



March 15, 2016

The Honorable Barack Obama
President of the United States of America
The White House
1600 Pennsylvania Avenue, N.W.
Washington DC 20500

Re: Papahānaumokuākea National Marine Monument Expansion Request by Mr. William Aila, Jr., Kaleo Manuel, Kamana'opono Crabbe, et al

Dear President Obama,

This correspondence forwards HFACT opposition to subject request and provides rationale thereof. Because the request provides no additional conservation benefits, HFACT asks that the Administration reject the request to expand the boundaries of the Monument.

The Hawaii Fishermen's Alliance for Conservation and Tradition, Inc. (HFACT) is a not-for-profit, IRS 501(c)(5) organization that advocates for small boat commercial, non-commercial, and recreational fishermen throughout Hawaii. Small boat commercial fishermen provide residents and visitors to Hawaii highly desired fresh fish such as mahimahi, ono, ahi, opakapaka, and onaga (deep sea snappers). HFACT board members sit on a number of federal fisheries and endangered species advisory committees and HFACT is thoroughly familiar with and participates in ocean and marine resource management in Hawaii and the central Pacific. HFACT is also supportive of other U.S. fisheries that supply high quality seafood while operating in full compliance with Federal and international regulations to assure the long-term sustainability of shared marine resources.

Subject letter dated January 29, 2016, requests an expansion of the boundaries of the Papahānaumokuākea National Marine Monument. The request is ill conceived, provides no conservation benefit to the Hawaiian Archipelago, and is disconcerting.

The current boundaries of the Monument, in conjunction with existing federal and international regulations, provide more than ample protection for the valuable marine resources mentioned in Mr. Aila's letter. Expansion of the current boundaries will further disadvantage our domestic longline fishery that competes on the global market with cheap foreign imports that are harvested at higher environmental costs.

Mr. Aila's letter requesting expansion justifies, in part, the request in order to "protect ... several species including Hawaiian Monk Seals, green sea turtles, sharks, whales, Black-footed and Laysan Albatrosses as well as other species."

Long-term species recovery plans, such as the Hawaiian Monk Seal Recovery Plan and the Pacific Green Turtle Recovery Plan, already exist for the threatened and endangered species that are mentioned in the letter requesting monument expansion. Many, many years of hard work have gone into these plans by a wide range of scientists, environmentalists, fishermen,

Hawai'i Fishermen's Alliance for Conservation and Tradition, Inc.
1082 Lunalilo Home Road, Honolulu, HI. 96825

government managers, and other marine stakeholders. For example, Hawaiian monk seals have historically done MORE poorly in Papahānaumokuākea than in the Main Hawaiian Islands. The Hawaiian monk seal is identified as the most endangered marine mammal in the United States.

The Hawaiian Monk Seal Recovery Plan identifies an increase in shark population and resultant predation within the Monument as the single largest threat to Monk Seal recovery. Additionally, other top predators such as the ulua (Giant Trevally) fish compete for forage so successfully that Monk Seals are dying of starvation (identified in the Recovery Plan as the second highest threat to Monk Seals). Expanding the Monument may continue the INCREASE in the shark population and top predators, which would continue to increase foraging competition with monk seals, resulting in unintended negative consequences to monk seal populations.

The Pacific Green Turtle Recovery Plan identifies a critical nesting habitat on French Frigate Shoals where 90% of sea turtle nesting occurs. French Frigate Shoals is a highly protected area, well within the existing Monument boundaries. Expanding the boundary will not benefit green sea turtles.

Like the green sea turtle, expansion of the boundaries will provide no additional benefit to the Black-footed and Laysan Albatrosses as their nesting areas are well protected within the current boundaries. The foraging area for these Albatrosses extends well beyond U.S. waters, thus expanding the Monument will add little benefit to the birds' far ranging foraging abilities.

Likewise as noted above, sharks have over-populated the North West Hawaiian Islands and aggressive behavior changes have been observed by scientists with sharks as they compete for food. Sharks have been regularly observed to swim out of the water and onto the beach to attack infant and juvenile monk seals. This behavior is unique to Papahānaumokuākea.

Whales that frequent the North West Hawaiian Islands are healthy and need no additional marine area. Migratory cetaceans, such as the Humpback Whale, move through the area or frequent the shallow waters (<600 feet depth) for reproduction and birthing of calves. These areas, again, are already protected and well within the current boundaries. Ship strike threats to whales occur in major shipping lanes. No major shipping lanes exist in the area. The closest shipping lane to Papahānaumokuākea is south of the EEZ, outside of U.S. jurisdiction. Additionally, NOAA has already proposed to remove the North Pacific Population of the Humpback Whale from the endangered species list. The final rule is expected to be published in mid-2016, with full expectation that the population will be de-listed. Furthermore, Humpback Whales are subject to protection under the Marine Mammal Protection Act, regardless of whether the whale is in the Monument or not.

The claim that expansion of the boundary will benefit endangered species runs counter to species recovery plans that are already in place and vetted by scientists around the world. None of these plans call for a need to increase the size of Papahānaumokuākea for added protection.

Mr. Aila's letter states that expansion of the monument "...will guarantee a healthier planet." Maintaining the status quo will provide ample protections to marine resources if supported by sound science with sensible regulation and strong enforcement. To think that a simple expansion

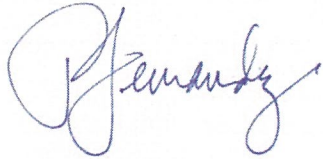
Hawai'i Fishermen's Alliance for Conservation and Tradition, Inc.

P.O. Box 240813 Honolulu, HI 96824-0813

of a marine protected area will “be a cure all” remedy is impertinent at best and dangerous at worst.

Please recognize and consider the years of science generated by academic and federal scientists that are embedded in the various Endangered Species Recovery Plans. Any expansion of the Papahānaumokuākea National Marine Monument that is not based on science is unnecessary.

Sincerely and Aloha,

A handwritten signature in blue ink, appearing to read "Phil Fernandez", with a large, stylized initial "P".

Phil Fernandez
President
Hawaii Fishermen's Alliance for Conservation and Tradition, Inc.

Cc: Hawaii Congressional Delegation
Senator Brian Schatz
Senator Mazie Hirono
Representative Mark Takai
Representative Tulsi Gabbard

Hawaii Governor David Ige