

HI OPEN HOUSE



### PUBLIC COMMENT FORM Pacific Marine Conservation Assessment

Name: Ellen Tong

Representing: Individual or the Audubon Society

#### COMMENTS

I have been to ~~many~~ Johnson Atoll and wondered how this gorgeous resource could be protected from the plunder of foreign fishing fleets. Establishing protections now is critical for this, Rose, and others. I worry that there will be fluctuating enforcement but modern technologies like GPS and satellite monitoring.

Protection of Shark spawning aggregations from Foreign Sharkfinners needs to happen on Johnson, Rose, and others. Deep water corals 300+m needs to happen. <sup>Prohibit</sup> no harvest from the precious coral trade or trawling.

- Options for submitting this form:
- 1) Drop off at open house
  - 2) Fax to: 1-202-456-6546
  - 3) Mail to (note that delays of 2-3 weeks possible):  
Assessment c/o Council on Environmental Quality  
722 Jackson Place  
Washington, D.C., 20503
  - 4) You can also submit comments via email to [oceans@ceq.eop.gov](mailto:oceans@ceq.eop.gov)

Additional information can be found at <http://ocean.ceq.gov/>

Cautious monitoring and Scientific research can happen; but the resource needs to come first.

\*\*\*ALL COMMENTS MUST BE RECEIVED BY OCTOBER 26, 2008\*\*\*



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## PUBLIC COMMENT FORM Pacific Marine Conservation Assessment

Name: Makaala Kaamoana

Representing: Hanalei Watershed Hui

### COMMENTS

We support protection of the whole  
area including the entire Mariana  
Trench.

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## Reasons I support the Mariana Trench Monument:

*Mariana Trench Name  
National Monument*

- ✓ Our Constitution already supports conservation
- ✓ World Class monument that will put CNMI on the map
- ✓ Local pride
- ✓ Improve federal relations
- ✓ Co-management of waters
- ✓ A remarkable opportunity to protect every link in our fragile marine environment
- ✓ CNMI will become a world leader in ocean conservation and marine education
- ✓ The college will benefit from visiting scientists, creating a unique opportunity for our youth
- ✓ Local college students could assist - as well as lead - internationally significant research projects
- ✓ Create a protected nursery for marine life
- ✓ Help replenish our fisheries
- ✓ An outdoor laboratory for international ocean research
- ✓ New way of thinking about ocean conservation
- ✓ Safe haven for unique species
- ✓ Make CNMI a leader in the Micronesia Challenge
- ✓ Our people and our local culture support conservation
- ✓ Saipan will receive a much needed economic boost via high end tourism and visiting researchers
- ✓ Great international media exposure for CNMI
- ✓ A world class icon in our own backyard
- ✓ Federally funded jobs
- ✓ Great for local businesses
- ✓ Visitor center on island will attract tourists
- ✓ A monumental legacy for our children

**Marine Conservation Areas Open House  
Honolulu, HI Meeting  
October 16, 2008  
Compilation of Verbal Public Comments**

**Facilitated Group Summaries and Key Points:**

- Principle goal should be ocean conservation
- All areas should be protected: limit the number of divers, limit access to the line islands, mixed use zoning in the trench, and a core reserve area that is no use
- Retain cultural practices in the area
- Should prohibit commercial fishing, mining, biomedical prospecting. Research should be allowed, but at a much high standard to protect environment
- Military imperatives are not infringed upon
- It's ALL connected, both in biology & cultural realms, guided by cultural protocol
- Opportunity for indigenous culture to lead heritage
- Opportunity for education, which could lead to best management practices through coordinated management
- Additional protections should be provided for these areas
- There should be a strong protective mission statement
- Concerns about agency coordination for management – need to designate a lead agency
- Primary purpose of monument should be ecosystem protection
- Risk assessments should be conducted for all activities
- Stringent, transparent, and efficient permitting needed
- No commercial exploitation should be allowed
- Concerns that recognition will create problems – if people know about the areas, they will want to exploit them
- Need strong enforcement
- Research and education can be seen as the second purpose of the monument, or it can be seen as a potential threats
- Adequate funding needed
- No Department of Defense missions should be allowed
- Ensure there is adequate on-site or remote surveillance and enforcement for the selected protected areas. Without these, all uninhabited areas are vulnerable to unauthorized access and exploitation
- Must have sufficient funding and resources to prevent the areas from being another “paper park.” The funds need to trickle down to the on-site managers
- Avoid the complex management scheme as presently accomplished in the Papahānaumokuākea Marine National Monument (PMNM). Instead, keep management under the control of the FWS for the seven NWR and extend its management to Wake and the offshore areas at Johnston NWR
- Establish the strongest possible management regime: limited access, no extraction or exploitation, and include permitting procedures for scientists and others needing or wanting to visit these areas

