

# Pacific Seabird Group



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

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Northwestern Hawaiian Islands Coral Reef Ecosystem Reserve  
6700 Kalanianaʻaʻole Hwy, #215  
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## **Re: Comments on Draft Reserve Operations Plan**

Dear Sirs:

On behalf of the Pacific Seabird Group (PSG), we thank you for the opportunity to review the draft Reserve Operations Plan for the Northwestern Hawaiian Islands marine area. PSG is an international non-profit organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG takes a broad international perspective in recognition that the oceans are tied together by the wandering of seabirds and the flow of ocean currents. Our membership is drawn from the entire Pacific basin, including Canada, Russia, Japan, China, Mexico, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations and individuals who are interested in marine conservation. PSG has a long history of interest in this bioregion and the seabirds associated with this proposed marine sanctuary.

We strongly support this effort, and hope that seabirds will figure prominently in the management of this reserve. Accordingly, we offer a few suggestions regarding the seabird portion of the draft plan in hopes that they will strengthen your document. The chart of breeding seabirds on page 22 does not include the world's largest colony of Tristram's storm-petrels (*Oceanodroma tristrami*), erroneously includes dark-rumped petrels (*Pterodroma phaeopygia*, recently the species-level differences between the Hawaiian and Galapagos populations of this bird were recognized; the Hawaiian species is *Pterodroma sandwichensis*, the "Hawaiian Petrel") and mistakenly includes band-rumped storm-petrels (*O. castro*). We suggest you

consider including a list of all seabirds that commonly occur in the marine area. Such a list would be much longer and should include Newell's shearwaters (*Puffinus auricularis newelli*).

We applaud the proposed marine debris cleanup efforts because many seabirds and their prey are lost to drift nets. We also support the proposed management of submerged banks such as St. Rogatien bank, and suggest that the protection of this area extend beyond regulation of bottom fishing. We encourage seabird monitoring in the sanctuary, either by NOAA or other agencies. We believe that the reserve should be a genuine protected area with minimal commercial activity. Fish stocks should be a source for repopulating the overfished grounds of the main Hawaiian Islands. We would encourage experiments with bringing ballast water from the Northwestern Hawaiian Islands to the main islands for release of fry. Fishing vessels increase the risk of oil spill and the introduction of rats, weeds and pests to the detriment of the resources protected by the Hawaiian Islands National Wildlife Refuge.

Over the last several decades we have monitoring funding for the Hawaiian Islands National Wildlife Refuge and lamented the lack of emphasis on education about its unique seabird resources. Consequently we support the proposed educational facilities and believe that they are critical. Rather than placing the learning center in Hilo, however, we urge you to consider placing it at Kilauea Point National Wildlife Refuge because of the numerous breeding seabirds there, some of which are easily visible to visitors, and the established visitor center and facilities. If that location is not feasible, other sites likely to reach high numbers of individuals should be considered near Kilauea Point or possibly the Waikiki Aquarium or the Maritime Museum in Honolulu.

We note that enforcement is very important to protecting marine reserves. Recently the U.S. Coast Guard has had insufficient funding to properly conduct surveillance of the 200 mile Exclusive Economic Zone around Hawaii, and suspect it will be unable to patrol the reserve without additional funding. In the operations plan, we suggest your enforcement program better define how the U.S. Coast Guard will assist enforcement and vessel management.

Again, we appreciate this opportunity to comment on your draft operations plan, and will gladly lend our expertise to managing seabirds in the reserve at any time.

Sincerely,

Craig S. Harrison  
Vice Chair for Conservation