



**Western
Pacific
Regional
Fishery
Management
Council**

June 29, 2022

The President
The White House
1600 Pennsylvania Ave NW
Washington D.C. 20006

Dear Mr. President:

The Western Pacific Regional Fishery Management Council (Council) requests that a comprehensive evaluation of unintended consequences, including social and economic impacts, of a proposed expansion of the Pacific Island Remote Marine National Monument (PRIMNM) be conducted and evaluated through a transparent and public process prior to implementation of any expansion. The Council asks that further fishery closures, including those proclaimed through the Antiquities Act, are to be decided upon through such an evaluation and process.

The Western Pacific Region has disproportionately contributed to the '30 by 30' objectives of the America the Beautiful Initiative from Executive Order 14008 with its existing marine managed areas (over 1,000,000 nm², including Marine National Monuments and fishery management areas). Existing conservation areas in the Western Pacific Region constitute 27-29% of U.S. marine waters. Further closures to fishing access would conflict with 'Securing Environmental Justice' Provisions in Executive Order 14008 (Section 219) and Executive Order 13985. The Western Pacific Region is comprised of mostly underserved communities, including territories that exceed the U.S. poverty rate. In American Samoa, over one quarter of the workforce depends on the viability of a tuna cannery that relies on supply from U.S.-flagged tuna vessels. More restrictions to U.S.-flagged vessels, including fishing access, jeopardizes the viability of the American Samoa economy. The proposed expansion of PRIMNM would only restrict already well-managed U.S. tuna fisheries.

Tuna stocks managed internationally through the Western and Central Pacific Fisheries Commission (WCPFC) and within proposed PRIMNM expansion areas are not deemed overfished and are currently harvested at sustainable levels. WCPFC manages purse seine tuna fishing through a balance of fishing effort within national waters with limits on the high seas. Closing U.S. waters to U.S. vessels would create an imbalance against U.S. interests, which would favor competing interests of heavily-subsidized fishing nations such as China. The U.S. already sets the gold standard of managing fisheries and marine resources, thus supplanting U.S. tuna production with foreign fisheries would likely come with negative conservation impacts while harming U.S. Pacific state and territorial economies.

Scientific evidence does not support the notion that large static closed areas provide adequate protections for dynamic open ocean ecosystems, like the proposed PRIMNM expansion area. Tuna fisheries in these waters do not interact with reef or sensitive habitats. Highly migratory marine life like tunas, sharks, turtles, and whales do not acknowledge political boundaries and shift their distributions throughout the dynamic ocean. These ecosystems are best protected through strengthening international conservation compliance for all nations, eliminating harmful subsidies from foreign fisheries, ending illegal fishing, and combatting climate change directly.

Mr. President, we urge your Administration to use a holistic and transparent public evaluation of any possible consequences of expanding the PRIMNM and request an opportunity to meet with appropriate officials. We can be reached at kitty.simonds@noaa.gov or +1 (808) 522-8220.

Sincerely,

Taotasi Archie Soliai
Chair

Kitty M. Simonds
Executive Director

CC: Honorable Secretaries of State, Commerce, and the Interior
Honorable Governors of American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands
Janet Coit, Assistant Administrator, National Marine Fisheries Service
Monica Medina, Assistant Secretary for Oceans and International Environmental and Scientific Affairs, U.S. Department of State
Maxine Burkett, Deputy Assistant Secretary for Oceans, Fisheries and Polar Affairs, U.S. Department of State
Western Pacific Regional Fishery Management Council Members