

## Comment on the proposed Sanctuary expansion.

From Kevin Millett, Kalaheo Kauai

### There is no legitimate reason to expand the Sanctuary's dominion

Main points:

- 1) Humpbacks have recovered.
- 2) Sea turtles have recovered.
- 3) Dolphins are not endangered.
- 4) Monk seals are already protected and doing better MHI.
- 5) Coral will not be protected by Sanctuary.
- 6) Sanctuary taking credit for Humpback return is bogus.
- 7) Hawaii already gave NHI to Feds.
- 8) Disentanglement program worthwhile but does not require expanded boundaries.
- 9) Sanctuary Water quality efforts ineffective
- 10) Denying access does not translate to species recovery.
- 11) Sanctuary skews reports of direct human effects vs. non-direct human effects.
- 12) Value the sanctuary could provide within current boundaries

1) Regarding further protections of Humpback Whales: No **additional** protections are needed. The US government is already considering de-listing the humpback from the endangered list. Current laws have proven more than adequate to assist the species back to high population growth.....less than 2000 at the beginning of the whaling Ban to over 60,000 currently. Now up to 13000 in Hawaii.

Current whale protection laws should remain in place.

Expanding the disentanglement program is also laudable but requires no sanctuary expansion to be effective.

2) Regarding further protections of Sea turtles: Current laws on the books have done an excellent job of bringing back the green sea turtle in Hawaii. These laws should remain in place and continue to be enforced. Additional sanctuary protection will not provide any numerical advantage to the population of sea turtles which has grown to over 160,000 statewide.

3) Dolphins are not endangered currently and are already protected by the MMA.

4) Monk seals are clearly doing better in human inhabited waters. So much so that there is a current effort within NOAA to move pups from the northern Hawaiian islands, where

they are completely protected and cut off from humans, down to the southern human inhabited islands, where they appear, for the most part, to flourish alongside humans. They too, are strongly protected by state and federal laws. We can share our beaches with monk seals. We don't need to segregate.

5) Coral reefs are endangered primarily due to distant point source pollution, local agricultural run off and global climate change. All three of these are worth fighting, but none of them will be meaningfully addressed by a Sanctuary. Otherwise, let the **current Sanctuary** get something substantial and meaningful done about any one of the above issues **before** requesting an expansion.

6) Sanctuary taking credit for Humpback return is bogus The Sanctuary has undoubtedly contributed to the survival of a few individual whales by assisting in disentanglement. However, the true savior of the Humpbacks has been and continues to be the BAN on whaling. The same is true of sea turtles.

7) The state of Hawaii has already given the entire Northern Hawaiian Islands 139,797 square miles of the Pacific Ocean (105,564 square nautical miles) - an area larger than all the country's national parks combined, to NOAA to play with. That's enough.

8) The Disentanglement program is worthwhile but does not require expanded boundaries. My company, HoloHolo Charters Inc. and others like it, are glad to participate in rescuing entangled whales. However, there is zero need to create artificial boundaries to get this done. Just ask us instead.

9) Sanctuary Water quality efforts ineffective. The Sanctuary has no leverage or powers over land based agricultural practices. It has even less control over international and national pollution. To imply otherwise is purely dishonest. This will not change with expanded boundaries.

10) Denying access does not translate to species recovery. Humans and other species are not mutually incompatible. The fact is monk seals and humans share the same beaches and waters on a daily basis with very little trouble.

11) Sanctuary skews reports of direct human effects vs. non-direct human effects. To gain credibility with ocean users, the Sanctuary and NOAA would do well to differentiate the harm caused by **direct human interaction** with a given species ( such as a human poaching turtles or shooting seals) as opposed to **indirect human interaction** (such as agricultural run-off or discarded fish nets). NOAA's "top threats" to monk seals list "human disturbance" as number 1. This is a gross lie. Anyone who has ever walked past a monk on the beach knows the seal doesn't even notice you unless you get ridiculously close. The amount of **actual harm** caused criminals intent on killing or injuring seals **compared to the actual harm caused by indirect human action is insignificant!**

11) Worthwhile efforts the Sanctuary should pursue:

- a) Continuing efforts at public education regarding animal interactions, particularly with visitors, remain valuable.
- b) Providing a “bounty” system for discarded/lost fishing nets and lines.
- c) Providing a “bounty” for invasive fish species statewide will do much for reef health and require no federal invasion.
- d) Expanding the disentanglement network throughout the state will also directly help whales, dolphins, seals and turtles. Yet it will not impose onerous bureaucracy on the local humans, as it will require no Sanctuary border expansions..