



COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Ralph DLG. Torres
Governor

Victor B. Hocog
Lieutenant Governor

July 11, 2017

The Honorable Ryan Zinke
Secretary
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

RE: Marianas Trench Marine National Monument Review

Dear Secretary Zinke,

As provided in section 4 of Executive Order 13795 of April 28, 2017, "Implementing an America-First Offshore Energy Strategy" (82 FR 20815, May 3, 2017), the Department of Commerce is to lead the review of the Marine National Monuments in consultation with the Secretary of the Interior. To participate in the process, please accept my comments concerning the creation and management of the Marianas Trench Marine National Monument (MTMNM) comprised of the Islands, Volcanic and Trench Units.

As background, Presidential Proclamation 8335 established the MTMNM in January 2009 and assigned management responsibility to the Secretary of the Interior, in consultation with the Secretary of Commerce. The Interior Secretary placed the Mariana Trench and Volcanic Units within the National Wildlife Refuge System, and delegated management responsibility to the U.S. Fish and Wildlife Service. The Secretary of Commerce, through the National Oceanic and Atmospheric Administration (NOAA), has primary management responsibility for fishery-related activities in the waters (and submerged lands) of the Islands Unit.

In sum, the U.S. Fish and Wildlife Service and NOAA have been working for almost ten years now with the CNMI government, Department of Defense, Department of State, U.S. Coast Guard, and others to develop a monument management plan. Today, the work remains unfinished for a management plan that is supposed to provide for public education programs, traditional access by indigenous persons, scientific exploration and research, consideration of recreational fishing if it will not detract from the monument, and programs for monitoring and enforcement.

The CNMI's participation and negotiation with our federal counterparts to ensure the inclusion of our preferences and desires have in all honesty been stretched thin throughout the process. Nonetheless, we remain persistent in our efforts because we are

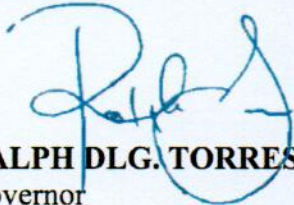
greatly concerned about the possibility of losing access to the waters for fishing purposes and to the natural resources contained in the three Units.

For example, at the time of the creation of the MTMNM, the CNMI had not yet actually received the formal patent to our submerged lands extending from the islands of Farallon de Pajaros (Uracas), Maug and Asuncion. Even though we have since been granted rights to the submerged lands, access to the natural resources in those submerged lands are now restricted and the Monument's prohibitions on mineral extraction in all three Units takes away potential economic opportunities for the CNMI. Such a result must be reconsidered.

In closing, the Federal Government has failed to provide the necessary resources to realize the promises made to the CNMI during the negotiations for the creation of the MTMNM. This includes the establishment of a co-management plan, an increase in patrols for illegal fishing in the waters of the CNMI, and other incentives such as the building of a visitors center in the CNMI which could all help mitigate for the loss of access to our natural resources. Although the CNMI does in general support the environmental goals and protections behind the creation of the MTMNM as good stewards, we have since the designation of this Monument under the Antiquities Act been required to carry the burden of an over-expansive federal program that should be reassessed.

I trust your report will note the CNMI's concerns about lost economic opportunities and restrictions on historical and traditional fishing practices. Please let me know if there are any questions or if I can provide additional information.

Sincerely,



RALPH DLG. TORRES
Governor

Commonwealth of the Northern Mariana Islands