

## Summary of Public Comments Regarding Executive Order 13178

On December 4, 2000, President Clinton issued Executive Order 13178, establishing the Northwestern Hawaiian Islands Coral Reef Ecosystem Reserve which includes the marine waters and submerged lands of the Northwestern Hawaiian Islands, extending approximately 1200 nautical miles long and 100 nautical miles wide. As part of the creation of the Reserve, the President established certain conservation measures that restrict activities throughout the Reserve and created Reserve Preservation Areas around various islands, atolls, and banks within the Reserve where consumptive or extractive uses are prohibited.

The President initiated a 30-day period during which the public had the opportunity to submit comments on the conservation measures and his proposal to make the Reserve Preservation Areas (RPA) permanent. On behalf of the President, the Secretary of Commerce held seven public hearings to accept written and oral comment. Comments were also accepted through email, faxes, and postal mail and compiled by the National Oceanic and Atmospheric Administration.

Within the allotted time, approximately 8,400 comments were received and were a mix of original and form letter comments from around the country with a wide range of opinions. Approximately 500 were unique comments while the overwhelming majority were generated via several form letters. Summary information on unique comments was recorded in a database, including a representative sample of each form letter. Although each form letter submission was not recorded in the database, the total number received was recorded. Separate summary statistics were derived for the unique set of comments as well as the total set of comments, including each form letter submitted. This information is presented in the attached table.

Based on the total number of unique comments, 52% were satisfied with the Executive Order, 31.6% were satisfied with some modifications, 9.7% were dissatisfied, and 9.7% did not specify their level of satisfaction. Of those who responded, 42.8% supported the proposal to make the RPAs and conservation measures permanent. 22.2% thought the RPAs should be more restrictive whereas 3.7% thought the RPAs were too restrictive. 30.7% did not specifically identify a position regarding the RPAs. Similarly, 24.9% wanted the conservation measures to be more restrictive as opposed to 4.5% who felt that the measures were too restrictive. 16.1% were satisfied with the

conservation measures and 54.5% did not state a preference regarding these measures. In terms of fishing, few commented specifically about recreational fishing. As regards commercial fishing, 18.9% felt that commercial fishing measures were too lenient and 8.0% thought that these measures were too restrictive. Most of these comments were directed toward bottomfishing and the seaward boundary within which fishing would be prohibited. Another fishing activity mentioned was the precious coral fishery on which 8.4% commented that precious coral harvesting be prohibited. Less than one percent indicated that they were concerned about the Reserve measures and the effect on the precious coral industry but those who responded did not provide specific recommendations.

The summary information changes dramatically when factoring in each form letter submission. Each form letter favored the establishment of the Reserve and often provided recommendations to strengthen measures. As an example, 96.5% of the total number of comments supported permanent RPAs and conservation measures, a sharp increase from the 42.8% who favored permanency in the unique set. In the unique set of comments, 8.4% supported prohibition of precious coral harvesting whereas this percentage increases to 94.3% of the total number of comments.