
Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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February 14, 1994

George T. Frampton
Assistant Secretary for Fish and Wildlife and Parks
1849 C Street, N.W.
Washington, D.C. 20240

Re: Marine Sanctuary in Hawaii

Dear Secretary Frampton:

On behalf of the Pacific Seabird Group (PSG), I am writing to ascertain the U.S. Department of the Interior's position regarding the establishment of a national marine sanctuary in Hawaii. PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG draws its members from the entire Pacific Basin, including Russia, Canada, Japan, China, Mexico, Australia and New Zealand. Among PSG's members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird populations and refuges, and individuals with interests in marine conservation.

PSG has long supported a national marine sanctuary offshore the Hawaiian Islands National Wildlife Refuge (HINWR). Those islands provide breeding habitat for at least 18 species of seabirds, the total population of which is about 14 million birds.^{1/} The HINWR also provides the only breeding habitat for the endangered Hawaiian monk seal and important nesting habitat for the threatened green sea turtle. PSG recognizes that the refuge already protects certain waters near some islands such as

^{1/} Harrison, C.S. 1990. Seabirds of Hawaii: Natural History and Conservation. Cornell University Press.

the lagoons at French Frigate Shoals and Pearl and Hermes Reef. However, the waters next to Nihoa, Necker, Gardner Pinnacles, Lisianski, and Midway Islands currently have no special federal protection. Moreover, the waters around Laysan Island, one of the most important seabird colonies on earth, are inadequately protected. In 1993, Laysan Island was hit with a large "phantom" oil spill. Marine sanctuary status could enable additional enforcement activities in those remote waters and could garner funds for conservation-oriented research.

In 1984, FWS completed a master plan for the HINWR that committed FWS to consider a marine sanctuary for the waters that surround the refuge. Indeed, the plan stated "the marine sanctuary proposal [will] be thoroughly evaluated in an open forum, involving all concerned parties, including the general public, following completion and approval of the HINWR Master Plan."^{2/} Interior secretaries Watt and Lujan never completed this evaluation.^{3/} After ten years, we are still waiting.

As you may know, Public Law 102-587 authorized the National Oceanic and Atmospheric Administration (NOAA) to begin planning for a national marine sanctuary in Hawaii. During congressional consideration of Public Law 102-587 in (which establishes a marine sanctuary in Hawaii but does not set its boundaries), we understand that FWS did not take a position.

In summer 1991, NOAA engaged in a feasibility study concerning the establishment of a marine sanctuary. PSG urged NOAA to include in its feasibility study: (1) waters surrounding the Hawaiian Islands National Wildlife Refuge; and (2) waters along the northern coast of Kauai offshore Kilauea Point National Wildlife Refuge. To our knowledge, FWS took no position.

During the scoping period for the DEIS for a marine sanctuary authorized by Public Law 102-587, PSG reiterated its support for a marine sanctuary for the waters surrounding the Hawaiian Islands National Wildlife Refuge. FWS still did not articulate a position.

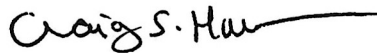
^{2/} HINWR Master Plan (1984), pp. 6.17-19, enclosed.

^{3/} Our experience indicates that FWS officials routinely ignore master plans, thereby limiting any potential benefit from the expenditure of the vast sums of money to produce them. This issue should be examined in the context of the DEIS for the management of the National Wildlife Refuge System, which advocates a costly (and possibly useless) master planning process for the entire national wildlife refuge system.

We understand that NOAA is pondering whether to adopt a single species or a multi-species ecosystem approach to this marine sanctuary. We note that you recently endorsed ecosystem management for Interior lands and said "What we mean by ecosystem management is good science, looking at a range of species in communities and trying to plan for some optimization of resources. Not just one resource at a time (emphasis added)."4/ PSG supports a multi-site and multi-resource sanctuary in Hawaii that would provide comprehensive and coordinated protection for a marine ecosystem, including seabirds.

We urge you to complete the long overdue study regarding a marine sanctuary adjacent to the HINWR. Moreover, we ask your support in working with NOAA to implement a multi-site and multi-resource sanctuary in Hawaii that would provide comprehensive and coordinated protection to seabirds.

Sincerely,



Craig S. Harrison

Enclosure

cc: Robert Davison, Deputy Assistant Secretary for Fish and
Wildlife and Parks
Douglas Hall, Assistant Secretary for Oceans and Atmosphere
Kate Kimball, Deputy Assistant Secretary for Oceans and
Atmosphere

4/ Forum Profile: George T. Frampton, The Environmental Forum (Environmental Law Institute) pp. 28-33 (November/December 1993).