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- Establish offshore boundaries that are as large as possible, but also within an area that can be effectively managed by the custodians. Some advocate establishing the boundaries at 200 miles from land, or the entire EEZ for each site
- Define pelagic areas to include all offshore waters down to the seafloor within the established boundaries
- Include geological features and oceanic processes of high interest and educational value, along with biological, ecological and historic and cultural components. Some of the group suggested making boundaries that included the entire length of the Marianas Trench
- Given the severe planning constraints over the next three months, define clear policies, goals, possible funding sources and procedures for future planning that will be followed to implement the chosen initiative after Bush leaves office
- Under these constraints it may be best to leave chief management responsibilities with the USFWS rather than transfer these to another “lead” agency that would require them “reinventing the wheel”. Obviously other agencies (USCG, NOAA, USGS, DOD) will have responsibilities but it should be hierarchical, with the FWS responsible for directing overall management. FWS already has Refuges laws, policies and comprehensive conservation plans in place or being established for seven of the eight central Pacific areas. Don’t supersede existing administration
- The greatest threats to these areas are commercial and extractive uses and human presence. As such, management should be placed within an agency that does not promote or advocate these conflicting activities and policies
- Determine a safe distance from island to fish: 12-20 miles out should be sufficient to avoid negative impacts to near shore ecosystem
- Need Adequate Planning Horizon (>5 years planning): i.e. Northwest Hawaiian Islands (NWHI) planning for sanctuary turned into monument management plan
- Need to assess present and past protection and enforcement regimes
- Cultural, archeological and historical significance/protections should be considered – use the NWHI as a model
- Science and monitoring must be allowed to continue in marine protected area. Science should be management based, increased enforcement is needed (especially for non-US activities), need to get foreign vessels to use VMS, need more cooperation between US and foreign nations
- Lessons should be learned from the development of NWHI Monument: heightened awareness from protection is inviting to more people (i.e. history/significance of nuclear contamination to these areas)
- Need for agency or institutional expertise to take lead on protecting areas. Expert panels/work groups (scientific, policy and management). Agency specific issues need to be addressed

### **Historic and Scientific Interest**

*Questions for discussion: Are there specific areas, living marine resources, cultural or historical resources, or artifacts of scientific or historic interest? For example: items or areas of interest related to World War II; areas important to telling the culture or history of the Pacific Islands; unique or special areas, ecosystems or living or non-living marine resources.*

