

**Papahānaumokuākea Marine National Monument
Management Plan**

**Scoping Report
Summary of Public Comments and Responses**

**U.S. Fish and Wildlife Service
and
National Oceanic and Atmospheric Administration**

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List of Acronyms

AIS	Alien and Invasive Species
CFR	Code of Federal Regulations
CCP	Comprehensive Conservation Plan
DLNR	State of Hawaii Department of Land and Natural Resources
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
FR	Federal Register
FWS	U.S. Fish and Wildlife Service
IMVSP	Interim Midway Visitor Services Plan
MDA	Missile Defense Agency
MMB	Monument Management Board
MMP	Monument Management Plan
Monument	Papahānaumokuākea Marine National Monument
nm	Nautical miles
NMFS	National Marine Fisheries Service (NOAA Fisheries)
NOAA	National Oceanographic and Atmospheric Administration
NWHI	Northwestern Hawaiian Islands
RAC	Reserve Advisory Council
Reserve	Northwestern Hawaiian Islands Coral Reef Ecosystem Reserve
ROP	Reserve Operations Plan
SMP	draft Sanctuary Management Plan
VMS	Vessel Monitoring System

1.0 Introduction

This scoping report summarizes the issues and opportunities identified by the U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration (NOAA), their partners, and the public about management of the Northwestern Hawaiian Islands (NWHI). Extensive public outreach was conducted initially as part of the proposed designation of the NWHI as a National Marine Sanctuary. With the establishment of the NWHI as the Papahānaumokuākea Marine National Monument (Monument) in 2006, public comments were solicited and received for the draft Interim Midway Visitor Services Plan (IMVSP) and the draft Sanctuary Management Plan (SMP) as the basis for developing the Monument Management Plan (MMP) and associated Environmental Assessment (EA). The MMP will consist of Action Plans that will address a range of issues related to Monument management. This scoping report summarizes issues raised during these three public comment periods spanning a period of over 7 years.

The Monument was established on June 15, 2006, via Presidential Proclamation 8031 under the authority of the Antiquities Act. NOAA and the FWS promulgated final regulations for the Monument under 50 *Code of Federal Regulations* (CFR) Part 404 on August 19, 2006. These regulations codify the scope and purpose, boundary, definitions, prohibitions, and regulated activities for managing the Monument. The proclamation was amended on March 6, 2007, to establish the name of the Monument and clarify some definitions. Many issues associated with the proposed sanctuary designation process have been settled through establishment of the Monument and these codified regulations, as well other relevant laws. Some issues raised in public comments on the draft IMVSP were addressed in the final IMVSP. Some new issues, identified since the establishment of the Monument, as well as previously identified issues will be addressed as part of the development of the MMP and EA. Finally, some issues are outside the scope of the Monument planning process. This document describes the issues and categorizes responses to these issues as:

- Issues settled by Presidential Proclamation 8031 establishing the Monument, Monument regulations, and other relevant laws
- Issues that have been previously addressed within the IMVSP and associated EA
- Issues to be addressed within the MMP and associated EA
- Issues outside the scope of the Monument management planning process.

Section 2.0 provides an overview of public and agency outreach efforts from the designation of the NWHI Coral Reef Ecosystem Reserve in 2000 through the notice to the public to prepare the MMP. Sections 3 and 4 summarize issues raised during proposed sanctuary designation and the draft IMVSP. Section 5 describes issues raised during the recent public scoping period for development of the MMP and EA that ended June 4, 2007. Section 6 provides an overall summary of Monument-wide or Midway-specific issues based on comments received from public and agency outreach described in Sections 3, 4, and 5.

2.0 Overview of Public and Agency Outreach

In 2000, President Bill Clinton issued Executive Order 13178 (EO 13178), establishing the NWHI Coral Reef Ecosystem Reserve (Reserve), with the purpose “to ensure the comprehensive, strong, and lasting protection of the coral reef ecosystem and related marine resources and species of the Northwestern Hawaiian Islands.” This EO directed the Secretary of Commerce, in consultation with the Secretary of the Interior, to develop a Reserve Operations Plan (ROP) and “initiate the process to designate the Reserve as a national marine sanctuary.” The EO also directed the Secretary of Commerce to establish “a Reserve Advisory Council (RAC) to provide advice and recommendations on the Reserve Operations Plan and designation and management of any sanctuary.” This section overviews public and agency outreach to solicit comments since 2000 on management of the NWHI through the Reserve Operations Plan, the proposed Sanctuary designation and the formulation of a Monument Management Plan.

