

**Arnold I. Palacios**  
Governor



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Lieutenant Governor

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COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

**OFFICE OF THE GOVERNOR**  
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May 24, 2023

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Mr. John Armor, Director  
NOAA Office of National Marine Sanctuaries  
1305 East-West Highway, 11<sup>th</sup> Floor  
Silver Spring, MD 20910

RE: Time extension request for the proposed Pacific Remote Islands Sanctuary public comment period

Hafa Adai and Tirow Mr. Armor,

I write to you again relating to the designation of marine sanctuaries in the Western Pacific. My previous letter, dated February 4, 2023, inquired about the status of the Mariana Trench Sanctuary nomination. The second public comment period ended on April 25, 2022 and it has been over a year and the Office of National Marine Sanctuaries (ONMS) has not officially made public whether the Marianas Trench remains on the inventory list or not. As I mentioned in my earlier letter, both the previous and current administrations do not support the proposed Mariana Trench sanctuary. I have yet to receive a response to my letter.

Now, the Western Pacific is facing another sanctuary designation for the Pacific Remote Islands (PRI) Monument that includes an expansion of boundaries throughout the EEZ. This particular sanctuary effort, the third in the Western Pacific, is being advanced at an unprecedented pace complete with pre-determined sanctuary boundaries and with the highest level of protection as outlined in the nomination document and President Biden's executive memorandum to the Secretary, Department of Commerce.

The ONMS just completed their series of public meetings in the Marianas for the PRI Sanctuary this past week. I was informed that the question-and-answer session was cut short in order to get everyone's comments before the close of the hearing at 8 pm. Unfortunately, our island communities are facing the same situation when ONMS was conducting their 5-year review for the proposed Marianas Trench Sanctuary; there was a lot of confusion of what was being proposed and the general public doesn't understand the difference between a monument and sanctuary. What good is it to collect public comments on a federal action when the affected communities don't fully understand what the issues are?

The CNMI island communities, as well as the entire US Western Pacific family, deserves better communication from your office as your agency attempts to designation one large marine sanctuary after another from Hawaii to the Marianas archipelago. The existing Marine National Monument system has already taken away our commercial fishing rights in over 50% of the entire US Western Pacific waters. Apparently, this is not enough as the proposed PRI Sanctuary includes monument boundary expansions with further inferred commercial fishing closures.

This designation has the potential to impact future fishing efforts by the US Pacific Island fishing communities and quite honestly, there is not much US waters remaining in the Western Pacific where the US fishing fleet doesn't have to compete directly with foreign fishing vessels. Keeping US waters open for future sustainable fishing ventures is necessary to maintain our island economies and support Pacific Island culture.

Despite ONMS guidelines requiring the proponents to show broad grassroots support for any sanctuary nomination, the CNMI was not consulted in advance of making the decision to proceed with the sanctuary designation process. The designation process has not been transparent, is moving too quickly, and is placing the underserved Western Pacific communities at a disadvantage.

Therefore, I am requesting an additional 45 days to the existing comment period for the Pacific Remote Islands sanctuary. In addition, I would request that ONMS meaningfully engage with the Marianas communities in explaining the sanctuary process and be more transparent in their actions.

Thank you for considering the request.

Sincerely,



**Arnold I. Palacios**

Governor

cc: The Honorable Gregorio Kilili C. Sablan,  
Delegate, U.S. House of Representatives  
The Honorable Lou Leon Guerrero, Governor of Guam  
The Honorable Lemanu Peleti Mauga, Governor of American Samoa  
Sylvan Igisomar, Secretary, CNMI Department of Lands and Natural Resources  
L. Hoku Ka'aekuahiwi Pousima, Policy Analyst PIR, Office of National Marine Sanctuaries  
Kitty M. Simonds, Executive Director, Western Pacific Regional Fish. Management Council