



**Western
Pacific
Regional
Fishery
Management
Council**

December 1, 2016

President Barack H. Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

The purpose of this letter is to communicate our continued concerns over the federal government's inadequate implementation of the Marianas Trench, Rose Atoll, and Pacific Remote Islands Marine National Monuments (MNM). These monuments were established by President George W. Bush in 2009, with you expanding the Pacific Remote Islands Monument in 2014. It has been nearly 7 years since these monuments were created, yet the Department of Commerce and the Department of the Interior have not finalized management plans for any of these monuments. Furthermore, there is no evidence of the conservation or economic benefits that were promised in return for local community support during the assessment period prior to designation.

For example, the Marianas Trench MNM proclamation by President Bush instructed DOC and DOI to implement a management plan within 2 years. To date, USFWS and NOAA have not fulfilled this basic mandate. In the lead up to the designation of the Marianas Trench MNM, federal officials and the Pew Environment Group painted a picture of how important it was to protect the valuable and unique natural resources they claim were under enormous threats, yet local officials and community members remained skeptical. Local government support was only swayed when the Presidential envoy promised in December 2008 that they would do the following:

- 1) Support conveyance of ownership to the 0-3 nm submerged lands back to the CNMI;
- 2) Establish a meaningful 50/50 co-management agreement between the federal government and CNMI, with the local government having veto power over any federal action in the monument;
- 3) Local control over travel to the monument by indigenous people of the Marianas; and
- 4) Construction of a world class visitor's center.

The Congress eventually conveyed unencumbered ownership for 0-3 nm surrounding each of the 14 islands in the Northern Marianas in 2013. However, you excepted from transfer those nearshore submerged lands surrounding the islands of Uracus, Maug and Asuncion until such time as the CNMI Government agreed to manage the submerged lands under the guidelines of the Presidential Proclamation that designated the Marianas Trench MNM.

In May of 2016, CNMI Governor Torres wrote to you expressing his disappointment with the broken promises associated with the Marianas Trench MNM. He cited that economic assurances were made based on a Pew-funded study that estimated that the monument would result in \$10 million per year in the direct spending and approximately \$5 million per year in tax revenue, plus the creation of 400 jobs. As Governor Torres stated, the CNMI has yet to receive any of these benefits.

The establishment of the Rose Atoll MNM also came with promises of co-management with the American Samoa government. This did not occur, and instead, NOAA superimposed the Rose Atoll MNM area with a National Marine Sanctuary, creating several layers of duplicative federal management. We believe it is important to recognize that the boundaries of the Rose Atoll MNM were incongruently overlaid with the Council's Large Vessel Prohibited Area (LVPA). This amounted to the loss of approximately \$240,000 per year to the American Samoa longline fleet, which forced the Council to amend LVPA boundary regulations to make them congruent with the Rose Atoll MNM boundaries and to prevent further economic losses.

Promises of increased enforcement were also common in the lead up to the creation of the monuments in 2008 and during the Pacific Remote Islands MNM expansion in 2014. However, this also has not been realized. The US Coast Guard and NOAA Office of Law Enforcement have not received additional funds or assets to increase patrols of monuments in the Western Pacific. While enforcement agencies have remained level-funded, we understand the NMFS and the USFWS have been receiving \$3 million per year for monument management. We question the utilization of these funds if the record shows that these agencies have failed to finalize the monument management plans. It appears the only promises being fulfilled are those associated with extended oversight by federal agencies associated with what we believe is empire building in the US Pacific Islands Region. We remind you that, prior to monument designation, these federal waters were already sustainably managed under existing law and regulations such as the Magnuson-Stevens Fishery Conservation and Management Act and that the local stakeholders play an important role in its management. With regards to marine monuments in the Western Pacific, local stakeholders and governments have been assigned a distant secondary role in managing waters that they have been managing for thousands of years.

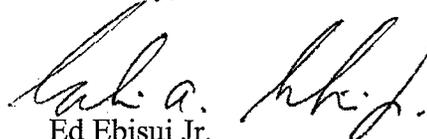
The Pacific Remote Islands MNM expansion displaced sustainably-managed US fishing vessels from US waters. For the US purse seine fleet, for example, this resulted in increased reliance on fishing in the waters of Pacific Island countries. Access to fish in waters of these countries comes at exorbitant costs (approximately \$12,000 per fishing day). Although touted by marine monument advocates as a fishery management tool, in reality monuments have little to no conservation benefits for highly migratory fish stocks (e.g. tuna and billfish), and as such, cannot be included in any stock assessment evaluating the condition of these stocks in our region. Simply closing off vast areas of marine waters to pelagic fishing does nothing for highly mobile

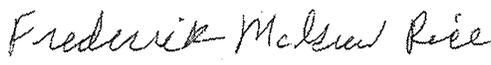
species when displaced fishing effort is not addressed. We are mystified why the White House believes removing US fishing vessels from US waters, without conservation benefits, is good for US fisheries. These actions are having negative impacts on the American Samoa economy which is dependent on fish processing for US seafood markets as its main private-sector industry. One of the two canneries in American Samoa has announced a December 2016 closure – laying-off 800 employees.

We are very disappointed that these MNM's have become nothing more than presidential legacy paper parks that offer little conservation benefits to marine resources and have provided no economic benefits to local communities. Further, marine monuments are examples of federal overreach that are an affront to Pacific Island culture, traditions, and threaten the economic stability of American Samoa, Guam, and CNMI.

Thank you for your attention to the concerns we have raised, and request you instruct your administration to ensure that promises are fulfilled and that the monuments are properly implemented and enforced.

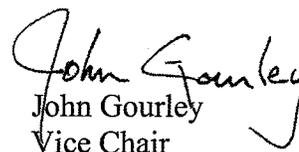
Sincerely,


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