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September 16, 2010

The Hon. Eileen Sobeck
Deputy Assistant Secretary for Fish, Wildlife and Parks
U.S. Department of Interior

The Hon. Andrew Scott Winer
Director of External Affairs, NOAA
U.S. Department of Commerce

Dear Co-Chairs Sobeck and Winer:

Thank you very much for the opportunity to submit our comments on a major concern that would have tremendous and quite possibly disastrous consequences on CNMI's immediate and long-term socio-economic conditions and outcomes if the ongoing process to list some sixty-plus species of Marianas corals take effect.

We respectfully request, on behalf of The Hon. Benigno (Ben) R. Fitial, Governor of the CNMI, and the Great People of the Commonwealth of the Northern Mariana Islands, that before listing any species of coral as a protected species, either threatened or endangered, that such decision be predicated upon a thorough research that is scientifically-based. Any such decision must also be based upon the degree of impact that might adversely affect the socio-economic conditions of the CNMI and the livelihood of its native people who very much depend on their surrounding ocean and marine resources for their survival. We believe that a sound, unbiased and thorough research, study and assessment be conducted before any final decision is made.

The people of this peaceful-loving and strong believers of freedom and independence and self-reliance upon Nature's Bounty be not bound by very strict and unreasonable set of rules and regulations crafted by bureaucrats many thousands of miles away from target islands who are unfamiliar with island living and the great dependence that island people have on their ocean resources for their livelihood, to legislate their lives and their living.

A series of public meetings, hearings and thorough discussions must first be conducted by NOAA's National Marine Fisheries Service on Saipan, Tinian and Rota before any final decision is to be made.

I wish to touch briefly on the issue of the potential listing of the Bumphead Parrotfish, Napoleon Wrasse and the 80-some species of corals being considered under the Endangered Species Act. I am requesting that NMFS coordinate closely with our Division of Fish and Wildlife during their status review as the CNMI has unique circumstances that may not warrant listing these species in the Northern Marianas. Relying on data from other regions without taking into consideration local ecological limitations, local protections, and present reef conditions is just not acceptable.

For example, the Bumphead Parrotfish is at its northern extent of its range and to our knowledge has never been an abundant fish. It is very possible that listing this species and determining a recovery population based on incomplete data will put the CNMI in a position where the species would be listed forever, with no hope to reach targeted population levels and thus 'recovered'.

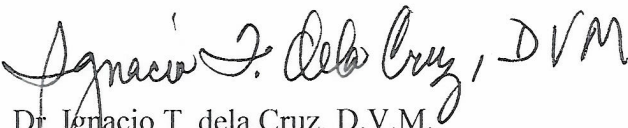
With respect to the Napoleon Wrasse, the primary reasons for listing this species under IUCN are due to the unregulated live reef fish trade and SCUBA spear fishing. Unlike elsewhere in Micronesia and the South Pacific Islands, the CNMI never supported the live reef fish trade industry. Additional conservation measures including bans on SCUBA spear fishing and restrictions on the use of nets have moved the CNMI to the forefront of sustainable use management.

In the annual State of Reefs report, coral reefs in the CNMI were found overall to be in good condition. The CNMI continues to work on improving the conditions of our coral reefs with the excellent support from our federal partners sitting with Our Governor Fitial on the Coral Reef Task Force. As such, doesn't it appear that it may be premature to list these coral species in the CNMI?

As a consequence to listing these species, please be aware that this action will have a profound regulatory and economic impact on the CNMI. It is, therefore, paramount that any such listings be thoroughly examined in an objective, scientific manner, taking into account not only biological, but also socio-economic considerations. Unbiased science needs to answer the question whether the Bumphead Parrotfish, Napoleon Wrasse, and the 80-plus species of corals are endangered in the CNMI – not a U.S. mainland environmental advocacy group or threats of a lawsuit.

Thank you again for the opportunity to submit our comments as herein presented.

Sincerely,


Dr. Ignacio T. dela Cruz, D.V.M.
Secretary

Cc: The Hon. Benigno (Ben) R. Fitial, Governor

The Hon Eloy S. Inos, Lt. Governor
SAA
Members of the Coral Reef Task Force
WesPac Council
NOAA, NMFS, PIRO Office