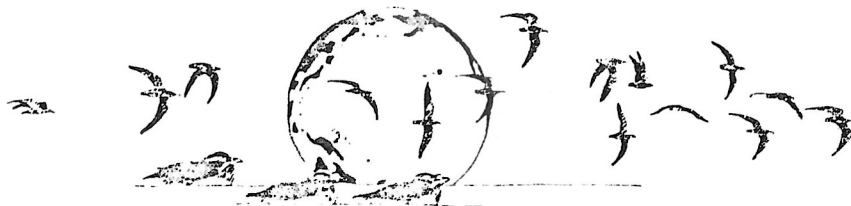


Pacific Seabird Group



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

January 5, 1983

Chelsea International Corporation
1724 H Street, N.W.
Washington, D.C. 20006

Dear Sirs,

In response to your request for public comment concerning the Marine Site Evaluation List for the West Pacific, we are astonished that our recommendations of October 7, 1982 have been ignored. We cannot comprehend the lack of nominations from Hawaii, the most developed and threatened archipelago in the tropical Pacific. In October we recommended:

- (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 stand by these recommendations and urge that they be reconsidered as nominations, preferably in a public forum. We do endorse the Northern Mariana Islands sanctuary, but none of the remaining sites have the worldwide scientific merit that the Northwestern Hawaiian Islands enjoy. This area is under considerable pressure for fishery development and most islands are protected only on the fast land, not surrounding waters.

Since we have no transcript of the Regional Evaluation Team's meeting, we cannot know the factors involved in this decision, but we suspect that political considerations rather than scientific merit were criteria. Such criteria have no place at this stage of the process and, if used, should invalidate the present nominations.

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Last, we are puzzled that Hawaii is included in the same region as Guam, Samoa, and the Mariana Islands. Laysan Island (Hawaii) is 2,500 miles from Samoa. Honolulu is 4,000 miles from the Mariana Islands. Throwing all of these diverse islands into a "waste basket" region makes about as much sense as placing the Gulf coast of Texas and the Gulf of Alaska in the same region because each is experiencing offshore oil development.

Sincerely,

Craig S. Harrison

Craig S. Harrison, Chairman
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