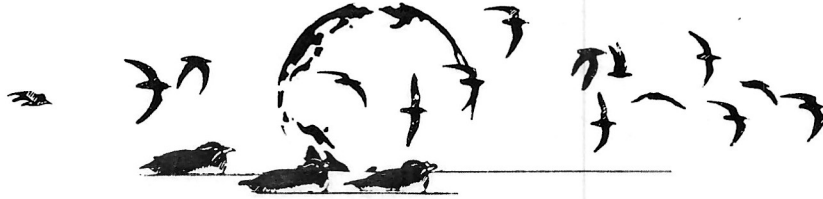

Pacific Seabird Group



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

September 5, 1991

Joseph Uravitch, Chief
Sanctuaries and Reserves Division
National Oceanic and Atmospheric Administration
1825 Connecticut Avenue, N.W., Suite 714
Washington, D.C. 20235

Re: Marine Sanctuary in Hawaii

Dear Sir:

The Pacific Seabird Group (PSG) is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. Its members are drawn from the entire Pacific basin, including Canada, Mexico, Japan, the U.S.S.R., China, Australia and New Zealand. Among its members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird refuges, and many individuals who are interested in marine conservation.

PSG applauds the National Oceanic and Atmospheric Administration (NOAA) for engaging in a feasibility study concerning the establishment of a national marine sanctuary in Hawaii and thanks NOAA for this opportunity to comment. PSG urges NOAA to include in its feasibility study: (1) waters surrounding the Hawaiian Islands National Wildlife Refuge and (2) waters along the northern coast of Kauai.

1. Northwestern Hawaiian Islands

PSG commented on NOAA's last site evaluation process for new marine sanctuaries, which Chelsea International Corporation prepared, when it was published in 48 Federal Register 35568 (1983). Then, PSG asked NOAA to consider establishing a national marine sanctuary in the waters offshore the Hawaiian Islands National Wildlife Refuge. According to the U.S. Fish & Wildlife

Service, those islands provide breeding habitat for at least 18 species of seabirds, the total population of which is about 14 million birds (Fefer et al. 1984:27). PSG again urges NOAA to include waters next to the Hawaiian Islands National Wildlife Refuge in a marine sanctuary.

PSG recognizes that the Hawaiian Islands National Wildlife Refuge already protects certain waters near some islands such as the lagoons at French Frigate Shoals and Pearl and Hermes Reef. However, the waters next to Nihoa, Necker, Gardner Pinnacles, Lisianski, and Midway Islands currently have no special federal protection (Harrison 1985). Moreover, the waters around Laysan Island, one of the most important seabird colonies on earth, are inadequately protected. The islands in the Hawaiian Islands National Wildlife Refuge also provide the only breeding habitat for the endangered Hawaiian monk seal and important nesting habitat for the threatened green sea turtle.

The Northwestern Hawaiian Islands have been protected in the past primarily by their remoteness. However, both historically and in recent years fishing activities have adversely affected seabirds, seals, and other living resources. For example, NOAA is currently considering a prohibition of longline fishing within 50 nautical miles of certain Northwestern Hawaiian Islands (56 Federal Register 37070 (1991)). Deep sea mining and ocean thermal energy conversion (OTEC) activities in the Hawaiian region are possible industrial uses of the ocean that could affect the natural resources of those islands. Marine sanctuary status could enable additional enforcement activities in those remote waters and could garner funds for conservation-oriented research. Accordingly, we urge NOAA to include waters next to the Hawaiian Islands National Wildlife Refuge in its study.

2. Northern Coast of Kauai

PSG suggests that NOAA consider the waters offshore the Northern coast of Kauai, from the Kilauea Point National Wildlife Refuge (Mokolea Point) to Makaha Point, including the Na Pali coastline, for a marine sanctuary. PSG recently supported the expansion of the Kilauea Point National Wildlife Refuge to include additional lands. Kilauea Point has the largest colony of seabirds in the main Hawaiian Islands, including a growing colony of Laysan Albatrosses [the only readily-accessible breeding site of albatrosses in the Northern Hemisphere], wedge-tailed shearwaters, red- and white-tailed tropicbirds and red-footed boobies. The refuge was host to up to 500,000 visitors in a single year, providing an important education function for the entire state of Hawaii.

Designating the waters offshore the refuge would improve the regulatory protection for this important area. Besides seabirds, those waters also provide habitat for green sea turtles, dolphins, and occasionally monk seals. The cliffs along the Na Pali coast contain many small nesting colonies of black noddies, tropicbirds and possibly brown boobies. Resource conflicts in the waters off north Kauai have increased in recent years in part because of the expansion of boat tours along the Na Pali coast. Sanctuary status should enable the hiring of a permanent enforcement officer for this area. It also might be possible to establish a marine education center together with the Kilauea Point National Wildlife Refuge.

In conclusion, PSG urges that NOAA analyze the waters surrounding the Hawaiian Islands National Wildlife Refuge and the waters along the northern coast of Kauai in its planning process for new marine sanctuaries in Hawaii.

Sincerely,

Arthur Sowers, cm

Arthur Sowers
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References

Fefer, S.I. et al. 1984. Synopsis of Results of Recent Seabird Research Conducted in the Northwestern Hawaiian Islands. In: Griggs and Tanoue, eds., Resources Investigations in the Northwestern Hawaiian Islands, Volume 1, University of Hawaii Sea Grant College Program.

Harrison, C.S. 1985. A marine sanctuary in the Northwestern Hawaiian Islands: An idea whose time has come. Natural Resources Journal 25:317-47.