



**OFFICE OF THE GOVERNOR
AMERICAN SAMOA GOVERNMENT**

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March 30, 2023

The Honorable Gina M. Raimondo
Secretary
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Secretary Raimondo:

I am writing to bring to your attention my concerns regarding the consequences of President Biden's announcement to initiate a new National Marine Sanctuary designation to protect U.S. waters around the Pacific Remote Islands. This action would designate 777,000 square miles of waters around the Islands as off limits for fishing, greatly impacting American Samoa's food security and employment.

American Samoa's fishing industry is 80 percent of our local economy and this policy change would destroy our single largest private industry. Closing access to these waters would require boats to travel farther from home for subsistence fishing and tuna catches to supply the cannery, our largest private employer.

I am also concerned that this policy change was announced without consultation with Territorial officials or the Western Pacific Fishery Management Council, which is authorized by the Magnuson-Stevens Fishery Conservation and Management Act to make fishery-management decisions for the Pacific Remote Islands Marine National Monument. I request a meeting as soon as possible to discuss these policy issues with Administration officials and industry leaders to determine ways to permit our fishing industry to survive while supporting reasonable conservation efforts.

The livelihood of American Samoans and Pacific Islanders depends on a reasonable solution to this policy change, and I am respectfully requesting prompt action to resolve this issue.

Sincerely,

LEMANU P. S. MAUGA
Governor

cc: Hon. Amata Coleman Radewagen, Member of Congress, American Samoa
Hon. Carmen G. Cantor, Assistant Secretary for Insular and International Affairs
Hon. Richard W. Spinrad, Under Secretary of Commerce for Oceans and Atmosphere
Hon. Joe Manchin, Chairman, Senate Energy and Natural Resources Committee
Hon. John Barrasso, Ranking Member, Senate Energy and Natural Resources Committee
Hon. Bruce Westerman, Chairman, House Natural Resources Committee
Hon. Raul Grijalva, Ranking Member, House Natural Resources Committee
Hon. Cathy McMorris-Rogers, Chairman, House Energy and Commerce Committee
Hon. Frank Pallone, Ranking Member, House Energy and Commerce Committee
Hon. Mike Simpson, Chairman, House Subcommittee on Interior Appropriations
Hon. Chellie Pingree, Ranking Member, House Subcommittee on Interior Appropriations
Hon. Dan New House, Chairman, Congressional Western Caucus



**OFFICE OF THE GOVERNOR
AMERICAN SAMOA GOVERNMENT**

Serial No.: 311-22

June 15, 2022

President Joe Biden
The White House
1600 Pennsylvania Ave., NW
Washington, DC 20500

Subject: American Samoa Opposes the Proposed Expansion of the Pacific Remote Islands
Marine National Monument

Dear Mr. President:

Expansion of the Pacific Remote Islands Marine National Monument (PRIMNM) would have a significant negative impact on the economy of American Samoa and undermine our nation's strategic interest in the Pacific. American Samoa is a remote island territory populated almost entirely by Pacific Islanders. Samoans have traditionally engaged in fishing, and tuna fishing and canning is now the largest sector of our private-sector economy. China continues to make inroads in Pacific fishing areas; as we lose our influence in the area, China's grows. Before you expand the PRIMNM, we ask you to commission a scientific study to ensure the expansion accomplishes its intended goals, and we invite you to visit the territory and meet with key stakeholders. Until and unless those steps are taken, I urge you not to expand the PRIMNM.

American Samoa has been part of the United States for more than 120 years. During World War II our islands were recognized to be an essential part of the communication between the United States, Australia, and New Zealand. The Samoa islands were part of the trade routes used to safeguard the communication links to our allies. Much of the jungle warfare training of the U.S. Marines was done in American Samoa to support the island-hopping campaign to defeat the Japanese Imperial Forces. American Samoans have proudly served in the highest number per capita of any other state in our military services to protect and defend the United States of America.

American Samoa again is found to be in a position of importance to the United States from the aggressive expansion of China into the South Pacific. China is entering into bilateral agreements with Pacific Region Nations with promises of security, infrastructure, economic and cultural aid. Our neighbor the Independent State of Samoa recently signed a bilateral agreement with China and this joins other Pacific nations that have also entered into agreements with China.

American Samoa serves as a gateway to all Pacific nations for the strategic development of U.S. security and economic opportunities. The expansion of the Pacific Remote Islands Marine

National Monument would have unintended consequences on the economic lifeline of American Samoa that is dependent on the tuna industry and the support of the U.S. fishing fleet.

Economic Impact of Expansion

The tuna industry is the largest private sector employer in American Samoa, supporting jobs for nearly a third of American Samoa's workforce. We have a relatively small locally based tuna purse seiner fleet that supplies the majority of the raw material needs of our local cannery. These vessels are also bound by U.S. laws and standards to ensure minimal adverse effects on the environment – standards that exceed foreign and international requirements.

The Pacific Remote Island Areas, consisting of Howland and Baker Islands, Palmyra atoll and Kingman Reef, have been traditional fishing grounds for the U.S. fleet that supply the local cannery even before the establishment of the PRIMNM. The proposed expansion of the PRIMNM from 50 miles to 200 miles will have a devastating negative impact to the U.S. fleet. This will be especially hard on American Samoa. I implore your consideration to keep these U.S. waters open to commercial fishing for the U.S. fleet so our tuna industry that supports our fragile economy can continue to be sustained. Without a sustainable fish supply, our local tuna industry will collapse and our economy soon will follow. This would lead to an economic catastrophe that no U.S. state or territory has experienced in recent times.

