

June 2, 2022

Ms. Hoku Kaaekuahiwi Pousima
Pacific Islands Region Policy Analyst
PRI-Proposed Sanctuary, NOAA Office of National Marine Sanctuaries
76 Kamehameha Ave.
Hilo, HI 96720

Re: NOAA-NOS-2023-0052

Dear Ms. Kaaekuahiwi Pousima,

We write to express our strong support for the designation of a new national marine sanctuary to permanently and strongly protect the Pacific Remote Islands (PRI).

The Pacific Remote Islands are the crossroads of the Pacific, serving as stopping points for migration and traditional voyages since time immemorial that used the winds, stars, and ocean currents to wayfind across the vast Pacific seascape. The waters of PRI contain some of the last relatively pristine ocean wilderness on the planet. These diverse and intact ecosystems—comprising vast pelagic seascapes, critical open-ocean underwater seamounts, and pristine coral reefs—are home to some of the most diverse tropical marine life with numerous species found nowhere else in the world. The thriving coral reefs in the proposed sanctuary waters are some of the last remaining reefs relatively untouched by human activities. The pelagic area of the proposed sanctuary is important as habitat and foraging area for a variety of highly migratory species, many of them endangered or threatened. The seamounts dotting the deep-sea floor serve as ecological hotspots for biodiversity and act as biological refuges for unique organisms.

Our planet is facing a biodiversity and climate crisis. Nature is declining globally at rates unprecedented in human history, and the window of opportunity to halt and reverse the worst impacts of climate change is closing. The Pacific is expected to experience increased sea surface temperature, ocean acidification, wave height, and storm intensity. The tropical Pacific is also predicted to show dramatic declines in coral cover and pelagic diversity under current climate change scenarios. Protecting these waters is imperative, as intact natural ecosystems such as the Pacific Remote Islands are more resilient to the effects of climate change and can help in the fight against biodiversity loss. To best protect these ecosystems, the sanctuary should encompass the areas within the existing Pacific Remote Islands Marine National Monument and extend to the seaward limit of the EEZ around Howland and Baker Islands, and Kingman Reef, and Palmyra Atoll.

The current protections afforded by the Pacific Remote Islands Marine National Monument are inadequate for sensitive, long-ranging wildlife that use the U.S. waters beyond the current 50 nautical mile boundary to hunt, feed, and breed. In addition, the health of the protected, nearshore ecosystems within the current boundaries of the monument relies heavily on unprotected offshore ecosystems. The value of designating a new national marine sanctuary for PRI to protect our ocean's biodiversity and unique Pacific habitats is priceless and would ensure the continued health of the precious coral reef ecosystems within the existing boundaries of the monument by managing these areas as a whole. To

best protect these fragile ecosystems, NOAA should only permit strictly regulated and permitted sustainable recreational or sustenance activities within the boundaries of the sanctuary.

NOAA should also promote cultural, historic and scientific research with the sanctuary. With strong protection, the sanctuary will provide a living laboratory where nature and culture are one. Biodiverse ecosystems, rich in ecological functions and cultural histories, can help us to better understand the structure and productivity of tropical marine ecosystems relatively free of anthropogenic effects, and how to ensure long term resilience, within the context of climate change.

Sanctuary designation will provide public education, outreach, and community engagement around the marine ecosystems, wildlife, and maritime, historic and cultural heritage of PRI. Sanctuary education programs have been a powerful force in building stewardship for these unique places and bringing ocean wonders to all Americans. High-quality virtual learning opportunities can provide a pathway toward meaningful connections to this special place for students, educators, policy makers, community leaders, and the public.

The unique ancestry, history and cultural significance of the Pacific Remote Islands should be honored with a culturally appropriate name. The sanctuary designation process should ensure Pacific Islanders with ancestral ties to this area and with cultural and language expertise can lead a culturally appropriate process as a way to propose a name that better reflects the identity, individuality, and importance of the region, with support from the federal government on the outcome. Additionally, NOAA should explore new or existing co-management structures to ensure Indigenous Pacific Islanders with long-standing cultural ties to the area have a seat at the decision-making table. We encourage NOAA to establish a pre-designation Sanctuary Advisory Council (SAC) to actively engage the community and explore feasible co-management models.

We also support the goals set forth in the sanctuary nomination to draw attention to the impact and need for cleaning up the legacy of military activity in the area and to honor the service, sacrifice, and significance of the Hui Panalā'au at a level that is commensurate with their sacrifice. The federal government should do this in close communication and collaboration with the living descendants of the Hui Panalā'au.

National marine sanctuaries play a critical role in protecting biodiversity and building a more climate-resilient future for our ocean and the communities that depend on it. To further ensure the protection of this unique and fragile area, and appropriately honor ancestral, historical, and cultural connections as soon as possible, we support the goal of completing sanctuary designation by the end of 2024.

The ocean sustains us all, whether we live on the coast or in the heartland. As individuals from across the United States, we stand in support of the vision of the local leaders and Pacific Island peoples spearheading this effort who have intimate knowledge of this region's needs and cultural and biological significance.