

**From:** Magallanes, Downey  
**To:** [Bowman, Randal](#)  
**Subject:** Fwd: Support to maintain Papahanaumokuakea Monument boundaries & protections  
**Date:** Wednesday, May 24, 2017 11:11:22 AM  
**Attachments:** [05\\_18\\_2017\\_Zinke\\_Ross\\_Pacific\\_Marine\\_Monuments\\_Letter\\_Final.pdf](#)

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**From:** Scott Kikiloi <[REDACTED]>  
**Date:** Wed, May 24, 2017 at 7:53 AM  
**Subject:** Support to maintain Papahanaumokuakea Monument boundaries & protections  
**To:** [nikolao\\_pula@ios.doi.gov](mailto:nikolao_pula@ios.doi.gov), [downey\\_magallanes@ios.doi.gov](mailto:downey_magallanes@ios.doi.gov)  
**Cc:** [scheduling\\_sio@ios.doi.gov](mailto:scheduling_sio@ios.doi.gov), [RR\\_Bowman@ios.doi.gov](mailto:RR_Bowman@ios.doi.gov)

Aloha Director Pula and Ms. Magallanes:

Attached please find an official public comment in support of maintaining the existing boundaries and protections of Pacific marine monuments. The comment and the attached documentation specifically details the sound rationale for the original creation and the expansion of the Pacific Remote Islands Marine National Monument (PRIMNM) and Papahnaumokuakea Marine National Monument (PMNM) under the Antiquities Act, summarizes the robust public process, and shows that no evidence of harm to the economy will result from maintaining the PRIMNM and PMNM as declared in Presidential Proclamations 8031, 8112, 8336, 9173, and 9478. This comment has been uploaded to [regulations.gov](http://regulations.gov) and will also be submitted via mail with the accompanying documentation as it is too large for the comment system.

As you will see there is significant support for and little opposition to PRIMNM and PMNM including from local elected officials.

Additionally, the signers request a meeting with Secretary Zinke to explain why local stakeholders believe the review should recommend no changes to our marine monuments.

Mahalo,

Kekuewa Kikiloi, PhD  
Chair, Papahnaumokuakea Marine National Monument Native Hawaiian Cultural Working Group

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Downey Magallanes  
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May 18, 2017

The Honorable Ryan Zinke  
Secretary U.S. Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

The Honorable Wilbur Ross  
Secretary U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, D.C. 20230

RE: Executive Order 13792: Review of Designations Under the Antiquities Act  
Executive Order 13795: Implementing an America-First Offshore Energy Strategy

Dear Secretary Zinke and Secretary Ross,

We the undersigned represent the Native Hawaiians, scientists, fishermen, local elected officials, citizens, conservationists, students, businesses, and chefs in support of the Pacific Remote Islands Marine National Monument (PRIMNM) and the Papahānaumokuākea Marine National Monument (PMNM). We are writing to express our strong support for maintaining the current boundaries and protections of both of the aforementioned monuments. Specifically, we oppose any recommendations that would weaken the conservation benefits of the marine monuments including removal of the prohibitions on commercial extraction of biological and mineral resources.

The following information contained in this letter and the attached documentation demonstrates the sound rationale for the original creation and the expansion of PRIMNM and PMNM under the Antiquities Act, summarizes the robust public process, and shows that no evidence of harm to the economy will result from maintaining the PRIMNM and PMNM as declared in Presidential Proclamations 8031, 8112, 8336, 9173, and 9478.

To put it simply, Hawai'i stakeholders overwhelmingly supported PRIMNM and PMNM because the science showed that expanding these monuments was the single best action to protect and conserve our ocean at a time when its health is in dire need of improvement. This action is also in the best interests of the commercial fishing industry, who have the most to benefit from sustainable fisheries at a time when over 65% of stocks are in need of replenishment. Further, we think this review process is unnecessary and appreciate the position you are in given the directives within the Executive Orders. That said we will work with the thousands of supporters to once again demonstrate the sound rationale and broad support for designation and expansion of PRIMNM and PMNM. We respectfully request a meeting during the review process to directly discuss this critical matter.

