



January 6, 2026

Acting Director Matthew Giacona
Bureau of Ocean Energy Management
U.S. Department of Interior
1849 C Street
Washington DC 20240

RE: Unified Position Regarding Docket No. BOEM-2025-0351

Hafa Adai,

On behalf of the government leaders of Guam, we respectfully submit this joint letter announcing our unified opposition to the proposed commercial leasing of the Commonwealth of the Northern Mariana Islands' (CNMI) EEZ under Bureau of Ocean Energy Management (BOEM)'s Request for Information and Interest (RFI) for "Commercial Leasing of Outer Continental Shelf Minerals Offshore the CNMI," under docket number BOEM-2025-0351.

We have established our unified opposition after convening with Guam's top government leaders, including the undersigned: Governor Lou Leon Guerrero; Lieutenant Governor Josh Tenorio; Congressman James Moylan; Speaker Frank Blas, Jr.; and Senator Tina Muña Barnes, the Legislature's Ranking Member. After this discussion, it is clear we are all opposed to the proposed commercial leasing in CNMI waters and bordering Guam's waters for the future of our archipelago.

Up to this point, there has not been sufficient scientific research and analysis on the environmental, ecological, economic and marine life impacts of seabed mining. We affirm that more data focused on these areas is needed before any consequential federal policy decisions are made.

We do know that based on the current available evidence however, deep sea mining has real potential to destroy our marine life ecosystems. The damage made by deep sea mining could also persist for decades, seriously limiting our island's ability to sustain itself.

We do know that ecological disruptions stemming from seabed mining such as sediment discharge, increased noise and ship activity, and heavy metals leaching could irreparably break essential food webs. These adverse effects do not remain localized, but would spread beyond the immediate vicinity of the lease area, damaging marine ecosystems hundreds of miles away.

Guam's residents rely on the ocean to provide fresh, nutritious and sustainable food, as well as provide economic activity through fishing and tourism. Available research shows that deep seabed mining threatens fish species both directly in the area of the proposed mining activity, and also downstream. In addition to reducing fishing incomes and impacting resident health outcomes, ocean degradation would deter tourists, negatively impacting the largest industry on the island. Our economy would be severely impacted for the sake of a few critical minerals.

Furthermore, we express profound concern that there is no guarantee of economic benefit for our island from the lease of our waters and the extraction of seabed minerals. We view this as a significant oversight, as the territories within the Mariana Island archipelago would be the ones

bearing the brunt of any negative impacts without fair and just federal funds for mitigation health treatments, and economic offsets.

Research shows there are numerous other ways to obtain these “critical” minerals without putting whole ecosystems and communities at risk, such as investing in a circular economy that recycles minerals already in use and through responsible terrestrial mining. Investigations find that deep-sea mining only accounts for four of the 60 USGS-defined critical minerals, two of which, copper and manganese, are widely available within the U.S. and from allies, while the other two, cobalt and nickel, are currently experiencing a significant surplus which is projected to extend into 2030. Therefore, the U.S. should be able to satisfy its national security needs without destroying invaluable ocean ecosystems.

Moving forward, deep sea mining in our Northern and Southern Pacific seabeds, without full engagement of our people fails to uphold a fundamental obligation with how we should be governed and demonstrates blatant disrespect for our people's right to permanent sovereignty over our natural resources, as well as basic indigenous rights as outlined in the United Nations Declaration of the Rights of Indigenous Peoples.

Not engaging our Pacific allies who have called for a moratorium on deep-sea mining is a greater national security risk than the one driving the needless rush for “critical” minerals. The U.S. security strategy in the Pacific relies on strong, reliable alliances for deterrence, as outlined in President Donald Trump's 2025 National Security Strategy. Acting in ways that erode trust and goodwill jeopardizes our diplomatic relations and also risks our neighbors changing alliances and inviting the very threat we are trying to prevent into our region.

For these reasons, we jointly and respectfully reiterate our unified opposition to the proposed commercial leasing of the CNMI's EEZ out of concern for the life of our oceans, environment, people, and economy. We strongly urge a pause to this RFI process until a transparent process is established that respects our rights, our input, our environment, our well-being, and our future. Thank you for your consideration in advancing responsible ocean governance and sound resource management in our region.

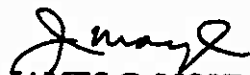
Senseramente,



LOURDES A. LEON GUERRERO
Governor of Guam



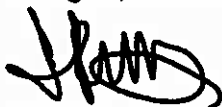
JOSHUA F. TENORIO
Lieutenant Governor of Guam



JAMES C. MOYLAN
Delegate, U.S. House of Representatives



FRANK F. BLAS, JR.
Speaker of the Guam Legislature



TINA R. MUÑA BARNES
Senator & Ranking Member, Guam Legislature