

MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814

25 May 2007

BOARD OF LAND AND NATURAL RESOURCES
P. O. Box 621
Honolulu, Hawaii 96809

SUBJECT: Request for a Papahānaumokuākea Marine National Monument Research Permit by the Pacific Islands Fisheries Science Center to Conduct Shark Control Activities.

Dear Members of the Board of Land and Natural Resources:

We understand that you are about to review and consider the subject request by the Pacific Islands Fisheries Science Center (PIFSC). The purposes of the requested permit are to help halt the decline and promote the recovery of the Hawaiian monk seal population at French Frigate Shoals and restore the affected marine ecosystem so that it also includes the seals.

We appreciate that approval of the request involves a difficult and complex decision, one not to be taken lightly. The PIFSC has requested permission to remove a number of Galapagos sharks, which, like monk seals, are important components of the ecosystem. Unfortunately, this is an example (among many) where a healthy predator population hinders the survival and recovery of a protected species. Such circumstances may require a difficult, measured management decision to carefully cull a few individuals of one population to allow recovery of the other, thereby promoting the return of the affected ecosystem to a more natural state.

We understand that staff from the Department of Land and Natural Resources have raised questions about the scientific basis of the proposed work. They have done their job—understanding the type of predator-prey relationship implicated in this case is often fraught with uncertainties that, under the best circumstances, are addressed by appropriate long-term research. We also believe that PIFSC scientists have been diligent in seeking alternative remedies to this situation. We strongly encourage them to continue their search for alternative management solutions and to conduct research to address the remaining uncertainties.

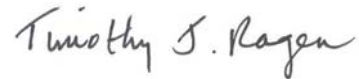
Regrettably, the circumstances surrounding the Hawaiian monk seal have become critical. Poor juvenile mortality has led to a significant decline that will continue for some time because of the now-distorted age distribution. Furthermore, shark predation is only one of several identified causes of poor juvenile mortality, all of which must be addressed. FFS still is home to one of the largest and most important populations of monk seals; loss of this group would have severe consequences for the species as a whole.

At the same time, however, we believe that the proposed work will provide important insights that will improve future management of this shark predation problem. From the perspective of a cost-benefit analysis, the proposed removal does not pose a significant risk to the shark population or the ecosystems, whereas it could be critical for the monk seal population. Although all

of us would prefer better alternatives for addressing this situation and more time to reduce remaining uncertainties, postponing or failing to conduct the proposed work may subject the monk seal population to further losses, which it clearly cannot tolerate.

For all of these reasons, the Marine Mammal Commission respectfully urges you to approve this permit. Please contact me if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a large, prominent initial 'T'.

Timothy J. Ragen, Ph.D.
Executive Director