Seamounts Marine National Monument*, *Frontiers in Marine Science* 7, no. 566 (July 2020), <https://doi.org/10.3389/fmars.2020.00566>.

²⁴ P.J. Auster et al. (July 2020).

²⁵ 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. (March 31, 2016), DOI:10.13140/RG.2.1.1268.1360.

²⁶ New England Aquarium, *More than 700 animals seen during Aquarium’s aerial survey of marine protected area*, Press Release (Aug.10, 2023), <https://www.neaq.org/about-us/press-room/press-releases/more-than-700-animals-seen-during-aquariums-aerial-survey/>.

²⁷ 10 P.J. Auster et al. (July 2020) (“Recent discoveries have included new species, genetic variability and hidden genetic structure within species, and range extensions of species known from elsewhere. Given the limited exploration work in this area, such discoveries are likely to continue, greatly increasing our understanding of marine deep sea biology.”).

²⁸ N.E. Kelly et al., *Biodiversity of the Deep-Sea Continental Margin Bordering the Gulf of Maine (NW Atlantic): Relationships among Sub-Regions and to Shelf Systems*. *PLoS ONE* (Nov. 2010), doi: 10.1371/journal.pone.0013832.

land and ocean by 2030.²⁹ Securing a final management plan that ensures this underwater treasure is effectively safeguarded will advance the Biden-Harris Administration's commitment "to protecting our most vital waters and the marine life that thrives in it."³⁰

II. The final management plan must include actions to draft and implement the regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations 9496 and 10287.

The Monument management team must finalize a management plan necessary for the proper care and management of the Monument.³¹ "The Proclamations require the Secretaries to promulgate and implement regulations that address specific actions necessary for the proper care and management of the Monument."³² NOAA has proposed regulations to address the commercial fishing prohibition.³³ The draft plan includes an objective to develop compatibility determination within three years for allowed uses and to "undertake rulemaking for the Monument as deemed necessary." Draft Plan at Objective 1.1, 22. FWS has not yet outlined steps to draft and implement regulations to address the remaining prohibited activities set forth in the Proclamations.³⁴ Draft Plan at 19-20, 22. Regulations addressing all prohibited activities

²⁹ 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>.

³⁰ U.S. Fish & Wildlife Service, Biden-Harris Administration proposed management plan, environmental assessment for Northeast Canyons and Seamounts Marine National Monument, (Sept 12, 2023), <https://www.fws.gov/press-release/2023-09/biden-harris-administration-proposes-management-plan-environmental-assessment#:~:text=Today%2C%20the%20U.S.%20Fish%20and,by%20President%20Biden%20in%20Presidential.>

³¹ 81 Fed. Reg. at 65,164; 86 Fed. Reg. at 57,352.

³² 87 Fed. Reg. 79,901 at 79,902.

³³ Magnuson-Stevens Act Provisions; Prohibition of Commercial Fishing in the Northeast Canyons and Seamounts Marine National Monument, 88 Fed. Reg. 72,038 (Oct. 19, 2023).

³⁴ 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)

will be necessary for effective enforcement. We urge FWS to include a plan for promulgating and implementing such regulations in the final management plan. Draft Plan at Objective 1.1.

III. We acknowledge the draft plan's permitting goals and urge improvements through the implementation of Alternative 3 and a comprehensive permitting process.

We urge the Monument management team to improve the proposed permitting program by implementing Alternative 3 and a comprehensive permitting process that allows managers and the public to fully understand the activities occurring within the Monument. Draft Environmental Assessment at 53. Effective protection of the Monument's natural and historic resources requires the ability to track and monitor all permitted activities so that their potential impacts can be evaluated. Requiring a monument-specific permit (Alternative 3), in addition to required existing permits, will enable the Monument management team to conduct a more comprehensive review of proposed activities, better track the uses of the Monument and understand their impacts, and ensure compliance with the Proclamation prohibitions.

In the absence of adopting Alternative 3—requiring a monument-specific permit—the Monument management team should improve the proposed permitting program with the establishment of a clear, comprehensive process to regulate, track, understand, and publicly share information surrounding the usage of the Monument to enable effective management. We would support a final permitting program that ensures the detailed tracking of permitted activities and sharing of information with the public and among the Monument management team agencies to enable monument managers to make necessary, informed management decisions.

"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 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.").

Additionally, to effectively “[c]onserve and protect the marine ecosystem within the Monument,” the regulated activities in the Monument must be permitted “consistent with the care and management of the objects within the monument.”³⁵ Draft Plan at 25. In particular, regulated activities anticipated to result in known “[s]eafloor disturbance” should be subject to restrictions necessary to avoid and minimize impacts to monument resources. Draft Plan at 19,

42. Anchoring scientific instrumentation to the seafloor and submarine cable maintenance and installation are at least two such regulated activities. Draft Plan at 19-20, 42. Anchoring has the potential to affect the ecosystem through the destruction of coral and live rock, affecting the fragile fish and benthic organisms and their habitats. Submarine cable maintenance and construction has the potential to be highly disruptive to the Northeast Canyons and Seamounts’ deep-sea ecosystems, and in particular, the slow-growing corals and seamounts that are extremely vulnerable to disturbance. We also urge the Monument management team to ensure that the Monument’s boundaries are represented on nautical charts, maps, and ocean-related apps such as WhaleAlert. Draft Plan at Objective 1.1. Awareness about the Monument’s location and management measures is essential to safeguard the Monument’s resources.

IV. We urge that the final management plan include actions to implement an effective monitoring and enforcement program to ensure compliance consistent with the Presidential Proclamations.

In recognition of its unique ecological resources, the Northeast Canyons and Seamounts is off limits to industrial activities. Draft Plan at 19. Year-round monitoring and enforcement of these prohibitions will be essential for the successful protection of the Monument’s fragile ecosystems and biological diversity.

It is imperative that the final plan require all vessels transiting through or operating in the Monument to have automated identification systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned on at all times to ensure the effective tracking of activities in the Monument and enforcement and compliance with Monument rules and regulations. The draft plan recognizes that “[l]aw enforcement in the Monument can be accomplished virtually” and sets an objective of exploring opportunities to use satellite data to track use of the Monument. Draft Plan at 74, Objective 1.2. We urge the Monument management team to adopt such an approach and ask managers to make it a priority to actively monitor activity in the monument using satellite data, where applicable, to ensure compliance

³⁵ 81 Fed. Reg. at 65,164.

with monument prohibitions, prevent illegal, unreported, and unregulated fishing in the Monument, and aid in the evaluation of vessel traffic activity in the Monument. Draft Plan at 26. Where appropriate, we also encourage the use of remote technologies including surface and subsurface buoy systems and drones to ensure successful resource protection of this remote area. This is essential to ensure effective protection of the Monument.

Managers should publish Monument use data as soon as possible on existing, publicly accessible databases—including the Northeast Ocean Data Portal³⁶—to provide a centralized location for collected data (e.g., AIS data, permit application and reporting data). This data should be used to understand the nature and extent of activities in the Monument, inform decision-making, and evaluate cumulative impacts on Monument resources over time.

V. The final management plan should include a requirement to review and update the plan periodically, at least every 10 years if not sooner.

An integral part of any management process is the routine review and evaluation of the Management Plan to ensure progress towards its goals and objectives. We are encouraged by the draft plan's objectives to adaptively manage the Monument, including through annual management team meetings that could include modifying the plan based on the development of new information, as well as the objective to undertake a condition report that will summarize the current status and health of resources in the Monument in order to inform the next management plan review process. Draft Plan at Objectives 1.9, 2.4.

Given the fragility of the Monument's marine ecosystems, growing threat of climate change impacts, and uncertainties surrounding funding for some long-term proposed objectives, we urge the adoption of a shorter management plan life cycle than fifteen years. A formal review and update should occur at least every 10 years, and sooner if actions that jeopardize the immense ecological importance of the Monument are identified. The formal review should be preceded by a comprehensive assessment (i.e., a condition report) of the status of human uses and health of resources in the Monument. The condition report will be critical to inform the next management plan review process, addressing and issues and threats that surface.

³⁶ Northeast Ocean Data, Maps and Data for Ocean Planning in the Northeastern United States, <https://www.northeastoceandata.org/> (last visited Oct. 24, 2023).

VI. We support the draft plan's actions to engage with Native American communities.

As the draft management plan recognizes, consultation with Native American governments and communities in the Monument region is crucial for the successful management of the Northeast Canyons and Seamounts. Draft Plan at 16, 27, 29, 33. We encourage the Monument management team to begin such engagement early and to continue to prioritize such efforts over the course of the management plan's term, guided by Native American communities' preferences regarding timelines for collaboration.

VII. We support the draft plan's actions to complete an assessment of all major uses of the Monument.

We support the draft plan's actions to complete an assessment of all major uses of the Monument. Draft Plan at Objective 1.4. We support the draft plan's actions related to assessing shipping vessel traffic impacts on the Monument, including understanding the potential interaction with marine mammals. Draft Plan at 21, 26, 56. As part of this, and as emphasized above, the use of satellite data to better understand shipping vessel traffic patterns and amount should be prioritized.

We support the draft plan's objective to improve understanding of submarine cable maintenance and installation activities in the Monument. Draft Plan at Objective 1.4. However, we urge this exploration to also include the analysis of the effects of submarine cable maintenance and installation. Draft Plan at 49. Submarine cable maintenance and construction has the potential to be highly disruptive to the Northeast Canyons and Seamounts deep-sea, fragile ecosystems that are extremely vulnerable to human disturbance.

We urge the Monument management team to take action as soon as possible to address, avoid and minimize any impacts to monument resources identified from any and all major uses of the Monument.

VIII. We support the draft plan's development of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces.

Creating equitable, accessible engagement opportunities for the public to connect with the vast and inspiring wonders contained within the Monument is imperative. We

therefore applaud the Monument management team's plan to create and share accessible and inclusive educational resources that share the incredible biodiversity of this monument with the diverse U.S. public and including in partnership with educational institutions and aquariums. This includes the Monument management team's efforts to develop outreach materials in multiple languages and establish educational curricula and programming to be disseminated broadly throughout FWS's Urban Wildlife Conservation Partnership, as well as connecting with schools that serve communities with environmental justice concerns in the Northeast. Draft Plan at 36-37. We urge a commitment to ensure the completion of the plan's important goals that are presently contingent on additional funding (e.g., conducting a demographic and sociological analysis to better define the Monument community or supporting the development of education resources on the cultural important of the Monument to Native American communities and historic fishing communities). Draft plan at 37.

IX. We support the draft plan's development of an exploration and research plan aimed at improving understanding of biological, physical, cultural, and historical resources in the Monument.

Specifically, we support the draft plan's commitment to support research that undertakes filling in the gaps in knowledge regarding species, habitats, ecosystem process, as well as physical, chemical, geologic, and oceanographic processes in the Monument. Draft Plan at 33-34. And we support the draft plan's inclusion of an objective that aims to fund at least one research project in the Monument each year to fill in these information gaps. Draft Plan at Objective 3.4. We encourage assembling a working group of experts that can help develop a research needs assessment. Draft Plan at Objective 3.3.

We support the draft plan's actions to share the research findings including by hosting research symposia. Draft Plan at Objective 3.5. We encourage the final management plan to utilize existing, publicly accessible databases for publishing research findings (as above with Monument use data)—including the Northeast Ocean Data Portal³⁷—to serve as a centralized repository as well as promote the dissemination of research to the public.

We also commend the draft plan's objectives to use monument research to inform management decisions. Draft Plan at Objectives 1.9, 3.4. The Monument, with its large

³⁷ Northeast Ocean Data, Maps and Data for Ocean Planning in the Northeastern United States, <https://www.northeastoceandata.org/> (last visited Oct. 24, 2023).

size and protected status, is an incredible living laboratory that can contribute to society's understanding of climate change impacts on ocean wildlife and habitats. Therefore, we urge the Monument management team to articulate steps to ensure that goals to research climate change impacts in the Monument and to develop a long-term climate change monitoring plan materialize early. Draft Plan at Objective 3.4.

X. We support the draft plan's efforts to inventory the Monument's resources and urge the final plan to expedite such efforts, as well as identify and minimize any impacts to those resources.

The Monument is filled with spectacular wildlife. The slow growing deep-sea coral, the diversity of marine mammals, majestic seabirds, sharks, rays and other fish, and the often-unseen base of the marine food web, plankton, all make this monument a haven for biodiversity. In recent years, as scientists have conducted dives with remotely operated vehicles and aerial surveys, they continue to observe new and rare species with each visit. We support the Monument management team's efforts to inventory the resources contained within the Monument, including by developing a comprehensive species list to be updated annually, developing and publicizing a condition report to ascertain and document the current status and health of the resources in the Monument, and to undertake the study of human history in the Monument to understand the cultural connections to this special place. Draft Plan at Objectives 3.2, 3.3, 3.4. As discussed above, we also support the draft plan's objective of completing an assessment of all major uses of the Monument as a detailed understanding of human uses of the Monument is essential to effective stewardship. Draft Plan at Objective 1.4.

We urge the Monument management team to complete a baseline assessment of the area's health and productivity as soon as possible to assess and adaptively address current impacts to the Monument. Draft Plan at Objective 3.4. Early information about the status and health of Monument resources can then inform ongoing management decisions including by tracking changes occurring in the Monument and by identifying, avoiding, and minimizing threats to monument resources.

XI. We support the draft plan's efforts to collaborate and coordinate among the relevant 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. We acknowledge the thorough efforts the Monument management team has outlined to rely on strategic partnerships and effectively coordinate across agencies so as to manage this area. Draft Plan at 28-30.

We encourage additional efforts to include stakeholders in the caretaking of this public resource. Draft Plan at Objective 2.4. 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.

XII. We support the draft plan's issuance of an annual report that summarizes key accomplishments and activities, provides information on staffing and budgeting, and a summary of permitting information.

We support the draft plan's actions to publicly share information on monument management including the annual publication of an accomplishments report. Draft Plan at Objective 2.4, 39-40. As discussed above, increased opportunities for the public's access to information, including the publication of data on the Monument's use and research findings would improve the public's ability to engage with this resource and provide input on monument management.

We thank FWS and NOAA for the opportunity to provide these comments on the Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument. Thank you for considering these comments.

Sincerely,



Priscilla M. Brooks, PhD
Vice President and Director of Ocean Conservation
Conservation Law Foundation

Document ID [FWS-R5-NWRS-2023-0154-0626](#)
Title Comment from Earthjustice
Duplicates 0
Signatories 1



October 26, 2023

VIA REGULATIONS.GOV
Docket ID: FWS-R5-NWRS-2023-0154-0001

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

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

Dear Superintendent Petersen:

Earthjustice appreciates the opportunity to provide these comments to the U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration (NOAA) (together, "Co-Trustees") regarding the Draft Monument Management Plan ("Draft Plan") for the Northeast Canyons and Seamounts Marine National Monument (the "Monument").³⁸

The Monument is one of the Atlantic Ocean's "most biologically productive and important marine environments" and "one of science's greatest oceanic laboratories."³⁹ The Monument's canyons and seamounts provide habitat and feeding grounds for a diversity of ocean life, including thousand-year-old deep-sea corals, endangered whales, sea turtles, puffins, sharks, and several rare and endemic species that are not known to

³⁸ Earthjustice joined a host of partners on a separate letter detailing comprehensive recommendations for the final management plan. We write separately to emphasize several key elements that the Co-Trustees should include in the final plan to ensure its success.

³⁹ 86 Fed. Reg. 57,349, 57,349 (Oct. 15, 2021).

occur anywhere else on the planet.⁴⁰ At a time when the climate and biodiversity crises are severely altering our oceans and jeopardizing our ecosystems, a strong and detailed management plan is necessary to ensure that the Monument safeguards irreplaceable features, habitats, and marine life for generations to come.

We commend the Co-Trustees for developing a Draft Plan with clear and extensive management goals to conserve the Monument, improve scientific understanding, and increase the public's awareness of and connection to the Monument. In particular, we appreciate the priority placed on protecting biodiversity and understanding climate change impacts.⁴¹ We support the Co-Trustees' commitment to consulting with Tribes, engaging with Native American communities, and honoring and nurturing Indigenous people's connections to the Monument.⁴² We also support the efforts to deepen public education and engagement, including development of outreach materials in multiple languages and partnerships with schools that serve communities with environmental justice concerns.⁴³ Moreover, we support the Co-Trustees' plans for research and exploration to better understand and inventory the Monument's unique physical, biological, and historical resources.⁴⁴ We also support the plans to assess shipping vessel traffic impacts on the Monument.⁴⁵

However, more than these goals and plans alone are necessary to adequately protect the Monument. Under Presidential Proclamations 9496 and 10287, the Co-Trustees must prohibit certain activities and regulate several other activities in the Monument.⁴⁶ The final management plan should include clear and detailed actions to enforce those prohibitions and regulations governing harmful industrial activities within the Monument.

First, we emphasize that effective enforcement depends on robust data. The Co-Trustees should develop a monitoring and enforcement program to ensure that industries are complying with the Monument regulations and prohibitions. The final management plan should require all vessels transiting through or operating in the Monument to have automated identification systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned

⁴⁰ FWS & NOAA, Northeast Canyons and Seamounts Marine National Monument Draft Management Plan and Environment Assessment 10–12, 77–83 (Sept. 2023).

⁴¹ See *id.* at 25–28, 32–34.

⁴² *Id.* at 16–17, 27, 29, 33.

⁴³ *Id.* at 36–37.

⁴⁴ *Id.* at 32–34.

⁴⁵ *Id.* at 26, 56.

⁴⁶ 81 Fed. Reg. 65,161 (Sept. 15, 2016); 86 Fed. Reg. at 57,349.

on at all times to ensure the effective tracking of activities in the Monument. The agencies should actively monitor activity in the Monument to ensure compliance with prohibitions and regulations, prevent illegal, unreported, and unregulated (IUU) fishing in the Monument, and aid in the evaluation of vessel traffic activity in the Monument.