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- Very concerned about these last areas of pristine coral coverage, predator ecosystems, pelagic ecosystems, large marine mammals, monk seals, seabirds, and sea turtles
- Nesting/breeding beaches must be protected, especially for endemic/endangered species
- Kingman and Palmyra are particularly important for coral coverage
- The equatorial reef ecosystems must be protected
- Management policies must consider the interconnectedness of the Pacific reefs
- Reef management should be weighted heavily over pelagic management
- More research is needed to determine how these reef systems are connected, especially Johnston Atoll, which seems to be a biological stepping stone between vast ocean distances
- The Mariana deep trench is unique and the whole area needs protection (other-worldly, like another planet)
- There are biomedical prospects in these areas due to different species, extreme conditions (cold/hot/high pressures), and biosynthetic pathways
- Evaluations of resources in deep waters should be conducted
- These are unique areas. Rose Atoll is small, Mariana Trench is deep
- Incredible variety of natural and cultural resources
- Immense cultural and scientific interest
- All reefs support predator dominated ecosystems
- All reefs are almost in a pristine state
- Importance of near shore ecologies probably more important than whole 200 mile EEZ
- Isolated islands/areas take a much longer time to recover, they are very fragile areas
- The Marianas' protection needs to go down further
- Palmyra and Kingman have upper trophic levels with apex production similar to NWHI
- Johnston atoll could be gateway for species according to recent studies
- Need for clean up of former military site/storage
- Concerns about ocean: 35% of ocean is severely impacted. Under the principle of conservation you should protect as much diversity as possible when faced with climate change
- Because these are some of the most pristine atolls in the world, conservation & protection is imperative
- These areas have been left alone and have unique ecosystems and areas for apex predators
- There must be a pristine baseline measured for comparison after management strategies have been applied
- People of the area must be included in area use
- Federal agencies must not over manage these areas and must work with local people to determine the compatibility of possible activities
- Access must be maintained for approved scientific research of all types
- There are both cultural and biological aspects of connection between islands. Language is a cultural connection between the areas. Cultural and natural aspects are inherently linked
- Scientific interests should be maintained in the monument only if compatible with conservation
- Minimal impacts should be allowed due to research. But these should be determined by risk assessments
- Research should be non-impacting and maintain natural status
- Research vessels should be held to stringent standards, including no discharge
- Research should be done on endemics found in monument
- Need to understand more about genetic mapping and dispersal ( i.e. Johnston Atoll)

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- Johnston Atoll is a genetic pool for organisms migrating to Hawaii and other places. What are the ecosystem impacts of nuclear tests on these islands? Need to understand effects of poisons, wastes, nuclear contaminants. Impacts on local and global ecosystems. See recently published (2005) paper from University of Hawaii and pay attention to research published in Conservation Forums. Data obtained should be used in management
- There needs to be equal considerations between historical, scientific, and cultural values
- Endangered species and habitats should be promoted

### **Recognition**

*Questions for discussion: Should these places be given national recognition. For example: items of interest to the nation; opportunities for education and research; highlight for tourism.*

- The volcanic area of the Marianas Trench should be identified
- Special recognition is needed for Mariana Trench, as well as educational programs to inform people about its uniqueness
- Protect the entire Mariana Trench as a unique earth feature
- Visitation to monuments should be limited, minimal, and purposeful. No tourism should be allowed. Limited science and education is OK
- The monument is nice model for how studies (film below and above water) can be done, but NOT feasible for tourism
- Ecotourism means economic benefits
- Monument designation can serve as non-human “control” (compare point) for megafauna
- Protection of Oceania is vital, recognition of all sites is appropriate
- Protection raises the profile of the sites and draws attention to threats we don’t know about
- Protections should be put in place in protection before mining or commercial interests do something
- Designation continues the chain part of PMNM
- Movies and videos can bring the place to the people, not the people to the place, but must be used for positive change, used to encourage rehabilitation of our own local environments, oceans
- The allowed level of visitation is critical. This applies to scientists as well. Efficiency of platforms is needed to minimize impacts
- Research opportunities – more pristine opportunities for researchers
- Opportunities for education are great
- There should be reasonable limited access that is done by the managing body
- Research should be restricted to that needed to properly manage the areas
- Bring the place to the people, not the people to the place. Tourists can cause too much damage
- Core message should be to bring the place to people not people to the place (this message should be used in all publicity materials)
- The term “Monument” seems to be confusing for some people, so perhaps there is better terminology to describe these areas, e.g. “sanctuary, refuge, etc”
- Any human presence will cause disturbance, so it must be minimized
- No unilateral designation. Take into account local differences/uses
- Respect sovereignty of local island governments

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- There must be consideration of native people's traditional uses
- Concern that science is coming first over culture. It removes cultural values for future generations. Knowledge is equal to practice - not statistics and lab research. There is an opportunity in this case for culture to lead the science. Science can be aligned with the culture, rather than one dominating the other
- The NWHI already has many impacts, including for biology and culture
- Opportunity for appropriate enforcement of regulations
- Take care over how the areas are governed
- A National Monument is the highest level of protection
- National recognitions should be given as long as the most stringent overlapping conservation applies
- Deep concern that the increased recognition will lead to an increase in resource damage from tourism, fishing, research
- No World Heritage Designation – it brings more tourism demands on area
- Provide scientific information to the world