Please accept this letter and all enclosed documents as official public comment for Docket No. DOI-2017-0002.

## Scientific Rationale for PRIMNM and PMNM

Recent science shows that the cumulative impact of human activities – including overfishing – has great consequence to ocean ecosystems. Scientists see marine reserves as critical tools for safeguarding biodiversity, habitats, and crucial ecosystem processes. Marine reserves yield the greatest conservation benefits when they are large, highly protected, isolated, well-enforced, and long-standing. The benefits increase exponentially when all five features are in place, which is the case for the Pacific marine monuments. Marine protected areas with all of these characteristics have 14 times the shark biomass, twice as many large fish, and five times as much fish biomass than fished areas. The included fact sheet (see enclosure #1) and accompanying documentation detail the conservation benefits of marine reserves.

The designation of Papahānaumokuākea Marine National Monument in 2006 ensured the ecosystem out to 50 nautical miles would remain among the most diverse and productive in the subtropical Pacific by protecting key habitats and approximately 7,000 species – a quarter of which are found nowhere else on Earth. The expansion of the PMNM boundaries in 2016 increased protections for important habitats such as seamounts and submerged reefs, and highly migratory species that forage beyond the 50 nautical mile border, including endangered sea turtles, whales, dolphins, seabirds, sharks, and tuna. In the decade between the creation and expansion of PMNM, a significant new body of science was conducted that clearly demonstrated that the original boundary of the monument was not the minimum size required to protect the biological resources of the Northwestern Hawaiian Islands.

The expanded PMNM takes into account new scientific information on seabird foraging ranges that was not available in 2006. These data demonstrate that white-tailed tropic birds, masked boobies, red-footed boobies, great frigatebirds, and wedge-tailed shearwaters travel far beyond the original 50 mile boundary. Better protecting seabird habitat is critical in light of a 70% global decline since 1950. The Northwestern Hawaiian Islands comprise the largest seabird rookery on the planet including nesting habitat for 98% of Laysan Albatrosses. The expanded monument provides greater protections for the true range of these birds.

The expansion area protects seabirds, sharks, and other species from being caught by longline fishing, a practice in which a single vessel uses a 30-mile long main line to which many smaller lines with up to 12,000 baited hooks are attached. The number of hooks set by the Hawai‘i-based longline fleet, which includes 140 vessels, averages 47 million annually. Longline fishing is a major driver of declines for many species including threatened sharks. The most recent data shows that prior to the expansion of PMNM, longline vessels in the Northwestern Hawaiian Islands were catching 5,600 sharks per year, which equates to one shark for every two bigeye tuna. More than 90% of these sharks are blue sharks, which are classified as Near Threatened by the International Union for the Conservation of Nature.

The Pacific Remote Islands Marine National Monument was created in 2009 based on the area’s unique biodiversity and ecological value. The monument safeguards some of the most pristine ocean habitats in the Pacific, and as a result provides a rare scientific baseline to help understand the magnitude of loss of ocean life elsewhere and to set appropriate benchmarks for management and conservation (see enclosure #2).

The expansion of the PRIMNM led to the protection of remarkably rich coral ecosystems and feeding and breeding grounds of an estimated 14 million seabirds representing 19 species, many of which are threatened with extinction including the black-footed albatross, Newell's shearwater, and Phoenix Petrel. The expanded PRIMNM also gives permanent protection to populations of endangered sea turtles, marine mammals, and sharks.

Recent NOAA Okeanos expeditions to Howland, Baker, and Wake Islands of PRIMNM and the seafloor in and around PMNM documented unprecedented levels of biodiversity and abundance of endemic species. In the waters of PMNM 100-300 feet deep, nearly 50 percent of the fish are unique to Hawai'i, found nowhere else in the world. The expeditions also discovered ancient coral reef ecosystems including one of the world's oldest living organisms – the deep-water black coral believed to be at least 4,000 years old. New species are discovered on nearly every deep-sea survey within the monument's waters and the potential for future discovery is high, especially surrounding the diverse and virtually unstudied ecosystems of seamounts and hydrothermal vents. These species may contain yet undiscovered chemical compounds of biomedical importance for the treatment of cancer, AIDS, and antibiotic-resistant bacteria.