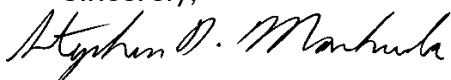
Second, in order to fully achieve the Draft Plan's permitting goals, the Co-Trustees should improve the permitting program proposed in the Draft Plan. A joint-agency access permit to the Monument would enable the Co-Trustees to comprehensively track and monitor permitted activities. A monument-specific permit will enable the agencies to better understand the uses— and the potential effects of those uses—of the Monument as well as ensure compliance with applicable regulations and prohibitions. In the absence of a monument-specific permit, the Co-Trustees should establish a comprehensive process to regulate, track, understand, and share information regarding the usage of the Monument among the agencies.

Third, the Co-Trustees should adopt strong and clear regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations. NOAA Fisheries has recently proposed regulations to address the Proclamations' prohibition on commercial fishing in the Monument, but additional regulations are necessary to effectively enforce the other prohibited activities.

Finally, the Co-Trustees should comprehensively revisit and update the management plan at least every 10 years. This will help ensure that the plan is still based on the best available scientific information and facilitate adaptive management that can adjust as required by changing climate- driven ocean conditions and other new information. Moreover, given the current uncertainties regarding timelines and funding for the Draft Plan's proposed long-term goals, a 10-year—or more frequent—cycle for review will help ensure that the agencies are improving and adjusting their approaches as needed to achieve all the goals outlined in the plan.

Thank you for the opportunity to provide these comments. We hope the Co-Trustees will incorporate our recommendations and finalize a strong management plan for the Monument as soon as possible.

Sincerely,



Stephen D. Mashuda

Managing Attorney, Oceans

Document ID [FWS-R5-NWRS-2023-0154-0609](#)
Title Comment from Mystic Aquarium
Duplicates 0
Signatories 1



October 23, 2023

Re: Comments on U.S. Fish & Wildlife Service and National Oceanic and Atmospheric Administration's Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument (FWS-R5-NWRS-2023-0154-0001)

Dear Superintendent Petersen and Monument Management Team:

Mystic Aquarium applauds the USFWS and NMFS for developing a robust joint management plan for the Northeast Canyons and Seamounts Marine National Monument, the only marine monument in the Federal waters of the Atlantic Ocean. The draft plan with an extensive set of goals, sets a high bar for ensuring the Monument's extraordinary biodiversity is protected. The strong focus on research, education, and outreach is a welcome and necessary component to such a plan. Efforts to equitably share new and existing knowledge about this extraordinary ocean wilderness and engage with a public which includes historically unheard voices that stretches across our Nation is both critical and laudable. Comprehensive regulations and permitting will ensure that Monument resources are safeguarded for current and future generations.

Mystic Aquarium's Sr. Research Scientist Dr. Peter Auster submitted a comment letter focused specifically on recommendations related to the research program. The Aquarium also supports letters submitted by the National Ocean Protection Coalition and the Aquarium Conservation Partnership. The purpose of this institutional comment letter is to reiterate broad support, and to focus specifically on Equity, Education and Outreach.

Equity

We recommend a thoughtful and intentional approach to engaging historically excluded groups into the management process. This includes incorporating lessons learned from the Pacific Monuments and the Chumash Heritage National Marine Sanctuary

designation process. As partners with Northeast Indigenous Groups and Tribal Communities we are happy to be utilized as a resource to connect our community work and the management plan to existing programs, initiatives, and relationships. We also urge the agencies to center equity in a way that enables Black, Indigenous, People of Color to be fully engaged in an authentic way where they feel a sense of ownership and autonomy. Equity work is challenging and Mystic Aquarium is helping to lead an effort with the Aquarium Conservation Partnership (ACP) to develop an equity framework for Zoos and Aquariums that the services might consider utilizing as additional guidance.

Education and Outreach

As mentioned previously, Mystic Aquarium applauds the plan's emphasis on education and outreach. Integrating content about the Monument in formal K-12 settings will be challenging due to the nature of curricular frameworks and adherence to federal and state standards and assessments. We suggest leveraging resources from NOAA Ocean Exploration(OE). For example, NOAA OE has a robust website with multimedia web resources specific to deep sea exploration, including expedition-specific content to the Monument region. NOAA OE also has a network of sites that serve as host locations for online and in-person professional development for educators. This established pathway provides access to formal educators. The agencies should also partner with the National Marine Educators Association (NMEA), and their regional chapters.

Informal education centers are better structured to take advantage of Monument educational resources. These include community-based organizations that target under-represented youth in out-of-school time, namely after-school and summer camp programs. Cultural, science education institutions such as Mystic and New England aquariums are great examples of where we have successfully engaged youth, educators, and the public to learn, and care, about the Monument.

In addition to leveraging scientific cruises to develop innovative educational content, we also suggest developing virtual reality and game-based digital content as a great way to convey a you-are-there experience and meet youth where they are at. Importantly, emphasis must be placed on cultivating and serving diverse audiences so as not to fall prey to the "if you build it, they will come" false narrative. Mystic Aquarium, with its regional and national reach, could not be more excited to assist in realizing the laudable education and outreach vision of the plan.

In adherence with the presidential proclamation and in order to move critical initiatives forward, we urge USF&W and NMFS to finalize the plan no later than early 2024 to ensure that the management program goals and pathways are clear and transparent to

all. The Northeast Canyons and Seamounts Marine National Monument is a national treasure for all. A robust management plan will ensure that this area thrives and serves as a model for future marine protected areas.

Sincerely,

A handwritten signature in purple ink that reads "Katie Cubina". The signature is written in a cursive style with a light purple color.

Katie Cubina

Sr. VP for Mission Programs

Mystic Aquarium

Document ID [FWS-R5-NWRS-2023-0154-0627](#)
Title Comment from North American Submarine Cable Association
Duplicates 0
Signatories 1

HW/G

October 26, 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-2023- 0154*

Dear Ms. Petersen:

On behalf of the North American Submarine Cable Association (“NASCA”), we urge the U.S. Fish and Wildlife Service (“FWS”) and the National Oceanic and Atmospheric Administration (“NOAA”) to revise the draft monument management plan and environmental assessment (together, the “Draft Management Plan”) for the Northeast Canyons and Seamounts Marine National Monument (“Monument”)⁴⁷ to more accurately reflect applicable international law—which clearly provides for the freedom to lay submarine cables on the continental shelf, in addition to the freedoms of navigation and overflight—and to expressly recognize the evidence in the record that submarine telecommunications cables are a sustainable use of the oceans, compatible with the environmental goals and key principles established in Proclamation 9496, as updated by

⁴⁷ Northeast Canyons and Seamounts Marine National Monument, Draft Management Plan and Environmental Assessment (Sept. 12, 2023), <https://www.fws.gov/project/monument-management-plan>.

Proclamation 10,287.⁴⁸ Accordingly, rather than deferring any discussion of submarine cable activity because it is “outside the scope of this draft management plan and environmental assessment,”⁴⁹ FWS and NOAA should expressly provide for the continued installation of submarine telecommunications infrastructure (and conduct of any related repair and maintenance activities with respect to that infrastructure) within the monument boundaries, consistent with existing use, pursuant to existing, manifold regulatory authorities and permitting processes.

NASCA believes that there is no need to “improve understanding of submarine (undersea) cable maintenance and installation activities by partnering with the Department of State to conduct outreach to the undersea cable industry.”⁵⁰ That industry—represented by NASCA—has repeatedly participated in FWS and NOAA proceedings, including this one, and has demonstrated unequivocally that submarine telecommunications cables, which serve vital environmental, social, and national security interests, have a neutral to benign impact on the marine environment and pose no risk to environmental, archeological, or cultural resources within Monument boundaries.⁵¹ Moreover, FWS and NOAA have failed to explain how outreach led by the Department of State would further Proclamations 9496 and 10,287 and the purposes of the Antiquities Act. NASCA suggests that FWS and NOAA should confer further with the Department of State regarding longstanding U.S. interpretations of UNCLOS and customary international law as they pertain to submarine cable installation and repair. In short, submarine telecommunications cables are a “complementary and reinforcing” priority,⁵² protected by international law, that contribute to “the well-being of the United States, [and] the prosperity of its citizens.”⁵³ NASCA strongly urges NOAA and FWS to issue a final Management Plan that reflects these key attributes.

⁴⁸ 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. 15, 2021) (“Proclamation 10,287”).

⁴⁹ Draft Management Plan at 22.

⁵⁰ Draft Management Plan at 26.

⁵¹ See e.g., Comments of the North American Submarine Cable Association, Docket No. FWS- R5-NWRS-2022-N062 (filed Jan. 27, 2023) (“NASCA MNM Comments”); Comments of North American Submarine Cable Association, Docket No. NOAA-NOS-2021-0080 (filed Feb. 1, 2022) (“Chumash NMS Comments”); Comments of the North American Submarine Cable Association, Docket No. NOAA-NOS-2022-0053 (filed Aug. 8, 2022) (“NASCA Hudson Canyon Comments”); Comments of North American Submarine Cable Association, Docket No. 230807-0815 (filed Oct. 25, 2023) (“NASCA Chumash DEIS Comments”), all of which are incorporated herein by reference.

⁵² Proclamation 9496 at 65,163.

⁵³ *Id.*

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.⁵⁴ 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, two of which are deployed within the monument boundaries:

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

Please refer to Exhibit A for a depiction of these cables within 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 seabed 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 Security⁵⁵

Submarine cables, which carry approximately 99 percent of the world's Internet, voice, and data traffic,⁵⁶ provide higher-quality, more reliable and secure, and less expensive communications than do communications satellites. Demand for submarine

⁵⁴ 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/>.

⁵⁵ See also NASCA MNM Comments at 3-5.

⁵⁶ 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>.

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.⁵⁷ 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. Increased digital communications contribute to our national environmental goals, as video conferencing and work from home arrangements reduce travel and commuting distances.

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.⁵⁸ 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.⁵⁹

Given the importance of submarine telecommunications cables to vital U.S. interests and their benign environmental impact in the marine environment (as discussed in part D below), NASCA believes that NOAA should factor submarine cable installation

⁵⁷ 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-bBheFMpGSR4nMvSZJ9kHpijOo/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>.

⁵⁸ 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”).

⁵⁹ 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>.

and repair into its strategy for a “New Blue Economy.”⁶⁰ A “Blue Economy” is one built on a long-term strategy aimed at supporting sustainable economic growth,⁶¹ and is consistent with the Proclamation’s key principles. Submarine telecommunications cables factor squarely into such a sustainable economic model.

C. The Freedom to Install and Repair Submarine Cables in the EEZ and on the Continental Shelf Is Well-Established Under International Law

The freedoms to install and maintain submarine cables are well-established by treaty and customary international law and are protected under U.S. law. The freedoms to install and maintain submarine cables clearly fall within the “rights, freedoms, and lawful uses of the sea” afforded under the law of the sea, as recognized in Proclamation 9496, and should have been mentioned expressly by FWS and NOAA.⁶²

Various international treaties dating back to 1884 guarantee unique freedoms to lay, maintain, and repair submarine cables—freedoms not granted for any other marine activities— and restrict the ability of coastal states (i.e., countries) to regulate them.⁶³ Principles articulated in these treaties have since been recognized as customary international law. Specifically, these treaties guarantee:

- The freedom to install submarine cables on the high seas beyond the continental shelf⁶⁴ and to repair existing cables without impediment or prejudice,⁶⁵

⁶⁰ See <https://www.noaa.gov/blue-economy>.

⁶¹ See <https://www.un.org/en/desa/exploring-potential-blue-economy#:~:text=%E2%80%9CA%20blue%20economy%20is%20a,the%20environment%2C%E2%80%9D%20he%20said>.

⁶² Proclamation 9496 at 65,163.

⁶³ See Convention for the Protection of Submarine Telegraph Cables, Mar. 14, 1884, 24 Stat. 989, 25 Stat. 1424, T.S. 380, (entered into force definitively for the United States on May 1, 1888) (“1884 Convention”); Geneva Convention on the High Seas, Apr. 29, 1958, 13 U.S.T. 2312, T.I.A.S. 5200, 450 U.N.T.S. 82 (entered into force definitively for the United States on Sept. 30, 1962) (“High Seas Convention”); Geneva Convention on the Continental Shelf, Apr. 29, 1958, 15 U.S.T. 471, T.I.A.S. 5578, 499 U.N.T.S. 311 (entered into force definitively for the United States on June 10, 1964) (“Continental Shelf Convention”); Law of the Sea Convention, Dec. 10, 1982, 1833 U.N.T.S. 397 (entered into force on Nov. 16, 1994) (“UNCLOS”).

⁶⁴ As used here, the continental shelf generally refers to the juridical continental shelf of a coastal state (rather than the geological continental shelf), and comprises “the seabed and subsoil of the submarine areas that extend beyond its territorial sea throughout the natural prolongation of its land territory to the outer edge of the continental margin, or to a distance of 200 nautical miles from the baselines from which the breadth of the territorial sea is measured where the outer edge of the continental margin does not extend up to that distance.” UNCLOS art. 76(1).

⁶⁵ High Seas Convention arts. 2 (“Freedom of the high seas is exercised under the conditions laid down by these articles and by the other rules of international law. It comprises, inter alia, both for coastal and non-coastal States: . . . Freedom to lay submarine cables and pipelines.”), 26(1) (“All States shall be entitled to lay submarine cables and

- The freedom to install and maintain submarine cables in the exclusive economic zone (“EEZ”) of all states; and⁶⁶
- The ability to install submarine cables in a state’s territory or territorial sea subject to conditions and exercise of national jurisdiction.⁶⁷

These treaty obligations are now treated as customary international law,⁶⁸ in particular by the United States.⁶⁹

For purposes of the EEZ and the continental shelf, submarine cables are distinguished from (1) artificial islands, (2) structures and installations used for exploration or exploitation of living or nonliving natural resources or for “other economic purposes,” and (3) installations and structures which may interfere with the exercise of the rights of the coastal state in the EEZ or on the continental shelf.⁷⁰ Although the relevant treaty provisions permit coastal states to take reasonable measures respecting natural resource exploitation on the continental shelf, they bar states from taking such measures with respect to submarine cables, the construction and repair of which are not undertaken for natural resource exploration or exploitation.⁷¹ These treaty provisions are reflected in the official position of the United Nations’ Office of Legal Affairs of the Division for Ocean Affairs and the Law of the Sea, which states that:

[B]eyond the outer limits of the 12 nm territorial sea, the coastal State may not (and should not) impede the laying or maintenance of

pipelines on the bed of the high seas.”), 26(3) (“When laying such cables or pipelines the State in question shall pay due regard to cables or pipelines already in position on the seabed. In particular, possibilities of repairing existing cables or pipelines shall not be prejudiced.”); UNCLOS art. 112(1) (“All States are entitled to lay submarine cables and pipelines on the bed of the high seas beyond the continental shelf.”).

⁶⁶ UNCLOS art. 58(1) (providing that “[i]n the exclusive economic zone, all States, whether coastal or land-locked, enjoy, subject to the relevant provisions of this Convention, the freedoms referred to in article 87 of navigation and overflight and of the laying of submarine cables and pipelines”).

⁶⁷ Id. art. 79(4) (providing that “[n]othing in this Part affects the right of the coastal State to establish conditions for cables or pipelines entering its territory or territorial sea”).

⁶⁸ See *Delimitation of Maritime Boundary in Gulf of Maine Area (Can. v. U.S.)*, 1984 I.C.J Rep. 246, 294 ¶ 94 (Oct. 12).

⁶⁹ The United States recognized these freedoms starting in 1983, even though the United States has never ratified the UNCLOS (it signed only in 1994) and even though the Convention did not enter into force for those states that had ratified it until 1994. 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 Presidential Proclamation No. 5030, *Exclusive Economic Zone of the United States of America*, 48 Fed. Reg. 10,605 (Mar. 10, 1983) (“Pres. Proc. No. 5030”) (establishing the U.S. EEZ); Presidential Proclamation No. 7219, *Contiguous Zone of the United States*, 64 Fed. Reg. 48,701 (Aug. 2, 1999) (establishing the U.S. contiguous zone).

⁷⁰ UNCLOS, arts. 56, 60(1), 80.

⁷¹ Id. art. 79(2); *Continental Shelf Convention*, art. 4.

cables, even though the delineation of the course for the laying of such pipelines [but not submarine cables] on the continental shelf is subject to its consent.

The coastal State has jurisdiction only over cables constructed or used in connection with the exploration of its continental shelf or exploitation of its resources or the operations of artificial islands, installations, and structures under its jurisdiction.⁷²

Thus, a coastal nation must forbear from imposing any restrictions on the installation or maintenance of submarine cables unless those submarine cables themselves are used for natural resource exploration or exploitation.

Notably, UNCLOS does not grant coastal states general jurisdiction over environmental matters in the EEZ or on the continental shelf. Instead, UNCLOS provides that states shall take all measures consistent with the treaty to prevent, reduce and control pollution of the marine environment from any source (including those to protect and preserve rare or fragile ecosystems) and to ensure that activities under their jurisdiction or control are so conducted as not to cause damage by pollution to other states and their environment.⁷³ States may conduct environmental assessments of activities within the coastal state's jurisdiction or control that threaten substantial pollution or significant and harmful changes to the marine environment.⁷⁴ As noted in part D below, submarine cable installation and repair do not cause pollution in the marine environment and do not threaten substantial pollution or significant and harmful changes to the marine environment.

Consistent with Proclamation 9646, the Draft Management Plan states that the "Monument shall be managed in accordance with international law, and NOAA and the Service shall coordinate with the Department of State to that end." The Draft Management Plan, however, does not recognize that international law protects the freedom to lay submarine cables, along with the freedoms of oversight and navigation.⁷⁵ Any final Management Plan should remedy this oversight, and any provisions regulating submarine cable activities within the Monument should reflect submarine cable

⁷² Maritime Space: Maritime Zones and Maritime Delimitations—Frequently Asked Questions, United Nations Department of Oceans and Law of the Sea, Office of Legal Affairs (responding to Question #7, "What regime applies to the cables and pipelines?"), http://www.un.org/Depts/los/LEGISLATIONANDTREATIES/frequently_asked_questions.htm.

⁷³ UNCLOS art. 194.

⁷⁴ Id. art. 206.

