10 May 2010

Mr. Rowan Gould, Acting Director U.S. Fish and Wildlife Service Department of the Interior 1849 C Street, N.W., Room 3256 Washington, D.C. 20240

Dear Mr. Gould:

In December 2009 the Marine Mammal Commission held its annual meeting in Honolulu, Hawaii, to review marine mammal conservation issues in the Pacific Islands region. The principal objective of the meeting was to review cooperative efforts to recover the Hawaiian monk seal. This species now numbers fewer than 1,200 animals and recently has been declining at a rate of 4.5 percent a year. Recovery of this species should be one of the nation's highest priority marine mammal conservation issues. The National Marine Fisheries Service has lead responsibility for its recovery. However, 90 percent of monk seals haul out on beaches of two Northwestern Hawaiian Islands (NWHI) national wildlife refuges within the Papahānaumokuākea Marine National Monument; thus, monk seal conservation is directly related to the mission of the Fish and Wildlife Service.

During the Commission's meeting, Mr. Barry Stieglitz, project leader for the Hawaii and Pacific National Wildlife Refuge Complex, and Ms. Susan White, the Service's Monument comanager, provided a very helpful review of the Fish and Wildlife Service's activities involving monk seals. Based on results of the meeting, the Commission offers the following recommendations and comments regarding the Service's involvement in Hawaiian monk seal recovery.

RECOMMENDATIONS

<u>The Marine Mammal Commission recommends</u> that, as a co-manager of the Papahānaumokuākea Marine National Monument, the Fish and Wildlife Service—

- provide funding to hire a wildlife biologist for the Hawaiian Islands National Wildlife Refuge;
- increase the annual funding base for the Midway Atoll National Wildlife Refuge by \$3.6 million to enhance management capabilities as called for in the Monument's management plan, including additional support for Hawaiian monk seal recovery efforts;
- provide logistic support, whenever possible, for Hawaiian monk seal recovery efforts by the National Marine Fisheries Service;
- consider options to acquire a vessel to support operations and activities, including logistic needs related to Hawaiian monk seal recovery, in the Papahānaumokuākea Monument and other remote refuges and monuments in the Pacific Islands region; and
- support the National Marine Fisheries Service proposal to remove up to 20 Galapagos sharks at French Frigate Shoals in 2010 by the various methods indicated in the proposal to preserve the atoll's monk seal population.

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RATIONALE

Each year, the National Marine Fisheries Service deploys monk seal field crews to sites within the Midway Atoll National Wildlife Refuge and the Hawaiian Islands National Wildlife Refuge. The Fish and Wildlife Service reviews and approves permits for monk seal field camps, research projects, and management activities in the Monument. Where housing exists (i.e., on Midway and Tern Island), the Fish and Wildlife Service also arranges for National Marine Fisheries Service biologists to use the facilities on a cost-sharing basis. When they are able to do so, Fish and Wildlife Service staff also assist with monk seal tagging, counts, and rescues (i.e., freeing seals entangled in marine debris or trapped in or behind various manmade structures) when monk seal biologists are not present or require assistance, and make space available to transport monk seal biologists and equipment on Fish and Wildlife Service vessel and aircraft charters. All of these types of support are valuable contributions to monk seal recovery.

That being said, the extent to which Fish and Wildlife Service staff can contribute is seriously constrained by lack of resources. The fiscal year 2010 budget for the Midway Atoll National Wildlife Refuge is \$4.77 million, of which \$3.69 million is required to maintain and operate the island's emergency airfield and infrastructure. This leaves about \$1 million for all refuge wildlife needs, such as staff salaries, habitat restoration, research, endangered species management projects, and other basic wildlife management tasks. The budget for the Hawaiian Islands National Wildlife Refuge is \$1.09 million, and that amount is similarly absorbed by salaries, costs for charters to and from the islands, and the most basic maintenance and operational needs. The combined budget of about \$5.8 million is simply not adequate to manage the refuge lands and nearshore waters that are the ecological essence of the Papahānaumokuākea Monument, one of the largest marine protected areas in the world extending nearly 1,200 nautical miles.

Hiring a wildlife biologist for the Hawaiian Islands National Wildlife Refuge is particularly important. The Fish and Wildlife Service currently has one biologist to address wildlife research and management tasks at the Midway Atoll refuge but has no trained biologists dedicated to research activities at the more extensive Hawaiian Islands refuge. Field personnel at the latter refuge are all managers or technicians with little time to devote to biological studies. A fulltime wildlife biologist is needed to conduct essential wildlife research, develop wildlife management plans, oversee habitat restoration projects, and so on. This position also is needed to coordinate, assist, and, as possible, supplement the work of collaborating research scientists from other agencies and academic institutions, including those working on Hawaiian monk seals. The Commission considers the lack of a single wildlife biologist to be unacceptable for a refuge that is the core of such an expansive and internationally important marine protected area and one facing numerous conservation challenges. The Marine Mammal Commission therefore recommends that the Fish and Wildlife Service provide funding to hire a wildlife biologist for the Hawaiian Islands National Wildlife Refuge.

