

Friends of the Mariana Trench  
PO BOX 7048 SVRB  
Saipan, MP 96950  
USA

February 10, 2017

Mr. Allen Tom  
Office of National Marine Sanctuaries  
1305 East-West Highway  
Silver Spring, MD 20910

Dear Mr. Tom,

Thank you for your letter regarding our nomination for a Mariana Trench National Marine Sanctuary. We received the letter via US Postal Service on January 30, 2017. We are excited that our nomination meets the sufficiency review provisions described in NOAA's final rule Re-establishing the Sanctuary Nomination Process (79 FR 33851). We also happily provide the additional information requested by your office.

Before answering the questions, however, we would like to recognize the work of a very important person. Rob Stewart is an award winning wildlife photographer, filmmaker, conservationist, and educator. He is best known for his 2006 documentary *Sharkwater*, which brought global attention to shark conservation. The film helped kick off the modern shark conservation movement, and has inspired governments and communities around the world to take actions to protect sharks and the ocean.

In 2011, Rob visited Saipan on the invitation of a sixth grade class at San Vicente Elementary School. The class had watched *Sharkwater* at school and asked Rob to come help them protect our sharks. This collaboration led to a law that banned the sale of shark fins in the entirety of the Northern Mariana Islands, making us only second place in the world to pass such a law. Rob's next stop was Guam, which soon became the third. Today, nearly two dozen states, territories, and cities, including every single island in Micronesia, have passed similar laws, and the United States Congress is considering a national shark fin trade ban. Rob told the story of that sixth grade class in his most recent film *Revolution*.

Rob inspired our community and he taught us not to be afraid to stand up for what we believe in. To quote Rob, "By working for good, for life, or for conservation, your task will call out to the best in you."

Sadly, Rob passed away after a diving accident in the Florida Keys this month. Rob inspired us, but he would always tell the people he met that it was our people who inspired him. The world lost one of the greatest voices for the ocean when Rob died, but we need to keep his memory alive to remind ourselves to be better, and stronger, and braver for all the hard work we still have to do.

We would, therefore, like to dedicate our nomination to designate a Mariana Trench National Marine Sanctuary to the memory of our friend Rob Stewart.

#### **Clarifying the areas including in our nomination**

The nomination tracks the September 28, 2016 letter of Governor Ralph DeLeon Guerrero Torres and Delegate Gregorio Camacho Kilili Sablan to then-President Barack Obama requesting that he consider initiating the designation of the present Mariana Trench Marine National Monument as a National Marine Sanctuary. A chart of the existing monument sufficiently identifies the area that is part of the nomination request.

We are hopeful that the scoping period of the designation process will kick off a discussion in our community on the broader need for marine conservation in our islands, and opportunities to partner with NOAA Sanctuaries to enhance the current management of marine resources.

Our nomination highlighted several areas of global significance within the United States Exclusive Economic Zone around the Mariana Islands that are not a part of our proposal. These areas are worthy of protection, and believe that the sanctuary designation process presents an opportunity to facilitate a discussion in our community on how to best manage these resources.

It is our understanding that there would be considerable opportunity for input from the community on the development of any proposals to protect any additional resources, and involvement in making the final decision. We further understand that any decisions would need to come at the end of the scoping and public consultation process, not at the start. The nominators pledge their support in helping to facilitate this conversation.

#### **Our community's contribution to education opportunities**

In our addendum submitted on January 17, 2017 we identified the CNMI Public School System and the Northern Marianas College as possible partners in education. We also see a role for the private sector and non-government organizations in supporting educational efforts associated with the monument. We describe our overall goals for education in the "Goals Description" of the nomination.

As we stated in the addendum, we did not approach these organizations for partnerships. We could obtain letters of partnership and describe opportunities that would be created with a sanctuary with these organizations and more, but this will take longer than the 30 day timeframe you have set. We are confident that all of these organizations are interested in partnering, and will work with them to provide the details. The details could also be discussed during the first round of sanctuary scoping. We will begin collecting the letters of proposed partnerships, and will deliver them to you as they come in to us.

Organizations we will approach include:

#### *Schools*

Private and public schools on Saipan

Northern Marianas College  
Joeten-Kiyu Public Library (Saipan)  
Private and public schools on Guam  
University of Guam  
Guam Community College

*Businesses*

Underwater World of Guam

*NGOs*

Micronesia Islands Nature Alliance  
Micronesia Conservation Coalition (Guam)  
Simon Sanchez High School Sharks M.A.D.E.  
George Washington High School Marine Mania

**Value of proposed national marine sanctuary beyond federal funding**

In the “Goals Description” of our nomination we outline six goals for the proposed sanctuary. These were developed and updated from our “Vision Statement” outlining our goals for the monument in 2008. The six goals are (1) Management & Enforcement, (2) Culture & Tradition, (3) Conservation, (4) Education, (5) Research & Education, and (6) Economic Development. These goals best outline the value the proposed national marine sanctuary would bring.