### **Coordinated management**

*Questions for discussion: Would the areas benefit from improved management? For example: could there be better coordination among federal agencies, or better local-federal coordination? How? Why?*

- Preference for management by Department of Interior
- Department of Commerce oversight is inconsistent with the mission of protection
- USFWS should take the lead in management, especially over land and near shore areas
- Make these atolls and islands into standardized marine refuges under control of USFWS
- Fisheries (Department of Commerce) impose contradictory mission statement
- Management should not fall under Homeland Security
- USFWS should be the sole management agency because: field camp and remote island experience; has 'Wildlife First' as a mandate
- Prefers conservation leadership to be DOI working with Territorial Government in American Samoa
- Keep FWS management of the NWRs intact, rather than DOC, and keep management simple
- NOAA should have some jurisdiction over resources surrounding islands and atolls as have more expertise in marine conservation and scientific research
- NOAA should maintain its jurisdiction
- Tripartite agency management (example is PMNM) is difficult
- Review the NWHI management model for effectiveness
- Better agency cooperation is needed. There is a perception of squabbling between agencies
- If areas are designated, real thought should go towards agencies doing what they are good at. There should be no competing, and we should have good management. Zones and refuges can be set up.
- Leadership needs to know the mission in order to define roles
- Funding is necessary to facilitate coordination

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- Need management coordination and combined efforts amongst various agencies. Funding for specific projects should be organized.
- On-site management/enforcement may be needed in certain areas
  - Impacts (+/-) of management teams must be considered as well. Field teams should use low impact strategies, and assessment of impacts needs to be publicly available
  - Management must be specific to area being managed
  - Management will largely be dictated by the threats to these sites
  - Management should vary with distance from protected island/atoll
  - Seasonal and spatial variability should be considered when managing areas - there must be fact based management
- All stakeholders must be involved in policy and oversight. Not necessarily day to day operations
- There should be a hybridized version of interested groups, such as Friends groups and Marine Fish Conservation Network Member Groups
- Management hierarchy should be: (1) resources; (2) cultural; (3) recreation; (4) commercial activities
- More data is needed. Agencies should do additional assessments
- Need to provide adequate funding for marine debris, monitoring poaching, habitat restoration
- Adequate funding must be available for enforcement and preservation and scientific research and conservation
- If funds are limited, then concentrate more effort on sites that are both vulnerable and more important
- Funding should go to agencies managing. One option would be a tiered organization with funding flowing through USFWS to other agencies
- Without funds the proposal is another paper park/sanctuary
- How can money and resources be piped more directly to those who need them?
- Money is essential, no matter what the final designation will be
- Money needed for ships and other infrastructure
- Increase the number of enforcement patrols
- Enforcement is essential- otherwise it is a paper park
- Enforcement needs to be fully funded with a significant penalty schedule. There should be an enforcement officer on-board all vessels
- Remote surveillance and enforcement options: USCG patrols and satellite surveillance; USCG needs to be more involved and active; establish permanent satellite “eyes” trained on these reefs; acoustic surveillance, especially where boats are likely to anchor; need to respond quickly to intrusions; more distant offshore boundaries buy time for enforcement
- The review process for planning, permitting, science, etc needs to be a public process, with public input
- Fully transparent permitting is needed. One person wanted public comment on all permits, but there were questions from several people as to who is the ‘public’ for the PRIAs
- Establish a committee for permits. Committee should be composed of independent scientists to avoid conflict of interest, cultural practitioners where applicable, agency scientists, and conservation advocates. The committee should have a strong mission statement to guide area use, allowable permits, management, and promote big picture thinking
- Culturally led management and local management are the way things will get done

