Sierra Club Comments on DRAFT Main Hawaiian Islands Management Plan for the Hawaiian Monk Seal

Greetings:

Thank you for the opportunity to comment on the DRAFT Main Hawaiian Islands Management Plan (the Plan) for the Hawaiian Monk Seal.

‘ĪLIOHOLOKAI – IN THE TRADITIONAL RECORD

We find it quite appropriate, and valuable, that the Plan begins with an exploration of the place of the Hawaiian monk seal, ka ʻilioholokai, and the honua ola code of conduct, in Hawaiian history and culture. While Western society might view the Hawaiian monk seal as a “resource” to be protected, it is good to recognize that in Hawaiian culture humans and nā ʻilioholokai are fellow creatures sharing the honua ola.

We suggest that the Hawaiian concept of puʻu honua (place of refuge) is also applicable, as the Plan seeks to provide multiple areas of refuge and protection for the ʻilioholokai.

THREATS AND RECOVERY CHALLENGES

As the title of the Plan indicates, the geographic scope of the Plan is the Main Hawaiian Islands (MHI), in recognition of the growing populations of Hawaiian monk seals now found there. The presence of these populations provides a hopeful note for the otherwise alarming picture of an endangered species in decline in its historic habitat in the Northwestern Hawaiian Islands. These populations, however, face a range of threats and challenges specific to the MHI. As identified in the Plan, the threats and recovery challenges are grouped as follows: Infectious Disease, Fisheries Interactions and Entanglement, Human-seal Interactions, Habitat Threats, and Human Dimensions.
HABITAT THREATS-CLIMATE CHANGE

Climate change, especially sea level rise, poses perhaps the most serious long-term threat to monk seal habitat, especially the current habitats in the Northwestern Hawaiian Islands. The growing population of monk seals in the MHI faces the prospect of a shrinking amount of habitat, beaches in particular, unless proactive measures for adapting to sea level rise are undertaken.

The Plan identifies climate change as a Habitat Threat, including the following statement:

“The exact impacts of climate change on monk seals in the main Hawaiian Islands are unclear, but several effects are likely. Sea level rise can erode shoreline habitat the seals need for resting, pupping, rearing, nursing, and molting. In the marine habitat, ocean acidification and seawater warming can cause coral reef die-offs, which could disrupt the overall marine ecosystem around Hawaii and degrade monk seal foraging habitat.”

We found no specific management strategy for dealing with Habitat Threat related to sea level rise. Within the discussion of Habitat Threats, the reader is referred to Strategy: CAPACITY (CAP), Build program capacity. Under CAP we did find Objective CAP-3, relating monk sea habitat. It is stated as follows:

“Partnerships: Improve management partnerships with organizations and regulatory agencies to protect monk seals and their habitat

Activities Outcome

• Engage state, county, and business officials to minimize loss of monk seal habitat due to development (Recovery Plan Action 5.4.2).”

The above activity does not appear to directly address loss of monk seal habitat due to coastal erosion and/or sea level rise.

We suggest the Plan take a more robust stance to deal with climate change impacts, recognizing that much of the actual decision making required to address habitat threats from sea level rise must happen at the state and county levels. While we support Objective CAP-3, “Establish Hawaiian monk seals as an important climate change indicator (i.e., sentinel species)” we suggest additional actions are needed to address sea level rise, especially those threatening monk seal critical habitat in the MHI.

Proactive measures could include identifying coastal areas vulnerable to sea level rise and taking proactive measures to promote natural “retreat” of shorelines where possible, and “managed retreat” of some shoreline areas where necessary, to assure that

1 DRAFT Main Hawaiian Islands Management Plan, NOAA Fisheries, Pacific Island Region, August 2015, Page 10.
2 Ibid, Page 34.
beach shorelines can move inland with sea level rise. Limited amounts of beach nourishment projects may also be warranted in some cases.

A vulnerability analysis may identify preferred habitat areas currently considered for development which may be found to be vulnerable to sea level rise and, hence, eligible for rezoning or acquisition for conservation purposes—including as critical habitat for monk seals. The analysis may also reveal existing developments subject to flooding and/or accelerated coastal erosion with sea level rise, which could also be rezoned or purchased with the result of reducing the loss or monk seal habitat in the MHI, or actually increasing it over time. Such opportunities should especially be sought for Neighbor Island locations, where the barriers to natural or managed retreat likely would be less than on Oahu, and the locations may be less likely to involve substantial human-seal interactions.

