

SUPREME COURT OF THE UNITED STATES

Massachusetts Lobstermen's Assn. v. Raimondo

Massachusetts Lobstermen's Assn. v. Raimondo, 592 U.S. ____ (2021) · No. 20-97 · Decided March 22, 2021

SUMMARY

The Supreme Court denied certiorari in a challenge to the Northeast Canyons and Seamounts Marine National Monument, established under the Antiquities Act. Chief Justice Roberts' concurrence questioned whether the Act's "smallest area compatible" requirement provides any meaningful limit when applied to vast marine ecosystems, noting the 3.2-million-acre submerged monument is far removed from the Act's original purpose of protecting small prehistoric ruins. The case highlights unresolved issues about the scope of presidential monument designations, particularly for ocean areas, and the relationship between monument management and commercial fishing restrictions.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Per Curiam
JURISDICTION	Federal
DECIDED	March 22, 2021
DOCKET	20-97
DISPOSITION	cert_denied
PROCEDURAL POSTURE	Petition for writ of certiorari denied.
PRECEDENTIAL VALUE	published
PARTIES	Massachusetts Lobstermen's Association v. Gina M. Raimondo, Secretary of Commerce

TOPICS

- statutory interpretation
- plain meaning rule
- administrative law
- canons of construction
- appellate procedure

PRACTICE AREAS

- Environmental Law
- Administrative Law
- Constitutional Law

KEY QUOTATIONS

“Somewhere along the line, however, this restriction has ceased to pose any meaningful restraint. A statute permitting the President in his sole discretion to designate as monuments 'landmarks,' 'structures,' and 'objects'—along with the smallest area of land compatible with their management—has been transformed into a power without any discernible limit to set aside vast and amorphous expanses of terrain above and below the sea.” (at 3)

“We may be presented with other and better opportunities to consider this issue without the artificial constraint of the pleadings in this case.” (at 4)

FACTUAL BACKGROUND

The Northeast Canyons and Seamounts Marine National Monument, designated by President Obama under the Antiquities Act, covers approximately 3.2 million acres of submerged land off the coast of New England. The designation banned commercial fishing, which was later lifted but may be reinstated. Petitioners are commercial fishing associations challenging the designation as exceeding the 'smallest area compatible' limitation of the Act.

PROCEDURAL HISTORY

The United States Court of Appeals for the District of Columbia Circuit dismissed the complaint for failure to state a claim. The Supreme Court denied certiorari.

DISPOSITION

cert_denied

CASES CITED

- Alaska v. United States, 545 U.S. 75 (2005)
- Missouri v. Jenkins, 515 U.S. 70 (1995)