Together these monuments encompass six large areas of the Pacific Ocean creating a connected network of marine reserves that help protect habitat and ecosystem functions demonstrating that size does matter. The expansion of both monuments improved the connectivity between the PMNM and the five sites of the PRIMNM creating a network that aids the dispersal of fish, coral, and other invertebrate larvae. For example, these protected areas act as key stepping stones for species of coral, which spawn in Johnston Atoll, then the larvae disperse, colonizing reefs in the Northwestern Hawaiian Islands. Not only did the expansions provide for protections between the monuments, but throughout the entire water column, which is critical to maintaining the health of the ocean. As marine ecosystems are strongly interconnected in three dimensions it is important to maintain protections from the seafloor to the ocean's surface.

The scientific case for the creation and expansion of the PRIMNM and PMNM is strong. Detailed scientific analyses demonstrating the strong rationale for the expanded boundaries of both monuments were developed and submitted to the Administration. These reports, as well as additional scientific analyses will be submitted within the public comment period to demonstrate that additional protections in the Pacific were warranted and based on the best available science.

#### Cultural Rationale for PRIMNM and PMNM

In addition to its scientific value, the waters of PMNM are of great cultural significance to the Native Hawaiian community. The Northwestern Hawaiian Islands and surrounding waters are considered a sacred place from which Native Hawaiians believe all life began, and to which spirits return after death. The area is used for the practice of traditional long-distance voyaging and wayfinding by observing the sun, moon, stars, and elements of the natural environment, such as migratory seabirds and leaping fish, which depend on healthy ecosystems. The cultural importance of this area to the community is evidenced by the elevation of the Office of Hawaiian Affairs (OHA) to co-trustee as a result of the public consultation process, Proclamation 9478, and a subsequent memorandum of agreement between the Departments of Interior, Department

of Commerce, State of Hawai‘i and OHA (see enclosure #3). OHA is recognized in Hawai‘i as a public agency protecting and advocating for Native Hawaiian rights and preserving Hawaiian culture. Through the co-trustee agreement, Native Hawaiians now play a more integral role in the management and protection of PMNM, which will continue to nurture and revitalize Hawai‘i’s living indigenous culture. Further information regarding protection of the Northwestern Hawaiian Islands as a cultural seascape is included in enclosure #4.

### Historical Rationale for PRIMNM and PMNM

As the 75<sup>th</sup> Anniversary of the Battle of Midway approaches, it is important to remember that both PRIMNM and PMNM were important battlegrounds in the Pacific theater for World War II. The original boundaries of PMNM include artifacts from the Battle of Midway, however the expanded monument includes additional sites and more respectfully memorializes the sacrifices of those who lost their lives in this pivotal WWII battle. On June 7, 1942 the *USS Yorktown* sank to the bottom of the Pacific and the expanded PMNM includes the final resting place for the many Americans who were serving on board.

The Pacific Remote Islands holds historical significance as 130 Hawai‘i men, known as the Hui Panalā‘au volunteered to occupy the islands of Howard, Baker, and Jarvis from 1935-1942. This colonization allowed President Franklin Roosevelt to claim jurisdiction of the islands, which became an important base during WWII. Specifically, Wake Atoll has been designated a National Historic Landmark because of the battle that took place there in December 1941. Features include U.S. defensive structures, historic shipwrecks, features related to American prisoners of war, among other important artifacts and memorials.