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- People don't have to be living on these places to have appropriate culture
- Protocol/tradition/connection to land cultural protocol is the only way management will work. It is the first step. There is an education aspect, folding generations into connection to place.
- State support and buy in are vital
- Need to somehow fuse the expertise found in the different agencies to manage ecosystems
- Wildlife Managers should raise concerns about Department of Defense operations that would impact area without fear of repercussions
- Rose Atoll NWR has a problem of people fishing there without permission
- Tongans are the biggest threats to Samoan reefs including Rose Atoll
- Coordinated risk assessments should occur
- There should be coordinated biohazard protocols
- State-of-the-art vessels for enforcement
- On Johnston Atoll there are contaminated areas that need to be controlled. The plutonium landfill cap is maintained by Department of Defense. There should be a full and permanent cleanup by Defense
- Most of these areas are remote enough to protect themselves
- Don't follow the NWHI Monument route unless there is money and resources for management and enforcement
- PMNM had the advantage of a longer drawn-out planning process during the proposed National Marine Sanctuary phase, which is absent for the present proposal
- Consider the same offshore boundaries as at PMNM or 50 nm offshore
- Night diving and free diving is pursued to avoid enforcement and penalties
- Forbid the sale of any reef fish at populated locales near the proposed reefs
- Special attention should be given to spawning aggregations and dispersal rates.
- Apex predator populations should be considered (shark populations)
- When considering fishing practices, management measures should include: depth limits to avoid fragile ecosystems; and distance from island limits (fishing should be conducted outside 10-12 miles from managed area)
- There should be 'brightline' limitations – or clear boundaries that are unmistakable
- Boundaries must be unique to managed area considerate of multiple resource uses
- All vessels, US and international, need to incorporate VMS tracking for enforcement
- Must protect Biomass, biodiversity, reefs, terrestrial life (i.e. birds)
- Historical importance less important maintaining biodiversity
- Need far reaching documentary to educate non-users (i.e. like Cousteau's *Voyage to Kure* and it's significance to the NWHI Monument)
- Highlight marine life uniqueness of each area through outreach tools
- Minimize impacts of landing on islands/visitors/scientists/workers/etc: do field teams really need to be there?; conduct threat assessments; select agency most qualified to manage what needs to be managed
- Consider Marine Debris issues (i.e. NWHI and fishing gear waste on beaches) - must account for oceanographic properties/marine debris flows

### **Strategic Implications**

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*Questions for discussion: The President directed in his letter that any measures this assessment recommends needs to consider several strategic issues. Please comment on the strategic implications regarding the following activities: continued ability to carry out the military mission; compatibility with recreational and commercial fishing; compatibility with energy and mineral resources, opportunities for scientific study.*

- Sonar testing has impacts, therefore “no restrictions” policy is ludicrous. Some restrictions of DoD are needed for maintaining integrity of ecosystem
- Military activities are not compatible
- What is the “military mission”?
- Military won’t care
- Military will/can help with education (fly there, ship, etc...)
- Military - keep Wake, trade concessions, financial support
- There must be documentation of current uses, military and non-military
- The US made an agreement with Japan regarding military relocation to Guam. They need training facility
- 8,000 Marines from Okinawa will be training in area, but Presidents memo said “do not conflict w/ military missions.” This is a conflict with environmental concerns – dissonance near to Saipan?
- Will it allow for a continued ability to carry out military missions?
- Protected areas should not have military exceptions (no military/DOD activity)
- US military leases island (Guarapou) for military training. The islands are no longer needed as “pit stops”
- Military ops, mining and industry at the islands are not compatible with the higher purposes of these areas as being fully protected
- Concern over previous military actions that generated waste that has not been cleaned up and which still poses a threat to islands, reefs and pelagic areas
- Full protection means no commercial extraction, no fishing drilling or mining
- No mining or drilling extraction should be allowed
- Mining could occur for limestone, sand, gravel, and polymetallic minerals
- It is easy to extract minerals that are in demand – a refuge should be created against commercial ventures (fishing & mining material)
- Access to the offshore pelagic zones will be easier compared to landing on the islands
- Cultural plan, commercially managed would be potentially better than current scheme
- These places likely have no/limited natural oil/gas/etc. resources
- If areas are set up for conservation, mining and drilling are not compatible with designation
- Commercial fishing is not likely if cultural management angle is employed
- Commercial fishing negatively impacted the environment of the NWHI
- Devastating effects of commercial fishing
- No commercial fishing. Leave the areas alone, because fishermen take the big fish out of the population
- Fishing hasn’t changed the age structure of the fish
- Purse seiners wipe out all fisheries they exploit as well as non-targeted species and must be banned from the proposed areas

