

October 1, 2010

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

**Re: Support of Submerged Cultural Resources within the Hawaiian Islands
Humpback Whale National Marine Sanctuary**

Dear Mr. Tom:

I would like to take this opportunity to support the inclusion of submerged cultural resources (during the forthcoming management plan review) into the Hawaiian Islands Humpback Whale National Marine Sanctuary. The sanctuary, encompassing some 1,218 square nautical miles around the main Hawaiian Islands, from the shoreline to the 100-fathom isobath, is a prime location for potentially significant submerged cultural resources. From early Polynesian explorers, to the 19th century whaling trade, to the islands role in World War II, Hawaii's maritime heritage is truly unique. We must consider that submerged cultural resources are non-renewable and deserve to be protected.

It has been estimated that approximately 75 percent of all shipwrecks within the western hemisphere occur in near shore waters (less than 10m of water). Therefore, the majority of shipwreck sites within the Hawaiian Islands would be located within the Humpback Whale National Marine Sanctuary. A review of one Hawaiian shipwreck inventory indicates there are approximately 53 historic vessels known to have wrecked off the Big Island alone. Many of these wrecks have never been located, documented, or assessed for significance. It can be assumed that the total number of shipwrecks and other submerged resources (such as prehistoric remains, plane wrecks, etc.) is much higher throughout the entire Humpback Whale National Marine Sanctuary.

I have been fortunate to have worked on two submerged cultural resource projects within the Hawaiian Islands. In 2000 I was invited to instruct students (enrolled in the University of Hawaii at Manoa, Marine Option Program) in remote sensing survey techniques for submerged cultural resources. All survey work was conducted in Kane'ohe Bay, Oahu and focused on the potential remains of PBV aircraft associated with World War II. More recently I was invited to participate on NOAA's 2010 Maritime Heritage Cruise to the Papahānaumokuākea Marine National Monument as a remote sensing specialist. We conducted surveys at French Frigate Shoal, Lisianski Island, Pearl and Hermes Atoll, Kure Atoll, and Midway. We were specifically

interested in locating 19th century whaling vessels as well as World War II resources associated with the Battle of Midway. Both of these projects were hugely successful and serve to highlight the range of submerged resources within the Hawaiian Islands.

I urge you to consider diversifying the sanctuary role to include submerged cultural resources. Hawaii is truly a unique place and its maritime heritage is an integral part of the history of these islands and should be protected under NOAA's Sanctuary Management Plan.

Regards,

A handwritten signature in black ink, appearing to read 'Michael C. Krivor', with a large, stylized flourish extending to the left.

Michael C. Krivor, M.A., RPA
Maritime Project Manager