⁷⁵ Draft Management Plan at 21.

activities' protected status under international law, as well as their compatibility with the Proclamation's environmental and cultural protection goals.

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

As NASCA has repeatedly demonstrated, submarine telecommunications cables are a sustainable use of the oceans that are neutral to benign in the marine environment—and should be acknowledged as such by FWS and NOAA.⁷⁶ 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 Monument. 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.⁷⁷ This includes environmentally sensitive areas, like the seamounts and canyons themselves, as is evident from the deployment of existing submarine telecommunications cables within the Monument boundaries.

Peer-reviewed scientific research conducted by leading academic and government scientists confirms that submarine cables are neutral to benign in the marine environment with small-scale spatial and temporal effects. 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.”⁷⁸
- **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”⁷⁹

⁷⁶ See e.g., NASCA MNM Comments at 5-10; NASCA Chumash Comments at 8-13; and NASCA Hudson Canyon Comments at 10-14.

⁷⁷ See generally 54 U.S.C. § 300101.

⁷⁸ 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.

⁷⁹ 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>.

- **U.N. World Ocean Assessment 2016:** Submarine telecommunications cables “have very limited environmental impacts.”⁸⁰ “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.”⁸¹

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.³⁶ 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 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.”⁸² 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.”⁸³

Other research into the specific characteristics of submarine cables and related activities confirms that submarine cables have only a **negligible and transient** impact on the marine environment, including the seafloor, and are compatible 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, including glass fibers, a copper core for conducting power, high-grade

⁸⁰ 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.

⁸¹ Id. at 6.

⁸² 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.

⁸³ 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>.

polyethylene sheathing, and steel wire rod for armoring in shallow-water areas. In deep-sea areas, such as the Monument, submarine cables rest on the surface of the sea floor.⁸⁴ When a cable is damaged or breaks, no polluting material is released, as the cable is transmitting light on the fiber.⁸⁵ 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.⁸⁶

- **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.⁸⁷ The frequencies of acoustic instruments used during submarine cable route surveys are directional and/or low energy,⁸⁸ 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.

⁸⁴ The Draft Management Plan flags submarine telecommunications as potential “marine debris.” Draft Management Plan at 69. NASCA notes that the removal of an out-of-service cable would, like the cable’s initial installation, have only a minimal, transitory impact on the seabed, as the cable would simply be winched and loaded onto the cable vessel.

⁸⁵ 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).

⁸⁶ 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).

⁸⁷ 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>.

⁸⁸ 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.p df.

- **Designed to Avoid Sensitive Ecosystems:** Submarine telecommunications cable operators prefer to install cables on flat sandy featureless 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.

Yet despite the exhaustive studies conducted to date and the unique, environmentally compatible characteristics of submarine cables—none of which have ever been refuted by any agency or third party in this or any other proceeding—the Draft Management Plan simply defers any decisions with respect to the regulation of submarine cable activities within the Monument boundaries: “While listed as a regulated activity in the establishing proclamation, regulation of and analyzing the effects of submarine cable installation and maintenance are outside the scope of this draft management plan and environmental assessment.”⁸⁹ While NASCA will not argue that NOAA and FWS should “improve [their] understanding of submarine (undersea) cable maintenance activities,”⁹⁰ there is no need to do so by “partnering with the Department of State to conduct outreach to the undersea cable industry” in order to do so,⁹¹ although NASCA and its member are always willing to engage with the agencies. In short, the record in this proceeding is more than sufficient for FWS and NOAA to address submarine telecommunications cables in the Management Plan, and in a manner that reflects their compatibility with the agencies’ and Proclamation’s environmental goals and their status under international law. Any final Management Plan should also reflect the existing regulatory regime governing submarine telecommunications cable activities.

E. 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 subject to numerous federal statutes and permitting processes that ensure they are surveyed, installed, operated, repaired, and maintained consistent with environmentally sound practices.⁹² Therefore, there is no need for the final Management Plan adopted for the Monument to impose burdensome 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.

⁸⁹ Draft Management Plan at 22.

⁹⁰ Draft Management Plan at 26.

⁹¹ *Id.*

⁹² See also NASCA MNM Comments at 8; NASCA Chumash Comments at 15-18; NASCA Hudson Canyon Comments at 17.

Accordingly, any regulations adopted in a final 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.⁹³

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 research indicates that there is little environmental impact to regulate. Consequently, NASCA believes that any Monument-specific regulation should be targeted to identifying gaps in existing regulation that may be needed for the protection of specific Monument features and resources.

Any such regulation, however, must be necessary and appropriately reflect submarine telecommunications cables' status under international law and their compatibility with the Proclamation's environmental goals. Any additional regulation should also reflect submarine telecommunications cables' role in serving key national interests, including its role in supporting a "sustainable, inclusive and growing economy"—a stated NOAA goal.⁹⁴

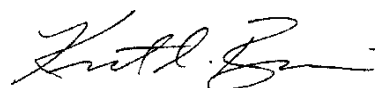
⁹³ Fishery Conservation and Management Act, 16 U.S.C. §§ 1801–1891(d); Marine Mammal Protection Act of 1972, Pub. L. No. 92-522, 86 Stat. 1027 (codified as amended in scattered sections of 16 U.S.C.); Migratory Bird Treaty Act, 16 U.S.C. §§ 703–708, 711–712; Rivers and Harbors Appropriations Act of 1899, 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.

⁹⁴ Richard W. Spinrad, Ph.D., Under Secretary of Commerce for Oceans and Atmosphere & NOAA Administrator, NOAA FY22-26 Strategic Plan: Building a Climate Ready Nation at 2 ("NOAA Strategic Plan").

Unwarranted regulation could 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) and offshore renewable energy development, 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 final Management Plan for the Monument that recognizes the freedoms afforded to submarine cable installation and maintenance activities under international law, reflects the unique, environmentally compatible attributes of such activities, as well as the role that submarine cables play in supporting vital U.S. economic, social, and national security interests.

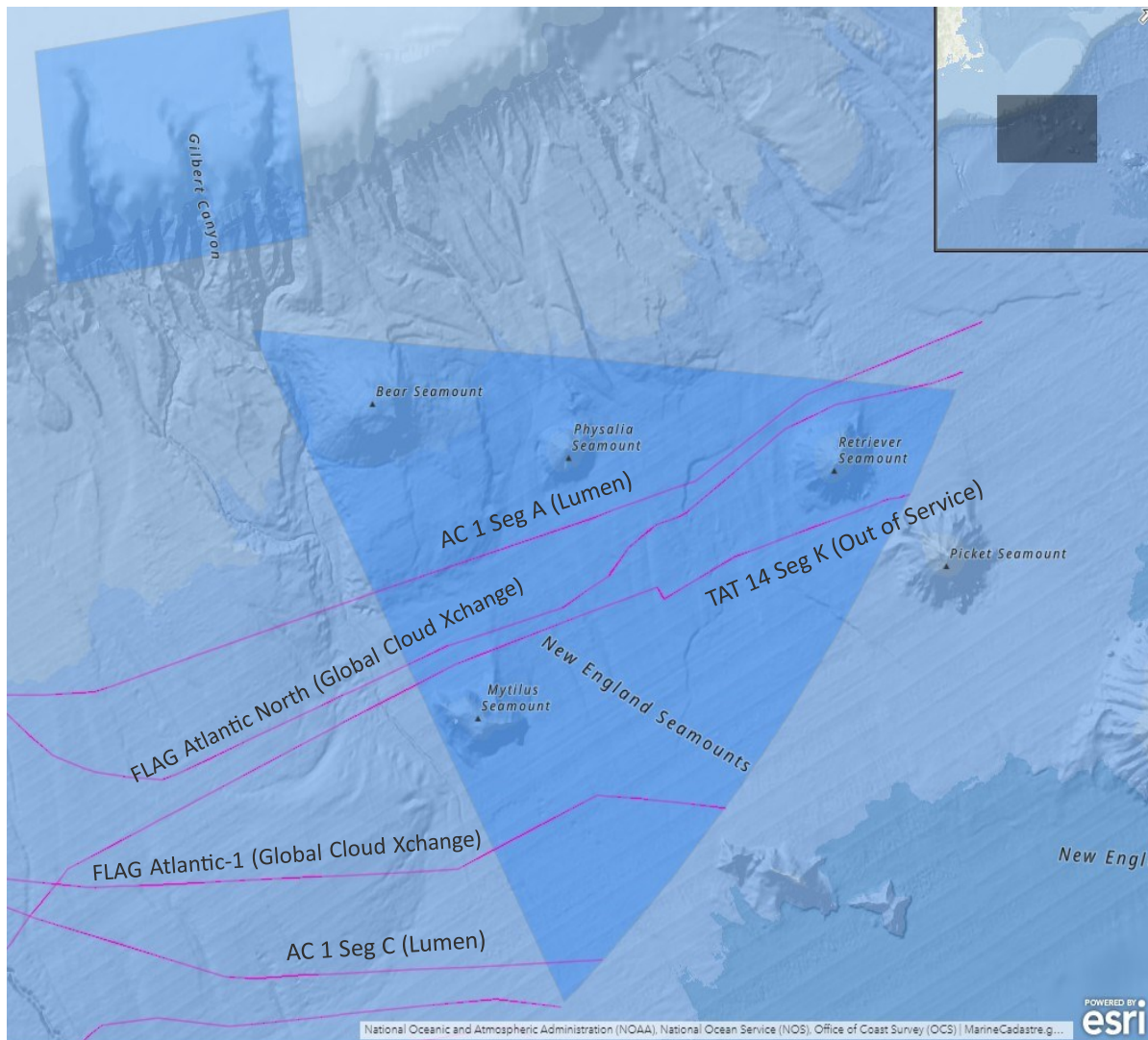
Yours sincerely,



Kent Bressie

Colleen Sechrest

Counsel for the North American Submarine Cable Association

Exhibit A:**MNM Subsea Cable Overlap**

Note: The above map, included as a reference for NASCA's public comment in response to the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration's Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument, is from the [Marine Cadastre National Viewer](#).

Document ID [FWS-R5-NWRS-2023-0154-0612](#)
Title Comment from New England Aquarium
Duplicates 0
Signatories 1



Protecting the blue planet

October 24, 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 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 Draft Management Plan (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 Plan. The draft Plan is a 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. We have observed a variety of species through aerial surveys in this area (e.g., blue whales, sperm whales, whale sharks, Chilean devil rays),⁹⁵ and the Monument contains some of the highest marine mammal

⁹⁵ 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/>.

diversity along the entire east coast.⁹⁶ We will continue to advocate for protecting this region, and look forward to supporting USFWS and NOAA (“the agencies”) as the Plan takes shape so that it reflects the intent of Proclamation 9496, and provides for stewardship, access and care of this incredible area.⁹⁷ We submit our recommendations in the spirit of creating a strong, holistic Plan that will effectively steward this environment long after designation. Detailed below, the Aquarium recommends the Plan: **1) ensures sustainable sources of funding for public education and outreach, 2) monitors and manages for multiple interacting stressors, and 3) builds upon existing scientific data with more comprehensive research to expand our understanding of the Monument and inform effective management of its resources.**

I. We support a Plan that ensures sustainable sources of funding for public education and outreach.

We support the draft Plan’s inclusion of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces. Creating equitable, accessible engagement opportunities for the public to connect with the vast and inspiring wonders contained within the Monument is important. We take seriously the responsibility we have, as a multi-disciplinary, scientific research institution that is embedded in a trusted cultural organization with direct outreach to more than 1 million visitors per year. We are uniquely positioned to conduct science, translate it, and co-develop solutions across sectors and communities, including in the Aquarium’s main building on Central Wharf in Boston, Massachusetts. We implement solutions that integrate science, policy, and innovation to achieve lasting positive outcomes, whether we are testifying before the U.S. Congress on federal actions, conducting in situ or ex situ research, interpreting our conservation work with Aquarium visitors, or engaging with community partners. To reiterate our comments on the request for input,⁹⁸

“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

⁹⁶ 2 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>.

⁹⁷ Presidential Proclamation 9496 (81 FR 65161, September 21, 2016). See <https://www.federalregister.gov/d/2016-22921>

⁹⁸ Docket Numbers FWS-R5-NWRS-2022-N062; FF05R00000 FXRS12610500000.

education and access is especially crucial and therefore must be central to the [] 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.”

Effective education and outreach are contingent upon robust funding resources. Additional federal funding would allow educational institutions like the Aquarium to pursue this line of work, and by extension, advance the collective educational and outreach impact of the agencies. The Aquarium recommends the Plan account for dedicated and sustained streams of funding to support education and outreach through the development of longer-term partnerships with educational institutions, like New England Aquarium, to promote learning and engagement around the Monument. As mentioned in our comments on the request for input:⁹⁹

“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.¹⁰⁰ The Aquarium is hopeful that funding [] can support the development and implementation of both the [] Plan and environmental stewardship for generations to come.”

II. We support a Plan that monitors and manages for multiple interacting stressors.

We encourage the creation of a working group of experts that can contribute to a research needs assessment; this working group must represent experts from across various areas of scientific, indigenous, and traditional knowledge, including those who can fill the current gaps in understanding about species, habitats, and processes—ecosystem, physical, chemical, geologic, and oceanographic—in the Monument. We

⁹⁹ Docket Numbers FWS-R5-NWRS-2022-N062; FF05R00000 FXRS12610500000.

¹⁰⁰ <https://www.whitehouse.gov/environmentaljustice/justice40/>.

applaud how the Plan expressly aims to apply research to inform management decisions. In so doing, we urge the Plan to account for multiple interacting stressors. As stated in our comments on the request for input:¹⁰¹

“The Aquarium has been deeply involved in research and data collection in the NCSM since before its original designation as a Monument in 2016.¹⁰² We have seen firsthand how diverse this environment is for marine species through our aerial surveys and associated research.¹⁰³ 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.¹⁰⁴ 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.¹⁰⁵

The health of the NCSM ecosystem requires identification of all potential threats and a [] plan that addresses them. The [] Plan needs to address overlapping activities, their associated stressors, and the interactions between these stressors, holistically.¹⁰⁶ The abundant species and habitat 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.”

III. We support a Plan that builds upon existing scientific data with more comprehensive research to expand our understanding of the Monument and inform effective management of its resources.

¹⁰¹ Docket Numbers FWS-R5-NWRS-2022-N062; FF05R00000 FXRS12610500000.

¹⁰² 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>.

¹⁰³ 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>.

¹⁰⁴ 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.

¹⁰⁵ 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.

¹⁰⁶ 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 <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).

As discussed in our comments on the request for input,¹⁰⁷ scientific organizations have conducted consequential research on the Monument, and together this research led to the original designation of the area as a Monument.¹⁰⁸ The Aquarium has been a participant in data collection in the NCSM ecosystem for many years and 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. We support a Plan that demonstrates how it will assess and effectively utilize 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 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 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,



Letise LaFeir, PhD
Chief of Conservation and Stewardship
New England Aquarium

¹⁰⁷ Docket Numbers FWS-R5-NWRS-2022-N062; FF05R00000 FXRS12610500000.

¹⁰⁸ 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>.

Document ID [FWS-R5-NWRS-2023-0154-0622](#)
Title Comment from NOAA
Duplicates 0
Signatories 1



October 25, 2023

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

Re: Comment on Draft Management Plan FWS-R5-NWRS-2023-0154

Dear Brittany,

I am writing in support of the Draft Management Plan and Environmental Assessment for the Northeast Canyons and Seamounts Marine National Monument (NECSMNM)¹⁰⁹ as prepared by the U.S. Fish and Wildlife Service (Service) and National Oceanic and Atmospheric Administration (NOAA). Establishing this marine national monument and the management plan are significant steps toward protecting and conserving this unique marine ecosystem. As superintendent of NOAA's Stellwagen Bank National Marine Sanctuary (SBNMS), I would like to direct my comments on the draft management plan to the objectives below, which are of relevance to SBNMS.

1. *Objective 1.7: Increase awareness of and avoid impacts to underwater cultural and historical archaeological resources in the Monument.*

SBNMS has protocols in place for managing and reporting the discovery of underwater cultural resources in the sanctuary. We would be happy to assist Monument staff by sharing our protocols and experiences as you develop your own processes.

¹⁰⁹ Docket ID: FWS-R5-NWRS-2023-0154

2. *Objective 2.5: Coordinate and partner with other coastal and marine protected areas to share resources and implement mutual or complementary management goals, objectives, and activities.*

SBNMS welcomes future opportunities to share resources and coordinate with NECSMNM in ways that may support and promote the stewardship and protection of marine protected areas. We look forward to working together in ways to implement management goals, objectives, and activities, and to learn from one another.

3. *Objective 3.1: Encourage and provide coordinated support for interdisciplinary research and exploration of the Monument.*

SBNMS is interested in collaborative scientific research opportunities, including studying species such as pelagic seabirds and marine mammals, that cross between SBNMS and the Monument. We are also interested in sharing knowledge and learning from each other's research activities.

I look forward to reviewing the final management plan and would like to commend your efforts thus far to establish, manage, and protect NECSMNM. I also look forward to future opportunities to collaborate and coordinate our mutual goals and interests regarding marine protected areas.

Thank you for the opportunity to provide these written comments.

Sincerely,

Captain Peter DeCola
US Coast Guard (retired)
Superintendent,
Stellwagen Bank National Marine Sanctuary

Cc:

Matt Brookhart, ONMS Eastern Region
Michael Pentony, NOAA Greater Atlantic Regional Fisheries Office
Jon Hare, NOAA Northeast Fisheries Science Center

Document ID	FWS-R5-NWRS-2023-0154-0620
Title	Comment from Natural Resources Defense Council (NRDC)
Duplicates	0
Signatories	2



October 26, 2023

Re: Comments on U.S. Fish & Wildlife Service and National Oceanic and Atmospheric Administration's Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument (FWS-R5-NWRS-2023-0154-0001)

Dear Superintendent Petersen and Monument Management Team,

On behalf of our hundreds of thousands of members and online activists, the Natural Resources Defense Council (NRDC) submits the following comments on the U.S. Fish & Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) Draft Management Plan ("draft plan") for the Northeast Canyons and Seamounts Marine National Monument ("Northeast Canyons and Seamounts" or "Monument").¹¹⁰ NRDC supports the draft plan's goals that focus on conservation and protection of the marine ecosystem within the monument, research and exploration, and engagement and education. These are admirable goals and there is much in the draft plan to be applauded. However, there are a few key parts of the draft plan which we urge the agencies to strengthen.¹¹¹

First and foremost, we encourage the adoption of a more robust and effective monitoring and enforcement program. The management plan should require that all vessels have automated identification systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned on at all times while transiting through or operating within the monument. The Coast Guard and NOAA should analyze the tracking data from these vessels to ensure compliance with monument prohibitions and regulations. This requirement will also enable the agencies and the public to gain a more comprehensive and complete picture of the nature and extent of activities occurring in the monument.

