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October 24, 2008

James Connaughton Chairman of the Council on Environmental Quality 722 Jackson Place, N.W. Washington D.C. 20503

Re: Marine Conservation Management Areas

Dear Mr. Connaughton:

The Pacific Seabird Group (PSG) strongly supports the initiative of the administration to protect a variety of resources in Marine Conservation Management Areas adjacent to several U.S. possessions in the Central Pacific, the Commonwealth of the Northern Marianas and American Samoa. PSG is an international, non-profit organization founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has an international membership drawn from the entire Pacific basin, including China, Canada, Mexico, Russia, Japan, Australia, New Zealand, and the United States as well as a substantial membership in Europe. Among PSG's members are scientists interested in seabird biology and conservation, managers of wildlife refuges, parks, and natural areas, and other individuals interested in marine conservation. Since its inception PSG has been a strong and vocal advocate of establishing conservation areas in the waters that surround seabird breeding colonies in the Pacific. For example, the undersigned advocated preserving the waters around the Northwestern Hawaiian Islands in 1985, a policy initiative that was implemented by your June 2006 proclamation establishing the Papahānaumokuākea Marine National Monument. See C. S. Harrison, "A Marine Sanctuary in the Northwestern Hawaiian Islands: An Idea Whose Time Has Come," 25 Natural Resources Journal 317 (1985).

We understand that you are considering establishing similar Marine Conservation Management Areas by executive order that would protect coral reefs, pinnacles, sea mounts, islands and surrounding waters of Johnston Atoll, Howland, Baker and Jarvis Islands, Kingman Reef, Palmyra Atoll, Wake Island, and Rose Atoll. Many of these

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islands support colonies of seabirds including such species as black-footed albatross, sooty terns, gray-backed terns, brown noddies, black noddies, blue noddies, white terns, red-tailed tropicbirds, masked boobies, red-footed boobies, wedge-tailed shearwaters, Christmas shearwaters, Polynesian storm-petrels, and Audubon's shearwaters. We strongly support this initiative because it would protect those seabird colonies and the food upon which the seabirds rely. These islands and the surrounding waters are remote from human populations and need to be conserved. These tropical oceanic islands are increasingly at risk from industrial fishing and the rats those fishing vessels may inadvertently carry. Protecting these areas would insure a strong marine legacy for this administration, and would complement the initiatives of President Teddy Roosevelt a century ago.

Please contact us if you have any questions or if we can be of further assistance in supporting or implementing this project.

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Sincerely,

Craig S. Harrison Vice Chair for Conservation