



Pacific Seabird Group

Dedicated to the Study and Conservation of Pacific Seabirds and their Environment

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Re: Review of Certain National Monuments Established since 1996: Notice of Opportunity for Public Comment

The Pacific Seabird Group does not support the reevaluation of the Marine National Monuments in Hawai'i and the Central Pacific Ocean, and herein provide comments to support the continuation of their expanded boundaries.

The Pacific Seabird Group (PSG) is an international, non-profit organization that was founded in 1972 to promote knowledge, study, and conservation of Pacific seabirds with a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and especially the United States of America. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and private individuals who are interested in marine conservation.

We call for retaining the current boundaries, created by Presidents Bush and Obama, for the four Marine National Monuments (MNM); Papahānaumokuākea in Hawai'i, The Pacific Remote Island MNM, Rose Atoll MNM in American Samoa, and the Mariana Trench MNM. These regions are unique in preserving intact ocean ecosystems from top to bottom and the ocean currents that fuel the innumerable ecosystems of these coral atolls. Recognized as the largest marine protected areas in the world, approved by State and Federal authorities, and appreciated by the world's scientific community, no other government has shown the forward thinking necessary to maintain marine ecosystems. We applaud the vision that required consideration of vast parameters to effectively manage marine systems for future fish harvest and ocean health and not to be curtailed for short-term gain by reducing their size.

Specifically we address the requirements of the Executive Orders 13792 and 13795, Section 4; Offshore Energy Strategy. The depths that surround these otherwise federal lands (National Wildlife Refuges, National Parks, National Monuments and Marine Sanctuaries) are too deep for oil drilling, and too isolated for tidal, wind or thermal energy creation.

EO 13792 has details that are answered below.

- (i) The case is made for the smallest area to include in a national marine preserve as extending out to the exclusive economic zone, for the reasons being the remoteness of the preserves allows foreign fishing fleets to illegally move in close to the islands to fish the reefs where much of the marine life is concentrated. At 12 or even 50 miles, foreign vessels can quickly sneak in and plunder the reef and escape. Making the boundaries at 200 miles allow the US Coast Guard to more easily surprise the pirate fisheries.
- (ii) Scientific interests are well-preserved and managed in these marine sanctuaries, specifically the integrity of the ocean currents. For example, Jarvis Island is a submarine volcano (atoll) that rises from the sea floor four miles deep and interrupts the flow of the

Equatorial Undercurrent (EUC). This current has been flowing deep under the hot surface waters, and when it approaches the underwater island, is forced to bring cold, nutrient-rich water to the sunny surface, allowing a novel food web to flourish downstream of the atoll. The boundaries of 3, 12, or 50 miles would not as effectively protect the fecundity of the current from over fishing. This example also plays out in other ways in the deepest ocean canyons of the Mariana Trench Marine Monument, and in other marine monuments as well.

- (iii) Both of these numbered items (iii and iv) refer to multi-use and enjoyment of use on federal and non-federal properties. In these cases, the absolute remoteness of the ocean areas to all but commercial fishing vessels allows the public the knowledge that the government is managing ocean systems for their environmental values: ocean nurseries for juvenile fish and other organisms, pollution free zones, ocean buffers for chemical and thermal changes, deep sea graveyards for World War Two ships and airplanes.
- (iv) Same as above for this concern.
- (v) State and tribal concerns were addressed for Papahānaumokuākea and Rose Atoll, American Samoa, and Remote Pacific Reefs. There may be unaddressed concerns for Mariana Trench MNM.
- (vi) Federal abilities to effectively manage these monuments have been addressed since their creation, and while not budgeted with sufficient funds, revoking the current boundaries will not make management easier, affording a more appropriate budget will allow any boundary limit to be better enforced.

In conclusion, at a time when ocean health, acidification, sea level rise, coral reef death, over fishing, plastic pollution, and declining biodiversity plagues our world, having the United States allow expansive boundaries is appropriate, especially in light of the disturbances, both American and others, have done to the areas now preserved. It is right and proper to respect the ocean for all it has given us in the past with allowing preservation to continue into our uncertain future.

Thank you for your consideration.

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Pacific Seabird Group