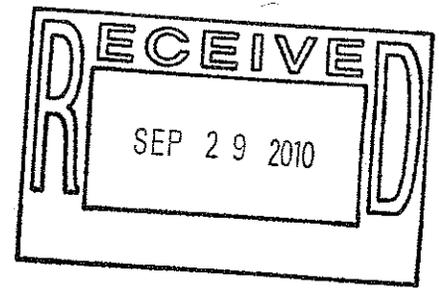




# Advisory Council on Underwater Archaeology



Matthew A. Russell, M.A., R.P.A.  
Chair, Advisory Council on Underwater Archaeology  
Archeologist, National Park Service  
Submerged Resources Center  
12795 W. Alameda Parkway  
Lakewood, CO 80227

September 8, 2010

Allen Tom, Director  
NOAA Office of National Marine Sanctuaries  
Pacific Islands Region  
726 South Kihei Road  
Kihei, HI 96753

Dear Director Tom,

The Advisory Council on Underwater Archaeology (ACUA) strongly supports a proposal to add maritime archaeological resources to Hawaiian Islands Humpback Whale National Marine Sanctuary's management plan through the management plan review process. We understand that the primary focus of the sanctuary has traditionally been its namesake species, and that there has been no mandate for inventory, assessment, or protection of maritime heritage sites. The current management plan review process, however, provides an excellent opportunity to bring these important historical resources under the sanctuary's protection.

Maritime archaeological sites found within sanctuary boundaries represent a heritage of both national and international significance, and can provide important information about various aspects of Hawaiian maritime history. Because the overall condition of maritime heritage sites is continually declining due to natural deterioration and inadvertent or intentional human impact, now is a good time to include these sites within NOAA's mandate to preserve and protect. The inclusion of underwater cultural heritage as part of NOAA's mandate in managing Hawaiian Islands Humpback Whales NMS is particularly important because of the diminished capacity of the state of Hawaii's historic preservation division and its difficulty in managing its maritime heritage. Were the sanctuary to become involved in active management of these resources, this would be the first time that these resources came under effective protection. Hawaiian Islands Humpback Whales NMS is the only NOAA site in the national system that does not include such resources in its management plan. Including submerged cultural resources management in the sanctuary management plan, including inventory, documentation, and assessment of sites, as well as education and outreach to raise awareness and stewardship of the resource, would only enhance NOAA's already exceptional national reputation as a leader in underwater cultural heritage management.

The ACUA ([www.acuaonline.org](http://www.acuaonline.org)) is an independent, non-profit organization closely affiliated with the Society for Historical Archaeology (SHA). The ACUA serves as an international advisory body on issues

relating to underwater archaeology, conservation, and submerged cultural resources management. It works to educate scholars, governments, sport divers, and the general public about underwater archaeology and the preservation of underwater resources. The ACUA is composed of twelve Board members elected on a rotating basis by the membership of the SHA. It includes professionals from State and federal archaeology programs, museums, non-profit institutes, and avocational societies involved in underwater archaeology. It also includes professionals in the fields of conservation and education. Our members hail from Europe, Canada, Australia, Mexico, the Caribbean, and the United States.

The ACUA appreciates the opportunity to comment and to express our support of adding maritime heritage site management to the Hawaiian Islands Humpback Whales NMS management plan. If you need further information, please do not hesitate to contact me at [matthew\\_russell@nps.gov](mailto:matthew_russell@nps.gov) or 303-378-6282.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew A. Russell", with a long horizontal flourish extending to the right.

Matthew A. Russell  
Chair, Advisory Council on Underwater Archaeology