2.1 Public Scoping for the Proposed Designation of the NWHI as a National Marine Sanctuary

Between 2000 and 2005, NOAA conducted an extensive scoping process, including over 100 meetings with jurisdictional agency partners, the RAC, the Western Pacific Fishery Management Council, non-governmental organizations, fishing and other stakeholder groups, and the public. The aim was to identify concerns related to sanctuary designation and development of the range of alternatives considered. This process included nearly 52,000 public comments received, most supporting strong protection of the NWHI. The comment period for public scoping started on March 18, 2002, and ended on May 17, 2002. Ten public scoping meetings were held between April 9 and April 19, nine in Hawaii and one in Washington, D.C. In order to include all comments sent after May 17, 2002, a later announcement to reopen the comment period for another 16 days was published in the *Federal Register* on July 22, 2002. All comments received between March 18 and August 6, 2002, were included as public scoping comments. Issues raised during this period are summarized in Section 3.

2.2 Public Scoping for the Draft Interim Midway Visitor Services Plan

In preparation for reopening of its Midway Atoll visitor program, FWS developed a draft IMVSP, which was open for public comment from December 8, 2006, through February 6, 2007; comments dated within 2 weeks after the official close of the comment period were accepted and analyzed. A total of 6,282 responses (by letter, e-mail, or telephone call) were received by FWS. This large response to the draft plan evidences the significant interest in the Monument, which was established during development of this plan. Along with the draft SMP, the IMVSP will become the basis for much of the MMP as this relates to the Midway Atoll National Wildlife

Refuge. Issues raised during this period are summarized in Section 4. The complete scoping report can be found in Appendix L of the approved IMVSP.

2.3 Public Scoping for the Preparation of the Monument Management Plan and Associated EA

After establishment of the Monument, public information meetings were held on all main Hawaiian Islands to inform the public of the establishment of the Monument and regulations. A total of 471 people attended meetings as follows:

- Moloka‘i, September 25, 2006 – 24 people
- Maui, September 27, 2006 – 79 people
- Lāna‘i, September, 28 2006 – 8 people
- Wai‘anae, October 2, 2006 – 37 people
- Honolulu, October 3, 2006 – 110 people
- Kāne‘ohe, October 4, 2006 – 55 people
- Kaua‘i, October 5, 2006 – 49 people
- Kona, October 10, 2006 – 56 people
- Hilo, October 11, 2006 – 53 people.

Overall, establishment of the Monument and the regulations codified under 50 CFR 404 were well received by the public, most of whom supported strong protection of the ecosystem of the Monument.

On April 4, 2007, the FWS and NOAA issued a *Federal Register* notice [72 FR 64.16328] for preparation of the MMP and associated EA for the Monument. The FR notice states “It is the intent of the Co-Trustees to integrate agency planning and operational needs into a single Monument Plan. A draft Monument Plan [and associated environmental assessment] will be distributed for public review and comment early in 2008.” The public was directed to focus additional comments “on any new environmental issues identified as a result of new information or changed circumstances since the comment periods identified above.” The public comment period for this notice ended on June 4, 2007. Issues raised during this period are described in Section 5.

3.0 Summary of Issues on the Proposed Sanctuary Designation

A summary of issues related the proposed sanctuary designation is provided in Table 1. Each issue is summarized, followed by a response categorized as “Settled” based on Monument and other relevant regulations, “To be addressed” in MMP, or “Out of scope” of the MMP.

Table 1. Summary of Issues on the Proposed Designation of the NWHI as a National Marine Sanctuary