### Public Processes and Overwhelming Public Support for PRIMNM and PMNM

As you are aware, the authority under the Antiquities Act to designate national monuments rests solely with the President and does not require a public process. Nevertheless, both Presidents George W. Bush and Barack Obama committed to an unprecedented level of engagement, soliciting public opinion and engaging directly with stakeholders for each designation. These public processes resulted in overwhelming support from the general public and political leaders for the designation and expansion of both monuments.

Prior to the Presidential Proclamation signed for the expansion of PRIMNM in September 2014, President Obama publicly announced that he was considering expansion in June and the White House Council on Environmental Quality subsequently held a widely attended town hall meeting in August 2014 in Honolulu, which was attended by 200 individuals from each Main Hawaiian Island, including conservationists, scientists, Native Hawaiian practitioners, and representatives from all facets of the fishing industry. In conjunction with the town hall, the Administration solicited the submission of public comments. During the PRIMNM public comment period 1,500 support letters from Hawai‘i residents were received, as well as more than one million letters of support from around the world including more than 135,000 U.S. citizens. More than 200 scientists who have worked in the Pacific, 200 Pacific practitioners, 30 Hawai‘i non-profits, and 35 Hawai‘i businesses, signed on to letters of support also (see enclosure #5). Opposition to the

expansion came primarily from the U.S. tuna fleets that operate in the region whose catch in the area at the time represented approximately three percent of the annual U.S. longline tuna catch and approximately five percent of the purse seine catch in the western and central Pacific. While the expansion of PRIMNM could have been significantly larger if all five atoll sites were included, Proclamation 9173 only included three – Johnston Atoll, Wake Atoll, and Jarvis Island. The Western Pacific Regional Fishery Management Council acknowledged the expansion was a compromise due to tuna industry input during the public process (see enclosure #6)

The Northwestern Hawaiian Islands has one of the richest bipartisan conservation histories of any protected area on Earth. Over the past 110 years seven U.S. Presidents have taken action to protect the Northwestern Hawaiian Islands and its unique ecosystems and wildlife. In 1903, in response to US Navy reports of seabird slaughter on Midway, President Theodore Roosevelt signed Executive Order 199A placing the atoll under Navy control and dispatching Marines to stop the killing of birds for feathers and eggs. In 1909, President Roosevelt signed Executive Order 1019 creating the Hawaiian Islands Bird Reservation stretching from Nihoa Island to Kure Atoll further protecting seabird habitat.

In 1940 President Franklin D. Roosevelt signed Presidential Proclamation 2416 changing the name of the Hawaiian Islands Reservation to the Hawaiian Islands National Wildlife Refuge, broadening protections for all wildlife. In 1967 under President Lyndon B. Johnson, the U.S. Fish and Wildlife Service designated French Frigate Shoals, Gardner Pinnacles, Laysan Island, Lisianski Island, Necker Island, Nihoa Island, and Pearl and Hermes Reef and surrounding submerged lands within the Hawaiian Island National Wildlife Refuge as Research Natural Areas. In 1988 President Ronald Reagan signed legislation designating Midway Atoll as a National Wildlife Refuge to protect and manage its biological and historic resources.

In 2000 and 2001 President William J. Clinton issued Executive Order 13158 directing the development of a plan to protect the Northwestern Hawaiian Islands coral reef ecosystem, and called for public process to explore additional protections for the area. As a result of public comments and negotiations between President Clinton and Congress, the Northwestern Hawaiian Islands Reserve was created and later upgraded to the Coral Reef Ecosystem Reserve under Executive Orders 13178 and 13196. The Northwestern Hawaiian Islands Coral Reef Ecosystems Reserve Advisory Council has been actively involved in advising the respective managing agencies, since that time, providing 1000's of hours of valuable input and expertise.

In 2006 President George W. Bush issued Proclamation 8031, creating the Northwestern Hawaiian Islands Marine National Monument, later named Papahānaumokuākea Marine National Monument at the request of Native Hawaiians under Proclamation 8112. In 2016, President Barack Obama became the seventh U.S. President to continue the bipartisan efforts to protect critical biological, cultural, and historic resources of the Northwestern Hawaiian Islands by expanding PMNM under Proclamation 9478.

