

Pacific Seabird Group



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

27 May 1983

Dr. Nancy Foster
Sanctuary Programs Division, NOAA
3300 Whitehaven Street, N.W.
Washington, D.C. 20235

Dear Dr. Foster,

We have the following comments to make on the "Proposed National Marine Sanctuary Program Site Evaluation List" as announced in the Federal Register on 1 March, 1983.

Washington

We believe the Western Washington Outer Coast sanctuary to be a top priority marine sanctuary. It would protect waters around refuge islands that are important to seabirds and that need protection from oil tankers and dumping. Present protection for these islands does not extend past the emergent land. We believe that the Washington State Nearshore site is important, but that it should be enlarged to encompass the original proposal that included Sequim Bay, Protection Island, Indian Island, and Nisqually Delta. The omitted areas are very important for ducks, shorebirds, and marine birds. Protection Island has the largest colony of rhinoceros auklets in the contiguous United States. These birds feed near Sequim Bay, Whitby Island, Skagit Bay, and the San Juan Islands. The Nisqually Delta is one of the last large, undeveloped deltas along the west coast and is very important to migrating shorebirds and seabirds.

Oregon

The seabird fauna of the Heceta-Stonewall Banks is poorly known, but preliminary data indicate that relatively high numbers of birds occur in the area. Consequently, we support this area to become a marine sanctuary.

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California

We urge sanctuary status for Morro Bay. This area has long been recognized as one of the most critical and vital links of natural bay habitat along the California stretch of the Pacific Flyway. In addition to its extensive resident and seasonal avifauna, the waters are important habitat for fisheries. Morro Bay salt marshes provide the last habitat for the endangered salt marsh harvest mouse. The establishment of a National Marine Sanctuary at Morro Bay would serve to establish the national importance of bayland resource areas along the entire California coast.

Alaska

We believe that the exclusion of Alaska from marine sanctuary proposals to be an inexcusable and irresponsible oversight. There are many areas that deserve sanctuary consideration that are outside the 3-nautical mile state water boundary. For example, we know of important feeding areas for marine birds and whales in Bristol Bay, near the Pribilof Islands, near St. Matthew Island, and near the Diomed Islands. I am sure that many other sites could be nominated by the experts that work in Alaska. The waters southeast of St. Lawrence Island are extremely important feeding areas for gray whales, yet oil and gas development and trawling along the bottom (where the whales feed) is unregulated. Planning for marine sanctuaries should proceed even if the State of Alaska will not cooperate.

Western Pacific

We support the sanctuaries proposed for the Mariana Islands (which should be a single proposal), Guam, and American Samoa. We are especially convinced of the importance of the Northern Mariana proposal, which includes an important seabird colony, threatens sea turtles, and humpback whales. We continue to object to the absence of a proposal for the State of Hawaii. Previous correspondence with Chelsea Corporation (5 January 1980) documented our concerns that the Regional Evaluation Team here did not even have a public meeting to discuss proposals. We believe that this is a violation of due process. We have pointed out previously that we have never obtained a copy of the transcript of the site evaluation team's meeting to evaluate the criteria that were used in discussing proposals in this area. We still strongly suspect that political not biological criteria were used to

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to eliminate the Northwestern Hawaiian Islands as a potential marine sanctuary. We do not believe that political considerations are appropriate at the nomination stage. We suspect that such considerations at this stage are contrary to the instructions given to the team by Chelsea Corporation. The Site Evaluation Team should have restricted its work to finding the most important biological areas, not those that might survive the political process to become sanctuaries. The team was selected for biological, not political expertise.

The omission of the Northwestern Hawaiian Islands at the nomination stage is incomprehensible and irresponsible. Eighteen seabird species numbering 10,000,000 birds live there. Those islands provide the exclusive habitat for the endangered Hawaiian monk seal. The sole nesting of the threatened green sea turtle occurs there. It is interesting to compare the Northwestern Hawaiian Islands to extant marine sanctuaries in California established for similar reasons. The Farallon Islands have 100,000 seabird pairs of 12 species. The Channel Islands have 20,000 pairs of 9 species. Neither California site has a breeding population of a threatened sea turtle or endangered seal. We strongly recommend that the Northwestern Hawaiian Islands be added to the list of sites. I have included a lengthy biological and legal analysis of this issue for your consideration and for the record.

We appreciate the opportunity to comment on these important national issues.

Sincerely,

Craig S. Harrison

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