

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

10 February 2012

Ms. T. `Aulani Wilhelm  
NOAA Superintendent  
Papahānaumokuākea Marine National Monument and World Heritage Site  
6600 Kalanianaʻole Highway, Suite 300  
Honolulu, HI 96825

Dear Ms. Wilhelm,

The Northwestern Hawaiian Islands Reserve Advisory Council (RAC) submits the following comments as our initial feedback on the United States Fish & Wildlife Service (FWS) Hawaiian & Pacific Islands National Wildlife Refuge Complex proposed Wilderness Review (WR) and Legislative Environmental Impact Statement (LEIS) regarding proposed Wilderness Designations in the Northwestern Hawaiian Islands (NWHI).

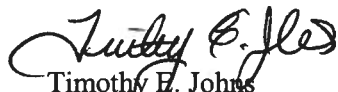
These comments are initial because the RAC has not been formally briefed on this initiative, its potential impacts on the natural and cultural resources of Papahānaumokuākea Marine National Monument and World Heritage site, or its impacts on the constituencies the RAC represents. Had it not been for the brief mention of the WR during FWS's agency report at the recent advisory council meeting on February 9, the RAC would have learned of the WR only after the initial deadline for submission of comments had passed. Advisory Councils were established because both Congress and the Executive Branch realized the necessity of public participation in resource conservation and management. It is regrettable that the RAC, the only federally sanctioned consensus advisory body to any of the three Co-Trustees responsible for managing the Monument, was not notified of this initiative prior to the comment period, nor provided any information with which to analyze the impacts of Wilderness designation. This oversight violates the touchstones of cooperative management clearly outlined in Presidential Proclamation 8031, the Monument regulations, and the Memorandum of Agreement (MOA) that governs the Co-Trustee arrangement and outlines the Monument's guiding principles.

In order to make a well informed, well thought out recommendation on the WR, we request that the RAC be provided a comprehensive briefing on the WR and Wilderness designation LEIS process, rationale, and impacts as soon as possible.

While the RAC will refrain from making assumptions about Wilderness designation in advance of an informational briefing, please be aware that the RAC cannot support any initiative that, either whole or in part, is inconsistent with the strict and cooperative resource protections already provided by Monument designation, existing regulations and the current management regime.

The RAC looks forward to hearing from you and to the WR briefing.

Sincerely,



Timothy E. Johns  
Advisory Council Chair,  
Northwestern Hawaiian Islands  
Coral Reef Ecosystem Reserve