The two most recent public processes for the designation and expansion of Papahānaumokuākea carefully considered the views of Native Hawaiians, Hawai'i residents, Hawai'i small-boat fishermen, the commercial longline fleet, scientists, and other stakeholders in Hawai'i. Prior to its original designation in 2006 representatives testified in support of the Monument at more than 30 public hearings and over 100 community meetings, and sent approximately 100,000 letters to federal and state officials (see enclosure #7).

Calls for expansion of PMNM began in January 2016 when a group of Native Hawaiian leaders wrote to the White House proposing expansion (see enclosure #8). The Northwestern Hawaiian Islands Native Hawaiian Cultural Working Group, made up of 50 individuals located across the Main Hawaiian Islands each with a strong tie to Papahānaumokuākea, followed up on April 5, 2016 with a letter to the White House Council on Environmental Quality (CEQ) with a more specific request to start a public process of stakeholder input, and included a map proposing an expanded boundary based on scientific and cultural research (see enclosure #9). On April 14, 2016, Senator Brian Schatz also urged the Administration to engage Hawai‘i constituents on the prospect of enlarging PMNM (see enclosure #10).

The public process for expansion began in earnest in May 2016 when officials from the White House CEQ, Department of Interior, Department of Commerce, Fish and Wildlife Service, the National Oceanic and Atmospheric Administration (NOAA), and U.S. Navy traveled to Honolulu to hold listening sessions with stakeholders including scientists, conservationists, Native Hawaiians, small vessel fishermen, and opponents of the expansion in the longline tuna industry. During this trip the federal officials also consulted with Governor David Ige.

On June 16, 2016, following these listening sessions and detailed reviews of the science, economic, and historic rationale for expansion, Senator Schatz wrote to President Obama asking him to use his authority under the Antiquities Act to expand Papahānaumokuākea, proposed a boundary, and requested public meetings (see enclosure #11).

On August 1 and 2, 2016 official public meetings were held by the U.S. Fish and Wildlife Service and NOAA’s National Marine Sanctuaries Office in collaboration with the Offices of Senator Brian Schatz and Senator Mazie Hirono. During these public meetings more than 6,705 letters and petitions in support of expanding the PMNM were submitted including 363 written and oral comments by attendees at the meetings. It is critical that this review take into account the significant amount of elected official support including Hawai‘i’s U.S. Senators, the Governor, three county mayors, 10 state senators, eight state representatives, and four local councilmembers. For the state legislators it is important to note that this includes the senator and representative whose district includes the Northwestern Hawaiian Islands. This support also includes the President of the Senate, Ron Kouchi, and the County of Kaua‘i Mayor, both of whom opposed the original proposal but supported Senator Schatz’s approach because key areas for small boat fishing constituents remained outside the monument boundaries. The Office of Hawaiian Affairs strongly supported the expansion not only due to the Northwestern Hawaiian Islands cultural significance but also because the final proclamation and subsequent memorandum of agreement granted them co-trustee status. Finally, after extensive reporting and reviewing the cases laid out by supporters and opponents of expansion, both Honolulu Civil Beat and the Honolulu Star-Advertiser – Hawai‘i’s only daily statewide newspaper – endorsed the larger monument with editorials (see enclosure for a summary of the support and elected official letters and editorials #12).

In addition to the official public process, more than 135 community meetings across the state were held by supporters of the expansion to take into consideration all perspectives. In total nearly 1.5 million letters and petitions in support of the expansion were submitted including 8,100 hand-signed petitions and 3,600 online petitions from Hawai‘i constituents. This support far outweighed the amount of opposition. The final decision on the boundaries of the expanded

Monument also directly took into account the concerns raised by fishermen. The final boundary in Proclamation 9478 was smaller than what was proposed by the Northwestern Hawaiian Islands Native Hawaiian Cultural Working Group in order to ensure that Hawai'i's small-boat fishers, including those on Kaua'i, could continue to access their traditional fishing grounds closest to the monument. It is important to note that this compromise also allows the longline industry to continue fishing the often fished seamounts south of Nihoa Island.

