

Date: December 12, 2025

To: Bureau of Ocean Energy Management

From: Deep Sea Rare Minerals (DSRM), CEO Tony Romeo

Re: Comment to Commercial Leasing for Outer Continental Shelf Minerals in the Commonwealth of the Northern Mariana Islands

Deep Sea Rare Minerals (DSRM) is submitting this memo in support of the deep sea mineral leasing in the Northern Mariana Islands OCS. In accordance with Section 7 of the RFI, we provide the following details to support our indication of interest:

1. Opening the Mariana Islands OCS to leasing reinforces active U.S. stewardship of its EEZ. Leasing enables the federal government to set the rules, data standards, environmental baselines, and monitoring requirements rather than leaving future activity to foreign operators just outside U.S. waters. A clear, science-driven leasing framework demonstrates that the United States intends to govern, study, and manage its seabed resources responsibly, rather than ceding de facto leadership through inaction. Leasing also does not equate to mining—it enables **structured scientific characterization**. The Mariana region remains under-sampled relative to its strategic importance. Leasing would unlock private-sector capital for:

- High-resolution bathymetry and backscatter
- Habitat classification and biodiversity baselines
- Long-term oceanographic and geochemical monitoring

These datasets would materially advance NOAA’s scientific mission and improve environmental decision-making **regardless of whether extraction ever occurs.**

2. Proximity of this area to China and nearby ports. The United States needs to establish the value of the seabed in our own EEZs and the commercial viability of commercial recovery even if we do not immediately move forward with mining the nodules. Unlike the Clarion Clipper Zone, this area represents a much more appealing location for mobilizing commercial deep sea mining assets. The area is close to ports in Guam and within just a few days of processing facilities once the nodules are collected. The economic viability of the industry has a much better chance of being successful and profitable in this area of the world than perhaps any other.

3. Securing a Resilient U.S. Supply of Critical Minerals: We support efforts to bolster the United States’ strategic reserves of critical minerals, such as nickel, cobalt, copper, and manganese, to ensure national security and economic independence. By developing domestic sources of these essential resources, we seek to reduce reliance on foreign supply chains and safeguard against external control or disruption, particularly from adversarial nations.

4. Alignment with Existing Federal Ocean and Security Strategies. Opening the Mariana OCS for leasing aligns with:

- U.S. Indo-China-Pacific strategy
- Critical minerals policy
- Blue Economy initiatives
- Maritime domain awareness objectives

Rather than being an outlier, it integrates seabed resources into a coherent national ocean strategy.

DSRM would also like to make the following recommendations in our comment to the RFI:

1. **DSRM recommends that BOEM complete a survey of the entire Northern Mariana Islands EEZ and not just the eastern side.** Once this work is completed, the United States will possess a comprehensive understanding of the mineral resources present within this EEZ. Establishing this valuation and baseline knowledge is an important safeguard against foreign powers that may seek—overtly or covertly—to access or appropriate American seabed resources. Given the location of this EEZ and its proximity to China, it is especially critical that the United States fully understands the extent and commercial viability of its offshore mineral endowment. Modern survey technologies now allow large offshore areas to be assessed efficiently and cost-effectively. It is not necessary to map every square meter of the seafloor to develop a reliable picture of nodule abundance and distribution. As with forest timber inventories, statistically robust sampling combined with advanced remote-sensing techniques—such as synthetic aperture sonar (SAS)—can be used to characterize resource density across broad regions with high confidence. While portions of the western EEZ contain existing subsea cable infrastructure that may limit near-term development, even areas that are not currently “mineable” warrant thorough evaluation. It is incumbent upon the United States to understand what resources exist within its jurisdiction, irrespective of present constraints. Infrastructure, technologies, and use cases evolve over time; subsea cable routes may eventually be rerouted, upgraded, or rendered obsolete by emerging wireless alternatives. A complete resource inventory ensures that future policy and national security decisions are grounded in knowledge rather than uncertainty.
2. **Lessons learned from activity in the ISA’s Clarion-Clipperton Zone and the Cook Islands suggest that BOEM should engage multiple contractors and actively encourage collaboration and entrepreneurial innovation as the industry advances.**

3. **DSRM recommends removing the word “mining” from all official publications as mineral collection is not truly “mining”. In place, DSRM recommends using the words “collection” or “harvesting of unattached nodules”.**

Thank you for the opportunity to contribute to this historic initiative. We are eager to partner with BOEM, the Department of the Interior, and the American Samoa community to responsibly unlock the potential of these critical mineral resources for the benefit of the United States and its territories.

Sincerely,

A handwritten signature in black ink, appearing to be 'AR' followed by a long horizontal stroke.

Anthony Romeo

President

Dee Sea Rare Minerals

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