

NORTHWESTERN HAWAIIAN ISLANDS CORAL REEF ECOSYSTEM RESERVE  
**RESERVE ADVISORY COUNCIL**

**Non-Government (Voting)** July 12, 2016

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*State of Hawai'i*

Linda Paul (Vice Chair)  
*Conservation*

Kem Lowry (Secretary)  
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*Native Hawaiian Elder*

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*Research*

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*Ocean-Related Tourism*

Don Schug  
*Research*

Laura Thompson  
*Conservation*

Jessica Wooley  
*Conservation*

John Armor, Acting Director  
Office of National Marine Sanctuaries  
1305 East-West Highway, 11th Floor  
Silver Spring, MD 20910

c/o Athline Clark, Superintendent  
Papahānaumokuākea Marine National Monument  
NOAA/DKIRC  
NOS/ONMS/PMNM  
1845 Wasp Boulevard, Building 176  
Honolulu, HI 96818

Aloha mai Acting Director Armor,

Subject: Support for the Expansion of Papahānaumokuākea Marine National Monument

The Northwestern Hawaiian Islands (NWHI) Coral Reef Ecosystem Reserve Advisory Council (RAC) supports the expansion of Papahānaumokuākea Marine National Monument (PMNM or Monument). The islands and atolls of the NWHI and the waters surrounding them abound with natural and cultural resources found nowhere else on earth. It is home to millions of seabirds, dozens of endemic marine species, and the critically endangered Hawaiian monk seal. The NWHI also are of immense spiritual and cultural importance to Native Hawaiians.

On August 15, 2014, the RAC submitted public comment supporting the expansion of the marine protected area around the Pacific Remote Islands Marine National Monument (PRIMNM). We also recommended the limited expansion of PMNM at its northern and southern boundaries.

On January 29, 2016, several prominent Native Hawaiians collectively sent a letter to President Obama recommending the broader expansion of PMNM's protections to the limit of the 200-nautical miles Exclusive Economic Zone (EEZ). Several of those individuals are on the NWHI Native Hawaiian Cultural Working Group (CWG), a volunteer group which is facilitated by the Office of Hawaiian Affairs (OHA). The CWG met on March 26, 2016, and affirmed its support of the January 29, 2016, proposal to expand the Monument, with the exception of the southern boundary near the islands of Ni'ihau and Kaua'i. They also proposed that the OHA be designated as a fourth Co-Trustee of the Monument. The main points of this meeting were captured in an April 5, 2016, letter to Christy Goldfuss, Managing Director of the White House Council on

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Athline Clark  
*Papahānaumokuākea MNM*

Malia Chow  
*HIHW National Marine Sanctuary*

David W. Laist  
*Marine Mammal Commission*

Michael Lesser  
*National Science Foundation*

Eric Roberts  
*U.S. Coast Guard*

Janice Fukawa  
*U.S. Department of Defense*

Kitty Simonds  
*WESPAC*

Barry Stieglitz  
*U.S. Fish and Wildlife Service*

Samantha Brooke  
*NOAA Fisheries PIRO*

Environmental Quality (CEQ), inviting the CEQ to come to Hawai‘i to discuss the expansion proposal with local stakeholders. In addition, the OHA Board of Trustees voted on May 29, 2016, to support the proposed expansion, provided that the OHA is designated as a fourth Co-Trustee, the cultural significance of the expansion area to Native Hawaiians is recognized, and there is no boundary expansion southeast toward the islands of Ni‘ihau and Kaua‘i.

During its May 12, 2016, meeting, the RAC discussed a number of issues regarding the potential expansion of PMNM, primarily based on the January 29, 2016, and April 5, 2016, letters sent to President Obama and Director Goldfuss, respectively.

At its June 8, 2016, meeting, the RAC continued its discussion of, and then voted on, several issues regarding the potential expansion of PMNM. While not all the position votes were unanimous, they all achieved a clear majority, and this letter fairly and accurately represents the position of the RAC.

The RAC recommends expanding the boundary of PMNM out to the 200-mile EEZ limit, with the CWG’s recommended exception at the southeast boundary (crossing Middle Bank), which should remain as it currently exists. While the RAC originally recommended including Middle Bank as part of an expanded PMNM in our August 15, 2014, public comment supporting the PRIMNM expansion, we recognize that some compromise may be necessary. The RAC’s latest recommendation regarding the southeast boundary is based on a desire to support and recognize the strong position taken by many Native Hawaiians who spoke or submitted testimony at our meetings. The RAC, however, does recommend that the Monument, in partnership with other appropriate agencies, direct research resources to document the possible effects of fishing on the Middle Bank ecosystem.

The expansion of the Monument should include a concurrent expansion of the NWHI Coral Reef Ecosystem Reserve boundaries. No prohibitions or regulations within the current Monument boundary should be diminished or eliminated in any expansion process. In addition, the RAC firmly believes that NOAA’s Office of National Marine Sanctuaries is the appropriate lead federal agency to manage the current and expanded marine protected areas in the Northwestern Hawaiian Islands.

Monument managing agencies and those agencies with enforcement authority within the Monument should be allocated additional management and enforcement resources to accommodate the larger protected area. The RAC also supports designation of the OHA as the fourth Co-Trustee to provide Native Hawaiians an equitable voice in managing this most precious of places.

The letters to President Obama and Director Goldfuss may imply that the expansion of the Monument would entail an expansion of all current Monument prohibitions and regulations to the revised outer boundary. The RAC recommends some accommodation for the discharge of treated vessel wastewater in the area between the current 50-mile and the revised outer boundary; otherwise, it would be difficult, if not impossible, for all but the largest vessels to operate near the islands and atolls. In addition, because of the number of unresolved issues regarding fisheries, we look forward to providing fisheries recommendations for the expanded area at a future date.

The RAC realizes there are opponents to any proposed expansion of PMNM. At our May 12, 2016, and June 8, 2016, meetings, we heard comments from members of the public who strongly support or strongly oppose the proposed expansion. Weighing all the input we received from the public as well as the voluminous materials provided by various agencies and organizations, we firmly believe that Monument expansion is both appropriate and desirable. In expanding the Monument, President Obama has the opportunity to establish a legacy of environmental conservation by creating the largest marine protected area in the world, and protecting the NWHI's natural and cultural resources for future generations. Mahalo for this opportunity to provide our input. The Council respectfully requests that this letter be forwarded on to the Secretary of Commerce, and President Obama as appropriate.

Sincerely,



Timothy E. Johns  
Chair, Reserve Advisory Council