

**KAHEA: The Hawaiian-Environmental Alliance · Sierra Club – Hawai'i Chapter ·
'Ilio'ulaokalani Coalition · National Wildlife Federation · Conservation Council of Hawai'i ·
Ocean Mammal Institute · Animal Welfare Institute · Save Our Seas · Lost Fish Coalition ·
Life of the Land · Seaflow · Malama Kaua'i**

**Letter In Support of
Responsible Science in the Northwestern Hawaiian Islands**

November 30, 2007

Aloha federal and state Co-Trustees,

Mahalo for the opportunity to comment on the development of a framework for the Natural Resources Science Plan for the Papahānaumokāūkea Marine Monument. After seven years of consistent public participation, the effort to fully protect the Northwestern Hawaiian Islands is beginning to come full circle. The NWHI *hui* is looking forward to working with the Co-trustees to develop the plans and protocols needed to implement the conservation mandates of the State Refuge and federal Monument.

Good conservation decisions require good conservation science. Responsible science addresses the conservation-needs of the resource, embraces strict 'best practices' protocols, and promotes transparent decision-making about the protection of public trust resources. Successful protection of the NWHI needs scientific investigation focused on addressing the threats to this imperiled marine ecosystem and committed to upholding the highest standards of responsible scientific practice and principles.

While responsible science perpetuates the protection of this public trust resource, poorly conducted research poses serious risks to the welfare of the NWHI and ultimately undermines the conservation goals of the federal Monument and the State Refuge. It is imperative that the priorities in the Natural Resources Science Plan reflect this reality. Responsible science enforces strict best practices protocols and imposes stiff penalties for violations; responsible science embraces transparent permitting and reporting procedures, including meaningful public comment on all permit applications; responsible science seeks to minimize harm to delicate resources by restricting projects to only the most pressing questions and conducting studies in more robust environments whenever possible.

In particular, bioprospecting serves little or no conservation value, appropriates Native Hawaiian resources, and contradicts the spirit of protection in which both the Monument and

the Refuge were created. Bioprospecting should therefore be precluded from the Monument's Natural Resources Science Plan.

As early as 2003, scientists agreed that human activity in the NWHI is a significant, but easily controlled threat to the overall health of this rare coral reef ecosystem. Degradation of the ecosystem by irresponsible research jeopardizes the future scientific value of the NWHI and the overall goal of setting this incredibly special place aside to flourish without human intrusion. Ultimately, high-risk, high-impact science projects could destroy the ability of the NWHI to contribute to the restoration of the world's coral reef ecosystems.

In 2004 at the height of the struggle to halt the devastation caused by commercial extraction efforts in the NWHI, 400 scientists signed a letter urging “responsible agencies with jurisdictions or interests in the NWHI to implement all necessary actions to ensure that existing conservation measures further strengthened and fully enforced, rather than weakened.” “Decision-making,” they stated, “must be based on a precautionary approach with resource protection favored when there is a lack of information.”

We join them in this statement, and urge the Monument and State Refuge Co-Trustees to ensure the strongest possible protections for the NWHI by ensuring the NWHI Natural Resources Science Plan defines the limited scope of research necessary to address the threats to this ecosystem and the strict compliance protocols to minimize the risks inherent to human activity in this remote region.

Mahalo,

A handwritten signature in cursive script that reads "Marti Townsend".

Marti Townsend

Program Director

KAHEA: The Hawaiian-Environmental Alliance

On behalf of the above listed organizations