



## CITY OF NEW BEDFORD

JONATHAN F. MITCHELL, MAYOR

August 19, 2016

Christy Goldfuss  
Managing Director  
White House Council on Environmental Quality  
722 Jackson Place, N.W.  
Washington, D.C. 20503

Dear Director Goldfuss:

Thank you again for taking time in March to host a fisheries stakeholder meeting in New Bedford, and for meeting last week in Washington with regional fishermen and regulators to discuss the possible designation of a permanent marine monument in the Atlantic Ocean under the Antiquities Act.

As you heard in March and again last week, we have serious concerns about the impact a monument would have on the commercial fishing industry here in New Bedford, the nation's top grossing fishing port, as well as across the Northeast. We are also troubled by the possible precedent-setting effect of the contemplated executive action, which has not been subjected to the level of scrutiny ordinary reserved for *temporary* ocean closures.

The Port of New Bedford and the industry that calls the port home have been active participants in the New England Fisheries Management Council and are directly affected by the decisions made by the NEFMC and NOAA Fisheries. The process is far from perfect, but it affords ample opportunity for stakeholders and the public alike to review and comment on policy decisions and for the peer reviewing of the scientific bases for those decisions. One of our major concerns is that the use of a parallel process, however well-meaning, which has none of the checks and balances employed in the NOAA process, could leave ocean management decisions vulnerable to political considerations in the long run.

In the event the Administration proceeds with a monument designation, we strongly encourage the President to accept the guidance of the Atlantic States Fisheries Management Commission (ASFMC) in May 2016. The Commission provided coordinates of a line seaward of the canyons that is acceptable to the industry.

We understand that as part of the designation, the CEQ is considering a moratorium on fishing in the water column above the monument. This possibility raises serious concerns for the pelagic fisheries, including swordfish and tuna fishermen and processors. We agree with the

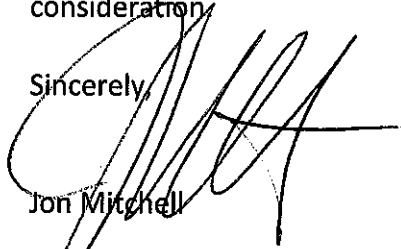
ASFMC's assertion that pelagic fishermen would have no impact on the integrity of the bathymetry and substrate that a monument would be meant to protect. While I disagree with fisheries management independent of the tried and true fisheries council process, the ASFMC proposal is derived from fishermen who work in these areas, many of whom are home-ported or serviced in New Bedford.

Moreover, we understand that CEQ may refuse to accept a monument seaward of the nine-hundred meter contour line in the canyons. If this is the case, it could reduce the area actually fished by this important, sustainable fishery by as much as 30%. Given that the red crab fishery represents 8% of the 240 million pounds of seafood transported annually to New Bedford for processing, it inevitably will lead to job loss. We urge you to take seriously the good faith concerns of this fishery.

As we discussed in March, these deliberations around the monument designation would be facilitated by a proposal visually depicted on a map. That way, everyone would have a better understanding as to what the Administration has in mind. To our knowledge, if a proposal actually exists, it has not been shared with any of the stakeholders. Therefore, from our vantage point, anything is possible. With merely four months left in the current Presidential administration, we are becoming increasingly concerned that there will not be enough time for the robust stakeholder input that would be necessary and appropriate for a decision so permanent.

We stand ready to aid in the discussion of this important matter. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon Mitchell', written over a large, stylized scribble.

Jon Mitchell

cc: Senator Elizabeth Warren  
Senator Edward Markey  
Congressman William Keating  
Governor Charlie Baker