



June 28, 2017

**Andrew Gottlieb**  
*Executive Director*

Secretary Ryan Zinke  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**BOARD OF DIRECTORS**

**Margo L. Fenn**  
*President*

RE: Monument Review, MS-1530

**Charles Sumner**  
*Vice President*

Dear Secretary Zinke:

**Robert Summersgill**  
*Treasurer*

The Association to Preserve Cape Cod (APCC) writes to express deep concern over the Department of the Interior's review of national monuments, and stands in strong opposition to any action to either reduce in size or revoke the designation of these lands, which are a vital part of the natural, historical and cultural heritage of the American people.

**Elizabeth Jenkins**  
*Clerk*

**Elliott Carr**

Established in 1968, APCC is the Cape Cod region's leading nonprofit environmental organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod's natural resources and quality of life. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

**Michael Corrigan**

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**Daniel Webb**

Since the establishment of the Antiquities Act in 1906, 16 U.S. presidents (eight Democrats and eight Republicans) have utilized the discretion and authority given by Congress in the act to permanently protect some of America's most significant natural wonders and historic landmarks, including the over two dozen national monuments currently under review. As required by the act, all of these national monument designations occurred on lands already under the ownership and management of the federal government; no state lands or property owned by another public or private entity were appropriated in the creation of the national monuments. Contrary to some criticism, these designations were not a "land grab." The designation processes were conducted with all due diligence. Designation was preceded by thoughtful expert analysis, consultation with elected officials and ample opportunities for input from stakeholders and the general public.

One of the national monuments subjected to the current review is the Northeast Canyons and Seamounts Marine Monument, located just 150 miles off the Cape Cod coast and designated by President Obama in 2016. Decades of scientific analysis shows that these underwater canyons and seamounts are among the most productive areas in the ocean, and support an amazing diversity of marine life—including many rare species. Protecting and carefully managing this rich habitat area has a direct correlation to the sustainability of our fisheries, which is an important component of the Cape Cod economy.

Extensive public and stakeholder participation over the course of a year helped shape the Northeast Canyons and Seamounts boundaries, which conform to the requirements of the

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Antiquities Act by being the smallest area compatible with protecting the monument’s targeted resources. Establishment of this national monument has widespread support. According to a 2016 survey conducted by the non-partisan research firm Edge Research, 78 percent of Massachusetts and Rhode Island residents approve of the permanent protection of this resource area.

It is important to note that no president has ever tried to revoke the designation of a national monument. Furthermore, leading legal scholars have weighed in, saying no president has the authority to revoke or significantly reduce a national park or monument; only Congress has that authority. The House of Representative’s committee report for the Federal Land Policy and Management Act of 1976 reaffirmed its exclusive authority, stating that the act “would also specifically reserve to the Congress the authority to modify and revoke withdrawals for national monuments created under the Antiquities Act.”

Our national monuments help define our country through the preservation of its most iconic natural wonders and historic sites, and they also help sustain the communities around them. Numerous studies have shown that local economies adjacent to national monuments benefit from the creation of those monuments. The Northeast Canyons and Seamounts—and all of our national monuments and parks—are national treasures that belong to the American people for their enjoyment and benefit, now and for future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Gottlieb', with a long horizontal flourish extending to the right.

Andrew Gottlieb  
Executive Director