



**Western  
Pacific  
Regional  
Fishery  
Management  
Council**

November 27, 2010

Jeff Walters  
Hawaiian Monk Seal Recovery Coordinator  
Protected Resources Division, NOAA  
NMFS Pacific Islands Regional Office  
1601 Kapiolani Blvd., Suite 1110  
Honolulu, HI 96814

Dear Jeff:

Thank you for the opportunity to comment on the forthcoming Programmatic Environmental Impact Statement (PEIS) for monk seals.

The Council is broadly in support of the PEIS. Council staff continue to be members of the Hawaii Monk Seal Recovery Team and contributed to the 2007 version of the Recovery Plan. We recognize the conundrum posed by the monk seal, namely its crashing to extinction within an undisturbed ecosystem in the Northwestern Hawaiian Islands (NWHI) while thriving where logically it should not, in the Main Hawaiian Islands (MHI). This conundrum continues to perplex the Recovery Team, since it is clear that post-weaned juveniles in the NWHI are vulnerable to starvation amid the largest fish biomass in the Hawaii Archipelago, creating a recruitment bottleneck to the population.

We recognize that in the absence of understanding the reasons why this starvation occurs and how it can be remedied, other actions must be contemplated. We understand that transfer of female juveniles to the Main Hawaiian Islands (MHI) is considered as part of the proposed action in the PEIS, with the intent to 'fatten them up' through the transition from juvenile to three years old, when they would have greater chances of survival in the NWHI. The Council's concerns with this element of the PEIS stem not so much from the expansion of the MHI monk seal population, but from the risks to monk seals in moving them to and from the MHI. First there are the attendant risks of capture of juveniles and their safe and successful release in the MHI. Second, having brought an animal from the NWHI and allowed it to flourish in the MHI,

there is an ethical dimension that needs to be considered. We see the logic of this strategy but feel justified in comparing these actions with taking a child out of a war zone for a couple of years only to send him back again. We hope that these issues will be fully explored in the PEIS.

The MHI monk seal population is in an exponential growth phase so more monk seals in this part of the archipelago are to be expected, barring some catastrophic mortality event like an epidemic. People in the MHI are naturally concerned how a growing population of monk seals will impact their lives and livelihoods, protected as the seals are by two powerful federal statutes, the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA). This will be a leap into the unknown for everybody, since no-one has experience of large numbers of seals in the MHI, nor is it apparent that there were large numbers here in the past.

The growth of the MHI monk seal population and some of the actions proposed under the PEIS are of concern to all residents of Hawaii. There are concerns that the increase in the monk seal population and the actions being contemplated in the PEIS may have consequences for all forms of fishing and seafood harvesting activities in the future in the MHI. Additionally, there are also concerns that activities associated with the marine and coastal environment, such as construction, aquaculture, and natural energy production, may be constrained by the growing monk seal population. Further, there are public safety concerns that arise from the potential increase in human-monk seal conflict. We request that these concerns are addressed in the PEIS, and in particular, the potential social impacts of human-monk seal conflict are analyzed in detail.

Lastly, the Council is ready to assist NMFS with the development of the PEIS by facilitating access to Council advisors and Council staff who may have specialist scientific, local and traditional ecological knowledge of use to the authors of the document. We look forward to commenting on the document when the draft PEIS is released for review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kitty M. Simonds', with a large, stylized flourish at the end.

Kitty M. Simonds  
Executive Director