



**SOCIETY *for*
HISTORICAL
ARCHAEOLOGY**

December 10, 2025

Ms. Jennifer Miller
Bureau of Ocean Energy Management
Pacific Region
Office of Strategic Resources
760 Paseo Camarillo (CM 102)
Camarillo, California 93010

Re: Docket No. BOEM-2025-0351 [Request for Information and Interest — Commercial Leasing for Outer Continental Shelf Minerals Offshore the Commonwealth of the Northern Mariana Islands]

Dear Ms. Miller,

The Society for Historical Archaeology (SHA) appreciates the opportunity to address the Bureau of Ocean Energy Management's (BOEM) Request for information (RFI) on and interest in the possibility of commercial leasing for mineral extraction on the Outer Continental Shelf (OCS) offshore the Commonwealth of the Northern Mariana Islands (CNMI).

The SHA was formed in 1967, and is the largest scholarly organization concerned with the archaeology of the modern world (A.D. 1400 to the present). SHA promotes the protection and conservation of historical archaeological resources on land and underwater. Many of SHA members are experts in the historical archaeology of the Pacific region, focusing on maritime underwater archaeological sites and cultural heritage.

The SHA is greatly concerned about the proposed commercial leasing for mineral extraction on the OCS offshore the Commonwealth of the Northern Mariana Islands. There is a high potential that these mining activities will encounter significant underwater cultural heritage (UCH). The majority of deep-water UCH in the region are shipwrecks and aircraft related to World War II as the area around the islands of the CNMI, especially Saipan, Tinian and Guam, experienced extensive fighting during the war. Of particular concern is that these hundreds of ship and plane wrecks may contain the remains of American service personnel. In addition, the area of proposed commercial leasing for mineral extraction includes cultural seascapes of enormous importance to the lives, culture, and spiritual beliefs of the region's Pacific Islanders. World War II wrecks in the region may likely contain fuel oil, munitions, chemicals, and other contaminants that, if released as result of deep seabed mineral extraction, would have a detrimental impact on the surrounding seascape and ocean life, and impact the livelihood of Pacific Islander communities.

Should the BOEM proceed and permit deep seabed mineral leasing activities in this area, it will do so with incomplete knowledge of the number or type of UCH resources, including places of religious and cultural significance to Pacific Islanders, that will be impacted. BOEM undertook the *Maritime Heritage of the U.S. Pacific Islands* study in 2023-2025 to compile baseline data of the UCH in the OCS and identify any potential heritage resources in the U.S. Pacific Island territories

of American Samoa, Guam and the CNMI. This study was terminated in mid-2025. Therefore, SHA urges the BOEM to complete this study prior to considering any OCS mineral-leasing for the CNMI. The completion of this work will also serve as the foundation for BOEM to comply with requirements of all relevant federal statutes, especially the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA), prior to issuing any mineral leases. Compliance with these statutes must involve consultation with all parties that have a demonstrated interest in the cultural and historical heritage that would be impacted by the proposed leases, especially regional Pacific Islanders and the descendants of American military personnel lost in this area during World War II. Should the above referenced BOEM study and compliance with NEPA and Section 106 of NHPA confirm the risks already evident from existing scientific and cultural-heritage research, BOEM should decline to pursue mineral development within CNMI's OCS to ensure the protection of irreplaceable underwater historical cultural heritage and the preservation of the resting places of American military personnel.

Thank you again for this opportunity to respond to this RFI. Please do not hesitate to contact the SHA at sara@sha.org so we can provide additional archaeological or cultural-heritage information that may assist BOEM in its consideration of the proposed commercial leasing for mineral extraction on the Outer Continental Shelf offshore the Commonwealth of the Northern Mariana Islands.

Sincerely,

[Rich Veit](#)

Richard Veit, Ph.D., RPA

President, Society for Historical Archaeology