Accordingly, we recommend that the Plan include a vulnerability analysis of current and potential monk seal habitats, especially beach areas, to a projected rise in sea level of two feet, as could be performed using NOAA’s sea level rise viewer or similar tools, if sufficient resolution can be obtained.

The counties have jurisdiction over most coastal properties, and their cooperation should be sought in making certain that the need for monk seal habitat, and projections of sea level rise, are incorporated in their land use planning, zoning, and permitting decisions.

MANAGEMENT STRATEGIES

Our remaining comments focus on the Plan’s proposed Management Strategies, which are grouped as follows: Disease Risk, Seal-Fishery Impacts, Response, Engagement, and Capacity.

Disease Risk and Response

The Disease Risk and Response strategies are particularly important for NOAA to support, as they require specialized skills and resources, such as detection of pathogens and use of veterinary services; the ability to mount at sea rescue missions to untangle, unhook, or otherwise help monk seals in distress; and other capabilities beyond those of community organizations, most NGOs, and other partners in the Plan.

On the other hand, as is true for most, perhaps all of the strategies in the Plan, the Disease Risk and Response strategies include actions which would benefit other species, including humans. These include supporting efforts to (1) monitor domestic and feral animals for disease, and reduce the risk of exposure of exotic diseases to the Hawaiian Archipelago through quarantine, vector control, and education programs (Recovery Plan Action 4.1.1); (2) promote stronger laws and regulations concerning invasive species management, and (3) reduce the numbers of feral animal species (cats, rats, mongoose, and pigs) in Hawai‘i. We suggest adding sheep and goats, and game mammals such as deer and mouflon sheep (which can escape and become feral) to the feral animals list.
Seal-Fishery Impacts

The potential for seal-fishery incidents will increase as the populations of Hawaiian monk seals in the MHI increase. Fishers and monk seals will often be found in the same locations, so the proactive measures of the Seal-Fishery Impacts strategy are important—especially the need for outreach to local recreational and commercial fishing communities. While NOAA has an important enforcement role to play, the state Department of Land and Natural Resources (DLNR) has well established connections with the fishing communities and can prove helpful in promoting measures to reduce the frequency of seal-fishery incidents, and the impacts of the incidents which do occur, e.g. by promoting the use of barbless hooks.

We agree that DLNR’s Makai Watch Program, and community-based management groups, should be supported as called for in Recovery Plan Action 5.4.1. The DLNR is chronically underfunded, so additional resources and cooperative actions associated with the Plan will be important. Community members, especially those participating in Makai Watch, can play an important role in promoting pono fishing practices and a recognition by kanaka lawai’a (fishers) that the monk seals should be welcomed and protected rather than viewed as threats and competitors.

The Western Pacific Regional Fishery Management Council has often demonstrated its ability to mobilize large numbers of fishers to respond to issues viewed as threatening their interests. The Council should be encouraged to use that ability to promote communication with the fishing communities in support of measures for addressing, and reducing, the frequency and severity of seal-fishery interactions.

Engagement and Capacity

As pointed out in various places within the Plan, efforts to reduce threats to monk seals and their habitats will have benefits beyond that single species. As an NGO concerned with the health of the coastal ecosystems, we welcome NOAA’s proposed efforts to “Improve communication and engagement between NGOs and other federal and state government agencies and organizations on near-shore ecosystem-based management issues”, (Objective CAP-1) which include, but are not limited to, those related to monk seal population recovery. Accordingly, we request that the Sierra Club be added to the list of Private & Non-governmental Organizations (NGOs) as an NGO with Statewide and National Scope, and primary areas of interest/specialty as follows: Outreach/Education; and Advocacy.3

CONCLUSION

In general, we found the Plan to be comprehensive in scope, and action-oriented. We appreciate the considerable attention given to the need for outreach to communities, NGOs, and the state and county agencies who must be involved for the Plan to succeed. We think the Plan, and the future of the Hawaiian monk seal, would be improved with

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3 Ibid, Page 50.
stronger strategies dealing with sea level rise so as to protect and possibly expand monk seal critical habitat.

We also appreciate your quote from John Muir, founder of the Sierra Club, i.e.: “When one tugs at a single thing in nature, he finds it attached to the rest of the world.”

Sincerely,

Dave Raney

Marine Action Team
Sierra Club
85 Second Street
San Francisco, CA 94105

Miyoko Sakashita
Oceans Director | Senior Attorney

Center for Biological Diversity
351 California Street #600
San Francisco, CA 94104

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