¹¹⁰ U.S. Fish & Wildlife Service, Northeast Canyons and Seamounts Marine National Monument Draft Management Plan and Environmental Assessment, (Sept. 12, 2023), <https://www.fws.gov/media/northeast-canyons-and-seamounts-marine-national-monument-draft-management-plan-and-environmental-assessment>.

¹¹¹ We note that NRDC also has signed onto a group comment on the draft plan that is being separately submitted.

Second, the plan should prioritize the use of satellite data and utilization of the information obtained to assess activity in the monument and help with enforcement. Currently, this activity is not identified as a priority activity and we believe it should be.¹¹²

Third, we urge the implementation of Alternative 3. (Draft Plan at 53). Requiring a monument-specific permit would enable the agencies to better track and understand the uses of the Monument and ensure compliance with the proclamation prohibitions and agencies' rules and regulations. In the absence of such a permit, how is the management team going to know the nature and extent of activities occurring in the monument? Without such a permitting system, it will be difficult to track that. If a monument specific permit is not required, as the draft plan envisions, then the plan needs to spell out an effective process that will be used to assess, track, and share reliable information across agencies and publicly regarding the usage of the Monument.

Fourth, we recommend that the plan include a requirement for assessment of the condition of the monument and the updating of the plan at least every 10 years if not sooner. We believe 15 years is too long a timeframe for such an evaluation and revision to take place.

Fifth, with respect to shipping, we support the draft plan's proposal to assess shipping vessel traffic impacts on the Monument over the next five years, including understanding the potential interaction with marine mammals and seabirds. (Draft Plan at 26). The apparent intent is to analyze AIS tracking data from vessels transiting the monument which is good (Draft Plan at 56).¹¹³ However, waiting ten years before action is taken to avert threats that have been identified in the assessment is not acceptable. The final plan should require quick action if the assessment reveals threats to marine mammals, seabirds or other species in the monument.

Sixth, we recommend that the plan call for the monument managers to undertake a two-step process regarding submarine cable-installation and maintenance activities similar to what the plan calls for with respect to shipping: first, evaluating the potential impacts of such activities on monument resources and then addressing any identified threats.

¹¹² The draft plan includes "exploring opportunities to use satellite data." (See Draft Plan at 26.) Exploring opportunities is different than committing to using that data. In addition, that activity is not identified as a priority because it is not accompanied by an asterisk. (The plan uses an asterisk to indicate those activities that the agencies expect will occur given current budget and staffing levels. (Draft Plan at 23).)

¹¹³ Use of satellite data to understand shipping vessel traffic patterns should be identified as a tool to be used in this assessment.

Seventh, we note that the description of the canyon unit of the monument (Draft Plan at 59) is clearer and more accurate than the earlier description (Draft Plan at 10) and recommend using the latter.¹¹⁴

Finally, we support the issuance of an annual report that summarizes key accomplishments and activities, provides information on staffing and budgeting, and a summary of permitting information. (Draft Plan at 29 and 39). However, we recommend that the annual report also include a summary of the monitoring and enforcement activities that have occurred over the last year and the nature and extent of activities in the monument.

In conclusion, the monument is a unique national treasure that contains highly valuable and vulnerable species and ecosystems. We urge the adoption of a strong management plan that ensures that this underwater treasure is effectively protected, and we urge the plan's adoption as soon as possible in light of the September 15, 2023, deadline in President Biden's 2021 Proclamation.

Thank you for this opportunity to comment.

Yours Sincerely,



Sarah Chasis
Senior Strategist, Oceans
NRDC
schasis@nrdc.org



Brad Sewell
Senior Director, Oceans
NRDC
bsewell@nrdc.org

¹¹⁴ For example, the earlier description starts by stating that there are three major canyons off the Mid-Atlantic and New England coasts. In fact, there are many more than three major canyons off these coasts. Also, an additional point that can be added to the description of the monument is that sperm whales have been observed in the monument in overflights conducted by the New England Aquarium.

Document ID [FWS-R5-NWRS-2023-0154-0614](#)
Title Comment from Natural Resources Defense Council (NRDC)
Duplicates 0
Signatories 2



October 25, 2023

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

RE: Comments on U.S. Fish & Wildlife Service and National Oceanic and Atmospheric Administration's Draft Monument Management Plan for the Northeast Canyons and Seamounts Marine National Monument (FWS-R5-NWRS-2023-0154-0001)

Dear Superintendent Petersen,

The Surfrider Foundation (Surfrider) appreciates the opportunity to provide written comments on the Northeast Canyons and Seamounts Marine National Monument Draft Management Plan and Environmental Assessment. Surfrider is a grassroots, environmental non-profit organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches for all people through a powerful activist network. We submit these comments on behalf of our nearly 200 chapters and school clubs in the United States, including our New England chapter network, and hundreds of thousands of supporters, volunteers and members nationwide.

Surfrider urges the U.S. Fish & Wildlife Service (USFWS) and the National Oceanic & Atmospheric Administration (NOAA) to finalize and implement a management plan for the Northeast Canyons and Seamounts Monument that is consistent with Presidential Proclamations 9496 and 10287, and which will ensure sufficient protection and stewardship of this national treasure. The Draft Management Plan is a very positive step towards this goal and we appreciate the priority focus on protecting biodiversity and understanding climate change impacts. We urge you to finalize the management plan as soon as possible, recognizing that the 2021 Proclamation's deadline for the completion

of a joint management plan is September 15, 2023. The implementation of such a plan is necessary to ensure the lasting protection of the monument's outstanding marine resources and associated wildlife.

Surfrider also urges USFWS and NOAA to develop regulations to implement the prohibitions described in the Presidential Proclamations. Such regulations should address the commercial fishing prohibitions that were outlined in the original designation document and are necessary to ensure the lasting protection of the monument's unique and sensitive resources. While the Northeast Canyons and Seamounts Monument constitutes only 1.5% of the Atlantic region of the U.S. Exclusive Economic Zone (EEZ), it is recognized as one the most important and biologically important marine areas off the East Coast. The successful promulgation of such regulations is critical to protecting the natural resources within the monument, as well as the surrounding marine ecosystem.

Surfrider emphasizes the importance of effective implementation of the management plan and regulations by responsible agencies to achieve the goals of the designation. This must include an effective monitoring and enforcement program to ensure compliance with the elements of the Presidential Proclamations. The system should require all vessels transiting through or operating in the Monument to have automated identification systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned on at all times to ensure the effective tracking of activities in the Monument. Given the Monument's geographic area and offshore location, the utilization of such technologies is necessary to ensure compliance and enforcement of Monument rules and regulations.

The Northeast Canyons and Seamounts management plan also provides an opportunity to help address environmental justice by expanding awareness and engagement of diverse communities that have received limited outreach in the past. Specific approaches should include: multilingual public education campaigns to inform the public, and programs that engage diverse and underserved populations in the Northeast region. With respect to Tribal Nations, the Northeast Ocean Data Portal highlights the interconnected importance of this Monument with migratory species that are reported to be of historic significance to Tribal nations in the vicinity of the Monument's boundaries. Ensuring that these species and their critical habitat are protected is not only vital for ecosystem protection, but also for historic and cultural purposes. The added restrictions noted above to prohibit high-impact and extractive uses will significantly benefit species protection.

Finally, Surfrider notes that a strong management plan for Northeast Canyons and Seamounts National Monument will advance the goals and recommendations in the Conserving and Restoring America the Beautiful report. Surfrider's network and recreation industry partners were pleased to see the Biden-Harris administration include in the report the goal of protecting 30% of our nation's lands and waters by 2030 as part of its Executive Order on Tackling the Climate Crisis at Home and Abroad. We believe such action is necessary to provide resilience to climate change, help protect our nation's marine and coastal ecosystems, and support ocean recreation and tourism economies that are valued at nearly \$130 billion annually (National Ocean Economics Program, 2020).

Surfrider appreciates the opportunity to provide written comments on the Northeast Canyons and Seamounts Marine National Monument Draft Management Plan. We thank USFWS and NOAA for your consideration of our input and look forward to supporting successful implementation of the new management plan.

Sincerely,

Pete Stauffer
Ocean Protection Manager
Surfrider Foundation

Isabella DeFrancesco
Northeast Regional Manager
Surfrider Foundation

Document ID	FWS-R5-NWRS-2023-0154-0603
Title	Comment from Creation Justice Ministries
Duplicates	0
Signatories	1

Dear Superintendent Petersen and Monument Management Team,

Creation Justice Ministries has been supportive of the first and only marine national monument in the Atlantic Ocean, since its designation in 2016. The Northeast Canyons and Seamounts National Marine Monument was designated 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]

God's people and planet are depending on us to not only reduce the harm that we perpetrate against God's creation, but to also ensure that we have the correct boundaries in place to safeguard this incredible marine monument for generations to come. Finalizing a strong management plan that ensures this underwater treasure is effectively safeguarded is vital.

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:

We urge that the final plan include an effective monitoring and enforcement program to ensure compliance consistent with the Presidential Proclamations. In recognition of its unique ecological resources, the Northeast Canyons and Seamounts is off limits to industrial activities.[6] Successful protection and maintenance of the Monument's ecosystems and biological diversity will require adequate monitoring and enforcement to prevent unlawful activities.

We acknowledge the draft plan's permitting goals and urge improvements in the proposed permitting program to ensure compliance with the Monument's rules and regulations. (Draft Plan at 41). We urge the agencies to improve the proposed permitting program for the activities permitted within the Monument (e.g., research and scientific exploration, sailing or bird and marine mammal watching)[7] through the implementation of a joint-agency access permit.

The final management plan must include actions to develop the regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations. As with the forthcoming regulations addressing prohibitions to commercial fishing which we recommend be finalized as soon as possible, additional regulations will be necessary to effectively enforce the remaining prohibited activities. (Draft Plan at 22).

The final plan should include a requirement to review and update the plan periodically, at least every 10 years if not sooner.

Additionally, we support the following objectives and actions outlined in the draft plan: We support the draft plan's actions to engage with Native American communities. (Draft Plan at 16, 27, 29, 33).

We support the draft plan's actions to evaluate shipping vessel traffic. (Draft Plan at 21, 26, 56).

We support the draft plan's inclusion of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces. (Draft Plan at 36).

We support the draft plan's inclusion of an exploration and research plan aimed at improving understanding of biological, physical, cultural, and historical resources in the Monument.

Specifically, we support the plan's commitment to support research that undertakes filling in the gaps in knowledge regarding species, habitats, ecosystem processes, as well as physical, chemical, geologic, and oceanographic processes in the Monument. (Draft Plan at 33-34).

We support the draft plan's efforts to inventory the Monument's resources and urge the final plan to expedite such efforts, as well as identify and minimize any impacts to those resources. We support the plan's efforts to collaborate and coordinate among the relevant 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. We acknowledge the thorough efforts FWS and NOAA have outlined to rely on strategic partnerships and effectively coordinate across agencies to manage this area. We encourage additional efforts to include critical stakeholders in the caretaking of this public resource.

We support the issuance of an annual report that summarizes key accomplishments and activities, provides information on staffing and budgeting, and a summary of permitting information. (Draft Plan at 29, and 39).

Creation Justice Ministries appreciates your continued work on this draft management plan. We are excited to work together for a better God's creation for all.

With gratitude and hope,

Creation Justice Ministries



CREATION JUSTICE MINISTRIES

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

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

Document ID:

FWS-R5-NWRS-2023-0154-0001

Dear Superintendent Petersen and Monument Management Team,

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 and restore God's Creation.

Creation Justice Ministries educates, equips and mobilizes Christian communions/denominations, congregations and individuals to protect, restore, and rightly share God's creation.

Creation Justice Ministries has been supportive of the first and only marine national monument in the Atlantic Ocean, since its designation in 2016. The Northeast Canyons and Seamounts National Marine Monument was designated 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]

God's people and planet are depending on us to not only reduce the harm that we perpetrate against God's creation, but to also ensure that we have the correct boundaries in place to safeguard this incredible marine monument for generations to come. Finalizing a strong management plan that ensures this underwater treasure is effectively safeguarded is vital.

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:

We urge that the final plan include an effective monitoring and enforcement program to ensure compliance consistent with the Presidential Proclamations. In recognition of its unique ecological resources, the Northeast Canyons and Seamounts is off limits to industrial activities.[6] Successful protection and maintenance of the Monument's ecosystems and biological diversity will require adequate monitoring and enforcement to prevent unlawful activities. It is imperative that the final plan require all vessels transiting through or operating in the Monument to have automated identification systems (AIS) and, in the case of commercial fishing vessels, vessel monitoring systems (VMS), with both systems turned on at all times to ensure the effective tracking of activities in the Monument and enforcement and compliance with Monument rules and regulations. We ask that the agencies make it a priority to actively monitor activity in the monument using satellite data to track use of the Monument to ensure compliance with monument prohibitions, prevent illegal, unreported, and unregulated fishing in the Monument, and aid in the evaluation of vessel traffic activity in the Monument. (Draft Plan at 26). Where appropriate, we encourage the use of remote technologies including below surface buoy systems and drones to ensure successful resource protection of this remote area. This is essential to ensure effective protection of the Monument.

We acknowledge the draft plan's permitting goals and urge improvements in the proposed permitting program to ensure compliance with the Monument's rules and regulations. (Draft Plan at 41). We urge the agencies to improve the proposed permitting program for the activities permitted within the Monument (e.g., research and scientific exploration, sailing or bird and marine mammal watching)[7] through the implementation of a joint-agency access permit. Key to effectively protecting the Monument's resources is the ability to track and monitor all permitted activities to evaluate potential impacts to Monument resources. Requiring a monument-specific permit, in addition to the required existing permits, will enable the agencies to better track and understand the uses of the Monument, and ensure compliance with the proclamation prohibitions and agencies' rules and regulations. In the absence of a monument-specific permit, the management team should establish a clear, comprehensive process to regulate, track, understand, and share information surrounding the usage of the Monument to enable effective management. We would support a final permitting program that ensures the detailed tracking of permitted activities and sharing of information among management agencies to enable monument managers to make necessary, informed management decisions.

The final management plan must include actions to develop the regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations. As with

the forthcoming regulations addressing prohibitions to commercial fishing which we recommend be finalized as soon as possible, additional regulations will be necessary to effectively enforce the remaining prohibited activities. (Draft Plan at 22).

The final plan should include a requirement to review and update the plan periodically, at least every 10 years if not sooner. We are encouraged by the draft plan's objectives to adaptively manage the Monument, including through annual management team meetings that could include modifying the plan based on the development of new information (Draft Plan at 28), as well as the objective to undertake a condition report that will summarize the current status and health of resources in the Monument in order to inform the next management plan review process. (Draft Plan at 34). However, given uncertainties surrounding timelines and funding to achieve the long-term proposed goals, we urge the final plan be reviewed every ten years or sooner.

Additionally, we support the following objectives and actions outlined in the draft plan: We support the draft plan's actions to engage with Native American communities. (Draft Plan at 16, 27, 29, 33). We encourage those efforts to begin early and often as a high priority for the Monument management team to inform the successful management of the Northeast Canyons and Seamounts.

We support the draft plan's actions to evaluate shipping vessel traffic. (Draft Plan at 21, 26, 56). We support the draft plan's actions related to assessing shipping vessel traffic impacts on the Monument, including understanding the potential interaction with marine mammals. As part of this, and as emphasized above, use of satellite data to better understand shipping vessel traffic patterns and amount should be prioritized.

We support the draft plan's inclusion of a robust public education and outreach component that prioritizes serving communities that have historically not had access to nature and outdoor spaces. (Draft Plan at 36). Creating equitable, accessible engagement opportunities for the public to connect with the vast and inspiring wonders contained within the Monument is imperative. We therefore applaud the agencies' plan to create and share accessible and inclusive educational resources that share the incredible biodiversity of this monument with the diverse U.S. public and including in partnership with educational institutions and aquariums.

This includes the agencies' efforts to develop outreach materials in multiple languages and establish educational curricula and programming to be disseminated broadly throughout FWS's Urban Wildlife Conservation Partnership, as well as connecting with schools that serve communities with environmental justice concerns in the Northeast. (Draft Plan at 36-37). We urge a commitment to ensure the completion of the plan's important goals that are presently contingent on additional funding. (Draft plan at 37).

We support the draft plan's inclusion of an exploration and research plan aimed at improving understanding of biological, physical, cultural, and historical resources in the Monument. Specifically, we support the plan's commitment to support research that undertakes

filling in the gaps in knowledge regarding species, habitats, ecosystem processes, as well as physical, chemical, geologic, and oceanographic processes in the Monument. (Draft Plan at 33-34). 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 geologic, ecological, and biological resources.[8] We encourage assembling a working group of experts that can help develop a research needs assessment. (Draft Plan at 33). We support the draft plan's actions to share the research findings including by hosting research symposia. (Draft Plan at 32). We also commend the plan's objectives to use Monument research to inform management decisions. (Draft Plan at 28, 34). The Monument, with its size and protected status, is an incredible living laboratory that can contribute to society's understanding of climate change impacts on ocean wildlife and habitats. Therefore, we urge the agencies to articulate steps to ensure that goals to research climate change impacts in the Monument and to develop a long-term climate change monitoring plan materialize early. (Draft Plan at 34).

We support the draft plan's efforts to inventory the Monument's resources and urge the final plan to expedite such efforts, as well as identify and minimize any impacts to those resources.

