

December 15, 2021

The Honorable Joseph R. Biden, Jr.
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Dear President Biden:

In furtherance of your efforts to unleash the full potential of the nation's economy and address the impact of rising prices on the American people, and in recognition of your acknowledgement of the essential role that the ocean plays in our economy and livelihoods, the undersigned groups representing workers, communities, and businesses from across the economy and country urge your support for using science-based and transparent processes when considering actions to manage the ocean for current and future generations.

We have become increasingly concerned by calls for the administration to establish "fully and highly protected areas" in 30% of the U.S. ocean by 2030, including through marine monuments designated under the Antiquities Act.¹ Concerns have been further heightened by recent decisions to restore a commercial fishing prohibition in the Northeast Canyons and Seamounts Marine National Monument² and join the High Level Panel for a Sustainable Ocean Economy, which commits the United States to actions that could lead to further prohibitions.³

Using the Antiquities Act to prohibit access to and economic activity in vast amounts of the U.S. ocean would needlessly harm jobs and economic activity and raise prices for Americans on everything from food and energy to beyond. Such actions would also be contrary to the Antiquities Act's provision that any designation "be confined to the smallest area compatible with proper care and management of the objects [of historic or scientific interest] to be protected."⁴

Rather than pursue actions like marine monument designations that run counter to multiple-use management, strong transparency, and procedural safeguards, when engaging in ocean-related decision-making we urge you and your administration to take a collaborative and inclusive approach, support locally-led and designed efforts, utilize approaches that create jobs and support healthy communities, support voluntary stewardship efforts, use science as a guide, and leverage existing tools with an emphasis on flexibility and adaptive approaches.

¹ See *e.g.*, June 14, 2021 Letter to President Biden, accessible at <https://s3.documentcloud.org/documents/20889111/scientists-letter-on-ocean-protection.pdf>.

² See Presidential Proclamation 10287, October 15, 2021, accessible at <https://www.govinfo.gov/content/pkg/FR-2021-10-15/pdf/2021-22674.pdf>.

³ See "The United States of America Joins the High Level Panel for a Sustainable Ocean Economy," November 2, 2021, accessible at <https://www.oceanpanel.org/news/usa-joins-hlp>, and "Building Political Momentum for the Ocean as a Policy Cornerstone," accessible at <https://www.oceanpanel.org/ocean-policy#policy>.

⁴ See 16 U.S.C. § 431, accessible at <https://www.govinfo.gov/content/pkg/USCODE-2011-title16/pdf/USCODE-2011-title16-chap1-subchapLXI-sec431.pdf>.

Where federal ocean-related regulatory actions are considered, focusing on statutorily-authorized processes with built-in mechanisms that ensure stakeholder engagement and thoughtful review including the Magnuson-Stevens Fishery Conservation and Management Act will help ensure maximized environmental and economic benefits alike. One additional example demonstrating the effectiveness of how open and transparent processes and multiple-use management approaches can secure important marine environmental benefits without jeopardizing jobs and the economy was the successful effort to establish and expand the Flower Garden Banks National Marine Sanctuary in the Gulf of Mexico.

In closing, we strongly urge you to pursue ocean management actions that embrace the principles outlined above and resist calls for the designation of marine monuments under the Antiquities Act, which would cost jobs, reduce economic activity, add new inflationary pressures, set back efforts to advance equity and environmental justice, and reduce trust and transparency in government.

Sincerely,

Agricultural Retailers Association
Alabama Charter Fishing Association
Alabama Gulf Coast Reef & Restoration Foundation
Alaska Chamber
Alaska Groundfish Data Bank
Alaska Miners Association
Alaska Support Industry Alliance
Alaska Trollers Association
Alaska Whitefish Trawlers Association
Alliance of Communities for Sustainable Fisheries
American Farm Bureau Federation
American Petroleum Institute
American Tunaboat Association
At-sea Processors Association
B Cubed Associates LLC (Powder Springs, GA)
Bornstein Seafoods
California Coast Crab Association
California Fisheries and Seafood Institute
California Pelagic Fisheries Association
California Sea Urchin Commission
California Wetfish Producers Association
Catalina Offshore Products
Charter Boat Miss Mary (Mexico Beach, FL)
Coastal Alabama Business Chamber
Destin Charter Boat Association
Destin Charters LLC
Destin FL Charter Boats
Directed Sustainable Fisheries (DSF), Inc.
Due South Adventures
FinSeeker Fishing Charters
Fishing Vessel Owners' Association
Florida Keys Commercial Fishermen's Association
Forest Landowners Association

Freezer Longline Coalition
Grand Strand Fishing Alliance
Greg Abrams Seafood (FL)
Groundfish Forum
Gulf Economic Survival Team
Gulf of Mexico Reef Fish Shareholders' Alliance
Half Hitch Tackle (Destin, Panama City Beach, Port St Joe, FL)
Independent Petroleum Association of America
International Association of Drilling Contractors
International Association of Geophysical Contractors
Intimidator Deep Sea Fishing Charters
LA 1 Coalition
Long Island Commercial Fishing Association
Maine Lobstermen's Association
Marine Alliances Consulting
Massachusetts Lobstermen's Association
Mexico Beach Charters
Mexicobeach.bz Inc.
Midwater Trawlers Cooperative
National Agricultural Aviation Association
National Association of Charterboat Operators
National Fisheries Institute
National Ocean Industries Association
National Ocean Policy Coalition
National Onion Association
New Bedford Seafood Consulting
North Carolina Watermen United
North Myrtle Beach Fishing Charters
Northeast Seafood Coalition
Organized Fishermen of Florida
Pacific Coast Federation of Fishermen's Associations
Pacific Seafood Processors Association
Pacific Whiting Conservation Cooperative
Panama City Boatmen Association
Recreational Fishing Alliance
Recreational Fishing Alliance – Forgotten Coast Chapter
Recreational Fishing Alliance-Oregon State Chapter
Resource Development Council for Alaska
Rhode Island Lobstermen's Association
Richmond Resources LLC
San Diego Fishermen's Working Group
Seafood Harvesters of America
Seafreeze Ltd.
Seafreeze Shoreside
Small Business & Entrepreneurship Council
Southeast Alaska Fishermen's Alliance
Southern Offshore Fishermen's Association
Southern Shrimp Alliance

Tarpon Dock Seafood (FL)
The American Waterways Operators
The Angler Advocate
United Catcher Boats
U.S. Chamber of Commerce
US Oil & Gas Association
Wahlbee LLC
West Coast Seafood Processors Association
Western Energy Alliance
Western Fishboat Owners Association

cc:

The Honorable Brian Deese, Director, National Economic Council
The Honorable Brenda Mallory, Chair, Council on Environmental Quality
The Honorable Eric Lander, Director, Office of Science and Technology Policy
The Honorable Jane Lubchenco, Deputy Director for Climate and Environment, Office of
Science and Technology Policy
The Honorable Deb Haaland, Secretary, U.S. Department of the Interior
The Honorable Gina Raimondo, Secretary, U.S. Department of Commerce
The Honorable Rick Spinrad, Administrator, National Oceanic & Atmospheric Administration