

July 24, 2017
Secretary Wilbur Ross
Marine Monument and Sanctuary Review
U.S. Department of Commerce
Washington, DC

Dear Mr. Ross:

On behalf of the Ecological Society of America (ESA), we submit these comments in response to the opportunity for public comments regarding the Department of the Commerce's notice pursuant to Executive Order 13795—Implementing an America-First Offshore Energy Strategy, signed on April 28, 2017—concerning a review of all designations and expansions of National Marine Sanctuaries and Marine National Monuments since April 28, 2007 as published in the Federal Register (Docket No.: ID NOAA–NOS–2017-0066).

ESA is deeply concerned about the review of six National Marine Sanctuaries and five Marine National Monumentsⁱ, and urge protection for the existing boundaries in recognition of their scientific, cultural and historical significance.

Protecting all six National Marine Sanctuaries and five Marine National Monuments under review safeguards important scientific research sites. The research spans a range of scientific disciplines—from oceanography, marine science, marine biology, ecology, biodiversity, paleontology geology and more. Each of the monuments and sanctuaries offers unique contributions, and we urge the Department of the Commerce to carefully analyze these and other examples of the scientific, economic and cultural value of the monuments. Highlighting the scientific value of even two national monuments demonstrates the importance of these jewels of nature and the myriad ways they contribute to science.

Pacific Remote Islands Marine Monument includes seven national wildlife refuges within the largest marine conservation area in the world. This monument sustains terrestrial and marine ecosystems and protects fish and wildlife species that are rapidly vanishing due to climate change, habitat destruction and overfishing. The monument also holds corals that are 5,000 years old, important nesting and resting habitat for seabirds, and refuges for species as diverse as the giant clam, sea turtles and a new-to-science species of beaked whale.

Papahānaumokuākea Marine National Monument is globally recognized for its biological and cultural significance, being the only mixed (natural and cultural) UNESCO World Heritage site in the United States and only one of 35 mixed sites in the world. Its extensive coral reefs provide critical protections for more than 7,000 marine species, including whales and sea turtles listed under the Endangered Species Act and the longest- living marine species in the world — black coral, which have been found to live longer than 4,500 years. Additionally, as ocean acidification, warming, and other impacts of climate change threaten marine ecosystems, the monument improves ocean resilience, helps the region's distinct physical and biological resources adapt, and creates a natural laboratory that allows scientists to monitor and explore the impacts of climate change on these fragile ecosystems.

Additionally, the health of our ocean systems is critical to our Nation's economy and to our way of life. The protected Marine Sanctuaries and Monuments are a crucial part of the ocean ecosystem that sustains the health of our planet. Each of the sites under review contributes unique and inimitable resources to the ocean ecosystem, which would be directly imperiled by the removal of their Monument or Sanctuary status. Americans deeply value their coast and ocean, as do the millions of tourists who visit U.S. marine sanctuaries and monuments from all over the world every year.

The Ecological Society of America, founded in 1915, is the world's largest community of professional ecologists and a trusted source of ecological knowledge, committed to advancing the understanding of life on Earth. The 10,000-member Society publishes five journals and a membership bulletin and broadly shares ecological information through policy, media outreach, and education initiatives. The Society's Annual Meeting attracts 4,000 attendees and features the most recent advances in ecological science.



Katherine S. McCarter
Executive Director

ⁱⁱⁱ Marine National Monuments Under Review:

- Marianas Trench Marine National Monument (Commonwealth of the Northern Mariana Islands/Pacific Ocean)
- Northeast Canyons and Seamounts Marine National Monument (Atlantic Ocean)
- Pacific Remote Islands Marine National Monument (Pacific Ocean)
- Papahānaumokuākea Marine National Monument (Hawaii)
- Rose Atoll Marine National Monument (American Samoa)

National Marine Sanctuaries Under Review:

- Channel Islands National Marine Sanctuary (California)
- Cordell Bank National Marine Sanctuary (California)
- Greater Farallones National Marine Sanctuary (California)
- Monterey Bay National Marine Sanctuary (California)
- National Marine Sanctuary of American Samoa (American Samoa)
- Thunder Bay National Marine Sanctuary (Michigan)