



TO: Management Plan Review Coordinator
Hawaiian Islands Humpback Whale National Marine Sanctuary
6600 Kalaniana'ole Highway, Suite 301
Honolulu, Hawai'i 96825

FROM: Sara L. Collins, Ph.D., Chair, Legislative Committee
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Comments on the Proposed Review of the Management Plan and Regulations for the Hawaiian Islands Humpback Whale National Marine Sanctuary.

I represent the Society for Hawaiian Archaeology (SHA) and we have nearly 200 members that include professional archaeologists and advocates of historic preservation in general. Among our members are several maritime archaeologists, who specialize in the identification, documentation, and preservation of submerged cultural resources. We strongly recommend that serious consideration be given to adding "submerged cultural resources" to the responsibilities listed Sanctuary's management plan. We believe that inclusion of submerged cultural resources such as sunken vessels and archaeological sites as a management responsibility is a logical and appropriate step for the Sanctuary to take.

The National Marine Sanctuaries Act (NMSA) authorizes the Secretary of Commerce to designate and manage areas of the marine environment with special national significance due to their conservation, recreational, ecological, historical, scientific, cultural, archeological, educational, or esthetic qualities as national marine sanctuaries. The primary objective of the NMSA is to protect marine resources, such as marine mammals, sunken historical vessels, and unique habitats.

To this end, we note that 185 historic maritime properties – primarily consisting of ship and aircraft losses in Sanctuary waters prior to 1960 – are in waters within the current boundaries of the Sanctuary. Approximately 25 of these sites have been confirmed while the others remain to be investigated. In addition, a significant number of ancient Hawaiian fishponds are along the shorelines of the islands included within the Sanctuary's boundaries. We believe that if submerged cultural resources are included in the Sanctuary's management plan, these significant and irreplaceable historic properties will receive the level of protection that they deserve.

The addition of submerged cultural resources to the Sanctuary's management plan will have the following benefits:

- It will enable the creation and maintenance of an accurate inventory of historic properties within the Sanctuary's boundaries
- It will enable regular monitoring of the condition and status of historic properties
- It will allow for better coordination with the State of Hawai'i on the inventory, documentation, and protection of maritime historic properties such as Hawaiian fishponds that fall under the State's jurisdiction.
- It will allow NOAA and other agencies to develop better programs for public outreach and education pertaining to these significant resources.
- It will improve NOAA's ability to meet its historic preservation responsibilities under applicable Federal law, including Sections 106 and 110 of the National Historic Preservation Act.

For all of these reasons, we respectfully urge you to include submerged cultural resources as an additional responsibility of the Sanctuary's in any revisions to be made to the management plan.

Thank you for considering our comments. Should you have any questions, please feel free to contact me at the above address or email address.