These goals have seen little advancement in eight years with the monument and we are hopeful that they will be more achievable by working with NOAA Sanctuaries.

**Supporting the current management framework beyond possible federal funding**

There are several examples within the United States, including in Hawaii, American Samoa, and Florida where NOAA Sanctuaries is able to integrate management authority with local governments and other federal agencies, and we are confident such an arrangement can exist in the Northern Mariana Islands. We would like to see a sanctuary co-management agreement between the commonwealth government and the appropriate federal managing authorities to manage these resources. We would like also to see an advisory council with local government agencies and community stakeholders have the opportunity to participate and provide input in the management of the sanctuary.

Additionally, in our addendum submitted on January 17, 2017, we described the commonwealth government agencies that work on natural resource management. These agencies are charged with managing the terrestrial resources within the Islands Unit. To date these agencies have not actively participated in the management of the Mariana Trench Marine National Monument, but it is our hope that with the co-management agreement and advisory councils, that this will change.

It is very difficult to comment on how a national marine sanctuary would fit in with current management of the Mariana Trench Marine National Monument because after eight years, the U.S. Fish & Wildlife Service (USFWS) and NOAA Fisheries still have not put out a draft management plan for public review, nor have they hired staff on Saipan. For many years the community has been told that the draft plan would be released “soon.” As of this writing, no firm date has been put forth publicly for its release, nor have any deadlines been set. This has created significant frustration in the community and built resistance to marine conservation in the Marianas and across the Pacific.

USFWS and NOAA Fisheries did not adhere to timelines stipulated by federal law in the monument designation language and were unable to put together a management plan, hire staff on Saipan, or dedicate funding to the Northern Mariana Islands during a presidential administration that was widely considered supportive of ocean conservation.

At some point, possibly in 2017, the USFWS and NOAA Fisheries will release the draft management plan and will conduct public meetings, but it is difficult to plan around their activities since they are already delayed eight years. It is also difficult to predict when a plan would be finalized. If there were a public timeline to develop the management plan for the monument, it would be easier to plan for the management of the proposed sanctuary.

Therefore, the best option for NOAA Sanctuaries would be to move forward with the sanctuary designation process now, and should the need to coordinate with USFWS arrive, assess and adapt as appropriate. It is safe to assume, therefore, that fitting in with the management of the monument will have to be adaptive.

### **Concrete examples of support for community partnerships**

In our addendum submitted on January 17, 2017, we identified 24 possible partnerships that could be developed between the community and the proposed national marine sanctuary, including examples of how we think these partnerships could develop. As we stated in the addendum, we did not approach these organizations for partnerships, but for their political support. We could obtain letters of partnership and describe opportunities that would be created with a sanctuary with these organizations and more, but this will take longer than the 30 day timeframe you have set. We are confident that all of these organizations are interested in partnering, and will work with them to provide the details. The details could also be discussed during the first round of sanctuary scoping. We will begin collecting the letters of proposed partnerships, and will deliver them to you as they come in.

Organizations and agencies we will approach include:

#### *Government*

CNMI Governor's Office  
Office of Delegate Gregorio Camacho Kili Sablan  
Marianas Visitors Authority  
Northern Islands Mayors Office  
Rota Mayors Office  
Tinian Mayors Office  
Saipan Mayors Office  
Department of Lands and Natural Resources  
Division of Fish & Wildlife  
Bureau of Environmental and Coastal Quality  
Division of Coastal Resource Management  
Division of Environmental Quality  
Commonwealth Ports Authority

#### *Business*

KSPN 2  
Chamber of Commerce  
Hotel Association of the Northern Mariana Islands

NGO

Micronesia Islands Nature Alliance  
Micronesia Conservation Coalition (Guam)  
Simon Sanchez High School Sharks M.A.D.E.  
George Washington High School Marine Mania  
Okeanos Foundation for the Sea

Thank you for considering this additional information and I hope that it supports a positive outcome for beginning the process to designate a proposed Mariana Trench National Marine Sanctuary.

Sincerely,



Ignacio V. Cabrera



Agnes M. McPetres



Chailang Palacios



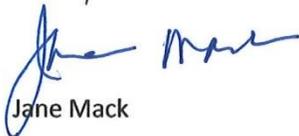
Karl T. Reyes



MarjaLee C. Taitano



Laurie Peterka



Jane Mack