The Monument is filled with spectacular wildlife. The slow growing deep-sea coral, the diversity of marine mammals, majestic seabirds, sharks, rays and other fish, and the often-unseen base of the marine food web, plankton, all make this monument a haven for biodiversity. In recent years, as scientists have conducted dives with remotely operated vehicles and aerial surveys, they continue to observe new and rare species with each visit. We support the agencies' efforts to inventory the resources contained within the Monument, including by developing a comprehensive species list to be updated annually. In particular, we urge the agencies to complete a baseline assessment of the area's health and productivity as soon as possible so as to assess and adaptively address current impacts to the Monument. (Draft Plan at 34). We also support the plan's objective of completing an assessment of all major uses of the Monument (Objective 1.4) as a detailed understanding of human uses of the Monument is essential to effective stewardship.

We support the plan's efforts to collaborate and coordinate among the relevant 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. We acknowledge the thorough efforts FWS and NOAA have outlined to rely on strategic partnerships and effectively coordinate across agencies to manage this area. We encourage additional efforts to include critical stakeholders in the caretaking of this public resource. 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.

We support the issuance of an annual report that summarizes key accomplishments and activities, provides information on staffing and budgeting, and a summary of permitting information. (Draft Plan at 29, and 39).

Creation Justice Ministries appreciates your continued work on this draft management plan. We are excited to work together for a better God's creation for all.

With gratitude and hope,

Creation Justice Ministries

Document ID	Submitted Via Email
Duplicates	0
Signatories	7

Congress of the United States

Washington, DC 20510

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

Ms. Janet Coit
 Assistant Administrator for Fisheries and
 National Oceanic and Atmospheric
 Administration
 1315 East-West Highway
 Silver Spring, Maryland 20910

Dear Superintendent Petersen and Assistant Administrator Coit,

We write to thank the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) for developing and publishing the Draft Management Plan and Environmental Assessment for the Northeast Canyons and Seamounts Marine National Monument (the Monument)—one of only five marine monuments in the nation and the only marine monument in the Atlantic Ocean. To ensure proper care and stewardship of this national treasure, pursuant to FWS-R5-NWRS-2023-0154-001, we urge swift finalization of the Management Plan and suggest inclusion of regular reviews of the Plan to ensure effective management.

Located about 130 miles off the coast of New England, the Monument is a spectacular underwater laboratory. It protects countless species, including deep-sea corals, endangered and threatened sea turtles, endangered whales and other marine mammals, and numerous fish and invertebrate species. Preserving the Monument's biodiversity will help keep the ocean healthy, supporting the tens of thousands of people in Connecticut and New England in the recreation and tourism sectors. Implementing a strong Management Plan for the Monument will help sustain the region's economy, build the ocean's resilience to ocean acidification and climate change, advance scientific research, and preserve natural history.

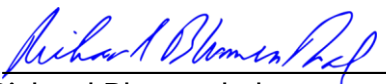
Preserving the rich biodiversity and pristine marine ecosystem of the Monument will require strong leadership and a robust Management Plan from USFWS and NOAA. Within the Draft Management Plan, we commend USFWS and NOAA for prioritizing

engagement with Native American Tribes and focusing on public outreach that serves disadvantaged communities that have historically faced barriers to outdoor access. Additionally, the Plan's focus on robust collaboration with Co-Trustees, stakeholders, and additional relevant agencies should prove invaluable for effective management. Finally, since the Monument is such a unique and productive ecosystem, we appreciate the Plan's emphasis on the importance of exploration and research aimed at improving understanding of the biological, physical, cultural, and historical resources in the Monument.¹¹⁵

As USFWS and NOAA finalize the Draft Management Plan, we urge additional considerations to ensure public transparency for the usage of and visitation to the Monument. To achieve this, we support the Plan's requirement of an annual report summarizing key accomplishments and activities, providing information on staffing and budgeting, and summarizing permitting information to successfully regulate, track, understand, and share information on the Monument's usage. However, USFWS and NOAA should also review and update the Management Plan on a regular basis—at least once every ten years—to maintain the best conservation and management strategies possible for the Monument.

The Northeast Canyons and Seamounts Marine National Monument is a spectacular underwater seascape that is both precious and priceless. We urge you to quickly finalize a strong Management Plan to protect the Monument for the benefit of generations to come. We once again thank USFWS and NOAA for developing a thorough Draft Management Plan for the Monument and look forward to working together to protect this national treasure.

Sincerely,



Richard Blumenthal
United States Senator

¹¹⁵ U.S. Department of the Interior and U.S. Department of Commerce, U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration, Northeast Canyons and Seamounts Marine National Monument Draft Management Plan and Environmental Assessment, https://www.fws.gov/sites/default/files/documents/NECSMNM%20DMP%26EA_20230831_FINAL_w_appendices_reducedfilesize_508Compliant.pdf.



Christopher S. Murphy
United States Senator



Joe Courtney
Member of Congress



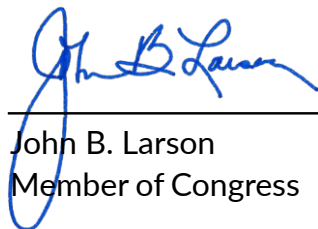
Rosa L. DeLauro
Member of Congress



Jahana Hayes
Member of Congress



Jim Himes
Member of Congress



John B. Larson
Member of Congress

Document ID [FWS-R5-NWRS-2023-0154-0611](#)
Title Comment from Environment America
Duplicates 3
Signatories 11,581



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

October 26, 2023

Re: FWS-R5-NWRS-2023-0154-0001

Dear Superintendent Petersen,

Environment America works to protect the places that Americans love and promote core environmental values we share, such as clean air to breathe, clean water to drink, and clean energy to power our lives. Along with our affiliated state groups, we are submitting the attached 11,581 signatures in support of the swift adoption and implementation of a strong, conservation-focused final management plan for the Northeast Canyons & Seamounts Marine National Monument.

Each of the 11,581 people signed the following letter:

Re: FWS-R5-NWRS-2023-0154-0001

Dear Superintendent Petersen,

From whales to deep sea coral, the Northeast Canyons & Seamounts is a hotspot for amazing ocean life. Thanks to President Biden, this area is once again one of the best protected parts of the U.S. Atlantic.

To make the most of these protections, we need to:

- *Create the resources to enforce the area's critical protections, including its protections against commercial fishing.*
- *Do more research in the next few years that can help us understand and mitigate new threats to the area's ocean life.*
- *Bring this science to more of the public, to inspire love and action to protect the ocean.*

I urge you to keep these efforts front and center in your agencies' actions, and want to thank you for doing everything you can to keep this New England ocean treasure safe for future generations.

Sincerely,

The Northeast Canyons & Seamounts is a national treasure, home to ocean life large and small that inspires wonder and curiosity in people across the country. With his presidential proclamation, President Biden took an important step towards ensuring this treasure will survive in perpetuity.

But lines on paper aren't enough to keep this area vibrant. By creating a strong, conservation-focused final management plan, you can ensure we're truly protecting the area's life from all threats, now and in the future. With the small changes to the existing draft management plan laid out in our members' letter and partners' comments, U.S. Fish & Wildlife Service and the National Oceanic and Atmospheric Administration can move forward with a management plan that will truly help us better understand, appreciate and protect this amazing place.

Sincerely,



Kelsey Lamp

Protect our Oceans Campaign Director Environment America

CC: NOAA Administrator Rick Spinrad

Note: all of this letter's 11,581 signatories can be found on www.regulations.gov, docket FWS-R5-NWRS-2023-0154

Appendix G. Response to comments on Draft Management Plan and Environmental Assessment

The Monument management team, comprised of the U.S. Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA), received 12,219 written and verbal submissions during the 45-day public comment period on the draft management plan. Many of those submissions contained multiple comments on a variety of topics relevant to the management plan. The management team, with assistance from Kearns & West, a collaboration and strategic communications firm, identified the substantive comments within the written and verbal submissions that were received and developed written responses to those substantive comments. **Copies of all comments submitted on the draft management plan can be found in Appendix F.**

All substantive comments submitted during the public comment period were taken into consideration when developing responses and determining changes or edits to the management plan. Many of the substantive comments overlapped in various respects. To avoid redundancy, the Monument management team has grouped and summarized comments of a similar nature and provided a single response. The responses to comments are grouped thematically, based on the Monument program area to which they most closely relate: Management & Stewardship; Research & Exploration; and Engagement & Education. Within each program area, the comments and responses are presented in no particular order.

The National Environmental Policy Act (NEPA) does not require Federal agencies to provide written responses to public comments on draft environmental assessments. This response to comments was not developed to fulfill a NEPA requirement, but rather to acknowledge the important role that public comments played in shaping the final management plan and to explain the Monument management team's thinking and decision-making regarding this foundational document. The public comments received on the draft management plan helped the Monument management team to further refine the objectives and activities in the management plan, clarify language and better understand the perspectives and concerns of stakeholders and partners.

MANAGEMENT & STEWARDSHIP

1. Comment: General support for Monument and draft management plan.

Multiple comments expressed broad and general support for the Monument and Monument draft management plan. These comments discussed the ecological importance of the Monument, particularly its high biodiversity and the importance of ensuring the Monument is protected.

Monument management team response:

The Monument management team appreciates this support and looks forward to partnering with interested stakeholders and members of the public to protect and conserve the Monument and its resources.

2. Comment: General opposition to Monument and draft management plan.

Multiple comments expressed broad and general opposition to the Monument and draft management plan. These comments stated strong objections to the way in which the Monument was created under the Antiquities Act.

Monument management team response:

The Monument management team acknowledges ongoing opposition to the Monument. While the management team cannot change how the Monument was created or make changes to the way the Monument must be managed under Presidential Proclamation 9496, the management team is interested in engaging the public and stakeholders in Monument management, regardless of whether they support or oppose the Monument.

3. Comment: The management plan needs to be finalized quickly.

Multiple comments stated that the management plan needed to be finalized quickly. Some commenters provided specific timelines for completing the management plan, ranging from the first quarter of 2024 to April 2024 to the end of 2024.

Monument management team response:

Finishing the Monument's management plan has been a top priority for staff at every level in both the FWS and NOAA. The agencies have accelerated timelines for internal reviews and conducted reviews concurrently to help meet deadlines. Our participating agencies (the Department of State, U.S. Coast Guard and Department of Defense) all greatly supported the Monument management team in these efforts, often reviewing documents and providing feedback on very short timelines. The Notice of Intent to develop the management plan was published on December 28, 2022, and the Final Management Plan was published in June 2024, approximately a year and a half later. And in that time, the Monument management team hosted six public comment meetings and a 45-day public comment period to take feedback on the draft management plan.

4. Comment: All uses of the Monument should be tracked to ensure compliance with and enforcement of prohibitions in the Monument.

Comments on this topic addressed a wide range of issues related to the importance of tracking and monitoring use of the Monument and ensuring compliance with Monument prohibitions. Comments stated that:

- All uses of the Monument need to be tracked and understood, particularly under the preferred alternative, which would not require a joint-agency access permit for all entry into the Monument. “The agencies should actively monitor activity in the Monument to ensure compliance with prohibitions and regulations; prevent illegal, unreported, and unregulated (IUU) fishing in the Monument; and aid in the evaluation of vessel traffic activity in the Monument.” One comment stated that the U.S. Coast Guard and NOAA should analyze tracking data from vessels that enter the Monument.
- Detailed tracking information should be shared among management agencies to “enable monument managers to make necessary, informed management decisions,” and enable,

“the public to gain a more comprehensive and complete picture of the nature and extent of activities occurring in the Monument.”

- A comprehensive monitoring and enforcement system is needed for the Monument, “to ensure compliance consistent with the Presidential Proclamations. Successful protection and maintenance of the Monument’s ecosystems and biological diversity will require adequate monitoring and enforcement to prevent unlawful activities.”
- The Monument should use remote technologies, including satellite data, below surface buoy systems and drones to “ensure successful protection of this remote area.”
- The draft plan’s actions related to assessing shipping vessel traffic impacts on the monument, including understanding the potential interaction with marine mammals, should be supported.

Monument management team response:

The Monument management team agrees that tracking use of the Monument and compliance with and enforcement of the prohibitions in the Monument is important. Consultations with law enforcement agents of various agencies lead us to believe that the best way to ensure compliance with Monument prohibitions, rules and regulations is to build relationships and partnerships with user groups and engage them in stewarding the Monument, whether that be by reporting any illegal activity they see or being themselves good stewards who follow the rules. This is one of the primary reasons the management plan focuses on a community stewardship approach to managing the Monument, especially given its relative inaccessibility. As remote technologies advance, we will routinely revisit conversations with the management team and enforcement partners to address the best approaches to monitor and enforce activities within the Monument boundaries.

The management plan includes multiple activities focused on gathering information and tracking use of the Monument. These activities include conducting surveys of recreational fishers to find out more about who fishes in the Monument and partnering with the USCG, NOAA Office of Law Enforcement and FWS law enforcement to explore the use of remote and satellite technologies to track use of the Monument. In response to the comments on this topic, the management plan has been modified to state that its annual report will include an overview of available vessel traffic information for the Monument from the past year.

5. Comment: Location monitoring systems should be required on all vessels when transiting the Monument.

Tracking systems (such as Vessel Monitoring Systems, or VMSs, or Automatic Identification Systems, or AISs) should be required on all vessels that enter the Monument and should be required to be turned on while in the Monument “to ensure effective tracking of activities in the Monument.”

Monument management team response:

The U.S. Coast Guard regulates and manages the use of AISs on vessels and information about the rules and requirements for AISs can be found on the U.S. Coast Guard's website: [Automatic Identification System \(AIS\) Overview | Navigation Center \(uscg.gov\)](#). Generally speaking, vessels over 65 feet are required to have an AIS on board and turned on. VMSs are required on some fishing vessels (depending on the species being fished). NOAA regulates VMS use and requirements regionally. VMS requirements are implemented and customized as needed for individual Fishery Management Plans. VMS regulations for the Northeast can be found at: <https://www.ecfr.gov/current/title-50/chapter-VI/part-648/subpart-A/section-648.9> and <https://www.ecfr.gov/current/title-50/chapter-VI/part-648/subpart-A/section-648.10>. A general description of VMS requirements for the Northeast can be found at: <https://www.fisheries.noaa.gov/national/enforcement/regional-vessel-monitoring-information#northeast-greater-atlantic-region>

By law, the U.S. Coast Guard and NOAA regulations for AIS and VMS must be followed in the Monument. Requiring all vessels to have an AIS or VMS on board and turned on while in the Monument would not be consistent with existing navigation or fishery regulations. AIS regulations are based on vessel size and type, not based on where they operate. VMS regulations for fishing vessels are implemented by NOAA for each region of the country and apply uniformly throughout a region to vessels associated with specific regional fisheries.

Monument vessel activity will be tracked by active patrols in addition to satellite tracking that can occur using VMS and AIS. For those interested, real-time AIS and VMS tracking information is publicly accessible on websites such as Vessel Tracker (www.vesseltracker.com, for shipping vessel tracking) and Global Fishing Watch (<https://globalfishingwatch.org/map> for fishing vessel traffic).

6. Comment: The management plan needs to prioritize adaptive management strategies that address climate change impact in annual management planning.

One comment stated, "In particular, the plan should ensure future research should effectively inform management to advance conservation outcomes that sustain its biodiversity through climate change impacts."

Monument management team response:

The team agrees that adaptive management strategies are important. The management plan states that one management team meeting each year will focus on adaptive management and thinking through whether any new information has come to light over the previous year that would lead the team to consider management changes.

Additionally, if funding allows, the Monument will organize and host a Northwest Atlantic Canyons and Seamounts research symposium every five years, which will bring researchers working in the Monument region together to share and discuss their findings. This will also help to inform adaptive management of the Monument.

The Monument management team also can develop and publish step-down plans that tier off the management plan and/or develop and publish supplemental revisions to the management plan at any time to address adaptive management needs.

7. Comment: The Monument management team should develop regulations to implement all prohibitions in the governing Presidential Proclamations.

Multiple comments stated the need for both NOAA and the FWS to establish regulations for the Monument in accordance with the prohibitions in Presidential Proclamations 9496 and 10287 and the Monument’s management plan. One such comment states, “the Co-[managing agencies] should adopt strong and clear regulations necessary to implement all prohibitions consistent with the governing Presidential Proclamations. NOAA Fisheries has recently proposed regulations to address the Proclamations’ prohibition on commercial fishing in the Monument, but additional regulations are necessary to effectively enforce the other prohibited activities.”

Monument management team response:

In response to these comments, the Monument management team has added an activity under objective 1.1 that focuses on assessing whether any additional regulations are necessary:

- Within three years, the FWS will assess whether any regulations in addition to the general regulations governing the National Wildlife Refuge System at 50 C.F.R. §§ 25-38 are necessary. *

NOAA Fisheries is obligated to issue regulations to ensure all conservation and management measures contained in fishery management plans implemented by the Secretary of Commerce are consistent with all applicable laws, including the Antiquities Act and Presidential Proclamations issued under the Antiquities Act. In order to codify the prohibition on commercial fishing in the Monument instituted by Presidential Proclamations 9496 and 10287, NOAA Fisheries promulgated regulations under the Secretarial authority of section 305(d) of the Magnuson-Stevens Fishery Conservation and Management Act, as necessary to carry out section 303(a)(1)(C) of the Act.

The Secretary of Interior signed Secretary’s Order 3412 on September 8, 2023, officially directing the FWS to manage the Monument as a unit of the National Wildlife Refuge System (NWRS). Lands and waters of the National Wildlife Refuge System are managed in accordance with the National Wildlife Refuge System Improvement Act and [National Wildlife Refuge System Administration Act](#) (16 U.S.C. §§ 668dd- 668ee, as amended), the [Refuge Recreation Act](#) (16 U.S.C. §§ 460k *et seq.*), the [Endangered Species Act](#) (16 U.S.C. §§ 1531 *et seq.*), Public Law 98-532, and Executive Order 6166 of June 10, 1933.

