March 29, 2021

Honorable Debra A. Haaland
Secretary
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

RE: Comments of the Western Pacific Regional Fishery Management Council on the implementation of Executive Order 14008

Dear Secretary Haaland:

The Western Pacific Regional Fishery Management Council (Council) wishes to be a partner in developing a process to address the ‘30 x 30’ provisions in Executive Order 14008 that focus on “conserving at least 30 percent of our lands and waters by 2030.” The Council is one of the eight Regional Fishery Management Councils established in 1976 by the Congress. The mission of the Regional Councils as mandated by the Magnuson Fishery Conservation and Management Act is to develop U.S. fishery policies for their respective regions. Our region includes the State of Hawaii, the Territories of American Samoa and Guam, the Commonwealth of the Northern Mariana Islands, and US uninhabited islands in the Pacific Ocean.

The Council fully supports the goals of Executive Order 14008 and respectfully requests that we are included in all aspects of the process. The history of stewardship in the Western Pacific Region, including conserving and preserving our resources, goes back Millennia. Sustaining the life and well-being of Pacific Islanders translates to sustaining natural resources, especially the resources from the ocean. The Council has been fully involved in insuring the heritage of Pacific Islands and the use of area-based management for the conservation of living marine resources since its inception in 1977; therefore, the Council should be integrally involved in implementing the ‘30 x 30’ process as the Department of Interior moves forward under EO 14008.

The Western Pacific region has already met the 30% conservation goal set forth in EO 14008 with the designation of the Papahānaumokuākea, Pacific Remote Islands, Marianas Trench, and Rose Atoll Marine National Monuments. National waters under the Council’s purview carry the conservation burden of the nation in this regard by encompassing 27% of the national 30% goal. To date, 53% of the 2.24 million square miles of waters of the Western Pacific Region include fishery closures, spanning 1.19 million square miles (map attached).
Area-based management is very important for the Council and to the many Pacific Islands fishing communities whom have limited secure access to fishery resources. These communities contain low income, disadvantaged populations that will suffer severely if their ways of life are further constrained. The Council seeks to assist in developing science-based guidelines or ‘best practices’ for spatial management in both insular waters and in oceanic ‘blue water ecosystems’. The Council convened an International Workshop on Area-Based Management of Blue Water Fisheries in partnership with the United Nations Food and Agriculture Organization (FAO) in June 2020 (http://www.wpcouncil.org/Blue-Water-ABMT-workshop/) to link management objectives with appropriate area-based management tools, including adaptive dynamic management, to face shifting environmental baselines. The workshop was the first of its kind to bring together worldwide expertise to summarize the state of knowledge of area-based management tools in blue water ecosystems. Management objectives discussed ranged from biodiversity targets to social objectives, including food security for island communities. Recommendations were shared with the 34th United Nations Committee on Fisheries by the U.S. delegation.

Archipelagic ecosystems and associated insular fishery resources are also subjected to area-based management, presumably under the ‘30 x 30’ initiative. Access to fisheries for community subsistence and social objectives need to be considered when implementing spatial management under ‘30 x 30’, which renders the need for Council involvement in the ‘30 x 30’ process. The Council’s advisory bodies and its Science and Statistical Committee (SSC) consider holistic approaches to managing marine resources, including social, economic, and biological objectives. The Council’s science-based approach to area-based management, as advised by its SSC, make it an ideal partner in formalizing a ‘30 x 30’ process.

The Council recognized the need for an ecosystem approach to managing the diverse fisheries of the vast Western Pacific Region. The Council applied the NMFS Ecosystem Principles published in 1999 with the integration of ecosystem-based considerations into its fishery management plans. This led to the completion of the Coral Reef Ecosystems Fishery Management Plan in 2001 and transition of all species-based plans to the nation’s first Fishery Ecosystem Plans in 2007. The Council also incorporated climate-related projects and activities into its MSA Five-Year Research Priorities in order to evaluate management measures in the context of a changing marine ecosystem. The Council’s Scientific and Statistical Committee (SSC) Research Plans include pelagic fishery priorities focusing on shifting species distribution and dynamic spatial management to minimize non-target catch while optimizing targeted fishery performance.

Our Climate Change Committee established Climate Change Modules in its Annual Stock Assessment and Fishery Evaluation Report, which is the foremost source of monitoring fisheries in the Pacific Islands. Oceanographic parameters such as atmospheric CO₂, oceanic pH, El Niño Indices, Pacific Decadal Oscillation, sea surface temperature anomalies, chlorophyll-a anomalies, and sea-level rise are summarized annually in the module. This effort will combine fisheries data with environmental information through an integrated framework with the goal of accounting for the effects of climate change into fishery management tools such as annual catch limits, vessel prohibited areas, and a potential focus of the Executive Order’s provision for area-based management.
The Council, because of its geographic and cultural breadth, is the agency to embrace on marine resource management in the Western Pacific region through its advisory bodies, and based on its sustainable record. The Council is willing and able to support the ‘30 x 30’ process through implementation. We represent a range of diverse populations across the Pacific which enables us to effectively communicate with local populations that have local knowledge on these matters. This will enable the Council to assist the Administration in achieving the objectives of the Executive Order to include coastal communities that have an essential role to play in mitigating climate change and strengthening resilience by protecting and restoring coastal ecosystems that support biodiversity and fisheries.

In closing, the Council stands ready to assist the Administration in implementing the Executive Order and engaging impacted native communities. This includes promoting fishing practices in line with sustainability and local island culture, supporting international agreements, protecting essential habitat, developing underutilized or underrepresented fisheries, allow fair and equitable access to participate in management processes, promoting a ‘bottom-up’ approach to resource management, and optimizing sustainable use of resources through its management plans.

Sincerely,

Taotasi Archie Soliai
Council Chair

Kitty M. Simonds
Executive Director

CC: Honorable Gina M. Raimondo, Secretary, U.S. Department of Commerce
Paul Doremus, Ph.D., Assistant Administrator, National Marine Fisheries Service
Martha Williams, Principal Deputy Director, U.S. Fish and Wildlife Service
Ralph D.L.G. Torres, Governor, Commonwealth of the Northern Mariana Islands
Lemanu Peleti Mauga, Governor, American Samoa
Lourdes Aflague Leon Guerrero, Governor, Guam
David Y. Ige, Governor, State of Hawaii

Attached: Map of US EEZ Regulated Areas within the Western Pacific Region
US EEZ Regulated Fishing Areas, Western Pacific Region

- **Magnuson-Stevens Act**
  - Large Vessel Prohibited Area (2002)
  - False Killer Whale Southern Exclusion Zone (2012)
  - Guam No Anchor Zone (2004)

- **Antiquities Act**
  - Marine National Monument (2006-2016)
  - Closed to all commercial fishing

**US EEZ Regulated Fishing Areas**

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- False Killer Whale Southern Exclusion Zone (2012)
- Guam No Anchor Zone (2004)

**Marine National Monument**

- (2006-2016)
- Closed to all commercial fishing