As with the decision for PRIMNM to only expand three of the five atoll sites, the determination to place the boundary further west than proposed by Hawai'i constituents demonstrates that the final decision was influenced by the public process that addressed economic concerns.

Your reviews will find that this support for marine monuments continues and that the only opposition is the longline tuna industry, which is attempting to recycle unsubstantiated claims of economic hardship, ironically during a time of record catch and profits.

#### No evidence of negative economic impact

These reviews must recognize that not a single small boat fisherman has been negatively impacted by the expansion of PMNM because the public process was so extensive and the boundary was moved to ensure local fishing would be able to continue. This is important not only because the industrial-scale fishing sector made numerous claims about the impact on local fishermen but also due to the fact that local fishermen provide a significant amount of fish to markets across Hawai'i. The fish provided to market by small boat fishermen is often more fresh and most of the catch stays in Hawai'i as opposed to the longline industry that exports a significant amount to the U.S. mainland and the foreign auction.

The two most economically important domestic fisheries in the Western Pacific are the Distant Water Tuna Fleet (purse seine fleet) and the Hawai'i-based longline fleet. Both fleets are focused primarily on highly migratory species (i.e. tuna and swordfish) and are therefore not limited to a specific geography or region. They are managed by an international quota and fishing effort allocation system that is negotiated each year at the Western and Central Pacific Fisheries Commission. This quota is based on the best available science that is aimed at ensuring the sustainability of the target species. The quota system means that these fisheries can, and do, catch their target species, anywhere in the western Pacific region including international waters where the vast majority of their fishing effort takes place. In fact very little fishing occurred in the PRIMNM and PMNM before the areas were designated or expanded and what fishing effort did occur in these regions was not eliminated but rather simply shifted to other areas. To put it very clearly, this means that the longline and purse seine fleets do not need to fish in the Pacific marine monuments to continue meeting their annual allocations and make record profits.

Last year the industry was highly successful and reached its internationally agreed to annual quota by July 22, just seven months into the fishing season (see enclosure #13). Additionally, in order to continue fishing after meeting the quota, the industry has successfully used a controversial loophole to acquire additional quota from U.S. Territories in the Pacific, allowing for record profits. This year appears to be on a similar track as the longline fleet had already reached 55 percent of its quota as of May 3, 2017.



Despite these facts, the industry continues to claim hardship but is unable to produce evidence to support claims of lost revenue due to the creation of marine protected areas. The facts actually show the opposite – catch and profits continue to rise as more acreage has been placed into protection by marine monuments designated or expanded under the Antiquities Act. For example, during the public process for the expansion of PRIMNM the Hawai‘i-based longline industry representatives and the Western Pacific Regional Fishery Management Council claimed that expanding the boundaries would severely cut into the \$100 million Hawaiian-based fishing and processing industry. In 2015, the following year after the PRIMNM expanded areas closed to commercial fishing, the industry had its best year to date in terms of tonnage of bigeye tuna catch (see enclosure #14). According to a recent statement from Senator Schatz, last year was the industry’s most profitable year and revenue for 2017 could exceed that from 2016 (see enclosure #15).

Again, it is critical to note – as the recent success of the industry proves – the Hawai‘i-based longline industry and its profits are not dependent on any location. This fishery is completely dependent on the internationally agreed to quota, which in turn is dependent on a healthy fish stock. In fact the health of bigeye tuna – the prized stock for the Hawai‘i-based longline industry – is “subject to overfishing” according to a recent notification by NOAA’s National Marine Fisheries Service (see enclosure #16). “Overfishing” as defined by NOAA is: “A stock that has a harvest rate higher than the rate that produces its maximum sustainable yield.” The goal of marine monuments and other conservation measures is to improve the condition of ecosystems and habitat and thereby benefit the species dependent on a healthy ocean, including fish stocks.