As noted, the current budget for the Midway Atoll National Wildlife Refuge is absorbed almost entirely by maintenance of the airfield and the atoll's extensive infrastructure, which includes contracting for a work crew of some 70 people, plus the salaries of six on-site refuge employees.

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Over the past five years, funding for these operations has remained flat despite increasing costs for operations, salaries, and transportation to and from the refuge. This situation has left almost no funds to restore degraded habitat, renovate decayed historical structures, or upgrade biological, cultural, and historical programs to meet the core conservation goals called for in the Monument management plan. As Midway is the hub for virtually all research and management activities in the western portion of the Monument and the Monument's principal point of access for scientists, students, and other visitors, adequate support for operations and management at this site is clearly necessary. The refuge staff has requested a core budget increase of \$3.6 million to address the Service's responsibilities at the Midway Atoll National Wildlife Refuge.

Monk seals were all but eliminated at Midway Atoll during the period of Navy occupation prior to the 1990s, but they are now slowly recovering at the site. Although the National Marine Fisheries Service has lead responsibility for recovering Hawaiian monk seals, it would be very helpful (and cost-effective) if Fish and Wildlife Service staff stationed on the island could contribute to basic recovery efforts by monitoring, disentangling, and tagging monk seals when National Marine Fisheries Service biologists are not present. The Fish and Wildlife Service also could help by providing logistic support to the National Marine Fisheries Service whenever possible. The National Marine Fisheries Service may need to establish a monk seal care facility to hold seals being transported to and from the main Hawaiian Islands, and support from the Fish and Wildlife Service would be vital in establishing such a facility. The budget requested by the refuge staff to enhance management capabilities should allow the Fish and Wildlife Service to contribute to these and other pressing needs. Therefore, to meet refuge operational needs as identified by the refuge staff, the Marine Mammal Commission recommends that the Fish and Wildlife Service increase the annual funding base for the Midway Atoll National Wildlife Refuge by \$3.6 million to enhance management capabilities as called for in the Monument's management plan, including additional support for Hawaiian monk seal recovery efforts. The Marine Mammal Commission also recommends that, whenever possible, the Fish and Wildlife Service provide logistic support for Hawaiian monk seal recovery efforts by the National Marine Fisheries Service.

Annual charters to transport equipment, personnel, and supplies to remote refuge islands are one of the highest recurring costs for refuges. A single vessel charter to and from the refuges now costs as much as \$180,000. In addition, Presidential Proclamation 8336 created new Fish and Wildlife Service responsibilities at several widely scattered Pacific island groups. The Service's staff has estimated that the Service could save considerable funding over time by purchasing a new multipurpose vessel to support refuges in the Papahānaumokuākea Marine National Monument and other remote holdings in the Pacific. The estimated cost for such a vessel is \$10 million, plus an annual operating budget of \$1.9 million. Considering the need to carry out activities in so many remote areas, and the number of charters otherwise required each year, the Commission believes that the acquisition of a vessel may be warranted. Such a vessel could certainly help meet growing logistic needs and save charter costs for transporting seals, monk seal personnel, and related equipment between the main Hawaiian Islands and the Monument. The Marine Mammal Commission therefore recommends that the Fish and Wildlife Service consider options to acquire a vessel to

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support operations and activities, including logistic needs related to Hawaiian monk seal recovery, in the Papahānaumokuākea Monument and other refuges and monuments in the Pacific Islands region.

Finally, the Commission's meeting included considerable discussion of shark predation on pre-weaned and newly weaned monk seal pups, which has been a major contributing factor in the monk seal decline at French Frigate Shoals. In some years, shark predation has removed one-third of all pups born at this atoll. The National Marine Fisheries Service has proposed to remove up to 20 Galapagos sharks at French Frigate Shoals in 2010 to reduce such predation. Tagging studies indicate that a very small proportion of the local Galapagos shark population exhibits this behavior, and the proposed removal could significantly reduce the number of monk seal deaths with negligible adverse effects on the local Galapagos shark population and the atoll ecosystem.

This proposal requires approval of a permit by Monument co-managers, including the co-manager from the Fish and Wildlife Service. The Commission recognizes that deliberately removing marine resources within a monument established to protect marine life is not to be taken lightly, but it strongly believes that circumstances surrounding this proposed action are in the best interests of Hawaiian monk seals, the French Frigate Shoals ecosystem, and the Papahānaumokuākea Monument. The Marine Mammal Commission therefore recommends that the Fish and Wildlife Service support the National Marine Fisheries Service proposal to remove up to 20 Galapagos sharks at French Frigate Shoals in 2010 by the various methods indicated in the proposal to preserve the atoll's monk seal population.

I hope these recommendations and comments are helpful. Please contact me if you have any questions.

Sincerely,
Thursthy J. Ragen

Timothy J. Ragen, Ph.D. Executive Director

Cc: Mr. Barry Steiglitz
Ms. Robyn Thorson
Ms. Susan White