The list of activities that are generally prohibited (with site-specific exceptions) in units of the NWRS is extensive (see 50 C.F.R. Parts 25-32). In general, activities in units of the NWRS are considered prohibited unless they are specifically deemed compatible and made allowable – either by the FWS or by another Federal agency or Executive authority that has specific management authorities over activities in the unit of the NWRS.

The FWS does not anticipate needing to promulgate an extensive suite of regulations that are specific to the Monument, as the existing regulations for the NWRS are largely inclusive of the prohibitions in the Monument's establishing proclamation. The FWS is in the process of reviewing the existing NWRS regulations to ensure that all prohibited activities in the Monument are addressed.

8. Comment: Select alternative 3, which would require a joint agency access permit for any activity in the Monument.

Multiple commenters stated that the Monument management team should select the non-preferred Alternative 3, which would require a joint agency access permit to enter the Monument for any activity. Commenters cited the importance of tracking and understanding use of the Monument and that a permitting system would be the way to ensure that the management team is aware of all use of the Monument and can also ensure compliance with the proclamation prohibitions and agencies' rules and regulations.

Monument management team response:

After careful consideration of the comments received in support of Alternative 3, the Monument management team has chosen to select the preferred Alternative 2 (Volume 1 final management plan and permitting system overview) as the final management plan because it best meets the purpose of and need for developing a management plan, most effectively manages compatible priority public uses under the National Wildlife Refuge Administration Act, and will likely lead to greater beneficial effects than the other alternatives considered. The permitting system under this alternative would *not* require a joint-agency access permit for all entry into the Monument but would require permits from either NOAA or the FWS for a wide variety of activities in the Monument.

As a result of the comments that were submitted in favor of selecting Alternative 3, the Monument management team reconsidered its preferred alternative, but again concluded that Alternative 2 is the preferred path for managing the Monument. Conversations with law enforcement staff in multiple agencies confirmed that Alternative 3 and the implementation of a joint-agency access permit for all entry into the Monument would likely result in a lengthy process to develop the permit and significant challenges in achieving compliance. Thus, the Monument management team believes that a joint-agency access permit is unlikely to be a good approach for tracking use of the Monument. Law enforcement staff consulted emphasized the importance of exploring emerging remote tracking technologies, integrating patrols of Monument waters into existing patrol efforts within the EEZ, building relationships with user groups, and developing outreach programs that encourage ocean stewardship as the best ways to protect and conserve resources in the Monument.

9. Comment: Support for the preferred Alternative 2, which is to implement the Volume 1 Draft Management Plan and proposed permitting system.

This comment expressed support for the preferred Alternative 2, stating that the fish stocks targeted by recreational fishermen in the monument areas are closely regulated by the International Commission for the Conservation of Atlantic Tunas (ICCAT) NOAA Fisheries, the Regional Fishery Management Councils and that NOAA Fisheries already has an effective

permitting system in place, utilizing existing authority and established programs to permit recreational fishing within the Monument.

Monument management team response:

The Monument management team has selected Alternative 2 to implement in the final management plan.

10. Comment: Support for the development of an annual report and for regular reporting on the Monument.

Comments on this topic discussed the importance of regular reporting on the status of Monument resources. There was specific support for the annual report proposed in the draft management plan and the role that this annual report can play in informing adaptive management of the Monument and its resources. It was requested that the Monument annual report include a summary of monitoring and enforcement activities that have occurred in the Monument over the past year.

Monument management team response:

The Monument management team agrees that the proposed annual report is a key adaptive management and communication tool and will strive to include as much information as possible in the annual report, including monitoring, permitting and enforcement information.

11. Comment: Commercial fishing should be managed under the framework of the Magnuson-Stevens Fishery Conservation Management Act and not using Presidential authorities under the Antiquities Act.

Multiple comments stated objections to the ban on commercial fishing in the Monument put forth in Presidential Proclamation 9496. These comments stated that commercial fishing should be managed under the Magnuson-Stevens Fishery Conservation and Management Act and not the Antiquities Act and referenced the work that the New England and Mid-Atlantic Fishery Management Councils did to establish deep-sea coral protection areas that include a large portion of the Monument.

Monument management team response:

The Monument management team understands the concerns and objections to the prohibition on commercial fishing in the Monument. Both the FWS and NOAA Fisheries are obligated to follow the orders in Presidential Proclamation 9496 and 10287. Thus, the Monument management team had no discretion to consider alternatives or changes to the prohibition on commercial fishing within the management plan.

The Monument's management plan identifies opportunities for the commercial fishing industry to be engaged in developing the research needs assessment for the Monument, which could include study of species that have commercial importance. The Monument management team is also open to establishing species and ecosystem monitoring inside and outside the Monument, as well as analysis of commercial fishing efforts outside of the Monument in order to best understand the ecological effects (or lack thereof) of the Monument's prohibition on commercial fishing.

12. Comment: Prohibit commercial fishing in the Monument.

One comment requested that the prohibition on commercial fishing in the Monument be reinstated, saying, “I would like to see the terms governing the Monument be returned to the initial proclamation issued by President Obama.”

Monument management team response:

President Biden in October 2021 reinstated the prohibition on commercial fishing in the Monument through Presidential Proclamation 10287. Under this proclamation, commercial fishing in the Monument was phased out over several years. As of September 15, 2023, commercial fishing of any kind is prohibited in the Monument.

13. Comment: Recreational fishing should be prohibited in the Monument.

Those who stated that recreational fishing should be prohibited in the Monument cited different reasons. Some felt that if commercial fishing was prohibited then recreational fishing should be prohibited too, referencing the fact that those fishing commercially and recreationally for species like tuna are using the same gear. Underlying some comments was a sense of unfair treatment – that commercial fishing was being vilified while recreational fishing lauded. Other comments stated that extraction of any kind should not be allowed in the Monument, whether it be for commercial or recreational purposes.

Monument management team response:

While commercial fishing is a prohibited activity in the Monument, Presidential Proclamation 9496 lists recreational fishing as a regulated activity that may be permitted in the Monument if deemed compatible with the purpose of the Monument. The FWS and NOAA reviewed NOAA’s existing analyses (environmental impact statements) of recreational fisheries (tilefish, tuna, and other highly migratory species) that are likely to occur in the Monument and its vicinity. These analyses concluded that recreational fishing for these species would cause no significant adverse impacts to the Monument’s biological, physical, cultural, historical, or economic environment. These findings are documented in the environmental assessment that accompanies the Monument’s management plan.

Additionally, recreational fishing is one of the priority uses of the NWRS that help connect people to nature and should be allowed in units of the NWRS when deemed compatible with a refuge’s purpose. The Monument management team has not found any scientific information to suggest that recreational fishing is incompatible with the purpose of the Monument and will be completing a compatibility determination for this and other uses of the Monument following the finalization of the management plan. Drafts of all compatibility determinations will be made available for public comment.

It should be noted that seafloor disturbance is not allowed in the Monument (including the use of typical anchors that lodge in the seafloor). Thus, any kind of recreational fishing that involves the use of bottom gear is prohibited in the Monument.

Moreover, the Omnibus Deep-Sea Coral Amendment, put in place by the New England Fishery Management Council in June 2021, closed 82% of the Monument to commercial fishing (with the exception of red crab, Jonah crab and lobster), but not to recreational fishing.

The final management plan identifies several activities focused on better understanding and tracking use of the Monument for recreational fishing. Uses of and activities in units of the NWRS, including recreational fishing, are reevaluated on regular intervals, allowing for the consideration of new information. Additionally, NOAA Fisheries, through the regional fishery management councils where applicable, evaluates the performance of management measures, including for recreational fishing, on an ongoing basis.

In response to the comments received on this topic, the management team has added an activity under Objective 1.8 (Develop a community stewardship program for the Monument) that involves working in partnership with the American Sportfishing Association (ASA) to explore developing a voluntary certification program for fishing guides in the Monument, similar to the [Blue Star program](#) the ASA developed with Florida Keys National Marine Sanctuary.

14. Comment: Support for recreational fishing in the Monument.

Comments offered in support of recreational fishing highlighted the role that offshore recreational fishing plays economically, stating that, “offshore recreational fishing is a tremendous economic driver for coastal communities throughout New England.”

Monument management team response:

The Monument management team agrees that offshore recreational fishing contributes significantly to the economies of coastal communities in New England.

15. Comment: Concerns about impacts from military activities in the Monument

One comment referenced concerns about military activities in the Monument, referencing concerns about sonic booms and urging the “U.S. Fish and Wildlife Service to finalize the absolute strongest possible protections as swiftly as possible.”

Monument management team response:

Military and law enforcement activities are allowed to take place in the Monument and the Monument management team has no authority to restrict these activities. The Monument is managed in cooperation with the U.S. Department of Defense and the U.S. Coast Guard, and the Monument management team coordinated closely with the U.S. Navy (Navy) and U.S. Coast Guard on the development of the management plan.

Presidential Proclamation 9496, which established the Monument, states specifically that the prohibitions in the Monument shall not apply “to activities and exercises of the U.S. Armed Forces, including those carried out by the United States Coast Guard”, but that, “the U.S. Armed Forces shall ensure, by the adoption of appropriate measures not impairing operations or operation capabilities, that its vessels and aircraft act in a manner consistent so far as is practicable, with this proclamation.”

The Navy does not have any active ranges or operations areas which overlap with the monument. While the Navy's Atlantic Fleet Training and Testing area does encompass the Monument, there has not been any recent training or testing within the Monument boundary. However, naval forces are expected to transit through the Monument and could need to carry out other training and testing activities in the future. Should this be the case, the Navy conducts mitigations during all activities to reduce interactions with marine resources, such as the use of lookouts and stand-off distances from marine mammals and would include these types of mitigations during any activities it might need to carry out in the Monument in the future.

Presidential Proclamation 9496 goes on to state that, "in the event of threatened or actual destruction of, loss of, or injury to a monument resource or quality resulting from an incident, including but not limited to spills and groundings, caused by a component of the Department of Defense or the United States Coast Guard, the cognizant component shall promptly coordinate with the Secretaries [of Interior and Commerce] for the purpose of taking appropriate action to respond to and mitigate any harm and, if possible, restore or replace the monument resource or quality."

The Department of the Navy and U.S. Coast Guard are key partners in the management of the Monument and the Monument management team will work closely with both agencies in the unlikely event that Monument resources are injured by military or law enforcement activities.

16. Comment: Multiple objections to the way the installation and maintenance of submarine cables in the Monument is addressed in the draft management plan.

The North American Submarine Cable Association (NASCA) submitted an extensive comment letter. The letter urges NOAA and the FWS to state in the Monument's management plan that laying cable is a right under international law, and that laying submarine cables is a sustainable use of the oceans and compatible with Presidential Proclamation 9496, which established the Monument. Rather than deferring discussion of submarine cables, NASCA urges the FWS and NOAA in the Monument's management plan to "expressly provide for the continued installation of submarine telecommunications infrastructure (and conduct of any related repair and maintenance activities with respect to that infrastructure) within the monument boundaries, consistent with existing use, pursuant to existing, manifold regulatory authorities and permitting processes." The comment letter also states that NOAA and the FWS do not have the legal authority to impose additional management or regulatory requirements on submarine cable installation in the Monument.

Monument management team response:

The installation and maintenance of submarine cables is outside the scope of the Monument's management plan and environmental assessment. This topic will be addressed in a separate document (potentially a step-down plan and/or compatibility determination, as appropriate), a draft of which will be published for public comment. The comment letter from NASCA will be carried forward and considered in that process.

The Monument management team is engaged in ongoing discussions with the Department of State regarding the installation and maintenance of submarine cables in the Monument to ensure that the FWS's and NOAA's obligations under Presidential Proclamation 9496 and the National

Wildlife Refuge System Administration Act of 1966 are met, consistent with international law. The Monument management team will engage with the submarine cable industry on this issue and greatly appreciate the industry's commitment to laying and maintaining cable in a way that is protective of the Monument's resources.

The Monument is managed in accordance with international law.

In response to this comment, the final management plan and environmental assessment have been edited to add the following language to the discussion of submarine cables under the sub-header, "Activities Outside Scope":

"This topic will be addressed in a separate document (potentially a step-down plan and/or compatibility determination, as appropriate), a draft of which will be published for public comment.

The Monument management team is engaged in ongoing discussions with the Department of State regarding the installation and maintenance of submarine cables in the Monument to ensure that the FWS's and NOAA's obligations under Presidential Proclamation 9496 and the National Wildlife Refuge System Administration Act of 1966 are met, consistent with international law. The Monument management team will also engage with the submarine cable industry on this issue to better understand the nature of submarine cable installation and maintenance work in the Monument and the best management practices used by industry to avoid impacts to sensitive marine resources.

The Monument is managed in accordance with international law."

17. Comment: Evaluate the impacts of submarine cable laying and management.

Another comment related to submarine cables requested that the management plan, "undertake a two-step process regarding submarine cable-installation and maintenance activities similar to what the plan calls for with respect to shipping: first, evaluating the potential impacts of such activities on monument resources and then addressing any identified threats."

Monument management team response:

The installation and maintenance of submarine cables is outside the scope of the management plan and environmental assessment. This topic will be addressed in a separate document (potentially a step-down plan and/or compatibility determination, as appropriate), a draft of which will be published for public comment. This comment will be carried forward to that process.

18. Comment: The management plan should be reviewed more frequently than every 15 years. It should be reviewed at least every 10 years,

Multiple comments stated that the 15-year interval for revising the Monument's management plan is too long and that the plan should be reviewed/revised at least every 10 years, if not sooner.

Monument management team response:

All units of the National Wildlife Refuge System are required to have a comprehensive conservation plan (CCP) and the Monument’s 2024 Final Management Plan serves as its CCP. FWS policy states that CCPs will be revised on 15-year intervals. Thus, the Monument’s management plan will be formally revised every 15 years.

That being said, the CCP process encourages the development of step-down plans and supplemental revisions to CCPs as necessary to support adaptive management of refuges in the face of changing information and changing conditions, such as those caused by climate change.

Thus, while the management plan will be formally revised as necessary every 15 years, nothing prevents or discourages the Monument management team from conducting additional public engagement and planning to address impacts, issues and concerns as needed. The management plan identifies multiple needs for step-down planning, including the development of a research needs assessment, and states that two community forums will be held every year, during which time the partners, interested parties and the general public will have the opportunity to provide feedback and raise concerns. Compatibility determinations for uses in the Monument are also reviewed on regular intervals that are frequently shorter than 15 years.

Thus, while the formal review interval for the management plan is set by policy as 15 years, this timeline will not prevent the Monument management team from managing adaptively and responding to new information about Monument resources and their condition.

19. Comment: Tribal Nations and Indigenous communities need to be an integral part of Monument management, stewardship, research, education and outreach programs.

Multiple comments discussed the importance of engaging with Tribal Nations and Indigenous communities on a wide range of Monument management, stewardship, research, education and outreach activities. Commenters were supportive of the inclusion and reference to Tribal Nations and Indigenous communities in the management plan and encouraged the Monument to honor and nurture, “Indigenous peoples’ connections to the Monument.”

Monument management team response:

The management plan highlights in multiple areas the connections between Tribal Nations and Indigenous communities – past and present – and the Monument. The Monument management team is greatly interested in supporting and exploring those connections to the extent that any Tribal Nation and Indigenous communities are interested.

20. Comment: The Shinnecock Nation has an express interest in being involved in Monument management.

The [Shinnecock Nation](#) provided verbal comments specifically related to the management of the Monument and issuance of permits for activities within the Monument. The comment expressed the Shinnecock Nation’s concerns about how their ancestral waters are affected by presidential decisions and stated that the Nation wants to be part of the permitting process for activities in the Monument.

Monument management team response:

The Monument management team recognizes that Tribal Nations may have specific interests in Monument management, such as those expressed by the Shinnecock Nation. The Monument management team is following up with the Shinnecock Nation – and any other Tribal Nations that express interest – to better understand their interests and to discuss opportunities to engage them in the Monument permitting program and other program areas.

21. Comment: Support for cultural and historic resource protection.

Multiple comments expressed support the objectives and activities in the management plan that focused on exploring the cultural significance of the Monument and protecting and conserving the historic resources that may be in the Monument.

- Stellwagen Bank National Marine Sanctuary offered to assist the Monument by sharing the sanctuary’s protocols for managing and reporting the discovery of underwater cultural resources in the sanctuary and sharing the sanctuary’s experiences in managing cultural and historic resources.
- Other comments noted that the Monument is home to migratory species that have, “historic significance to Tribal nations,” and that “ensuring that these species and their critical habitat are protected is not only vital for ecosystem protection but also for historic and cultural purposes.”

Monument management team response:

The Monument management team is appreciative of Stellwagen Bank National Marine Sanctuary’s (Sanctuary’s) assistance and will reach out to the Sanctuary regarding its protocols for the reporting and discovery of underwater cultural and historic resources. Objective 1.7 (increase awareness of and avoid impacts to underwater cultural and historical archaeological resources) has been edited to reflect this.

The Monument management team agrees that there are species of cultural significance in and surrounding the Monument and appreciates the need to protect these species and their habitats for cultural and historic purposes. Multiple activities under the plan’s Management & Stewardship program focus on ensuring protection of species in the Monument in perpetuity and improving understanding of the cultural and historic meaning of species and habitats through engagement with Tribal Nations and Indigenous communities.

22. Comment: Provide more details about the budget needed to implement the management plan:

This comment requested that the management plan provide detailed budget information.

Monument management team response:

The management plan is intended to provide broad, overarching guidance for Monument management over the course of the next 15 years. Budgets for Federal agencies can fluctuate significantly over the course of this many years. Additionally, ocean research and monitoring

technologies are evolving rapidly: an activity that might be infeasible today due to cost could be a low-cost endeavor ten years from now.

The Monument management team plans to provide an overview of the past year's budget in each annual report and will provide as much information about the coming year's budget as is available. The asterisked activities in the management plan are those that we believe can be achieved under current budget and staffing levels.

23. Comment: Prioritize the funding and implementation of two activities in the FY2023-24 budget.

The comment on this topic states, "We recommend reprioritizing funding resources to include the following two bullets considering the 2023 FY budget directs most funds towards research and education. Although NOAA fisheries has a robust permitting system, additional education and outreach to anglers who fish within the Monument is important.