There is no scientific evidence to support the notion that large-scale closures in “blue water” open ocean ecosystems (such as the proposed expansion area of the PRIMNM) have any impact on the sustainability of highly migratory species like tuna, are effective for protecting biodiversity in these dynamic ecosystems, or can mitigate stressors such as climate change. On the contrary, the result of large, static area closures is a transfer of fishing effort from one place to another, oftentimes at the expense of conservation. Instead of fishing in U.S. waters where they have privileged access, these U.S.-flagged vessels will have to fish elsewhere, likely further away from American Samoa, thereby increasing their costs. This situation also exacerbates the “uneven playing field” our fleet and fishing industry face while competing with heavily-subsidized fishing industries such as China's in waters that are already heavily fished.

We respect the concerns of the state of Hawaii. The Pacific Remote Islands Marine National Monument protects, preserves, and enhances the waters surrounding Howard and Baker Islands, Kingman Reef, and Palmyra Atoll ***without the need for any further expansion***. Hawaii has a large, highly developed and diversified economy. American Samoa does not. American Samoa is highly dependent on the United States for financial assistance to support our infrastructure, harbors, airports, hospital, and schools. If our tuna industry collapses, American Samoa will become more dependent on U.S. financial aid.

Strategic Interests

Fishing prohibitions not only weaken U.S. fisheries but also increase seafood imports and jeopardize U.S. food and national security. The proposed monument expansion would continue to displace U.S. fishing fleets to international waters where they must fish alongside and compete with foreign fishing fleets. Fishing vessels from China, Taiwan, Korea, and Japan are regularly observed fishing the border of the U.S. exclusive economic zone (“EEZ”) around American

Samoa, Hawaii and the U.S. Pacific Remote Islands. China continues to build up its longline fleet in the Western and Central Pacific Ocean which has increased from around 100 vessels in 2007 to over 520 now (catching approximately 50,000 metric tons of tuna annually). China's fleet also includes 73 purse seine vessels. In comparison, there are 14 U.S.-flagged longline vessels and 13 U.S.-flagged purse seine vessels based in American Samoa.

China is making a concentrated effort to integrate its economic, diplomatic, military and technological might to expand its influence throughout the Pacific. This approach by China appears to be very effective, as evidenced by the recent bilateral agreements made with our Pacific neighbors, including the Independent State of Samoa.¹ The U.S. Indo-Pacific Strategy highlights concern over China's influence in the Pacific region and its vulnerable island countries. If China succeeds in using the bilateral agreements with the island nations in the Pacific region, their heavily subsidized fishing fleets will harvest the fish supply from within the fishing zones that will be denied to the U.S. fishing fleet. The United States is losing influence in the international fisheries management organizations, such as the Western and Central Pacific Commission, due to weakened U.S. fisheries. These impacts are exacerbated by the loss of U.S. fishing grounds as a result of monument designations. Deterrence of foreign fishing fleet encroachment in the U.S. EEZ is compromised when U.S. commercial fishing vessels are removed from the 25 percent of the entire U.S. EEZ that is now under monument protection. Reducing fishing grounds by expanding the marine monuments will aid this Chinese expansion by forcing our U.S. fishing vessels out of U.S. waters. This is the time for the United States to use American Samoa to increase the U.S. presence in the Pacific region to provide security and economic development to the island nations presently seeking or signing bilateral agreements with China.

Equity


Any adverse impact to the American Samoa tuna industry will result in job losses and other residual effects that will further increase the poverty level of what is already by far the poorest territory or state in the U.S. and perpetuate inequities for years to come. The U.S. Pacific Island community should not carry the full conservation burden of the country under the "America the Beautiful" initiative outlined in Executive Order 14008. The proposal for expansion of the PRIMNM states it will ensure over 30% of the conservation goal under "America the Beautiful." But this would be counter to Sec. 219 of Executive Order 14008 on securing an equitable future for the underserved American Samoa community. It would also run counter to Executive Order 13985, which makes it the policy of your administration to "pursue a comprehensive approach to advancing equity for all...including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." The people of American Samoa fall under these categories of underserved and historically disadvantaged communities as approximately 57% of our population lives in poverty.

Respectfully, I seek your assistance to ensure that the economic viability of American Samoa is protected. I respectfully request that you reject further expansion of the PRIMNM. Alternatively, we ask that a scientific study be conducted to determine the effectiveness of the expansion. We

¹ "China signs deal with Samoa as Australia vows Pacific Islands plan." Reuters, May 28, 2022, <https://www.reuters.com/world/asia-pacific/china-signs-deal-with-samoa-australia-vows-pacific-islands-plan-2022-05-28/>

invite you or your representative to visit these islands, so you might understand what losing the cannery would do to the territory. Please help us sustain and protect our delicate, fishing-based economy by denying the proposed expansion of the PRIMNM.

Sincerely,



LEMANU P. S. MAUGA
Governor

cc: Hon. Deb Haaland, Secretary of Interior
Hon. Uifaatali Amata Radewagen, Congresswoman
Hon. Monica Medina, Asst. Secretary of State for Oceans and Int'l. Scientific Affairs
Hon. Keone Nakoa, Deputy Asst. Secretary for Insular and International Affairs
Hon. Nikolao Pula, Director, Office of Insular Affairs
Hon. Talauega E. V. Ale, Lieutenant Governor
Hon. Tualo Manaia Fruean, Senate President, Legislature of American Samoa
Hon. Savali Talavou Ale, Speaker of the House, Legislature of American Samoa
Janet Coit, NOAA Fisheries Assistant Administrator
Kitty Simonds, Director WPFMC Executive Director
Taotasi Archie Soliai, Director, American Samoa Department of Marine & Wildlife
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