The facts are clear, economic liabilities for the Hawai‘i-based longline industry are self-inflicted and the result of an unsustainable use of the annual quota system, which is being fished down at a rapid pace. This causes instability in the market including price fluctuations that harm local fishermen and small business owners who are susceptible to market uncertainty. Early indications show that putting some limits on where the longline industry can fish helps stabilize the market by slowing down how quickly the quota is met. In the long run improving the health of the ocean and fish stocks with protected areas like marine monuments is a benefit to the longline industry, not a liability.

Additionally, the longline industry and fish auction export a significant amount of tuna outside of Hawai‘i each year, which allows the sector to earn ever increasing profits but also requires importation of more seafood into Hawai‘i, than may be necessary if more of the longline catch stayed in Hawai‘i. This is concerning given the fishing and processing practices where much of our imported fish originates. For example, in Hawai‘i a hepatitis A discovery in May 2017 was linked to imported frozen tuna from Indonesia and resulted in a Hawai‘i Department of Health warning (see enclosure #17).

#### Antiquities Act and Monument Review Process

Regarding the review of designations and expansions under the Antiquities Act back to January 1, 1996 and the public comment period as outlined in Docket No. DOI-2017-0002, we contend that this process is unnecessary and redundant, however we will make the case once again that

PRIMNM and PMNM were created and expanded properly, and as required under the Antiquities Act. We request that the letters, petitions, emails, and any other comments that were submitted during the original processes to create and expand both PRIMNM and PMNM be included in this current process. We would also like the final review to include an accounting of proponent versus opponent comments. Additionally, we appreciate that the Department of Commerce has been included in this process and we ask that NOAA's Office of National Marine Sanctuaries serve as the lead for this review.

In addition to our specific support for PRIMNM and PMNM, we also express our strong support for the use of the Antiquities Act to create marine national monuments in Federal Waters. We agree with past Presidents of both parties that the authority to do so is clearly granted by the Antiquities Act and that previous designations have been made with the clear objective of preserving objects of historic and scientific value. These include Rose Atoll Marine National Monument (Presidential Proclamation 8337), Marianas Trench Marine National Monument (Presidential Proclamation 8335), and the Northeast Canyons and Seamounts Marine National Monument (Presidential Proclamation 9496). These Monuments have both the backing of science and broad public support. As with PRIMNM and PMNM, altering or reducing the scale and scope of their protections would put the objects and ecosystems they protect at risk and imperil our Nation's cultural and scientific legacy.

Thank you for your time and attention to this critically important marine conservation issue. We are confident that your review will conclude that there is adequate scientific, cultural, and historical rationale for the designations and expansions of both the Pacific Remote Islands Marine National Monument and the Papahānaumokuākea Marine National Monument under the Antiquities Act. Further, all stakeholders were counseled during the robust public processes and there is no evidence of a negative impact on the economy, rather the industry is experiencing record catch and profits even after the expansion of the protected areas.

We look forward to meeting with you to discuss this matter further.

Sincerely,



Kekuwa Kikilo, PhD  
Chair, Papahānaumokuākea Native Hawaiian Cultural Working Group



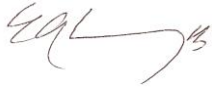
Rick Gaffney  
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Ed Kenney  
Chef and Owner  
Town, Kaimuki Superette, Mud Hen Water, UPTown Events



Laura Thielen  
Hawai'i State Senator  
District 25, includes Papahānaumokuākea



Chris Lee  
Hawai'i State Representative  
District 51, includes Papahānaumokuākea



William J. Aila, Jr.  
Founding Member, Northwestern Hawaiian Islands Coral Reef Ecosystem Reserve

cc: Hon. David Y. Ige, Governor of Hawai'i  
Hon. Brian E. Schatz, United States Senator  
Hon. Mazie Hirono, United States Senator  
Hon. Tulsi Gabbard, United States Representative  
Hon. Colleen W. Hanabusa, United States Representative