- Publish a user-friendly, online permitting guide for the Monument.
- Improve awareness about the Monument's location and management measures by ensuring that its boundary is represented on nautical charts, maps, and ocean-related apps such as WhaleAlert."

Monument management team response:

We have revised the management plan to place an asterisk next to these two activities. The asterisk means the activity will be prioritized for implementation in the near-term, given existing staffing and funding levels.

24. Comment: Additional planning resources

Several comments suggested utilizing existing planning resources as examples for Monument management. These comments referenced the following planning resources:

- This Visitor Use Management tool developed by 6 land management agencies including NOAA and the FWS:
<https://visitorusemanagement.nps.gov/VUM/VumOverview#:~:text=Visitor%20use%20management%20is%20the,resource%20conditions%20and%20visitor%20experiences>
- The Northeast Integrated Ecosystem Assessment for the Stellwagen Bank National Marine Sanctuary Condition Report 2007-2017
- Lessons learned from the Pacific Monuments and the Chumash Heritage National Marine Sanctuary designation process

Monument management team response:

These references are appreciated and will be made available to Monument managers and staff.

25. Comment: Improve engagement around the collection of public comments.

Multiple comments described deficiencies in the way the public comment process for the draft management plan was conducted. These comments addressed multiple facets of the public engagement process, including:

Location of meetings: Comments urged NOAA and the FWS to hold public meetings about the Monument in New Bedford, Massachusetts

Lack of participants in public comment meetings: Comments expressed concerns that there were only 20 participants in one of the virtual calls and stated that that number should be higher.

Absence of particular stakeholders: One commenter expressed concern that the oyster industry in southeastern Connecticut had not gotten involved with the Monument's management plan, stated that there were stakeholders with an interest in the Monument who haven't been involved, and asked why those stakeholders weren't involved.

Monument management team response:

The FWS and NOAA released a draft management plan and environmental assessment for the Northeast Canyons and Seamounts Marine National Monument on September 12, 2023, and initiated a 45-day public comment period, which closed on October 26, 2023. During the public comment period, any interested individual or organization could submit written comments. In addition, the agencies hosted six public meetings, during which the public could provide verbal comments on the draft management plan and environmental assessment. The public meetings were a mix of virtual (three meetings) and in-person (three meetings) and were spaced throughout the 45-day comment period. The meetings were held on different days of the week in the evenings to maximize attendance. One virtual meeting was held during the middle of the day to provide an alternative to evening attendance.

In-person meeting locations were selected to cover our broad user base and tried to identify accessible areas north of Boston, near Boston, and south of Boston, and along transit corridors to provide access to the highest diversity of user groups. The first in-person meeting (September 27) was held in Plymouth, Massachusetts, a few minutes away from where the New England Fishery Management Council (Council) was meeting to ensure that fishing community stakeholders could easily attend a public comment meeting in conjunction with the Council meeting.

The management team has identified New Bedford as a potential location for a future community forum. The management plan states that two community forums to discuss Monument management, stewardship, research, exploration, engagement, and education programs will be held every year (one in person and one virtual).

The Monument management team notified the public about the meetings and public comment period using a NOAA fisheries bulletin, which is circulated to thousands associated with the fishing industry, as well as an extensive Monument-specific email contact list of over 800 people. The management team will continue to grow this contact list in coming years and several activities in the management plan are focused on growing our contact lists. We welcome anyone who wishes to be added to this list to request that at: ncsmnm@fws.gov.

26. Comment: The final management plan needs to include additional protections for the Monument.

One comment stated that the management plan should include "additional actions" to ensure the Monument's proper care and management in perpetuity. The comment did not specifically describe the additional actions.

Monument management team response:

The Monument management team believes that the prohibitions in the Monument along with the permitting system overview in the final management plan are protective of the Monument's resources and provide proper care and management. As we learn more about the Monument, the management team will actively consider new information about the health of marine resources in the Monument and adaptively manage to ensure the Monument's conservation and protection in perpetuity.

27. Comment: Specific requests for editorial changes to the management plan to improve clarity.

Several comments requested specific editorial changes to the text of the management plan. These comments were:

- “Objective 1.3: The following bullet is too vague. What does the word significant mean in the context of abandoned, lost, discarded fishing gear? The scientific process associated with achieving objective 1.3 must be clarified...Should significant marine debris or ALDFG issues be found, evaluate their impacts, and explore management options for mitigating, replacing, or restoring injured Monument resources.”
- “Objective 1.9: The following bullet needs more clarification and an example of “adaptive management toolkits” ...Implement adaptive management toolkits to assess Monument resource management needs.”
- The description of the canyon unit of the monument (Draft Plan at 59) is clearer and more accurate than the earlier description (Draft Plan at 10) and recommend using the latter.”

Monument management team response:

Regarding the comment on Objective 1.3, there are several tools and methods for evaluating marine debris, including debris mapping apps, and the management team is not sure yet which would tool is the most appropriate for mapping and evaluating marine debris impacts. Also, it is unclear at this point how costly and/or feasible it would be to try to remove marine debris from the Monument, depending on the nature of the debris. A floating island of debris would be very different to remove than debris that is entangling a deep-sea coral. These issues will have to be discussed further once a better understanding of marine debris in the Monument has been achieved.

Regarding the comment requesting clarification on Objective 1.9, an example of an adaptive management toolkit has been added to the objective.

Regarding the descriptions of the Canyons Unit, the description of the Canyons Unit in Chapter 1 management plan (now Volume 1) has been reworded for accuracy and to incorporate language used in the description that comes later in Volume 2 environmental assessment (formerly Chapter 2).

RESEARCH & EXPLORATION

28. Comment: Wide variety of recommendations on how the research needs assessment is conducted, what the Monument's research program should include and how the research program should be run.

A multitude of comments discussed the research needs assessment proposed in the management plan and the broader research program for the Monument. Comments on this topic included:

- General support for the development of a research needs assessment and research plan for the Monument, as well as the proposed research symposia.
- General support for funding at least one research project in the Monument each year.
- The ability of the Monument to serve as a “living laboratory that can contribute to society’s understanding of climate change impacts on ocean wildlife and habitats research and study.”
- Make sure that the public can access data collected in the Monument by utilizing publicly accessible databases for publishing research findings and use the Northeast Ocean Data Portal to serve as a centralized repository for data that the public can access.
- Ensure that previously collected data from the Monument, including aerial survey data that has been collected since 2017, be analyzed and utilized as a “foundation to design future data collection efforts.”
- The agencies (presumed the FWS and NOAA) need to prioritize obtaining and allocating resources to support data collection in the Monument.
- Create an interdisciplinary working group of experts to develop the research needs assessment. Members of the workgroup should include expertise “from across various areas of scientific, indigenous, and traditional knowledge, including those who can fill the current gaps in understanding about species, habitats, and processes – ecosystem, physical, chemical, geologic, and oceanographic – in the Monument.”
- Quickly develop a long-term climate change monitoring plan
- Specific recommendations for research studies:
 - Ocean carbon pump and the direct capture storage potential of carbon
 - Understanding the ecological linkages from surface waters to the deep sea.
 - Time series studies are necessary for assessing the status and trends of species and habitats in the monument. Identifying existing data sets can provide historic trends and current status, while enhancing and expanding those efforts now and into the future can target elements of biodiversity specific to the Monument.
 - Focused partnerships with NOAA to utilize existing northeast regional monitoring efforts could identify patterns and trajectories based on, for example, seasonal trawl surveys, ecosystem monitoring studies (ECOMON), satellite oceanography, and passive acoustics are among the many regional efforts that could provide insight when examined through the lens of the Monument and adjacent areas (e.g, for example, see Pittman, S.J., 2019. Relevance of the Northeast Integrated Ecosystem Assessment for the Stellwagen Bank National Marine Sanctuary Condition Report 2007-2017. Marine Sanctuaries Conservation Science Series ONMS-19-08);

- Understanding the ecological linkages of apex pelagic predators with the local food web would allow a comparison with historic effort within the monument region as well as contrast with contemporaneous effort outside the boundaries.
- A collaborative research project with recreational fishers could identify a suite of species interactions, responses of prey species, and space-time variability over the precipitous landscape of the monument.
- Improve understanding of submarine cable maintenance and installation activities in the Monument. Analysis of the effects of submarine cable maintenance and installation. Submarine cable maintenance and construction has the potential to be highly disruptive to the Northeast Canyons and Seamounts deep-sea, fragile ecosystems that are extremely vulnerable to human disturbance.
- Seafloor communities other than deep-sea corals (e.g., tilefish grottos in the canyon heads, xenophyophore communities on and around the seamounts) as well as the water column from the surface to the bottom (diel vertical migrators).

Monument management team response:

The final management plan prioritizes the development of a research needs assessment for the Monument. These research topic suggestions will be provided to the team that leads development of that needs assessment. The Monument management team is grateful for this input and will rely on further input from technical experts, stakeholders, partners, and the public in the development of the research needs assessment.

29. Comment: The inventorying of the Monument’s natural resources and uses needs to be sped up, and a baseline assessment of natural, historical and cultural resources needs to be developed as soon as possible.

Comments on this topic specifically called for the development of a comprehensive species list, to be updated annually. Other comments also specified the development of a baseline assessment of the Monument’s health and productivity.

Monument management team response:

The Monument management team agrees that inventorying the Monument’s natural resources and establishing a baseline assessment of natural, historical, and cultural resources is important. One of the activities in the management plan is the establishment and maintenance of an online species list for the Monument.

Conducting a complete inventory of an ocean region that is the size of Connecticut, 130 miles offshore, and in places deeper than the Grand Canyon, without a dedicated research vessel is infeasible at this time. Time on existing research vessels is costly and competition for time on these vessels is fierce, as there are many high priority research and surveying needs.

Additionally, focusing current efforts solely on developing an inventory of what is in the Monument would detract from the management team’s ability to support research that delves deeper into the ecology of the Monument to inform management decisions. An inventory of species and habitats in the Monument is important but does not necessarily help managers understand how to conserve what they find. Understanding ecosystem processes, how species

and habitats interact, and what changes species and habitats are experiencing due to a changing climate is key to making informed management decisions.

To address the inventorying need, the Monument management team is focused on working with researchers to gather as much information about the natural, cultural and historical resources in the Monument as possible when they visit a particular location in the Monument. For example, the management plan identifies activities such as sharing sidescan sonar data collected from the Monument with archaeologists and funding their analyses of these data to identify potential shipwrecks and archaeological sites.

It is possible that increases in funding, increases in the availability of research vessels in the North Atlantic, and/or new ocean mapping and surveying technologies (which are developing rapidly) could dramatically improve our ability to inventory the Monument in the coming years.

While we may not be able to create an exhaustive inventory of species and habitats in the Monument in the near future, we can improve our knowledge of the species that inhabit the Monument over time. It is likely that some locations in the Monument will become long-term monitoring sites and will be inventoried in a more comprehensive and detailed way, while other regions of the Monument will be visited with less frequency and have less detailed inventories.

30. Comment: Assess impacts of marine debris in the Monument and establish a marine debris management program for the Monument

The comments on this topic identified concerns about right whale entanglement in debris and the impacts of marine debris on seabirds who accidentally ingest marine debris. Comments focused on the need both to assess the extent of marine debris in the Monument, reduce its presence in the Monument and encourage fishers, ecotourists, researchers and boaters to participate in a Monument marine debris program (to encourage a community approach to managing marine debris).

Monument management team response:

The Monument management team agrees that marine debris is a problem that affects many species. Not a lot is known about marine debris in the Monument, though researchers have observed gear entangling corals. The management plan includes several activities related to assessing the presence and potential impacts of marine debris in the Monument. A community approach to managing marine debris is a great idea and the management plan supports and encourages this approach.

31. Comment: Support for developing a Condition Report for the Monument.

Comments on this topic stressed the importance of developing a condition report prior to the next management plan review that would, “summarize the current status and health of resources in the Monument in order to inform the next management plan review process.”

Monument management team response:

The Monument management team agrees and will strive to complete a condition report prior to the next management plan review. Development of a condition report is an activity in the

management plan, but is not asterisked, meaning that the Monument will likely require additional funding or staffing support in order to develop a condition report.

32. Comment: “The issue of coral restoration is interesting but puzzling. What elements of coral communities would serve as targets for restoration? How would success be measured (i.e., restoration to what state)? Where would such a restoration effort be implemented? Can we predict direct and indirect ecological effects? In any case we should avoid introducing genetically modified organisms. While restoration may ultimately be a fine idea, a good deal of homework should be necessary before embarking on such a program.”

Monument management team response:

The restoration of deep-sea coral communities is a new and evolving field of restoration ecology. Advancement in restoring deep-sea coral communities is being made in the Gulf of Mexico with funding from the Deepwater Horizon Restoration Fund. [NOAA’s Hollings Laboratory](#) in South Carolina is being used to culture deep-sea coral specimens collected from injured deep-sea ecosystems in the Gulf of Mexico until they are able to be outplanted near the site where they were collected.

The Monument management team does not yet understand the full extent to which deep-sea corals in the Monument may already be injured due to gear interactions or climate change, or the extent to which deep-sea corals in the Monument may become injured in the future due to climate change. There are also significant technological challenges involved in collecting, culturing and outplanting corals in a deep-sea environment.

However, it is important to think ahead and begin considering the potential need for restoring coral communities in the Monument, what that process could look like and how it might be accomplished. The questions raised in this comment are all important for managers to consider. Restoration of deep-sea coral ecosystems could involve collecting coral samples from the vicinity of injured or dying corals, culturing those specimens in an aquaculture lab and then outplanting those specimens near where they were collected (or perhaps in a location that supports their migration to a more appropriate microclimate in the Monument, if their current climate is changing in a way that is detrimental to them).

It is important to note that this activity in the management plan is not asterisked, meaning that it is not an immediate priority.

ENGAGEMENT & EDUCATION

33. Comment: Support for an equitable and inclusive engagement program for the Monument that increases public awareness of the Monument and leverages partnerships to bring more funding and resources to engagement efforts.

Comments that addressed this topic that ranged from general comments offering broad support for the engagement activities in the draft management plan and the role the Monument can play in engaging the public in ocean conservation, to providing specific suggestions for ensuring the

effectiveness and longevity of the Monument’s engagement programs. Comments on this topic included:

- Improve awareness about the Monument’s location and management measures by ensuring that its boundaries are represented on nautical charts, maps, and ocean-related apps
- Create equitable, accessible engagement opportunities for the public to connect with the Monument and that enable “Black, Indigenous, People of Color to be fully engaged in an authentic way where they feel a sense of ownership and autonomy.”
- Develop outreach materials in different languages and disseminate educational curricula broadly throughout communities with environmental justice concerns.
- Utilize the Aquarium Conservation Partnership’s (ACP) equity framework for Zoos and Aquariums (in development) for guidance in creating equitable engagement and education opportunities.
- Partner with NOAA Ocean Exploration (OE) program in engaging K-12 students.
- Partner with local aquariums, including Mystic and New England Aquarium, to develop Monument onsite and offsite programming.
- Develop virtual reality and game-based digital content related to the Monument in order to create a “you-are-there” experience and meet youth where they are at.”

Monument management team response:

In response to these comments, the Monument management team has:

- Added an asterisk to the activity under Objective 1.1, “improve awareness about the Monument’s location and management measures by requesting that its boundary be accurately represented on nautical charts, maps, and ocean-related apps such as WhaleAlert.” An asterisk means that this activity will be prioritized under current staffing and funding levels.
- Modified the activities under Objective 4.3 (Support development of education programs that connect students of all ages and backgrounds to the Monument and its resources) to reference existing education programs at regional aquariums and NOAA’s Ocean Exploration program. An activity has been added under this objective that highlights partnering with zoos and aquariums to develop exhibits and other educational programming.
- Added the Aquarium Conservation Partnership to the list of potential partners under the Engagement & Education program in the management plan.
- Modified, under Objective 4.5, the activity focused on developing at least one virtual reality experience to include game-based digital content as an option in addition to virtual reality.

34. Comment: Reference in the final management plan the following partners and partnerships:

Numerous comments suggested potential partners for Monument programs and projects. Some of these partners were already mentioned in the draft management plan, and others were not.

Partners mentioned in the comments included:

- The American Sportfishing Association

- Stellwagen Bank National Marine Sanctuary
- Environmental non-governmental organizations:
 - Massachusetts Public Interest Research Group
 - National Ocean Protection Coalition
 - Creation Justice Ministries and faith-based organizations
 - Sustainable Ocean Alliance in New York and Massachusetts
- Tribes
- Aquariums
 - Mystic Aquarium
 - New England Aquarium
- Communities that have historically not had access to nature and outdoor spaces
- Environmental Justice Communities
- Recreational Fishing and Boating Industry
 - National Marine Manufacturers Association and the International Game Fish Association
- Educational Institutions
 - National Marine Educators Association (NMEA) and their regional chapters
- Informal Education/Youth Outreach
 - Boys and Girls Clubs
 - YMCAs
 - After school clubs
 - Summer camp programs
- Atlantic States Marine Fisheries Commission
- New England Fishery Management Council
- U.S. Navy
- Audubon Society
- NOAA Ocean Exploration
- Recreational Fishermen

Monument management team response:

The Monument management team looks forward to engaging with the potential partners mentioned in these comments. Any partners in this list that were not already mentioned in the draft management plan have been added to the final management plan.

35. Comment: Additional funding is needed to implement effective education and outreach programs.

This comment discussed the importance of adequate and long-term dedicated funding streams to achieve the management plan’s engagement and education goals and objectives. This comment also noted that, 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.

Monument management team response:

The Monument management team agrees that funding for engagement and education programs is very important. Based on the Monument’s current budget, staff are committed to funding at least

one education/engagement project each year as is stated in the management plan. The management plan also identifies the need to establish public-private partnerships in order to fund education and engagement programs on a larger scale. The Monument management team looks forward to partnering with educational institutions to leverage additional funding sources in order to design and implement education and engagement programs that reach underserved communities, including communities of color and frontline communities.

