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26 October 1984

Regional Director, Region One  
U.S. Fish & Wildlife Service  
500 N.E. Multnomah Street  
Portland, Oregon 97232

Dear Sir:

The following are comments to the Draft Environmental Impact Statement for the Master Plan of the Hawaiian Islands National Wildlife Refuge, prepared by our members most familiar with the region. We appreciate this opportunity to comment on these important issues.

We endorse the general approach of the DEIS with respect to the objectives in the management of marine birds and other resources. To improve management and efficiency, however, some approaches should be modified and should be discussed in the final EIS.

1. Although the DEIS states that this plan should guide management of these resources for as long as twenty years, most of the plan dwells on immediate problems, such as fishing, to the exclusion of other problems that ultimately may be more important. More attention should be devoted to deepsea mining (mentioned very briefly on 4.24), nuclear waste disposal (proposed recently for Midway), or other developments that might affect the refuge even though FWS does not control such actions.
2. The refuge does not seem to provide a management framework to manage and protect some of its resources. Fishing outside the refuge (0.5) and deepsea mining may affect marine birds. The Director of FWS or the Secretary of the Interior should formally nominate the Northwestern Hawaiian Islands to be a marine sanctuary. We agree with the DEIS that this concept requires extensive consideration (6.18), but because the lead agency, NOAA, requires a five-year review process, it seems inappropriate to await an FWS internal review before NOAA begins its deliberations (which would have FWS input).
3. Research and management of the NWHI seems to be expensive. The final EIS should consider the use of a private non-profit organization to conduct research in the NWHI and possibly to manage facilities such as Tern Island. Such an arrangement has been very successful on the Farallon Islands refuge in California.

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saving government funds and positions. More important, it enhances opportunities for long-term research and allows agencies such as NSF to be involved in funding studies (NSF is not allowed to fund FWS studies). Should that approach be adopted, PSD would be pleased to lend the expertise of its members to the formation of such an organization.


4. The final EIS should provide a systematic process for the decisions (2.3) with respect to research on the refuge. The DEIS is too vague. Clear guidelines should be provided that ensure such decisions do not change with differing attitudes of each new refuge manager. This has been a problem in the past, especially with respect to collecting birds. In addition, clear policies must be promulgated with regard to space on research vessels. Special Use Permits to do research in the refuge, for example, should not be bartered for allocations of berths on research vessels for Federal employees. If this is the policy of FWS, however, it should be clearly stated.

5. Any policies using Special Use Permits to restrict access to the NMHI should be modified for Midway Islands, if or when they become part of the refuge. Midway bird populations have survived almost fifty years of the U.S. Navy and are unlikely to be adversely affected by visiting tourists or researchers.

6. FWS should establish a consent regime for Special Use Permits for research. A written request for a SUP for research should be deemed to be granted if FWS does not make a written reply within thirty days. Individual researchers have been frustrated in the past because of extensive delays in processing routine research permits.

Again, thank you for this opportunity to review this DEIS.

Sincerely,

  
Judith Latta Hand,  
Chair, Pacific Seabird Group

cc: Harrison  
Vermeer  
Anderson