

# Pacific Seabird Group



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

7 October 1982

Dr. Allison Kay  
Department of Zoology  
University of Hawaii  
Honolulu, Hawaii

Dear Dr. Kay,

On behalf of the Pacific Seabird Group, I wish to offer the following comments on the sites considered by the West Pacific Resource Evaluation Team for marine sanctuaries.

We endorse the five sanctuaries which you have proposed, especially the two for the Marianas Islands. In addition, we believe that the following sites merit active consideration:

- (1) The waters out to 12 miles surrounding Rose Atoll (Samoa)
- (2) The waters out to 12 miles surrounding the islands of the Hawaiian Islands National Wildlife Refuge in the Northwestern Hawaiian Islands.

We believe that these areas, although part of the National Wildlife Refuge System, need additional protection. Although the USFWS currently manages the terrestrial portions of these islands for birds, turtles, and seals, that agency is funded primarily pursuant to the Migratory Bird Act and the Endangered Species Act. As a consequence, there is little institutional support for research, management, or conservation of marine fishes or invertebrates. The marine ecosystems surrounding those islands would make excellent additions to the marine sanctuary program. Furthermore, many of the islands of the Hawaiian Islands National Wildlife Refuge (e.g. Lisianski and Nihoa) have no protected waters and consequently there is no administrative mechanism to protect feeding areas of the wildlife which breeds on the refuge islands.

We do not wish to make detailed proposals at this time, but given the unique qualities of both Rose Atoll and the NUHI (where about 10 million seabirds breed), we believe that they should be formally

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considered for inclusion in the marine sanctuaries program.

Thank you.

Sincerely,

*Craig S. Harrison*

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