Appendix H. Finding of No Significant Impact (FONSI)

FINDING OF NO SIGNIFICANT IMPACT AND DECISION TO IMPLEMENT THE NORTHEAST CANYONS AND SEAMOUNTS MARINE NATIONAL MONUMENT FINAL MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT

I. Purpose of Finding of No Significant Impact (FONSI): The National Environmental Policy Act (NEPA) requires the preparation of an Environmental Impact Statement (EIS) for any proposal for a major federal action significantly affecting the quality of the human environment. 42 U.S.C. § 4332(C). The Council on Environmental Quality (CEQ) Regulations direct agencies to prepare a Finding of No Significant Impact (FONSI) when an action not otherwise excluded will not have a significant impact on the human environment. 40 CFR §§ 1500.4(b), 1500.5(b), & 1501.6. To evaluate whether a significant impact on the human environment is likely, the CEQ regulations direct agencies to analyze the potentially affected environment and the degree of the effects of the proposed action. 40 CFR § 1501.3(b). In doing so, agencies should consider the geographic extent of the affected area (i.e., national, regional or local) and the resources located in the affected area (40 CFR § 1501.3(b)(1)). In considering the degree of effect on these resources, agencies should examine, as appropriate, short- and long-term effects, beneficial and adverse effects, and effects on public health and safety, as well as effects that would violate laws for the protection of the environment (40 CFR § 1501.3(b)(2)(i)-(iv), and the magnitude of the effect (e.g., negligible, minor, moderate, major). CEQ identifies specific criteria for consideration. 40 CFR § 1501.3(b)(2)(i)-(iv). Each criterion is discussed below with respect to the proposed action and considered individually as well as in combination with the others.

In preparing this FONSI, the U.S. Fish and Wildlife Service (FWS), represented by the National Wildlife Refuge System, and the National Marine Fisheries Service, on behalf of the National Oceanic and Atmospheric Administration (NOAA), reviewed the **Northeast Canyons and Seamounts Marine National Monument (Monument) Final Management Plan and Environmental Assessment (EA)**, which evaluates the affected area, the scale and geographic extent of the proposed action of adopting and implementing a management plan for the Monument and the degree of effects on resources within the affected environment (including the duration of impact, and whether the impacts were adverse and/or beneficial and their magnitude). The environmental assessment evaluates a no action alternative and two action alternatives, including the preferred alternative identified below. The environmental assessment is hereby incorporated by reference (40 CFR § 1501.6(b)).

II. Selected Action

Of the three alternatives considered, the FWS and NOAA select the preferred alternative, Alternative 2, which is the final management plan and permitting system overview presented in

Volume 1 of the **Northeast Canyons and Seamounts Marine National Monument (Monument) Final Management Plan and Environmental Assessment.**

This alternative is being selected because it,

- best meets the purpose of and need for developing a management plan, which is set forth in the Volume 2 final environmental assessment and focuses on establishing a framework for community stewardship;
- most effectively manages compatible priority public uses under the National Wildlife Refuge Administration Act, thus supporting the establishing purpose of the Monument to provide opportunities for activities that will further the educational value of the Monument and connect people with its unique ecosystems; and
- will likely lead to greater beneficial effects for biological and physical resources than the other two alternatives considered by focusing staff effort on building relationships with Monument user groups and promoting a community-driven, shared sense of stewardship and caretaking of the Monument.

III. Approach to Analysis and Other Alternatives Considered:

The management plan is a broad level planning document that will guide the work of Monument staff for the next 15 years. It is a foundational guidance document for the Monument and evaluates a wide range of management, stewardship, research, education, engagement and recreational activities that may take place in and be associated with the Monument. While the management plan itself is broad-reaching, the potential adverse environmental impacts associated with these activities are anticipated to be insignificant within the context of NEPA.

The management plan was developed specifically to guide conservation and protection of Monument resources and to have an overall beneficial effect on the Monument and its resources. Based on the analysis in the environmental assessment, which has been incorporated by reference, no activities proposed to occur in the Monument under the guidance of the management plan would have significant adverse environmental effects. Supplemental project-specific NEPA analyses may be required for projects that tier off of the management plan's environmental assessment and require further investigation, analysis and evaluation.

The proposed action of developing and implementing a management plan for the Monument is not connected to any other actions proposed or taking place in the affected environment. There is no potential for the proposed action to add to the effects of other projects such that the effects taken together could be significant.

The FWS and NOAA (Monument management team), as joint managers of the Monument, evaluated three alternatives for developing and implementing a management plan for the Monument:

[Alternative 1: No Action, meaning no management plan would be adopted or implemented.](#)

Alternative 2: Volume 1 final management plan and permitting system overview that leverages existing permitting requirements and would require FWS or NOAA permits for many but not all activities in the Monument (*preferred alternative*)

Alternative 3: Volume 1 final management plan with a different approach to permitting that would create and require a joint-agency access permit for all access to the Monument (in addition to any existing NOAA and FWS permitting requirements)

The primary difference between Alternative 2 (preferred) and Alternative 3 is that, under Alternative 3, a joint-agency access permit would be required for all entrance to and activities in the Monument (in addition to any other existing permitting requirements). Whereas under Alternative 2, no joint-agency access permit would be created and many – but not all – activities in the Monument would require either a NOAA or FWS permit. Under the no action alternative, no management plan would be adopted or implemented, but both NOAA and the FWS would still authorize and issue permits for activities in the Monument under their respective authorities. Thus, in regards to permitting, the approach to permitting in the preferred Alternative 2 would not differ substantially from the permitting that would take place under the no action alternative.

A wide variety of management, stewardship, research, exploration, education and engagement activities were evaluated in the environmental assessment for the Monument’s management plan. ***It is important to note that the management plan is a planning-level document and does not explicitly authorize or permit any specific activities to occur.*** The environmental assessment associated with the management plan evaluates and considers the potential environmental effects of two broad types of activities that are anticipated to occur in the Monument: management and program activities (onsite and onshore); and onsite use activities in the Monument. The environmental assessment evaluates the effects of the following suite of activities under all three alternatives:

Management and Program Activities

- **Onshore routine office and management activities**
- **Onshore educational and outreach activities**
- **Onshore research activities**
- **Onsite field research and monitoring activities**
- **Onsite marine debris mechanical removal**
- **Restoration of deep-sea corals**
- **Onsite routine enforcement and compliance activities**

Onsite Use Activities

- **Onsite non-fishing recreational and visitor activities**
- **Recreational fishing activities**
- **Onsite photography and filming (for commercial distribution)**
- **Onsite education activities that involve fishing**

In evaluating all three alternatives it was determined that developing and implementing a management plan for the Monument would have an overall beneficial effect on the Monument's biological, physical, cultural and historical environment (see Volume 2, Affected Environment and Environmental Consequences). The Monument management team anticipates some insignificant and minor direct, indirect, short-term, long-term and cumulative adverse impacts to the biological, physical, and socioeconomic environment under all three alternatives. None of these effects are considered significant within the context of NEPA.

The minor insignificant adverse effects to the physical, biological and socioeconomic environment associated with the activities in the management plan include seafloor disturbance associated with scientific research activities; injury to marine organisms from the process of collecting samples for scientific identification and study; exacerbation of climate change from the operation of vessels that rely on fossil fuels; entanglement/hooks; vessel strikes; sound and light disturbance from research, recreational, and enforcement vessels; small accidental discharges from research, recreational and management vessels; and inconveniences to Monument visitors under Alternative 3, which would require a separate access permit for all entry to the Monument. None of these adverse effects are expected to be significant.

The Monument management team published a draft management plan and environmental assessment in September 2023 for public comment and considered all substantive comments received before selecting the preferred alternative, Alternative 2.

IV. Geographic Extent and Scale of the Proposed Action:

The geographic extent of the management plan onsite activities are the Monument boundaries. The Monument is located approximately 130 miles southeast of Cape Cod, Massachusetts, within the North Atlantic Ocean. The Monument is comprised of two distinct units (the Canyons Unit and the Seamounts Unit) covering 4,913 square miles of ocean floor and waters of the continental margin, off the southeastern portion of Georges Bank. The geographic extent of onshore activities is anticipated to be the region from Maine to New York; and this is the geographic range that was used to consider cultural and socioeconomic effects.

While the Monument is geographically large compared to other national parks and national wildlife refuges in the Northeast region, it is geographically small in relation to the North Atlantic ecosystem in which it resides. Because of its great distance from shore and inaccessible deep-sea environments, relatively few activities are anticipated to occur in the Monument in any given year under any of the management plan alternatives. Additionally, while the onshore geographic range is large (Maine to New York), there are a relatively small number of activities and events that will occur in this large range associated with the Monument's management plan.

V. Degree of Effect:

The insignificant and minor adverse effects associated with the activities that would occur under all three alternatives include seafloor disturbance associated with scientific research activities; injury to marine organisms from the process of collecting samples for scientific identification and study; exacerbation of climate change from the operation of vessels and vehicles that rely on fossil fuels; entanglement/hooking; vessel strikes; sound and light disturbance from research, recreational, and enforcement vessels; small accidental discharges from research, recreational and management vessels; and inconveniences to those visiting and transiting the Monument under Alternative 3, which would require a separate access permit for all entry to the Monument. None of these adverse effects are expected to be significant.

These insignificant adverse effects may impact fish and wildlife species and habitats, air quality and water quality. Because the Monument is home to multiple protected species and habitats, those engaged in passive recreation, angling, at-sea educational trips, photography and filming, and research will have to be particularly observant of their surroundings to avoid collisions, follow all distancing requirements for marine mammals, ensure that appropriate lighting techniques are used and ensure that lines that could cause entanglements are removed from the water when certain species are present. Under the management plan, Monument staff will be distributing existing guidance on best management practices to user groups and developing additional guidance as necessary.

Some activities in the Monument will also be evaluated in greater detail through project-specific NOAA and FWS permitting and authorization processes under the National Wildlife Refuge Administration Act and Improvement Act, the Marine Mammal Protection Act, Migratory Bird Treaty Act, essential fish habitat provisions of the Magnuson-Stevens Fishery Conservation and Management Act and/or the Endangered Species Act. These evaluations may result in modifications to proposed activities in order to minimize and avoid adverse effects to Monument resources and ensure that no significant adverse effects occur.

The potential for the proposed action to threaten a violation of Federal, state, or local law or requirements imposed for environmental protection; and the degree to which the proposed action is expected to affect public health or safety: Implementation of the management plan is not expected to result in violations of Federal, state, or local law and there are no anticipated adverse effects to public health or safety.

The degree to which the proposed action is expected to affect a sensitive biological resource: The Monument is home to many sensitive biological resources, which was a driving factor in its establishment. Allowing recreational, educational and research activities to occur in the Monument means that interactions with sensitive biological resources are possible. The management plan identifies a multitude of strategies to ensure proper care and stewardship of sensitive biological resources and ensure that they are not adversely affected. These activities include outreach to recreational anglers, wildlife watchers and researchers to ensure they know how to avoid and respond to vessel collisions and entanglements and ensure that all activities in

the Monument minimize the risk to any biological (as well as physical, cultural and historical) resources.

The final management plan itself is a high-scale, broad view planning document that does not evaluate in detail the methods for every study or activity that might be proposed in the Monument. The management plan itself does not explicitly authorize or permit activities to occur in the Monument.

It is anticipated that some future activities will require informal or formal consultations in accordance with the Refuge System Administration Act and Improvement Act, Marine Mammal Protection Act, Migratory Bird Treaty Act, essential fish habitat provisions of the Magnuson-Stevens Fishery Conservation and Management Act, Endangered Species Act, and/or other laws and regulations in order to be permitted or authorized to occur in the Monument and ensure the protection of sensitive biological resources

The potential for the proposed action to cause an effect to any other physical or biological resources where the impact is considered substantial in magnitude: The proposed action of developing and implementing a management plan for the Monument will not cause any effects that are considered substantial in magnitude; no substantial long-term or permanent adverse effect is anticipated.

The degree to which the proposed action is likely to result in effects that contribute to the introduction, continued existence, or spread of noxious weeds or nonnative invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of the species: No activities considered under the management plan, if conducted according to best management practices, should lead to the introduction, continued existence or spread of noxious or nonnative invasive species.

The degree to which the proposed action is reasonably expected to affect a cultural resource – properties listed or eligible for listing on the National Register of Historic Places; archeological resources (including underwater resources); and resources important to traditional cultural and religious tribal practice: No activities under the management plan, if conducted according to best management practices, are reasonably expected to affect a cultural resource. While there very likely are shipwrecks in the Monument as well as archaeological sites at the heads of the three canyons (which would have been exposed during the last Ice Age and used by Indigenous peoples), the proposed activities in the Monument are not likely to disturb any of these resources. Activities in the Monument may lead to the discovery of shipwrecks and/or archaeological sites, which would have a beneficial effect on our understanding of the Monument's cultural heritage. Management plan activities may also lead to increased understanding of the connections between Tribal Nations and Indigenous communities and the Monument.

The Monument management team reached out to eleven federally recognized and three state recognized Tribal Nations in the development of the management plan. Informal conversations suggested that Tribal Nations and Indigenous communities have an interest in the Monument and

its management. The Shinnecock Nation provided formal comments on the draft management plan, which were addressed in the final management plan.

Under the management plan, those conducting research or underwater filming in the Monument will be given protocols for what to do in the event that they encounter a historical or cultural resource. The management plan identifies several activities focused on coordination with Tribal Nations and Indigenous communities on Monument management and in the event that a historical or cultural resource is found in the Monument.

The degree to which the proposed action has the potential to have a disproportionately high and adverse effect on the health or the environment of minority or low-income communities, compared to the impacts on other communities (EO 12898): No activities occurring under the management plan will have a disproportionately high adverse effect on the health or environment of minority or low-income communities. It is anticipated that the activities in the management plan will provide beneficial educational and engagement opportunities for low-income and minority communities.

VI. Other Actions Including Connected Actions:

The management plan itself includes a wide variety of management, stewardship, research, exploration, engagement and education activities, which were considered and evaluated together in the environmental assessment. The proposed action of developing and implementing a management plan for the Monument is not connected to any other actions proposed or taking place in the affected environment. There is no potential for the proposed action to add to the effects of other projects such that the effects taken together could be significant.

The Monument's Final Management Plan and Environmental Assessment includes analysis of a wide variety of activities likely to occur in the Monument over the next 15 years. These activities will be implemented under the framework of the final management plan. Supplemental NEPA analyses for actions that tier off the Final Management Plan and Environmental Assessment may be developed as appropriate.

VII. Mitigation and Monitoring:

Mitigation measures can be taken to avoid, minimize, reduce over time or compensate for adverse impacts to the human environment. There are no anticipated significant adverse effects associated with the development and implementation of a management plan for the Monument (and activities proposed therein) that would require formal compensatory mitigation be proposed or adopted.

The management plan does propose to establish and communicate best management practices for conducting activities such as wildlife watching, boating, angling, at-sea education, photography and filming and research in the Monument that could be considered avoidance mitigation. These best management practices are being established to prevent and avoid adverse impacts to biological, physical, cultural and historical resources. These best management practices may also be incorporated into permits issued for activities in the Monument.

Monitoring the use of best management practices in the Monument will occur through a variety of mechanisms, including the permitting process, law enforcement patrols, establishing relationships with wildlife watching and angling charters and reports and observations from Monument visitors.

It is possible that future projects could be proposed in the Monument that could trigger formal compensatory mitigation requirements. In that event a separate analysis of the proposed activity and its appropriateness and compatibility with the Monument and its establishing purpose would likely be required. Analysis of future projects may tier off the Final Management Plan and Environmental Assessment.

VIII. Public Review:

The FWS and NOAA provided multiple opportunities for public input during the management plan development process. A Notice of Intent to develop the management plan was published in the Federal Register on [December 28, 2022](#) and the public was able to submit written comments during the 60-day public scoping period. The public scoping period also included four public meetings, at which verbal comments were accepted. The Draft Management Plan and Environmental Assessment was published for a 45-day public comment period, which included six public meetings. Information about these comment periods and public meetings was posted on both agencies' websites and communicated through press releases, NOAA Fishery Bulletins and social media.

The public comments received during public scoping directly shaped the content of the draft management plan, including the Monument vision, goals, and objectives, as well as the development of alternatives. The public comments received on the draft management plan and environmental assessment helped the Monument management team identify important environmental issues and concerns, which were used to further refine and clarify language in the management plan and better understand the value of the Monument to partners, stakeholders and the public.

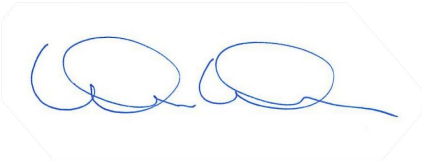
Finding of No Significant Impact:

The CEQ NEPA regulations, 40 CFR § 1501.6, direct an agency to prepare a FONSI when the agency, based on the EA for the proposed action, determines not to prepare an EIS because the action will not have significant effects. In view of the information presented in this document and the analysis contained in the supporting EA prepared for the Northeast Canyons and Seamounts Marine National Monument Final Management Plan, it is hereby determined that the proposal to adopt and implement the Monument’s Final Management Plan, as described in Volume 1 of the Northeast Canyons and Seamounts Marine National Monument Final Management Plan and Environmental Assessment, does not constitute a major Federal action significantly affecting the quality of the human environment under the meaning of section 102 (2) (c) of the National Environmental Policy Act of 1969 (as amended). As such, an EIS is not required.

The Northeast Canyons and Seamounts Marine National Monument Final Management Plan and Environmental Assessment is hereby incorporated by reference. In addition, all beneficial and adverse impacts of the proposed action as well as mitigation measures have been evaluated to reach the conclusion of no significant impacts. Accordingly, preparation of an EIS for this action is not necessary.

Decision:

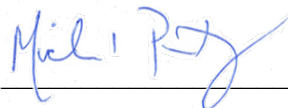
The FWS and NOAA have decided to adopt and implement the Final Management Plan for the Northeast Canyons and Seamounts Marine National Monument.



5/17/2024

Wendi Weber
Regional Director, Northeast Region
U.S. Fish and Wildlife Service

Date



5/17/2024

Michael Pentony
Regional Administrator, Greater Atlantic Regional Fisheries Office
National Marine Fisheries Service

Date