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- Purse seiners pollute the ocean, dumping fuel to accommodate increased landings; purse seining is a non-sustainable fishing practice; purse seiners place buoys out in mid ocean areas to facilitate fish aggregations and then return to wipe them out
- Most vessels fishing near these remote island areas are self sufficient and practice reef avoidance awareness (i.e. they don't want to get stuck on a reef or lose their gear)
- The fish at Johnston Atoll are not "protected" and fish stocks have been reported at lower levels due to higher fishing pressure and the lack of an offshore boundary for the National Wildlife Refuge
- Need to distinguish between various impacts due to different fisheries/resource uses. For example, there are minimal impacts to the near shore environment with pelagic fisheries
- Ecotourism visits to some of these islands is not feasible (Baker and Howland) due to long commutes and limited entry
- Science can have impacts on very remote systems - invasive species, disease. Research in remote areas like Palmyra and Kingman should be held to a higher standard
- Areas offer an opportunity to conduct research and monitoring
- Concern about impacts from research
- Researchers should not be above the law
- There is a perception that scientists are treated differently from non-researchers
- Need more outreach and education to quantify climate change impacts on the areas

### **Protections**

*Questions for discussion: Should there be additional protections put in place to limit adverse effects from existing or future activities, or to maintain the character and resources of the area? For example, from: development (cables, pipelines); discharges (dumping, wastewater); extraction (fishing, mining, energy development); other (ship groundings, anchoring).*

#### *Fishing:*

- Full no-take protection for all locations needs to be extended out to the 200 nautical miles limit
- Fishing should be allowed in the remote areas
- Stop commercial fishing. It is proven that fishermen do not respect habitat
- Boundaries of 100 nautical miles would allow some fishing
- Must consider impacts from foreign fishing fleets (non-US vessels/interests)
- Must consider cultural access, indigenous fishing rights, etc. (i.e. NWHI, CNMI)
- No fishing should be allowed, with the exception of traditional cultural practices, if they can be proven to exist, and are non-commercial
- Consider overfishing regulations to avoid fishery collapses in greater area

#### *Tourism:*

- Letting people experience pristine ecosystem would create conservation "disciples"
- Share knowledge of responsible eco-tourism by creating models (ex. diving standards)
- Unique opportunity to cap the number of divers. You can auction off a limited number of permits and create a revenue stream
- Fear tourism that commercialization will impact the environment

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- How can you control tourism?
  - Will create commercialization
  - Rather no tourism; there is a line that needs to be drawn
  - Limiting access – because they are unknown, that is why they are unique; but once they are known, they can be protected
  - Core reserve – zero tourism & extraction so that it stays a control
- Don't promote tourism if designated a National Monument
- No tourism should be allowed

*Enforcement:*

- There must be sufficient funding to ensure all policies, monitoring, and enforcement can be carried out
- Making protected area too large will make enforcement of boundaries impossible
- Have a 12 mile protected management area and 50 mile enforcement zone
- Enforcement needs to start with cultural side - they need a role
- The use of VMS is important for US management and must be coordinated on an international level

*Discharge and Shipping:*

- There must be protection from alien/invasive species
- Promotion of designation of avoidance area for things such as shipping or ship traffic
- All entering area would have sufficient insurance to cover potential groundings, oils spills, or other accidents
- Must include protections against invasive species (i.e. ballast water, quarantine, etc)
- Fines for dumping (how to enforce?)

