



Coalition
for a
Nuclear Free
Great Lakes



Don't
Waste
Michigan



March 18, 2021

The Honorable Gina Raimondo
Secretary
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Request to Withdraw the Review of the Thunder Bay National Marine Sanctuary

Dear Secretary Raimondo,

We are writing to request that the U.S. Department of Commerce officially withdraw and close its review of the Trump administration’s proposal to cut by 90% the boundaries of the Thunder Bay National Marine Sanctuary in Lake Huron. This “review” was conducted pursuant to President Trump’s Executive Order 13795: *Implementing an America-First Offshore Energy Strategy*. The Thunder Bay National Marine Sanctuary is the nation’s only freshwater marine sanctuary, has its headquarters in Alpena Michigan, and is strongly supported by environmental, conservation and outdoor recreation groups, Michigan’s Governors (both current Gov. Gretchen Whitmer and former Gov. Rick Snyder), Michigan’s Congressional delegation, and local public officials and economic development groups.

The Thunder Bay National Marine Sanctuary contains a unique and important maritime and trade history of the Great Lakes. It encompasses “Shipwreck Alley,” an area with a large number and variety of ships now lying on the lake bottom due to extreme weather and other conditions. The visitors’ center in Alpena, Michigan attracts and engages both school children and tourists.

President Biden revoked the prior Executive Order 13795 with his new January 20, 2021 Executive Order 13990, entitled *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*. In addition, President Biden’s Executive Order directed the heads of all agencies to “immediately review all existing regulations, orders, guidance documents, policies or any other similar agency actions (agency actions) promulgated, issued, or adopted between January 20, 2017 and January 20, 2021.”

In 2014, after a comprehensive process, the Thunder Bay National Marine Sanctuary’s boundaries were expanded from 448 square miles to 4,300 square miles. The prior Executive Order 13795 (2017), among other things, directed the Secretary of Commerce, in consultation with the Secretary of Defense, the Secretary of the Interior, and the Secretary of Homeland Security, to conduct a review of all designations and expansions of National Marine Sanctuaries. On June 26, 2017, the National Oceanic and Atmospheric Administration published Notice of Review of National Marine Sanctuaries and Marine National Monuments Designated or Expanded Since April

28, 2007 (82 Federal Register at 28827). Thunder Bay was among the national marine sanctuaries included in the review.

Support for retaining the larger boundaries of the Thunder Bay National Marine Sanctuary was strong. On July 27, 2017, in a bipartisan letter, eight members of the Michigan Congressional delegation called on the Commerce Department to retain the expanded sanctuary boundary. On August 15, 2017, fifteen Great Lakes not-for-profit organizations filed comments strongly opposing the review and its proposed reduction of the size of Thunder Bay National Marine Sanctuary. The Executive Order 13795 directed the Secretary of Commerce to issue the results of the review to the Director of the Office of Management and Budget, the Chairman of the Council on Environmental Quality, and the Assistant to the President for Economic Policy. If a report was conveyed to the White House, however, it was not made public.

With the review results uncertain, on March 18, 2018, then-Michigan Governor Rick Snyder sent a letter to the Secretary of the Commerce supporting the expanded boundaries and noting the thoroughness of the process that resulted in the 2014 expansion, the economic benefits of the Thunder Bay National Marine Sanctuary, and the important fact that oil and gas drilling in the Great Lakes are prohibited by both state and federal law.

The undersigned organizations request that you and the Department of Commerce act soon to officially end the harmful and unwarranted review of the boundaries of the Thunder Bay National Marine Sanctuary. Ending this review is consistent with President Biden's direction to all agency heads to review "agency actions". It would remove any doubt or cloud over the legitimacy of the current boundaries and the many shipwrecks and fisheries protected within them.

Thank you for your consideration of this request and for taking the requested action steps.

Sincerely,

Howard A. Learner
Executive Director
Environmental Law & Policy Center

Joel Brammeier
President & CEO
Alliance for the Great Lakes

Mike Shriberg
Regional Executive Director, Great
Lakes
National Wildlife Federation

Kristy Meyer
Associate Director
Freshwater Future

Liz Kirkwood
Executive Director
For Love of Water (FLOW)

Melinda Hughes
President
Nature Abounds

Sandy Bihn
Executive Director
Lake Erie Waterkeeper

Chance Hunt
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Citizens for Alternatives to Chemical
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Tanya Keefe
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William Freese
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