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**OFFICE OF THE GOVERNOR
AMERICAN SAMOA GOVERNMENT**

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Serial No.: 545 – 23

June 1, 2023

Hon. Gina M. Raimondo
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Subject: Request for Extension of Comment Period for Proposed Designation of National Marine Sanctuary for the Pacific Remote Islands

Dear Secretary Raimondo:

I respectfully request the comment period for the Notice of Intent to Conduct Scoping and to Prepare a Draft Environmental Impact Statement for the Proposed Designation of a National Marine Sanctuary for the Pacific Remote Islands (the “Notice”) be extended to August 16, 2023 or beyond. As explained in detail in my attached letter to President Biden, the matters covered in the Notice have the potential to significantly harm the way of life of the indigenous people of American Samoa. Our community must have an opportunity to thoroughly review the Biden Administration’s intended actions and to provide comments. Our territorial legislature, the Fono, is on recess until mid-July and it is imperative that our legislative representatives have the chance to formally weigh in.

The Notice was published on April 18, 2023, and the June 2, 2023 deadline for comments is a mere forty-five (45) days later. However, the NOAA scoping meeting was held in American Samoa on May 24, 2023, which means that American Samoa stakeholders have effectively had only nine (9) days after the NOAA presentation to provide their comments. This is simply not enough time for American Samoa to develop and provide evidence to support their objections to the proposed rule and/or to document the adverse impacts that should be considered in the impact statement.

This is especially true given that the economic and cultural impact that will result from the proposal to designate the Pacific Remote Islands as a National Marine Sanctuary will be exacerbated by the concurrent proposed rulemaking related to the Effort Limit Area for Purse Seine Fisheries (“ELAPS”). Combined, these two proposals have the potential to cause catastrophic damage to the American Samoa government and people.

The proposed designation of a national marine sanctuary, combined with the proposed rulemaking to the ELAPS, will likely result in the loss of the tuna industry in American Samoa, the loss of 5000 jobs, a potential 40% increase in shipping and freight costs, and a dramatic increase in utility



**OFFICE OF THE GOVERNOR
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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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