

Comments on the Draft Management Plan for the Papahānaumokuākea Marine National Monument

KAHEA: The Hawaiian-Environmental Alliance	National Wildlife Federation
Sierra Club-Hawai'i Chapter	Center for Biological Diversity
`ilio`ulaokalani Coalition	Seaflow
Conservation Council of Hawai'i	Ocean Conservation Research
Malama Kaua'i	Animal Welfare Institute
Snorkel Bob Foundation	Acoustic Ecology Institute
Hawaii Health Guide	Professor Jon VanDyke
Hawaii Healing Garden	Representative Maile Shimabukuro

Mahalo for this opportunity to comment on the Draft Monument Management Plan (DMMP) for the Papahānaumokuākea Marine National Monument ("Monument"). The following is a letter from organizations representing well over **5 million people** around the world. Together, we stand in full support of the Monument and call upon the managers to **uphold conservation as the primary purpose of management in the Monument.**

Where most marine protected areas in the world are managed based on a need to balance and manage multiple human uses of the ecosystem--primarily fishing--the Northwestern Hawaiian Islands is a no-take reserve in which human impacts are to be strictly limited. This is inherent in the "do no harm standard" of the State Refuge, the precautionary approach to all management decisions, and the strict, limited-entry permitting system. Indeed, the Papahānaumokuākea Marine National Monument Proclamation and the Hawai'i State NWHI Refuge constitute perhaps the most visionary legal marine area protections in history. This is an unprecedented opportunity to truly protect one of the last intact, predator-dominated coral reef ecosystems on earth.

As currently drafted, however, the fifteen-year DMMP falls short of what is needed to adequately uphold the conservation mandate of the Monument Proclamation and the State Refuge Regulations.

Together, we recommend adopting the following three changes to the DMMP:

1. Protect Monument resources from the harms of human activity in the following ways:

- a. Assess the risk and cumulative impact of all human activities affecting the region, including global warming. The current environmental assessment fails to adequately review the past, present, and likely future impacts of the human presence in the Monument. This information is crucial for proper management and should serve as the basis for numerical carrying capacity.
- b. Require mitigations on military activities affecting Monument resources. The U.S. Navy proposes to expand its activities in and around the Monument, including ballistic missile tests, chemical warfare exercises, and high-intensity active sonar. Uphold Monument regulations requiring the Navy to minimize and mitigate the harm of its activities.

c. Strictly limit tourism activities in the Monument. To ensure the human footprint in the Monument is not deepened, set a maximum limit on the number of tourists visiting Midway based on current tourism levels.

d. Prioritize conservation-based science needs to ensure the management needs of the Monument are met. This means restricting permitted activities to those absolutely necessary for protecting endangered and threatened species and their habitats. This must include re-instating the ban on bioprospecting.

2. **Establish a public Monument Advisory Council (“MAC”)**, which – like the original Reserve Advisory Council – would operate under sunshine laws, and include Native Hawaiians, representatives of the conservation community, independent scientists, and independent educators as voting members with the authority to review all management decisions, including issuance of permits. Additionally, we urge the placement of at least two members of the MAC on the Monument Management Board, which currently makes all management decisions without public oversight.

3. **Empower Native Hawaiian decision-making by integrating Native Hawaiian cultural knowledge of indigenous traditions and ecosystem management into the larger management scheme.** For example, the Native Hawaiian Cultural Resources Working Group must have the authority to review any management decisions. Without meaningful participation of cultural practitioners in management and adequate funding, resources, and commitment to empowering Native Hawaiian decision-making, the ideas contained within the DMMP are simply empty promises. Currently, eleven times more funding is proposed in the DMMP for scientific research than for activities related to cultural perpetuation, this is unacceptable.

Finally, the DMMP would greatly benefit from the expertise and unique perspective of a thorough public review. Therefore, we request an extension of the public comment period. The DMMP includes several major documents, including 22 action plans, ## compatibility reviews, an Environmental Assessment, a Cultural Impact Statement, the Draft Midway Visitor Services Plan, and a Conceptual Site Plan for the development of Midway. These documents, totalling 1,200 pages in length, were developed over a 2-year process by the Co-Trustees without the benefits of public participation. Adequate review and effective comments cannot be achieved in only 75 days. The low attendance at the recent public hearings in Hawai’i and Washington D.C. is an indication that the community is not yet sufficiently engaged in this crucial decision-making process.

On behalf of the above organizations, thank you for your consideration in reviewing our recommendations, we look forward to continued collaboration in protecting this special place.

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