*Development and Extraction:*

- No extractive uses should be allowed
- Allow for possible uses such as aquaculture and other sustainable technologies near populated isles
- No commercial development or resource extraction should be allowed
- Exclude all extractive and related commercial/exploitive activities in the proposed areas
- Protect against development
- Define responsible uses and cultural implications
- Consider bio-prospecting access and impacts
- No bio-prospecting should be allowed
- Need to distinguish between commercial activity and subsistence/artisanal activities

*Other Comments:*

- Adding levels of protection has both pros and cons (bureaucracy can be a cons). The bureaucracy should be streamlined
- All these areas are worthy of protection, and protection of these areas is the least we can do
- Designation should be to 200 nm for management, protection, research necessary for conservation, research for global issues
- Add the entire Mariana Trench out to the limits of the U.S. EEZ

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- Rather than just protecting the deep end of the Mariana Trench, protect the whole trench
- All eight of these areas should be designated as no-take and no extraction
- Marianas Trench: should protect the whole trench and not just part of it; identify threats to trench area; consider future exploration; consider undiscovered minerals/biosystems/geosystems
- Extend offshore boundaries to provide cushions or buffers from undesirable or conflicting activities
- Maximize the boundaries of the protected areas but also tailor management to protect vulnerable species specific to each site
- Although none of these areas are truly pristine, they likely have the fewest threats of any area, and it is vital to keep them that way via adequate protection
- Most land animals (seabirds, sea turtles) make a living offshore that requires protecting these areas
- A 100 nautical boundary around each may of the eight is recommended to allow nesting seabirds to find prey food nearby for chicks and fledglings
- The protection must reflect the compatibility of other activities
- Protections must be in place against shipwrecks and contamination/damage from ships
- Local action strategies should be implemented
- These areas have to get further protection
- Protect the entire Mariana Trench from top to bottom and end to end
- Recreational use should be limited in the remote areas
- The northern islands of the CNMI are inhospitable to recreation
- Gradient scale can be applied for recreational use
- Data are too scant to accomplish a thorough analysis of these areas
- Need long term monitoring systems for conservation
- Needs assessment on cultural practices protection, traditional use, and subsistence should be completed. Multiple use could be allowed around shores, with zoning concepts focused on cultural and traditional uses
- Primary goal should be protection of resource genotypes, while secondary goal should be allowing traditional use
- Look at zoning at population centers
- The northern islands of the CNMI could be made into a multi-use model like Great Barrier Reef. There is a slim chance that anyone would go into the deepest parts. Higher standard could be applied to shallower parts – a gradient system
- At least 1 very pristine area should be very restrictive access so that these places stay pristine
- In Palmyra and the CNMI there should be very limited and restrictive use for education and research
- Controlled research and well-managed limited recreation uses should be allowed in Palmyra, Kingman
- Limit the number of science permits issued each year to reduce possible damage to reefs
- Must have permit system in place before MPA designation
- All remaining dogs and cats should be removed from Palmyra Atoll
- If offshore pinnacles and banks are present they should be added for protection because they include unique habitats and attract fish that are targeted elsewhere
- Charismatic geological features should be included in the proposal
- The areas could provide for education of future generations

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- Protection needed sooner rather than later
  - Use language such as in NWHI State Refuge designation not what is used in the PMNM Presidential Proclamation, as it is too weak and vague
  - Refer to Kahea comments on NWHI Management Plan for problems to avoid
  - Include Hawaii State's 'One Strike You're Out' rule
  - Designation should stress the precautionary principle of do no harm
  - No Department of Defense bombing, war games, or sonar should be allowed
  - No Department of Defense missions should be allowed
  - Need to commit to clean up of polluted systems
  - Clean it up if you are going to protect an area
  - Define relevant islands/areas as a 'superfund' site (i.e. Johnston Atoll - in need of clean up and protection versus just protection)
  - Need to push international agreements/enforcement (i.e. international coast guards)
- Need at least 5 years of advanced planning and more than 100,000 public comments before developing marine protected areas
- Consider the costs and benefits of a larger offshore protected area before selecting the desired boundaries
  - Marine debris removal should be allowed within these areas to reduce threats
  - Lands, reefs and pelagic waters should be evaluated
  - Should conduct a threat analysis for ocean acidification and sea level rise- not only at the proposed areas but also for the NWHI and the world that may help to reinforce the importance of protecting the proposed areas
  - Poachers do not submit their data to assist in future stocks assessment, and thus poaching must be curtailed or stopped altogether
  - Wealthy fly-fishers bring in money and release bonefish, but studies have shown that released bone fish are often spent after fights and fall easy prey to sharks
  - Property rights and permit issues should be considered well in advance
  - Free prior informed consent (UN) (What to do if someone take resource)

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