

June 2, 2023

**By electronic mail**

NOAA/ONMS  
% Hoku Kaaekuahiwi Pousima  
76 Kamehameha Ave.  
Hilo, HI 96720.

**Re: PRI-Proposed Sanctuary**

Hafa adai,

I am writing to express deep reservations regarding designation of the Pacific Remote Islands National Marine Sanctuary.

A sanctuary is supposed to be manageable. But this proposed sanctuary is *unprecedented* in size. It is more than 50 times larger than any previously-designated sanctuary. A sanctuary is also supposed to comprise a discrete area. There is nothing discrete about what would be created here. The sanctuary would include five separate designated areas, with the sanctuary extending all the way to the EEZ for each area.

Sanctuaries should be based on ecosystem and ecosystem function, not on legal boundaries like the current proposal. The Western Pacific Fishery Management Council conserves and manages fisheries using an ecosystem-based approach and NOAA should be allowing the Fishery Management Council to take the lead in recommending conservation and management measures.

This sanctuary process should be driven by science, not politics. Scientists have criticized the use of MPAs to protect biodiversity because of the highly mobile nature of ocean biodiversity in the region. If anyone will benefit from the sanctuary, it will be foreign fishermen fishing just outside the sanctuary boundaries.

Any sanctuary should not ban fishing. Such a ban is not required in a marine sanctuary and, in fact, most sanctuaries do not completely ban fishing. Based on our experience with the Marianas Trench Marine National Monument, it is likely that the refuge that is supposedly created will be no refuge at all, because NOAA will not prohibit Defense Department activities in a marine reserve.

Finally, at the public hearing, I asked for an extension of the time to submit comments. As I write this, most of the people in Guam are without water or power, let alone reliable internet service. Not providing an extension under these circumstances exposes the failure of NOAA/ONMS to provide a meaningful way for our community - which is made up primarily of indigenous people and ethnic minorities - to participate in this process.

Thank you very much for the opportunity to submit these comments.

  
Manny Duenas  
President, Guam Fishermen's Co-Op