Issue	Response (Settled, To be addressed, Out of scope)
Impacts of the aquarium trade	Settled – Aquarium collecting is prohibited by Monument regulation
Need for monitoring and research on the ecosystem and cultural resources	To be addressed – All Action Plans in the MMP will be developed using the best available science to undertake activities in a manner that ensures ecosystem diversity, integrity, and health, and cultural resource protection, preservation and interpretation.
Need for clearly defined and easily identified boundaries and zones to facilitate enforcement	Settled – Monument regulations establishing Monument boundaries include a specific zoning scheme with specific regulations for individual zones. Zoning includes Special Preservation Areas, Ecological Reserves, Midway Special Management Area, and Commercial Fishing Phase-out Area. A map of these boundaries and zones is included in the Monument regulations.
Conservation and protection, management, and care of natural and cultural resources	To be addressed – This is the primary purpose of the Monument; it will be addressed in various Action Plans of the MMP.
Native Hawaiian management concepts and access	To be addressed – Native Hawaiian input, including traditional management concepts, will be incorporated throughout the MMP. Settled – Native Hawaiian practices is one of the six permit types issued for access to the Monument.
Interagency and international cooperation for protecting endangered species	To be addressed – With the establishment of the Monument, interagency cooperation will be accomplished through a number of Action Plans. Outside of scope – International cooperation for endangered species occurs at an elevated level of government outside the MMP.
Protection of endangered or threatened species including Hawaiian monk seals, sea turtles, birds, and other marine animals	Settled – Endangered species protection is a primary objective of both the FWS and NOAA and covered by existing laws. The Endangered Species Action Plan will specifically address protection of these species under existing laws and promote coordination among the Co-trustees to implement recovery actions.
Increasing public understanding and appreciation of the NWHI through education and outreach	To be addressed – Education and outreach constitute a large component of the MMP and will be addressed cooperatively in the Constituency Building and Outreach and Ocean Ecosystem Literacy Action Plans by the Monument agencies.
Specific fisheries and their economic and ecological impacts	Settled – Commercial fishing will continue until June 15, 2011, and recreational fishing is prohibited by Monument regulations. Sustenance fishing may be permitted outside of the Special Management Areas as a term or condition of any permit issued by the Monument. To be addressed – Sustenance fishing is a regulated activity and will be addressed in the Permitting Action Plan.

Table 1. Summary of Issues on the Proposed Designation of the NWHI as a National Marine Sanctuary

Issue	Response (Settled, To be addressed, Out of scope)
Habitat alteration due to natural phenomena and human activities	<p>To be addressed – Habitat alteration due to natural processes and human activities will be addressed in the Habitat Management and Conservation, Marine Debris, and Alien Species Action Plans.</p> <p>Out of scope – Extensive habitat alteration, if identified in the future for the purpose of resource management, would require a separate environmental analysis and other consultations prior to approval.</p>
Interagency management coordination and inclusion of state lands and waters in the proposed Sanctuary	<p>Settled – The establishment of the Monument requires interagency management coordination; State waters and all emergent land are included by Monument designation.</p>
Impact of invasive species altering habitat structure and the economic cost of preventing the introduction of alien species	<p>To be addressed – The MMP will address the impacts, costs, and preventative measures of land and marine alien and invasive species (AIS) in the Alien Species Action Plan.</p>
Vessel groundings, release of hazardous materials or wastes, and other maritime hazards	<p>Settled – The release of hazardous waste is prohibited by regulation throughout the Monument.</p> <p>To be addressed – Vessel groundings and similar unforeseen events will be addressed in the Emergency Response Action Plan.</p>
The interdependence of species across the archipelago	<p>To be addressed – Designation of the Monument acknowledged the interdependence of marine, coastal, and land habitats and species. The Conservation Science Action Plan will further develop the connections between species and habitats.</p>
Cleanup of marine debris	<p>To be addressed – The clean-up of marine debris in the NWHI has been ongoing since 1996, and the Monument staff will continue this into the future. Marine debris initiatives and MMB cooperation regarding this issue will be covered in the MMP.</p>
The potential impacts military activities have on the health of the ecosystem	<p>Settled – Monument regulations state that “activities and exercises of the Armed Forces shall be carried out in a manner that avoids, to the extent practicable and consistent with operational requirements, adverse impacts on monument resources and qualities...” and “In the event of threatened or actual destruction of, loss of, or injury to a monument resource or quality resulting from an incident, including but not limited to spills and groundings, caused by a component of the Department of Defense or the USCG, the cognizant component shall promptly coordinate with the Secretaries for the purpose of taking appropriate actions to respond to and mitigate the harm and, if possible, restore or replace the monument resource or quality.”</p>
Facilitation of multiple use of the proposed Sanctuary, including all public and private uses	<p>Settled – Monument regulations established Ecological Reserves, Special Preservation Areas, and the Midway Atoll Special Management Area that identify the types of activities permitted in each of these areas.</p> <p>To be addressed – Human uses will also be addressed in the Permitting Action Plan and the Midway Atoll Visitor Services Action Plan.</p>
Cultivation of partnerships between federal and state agencies and the public and nongovernmental organizations	<p>Settled – The Monument will be jointly managed by the Co-trustees, with a Monument Management Board (MMB) established at the field level to promote coordinated management.</p> <p>To be addressed – The Constituency Building and Outreach Action Plan will provide mechanisms for public input and partnerships.</p>
Pollution in all forms	<p>Settled – Monument regulations address pollution from vessels.</p> <p>To be addressed – Response to accidental or unavoidable pollution impacting Monument resources will be addressed in the MMP.</p>

Table 1. Summary of Issues on the Proposed Designation of the NWHI as a National Marine Sanctuary

Issue	Response (Settled, To be addressed, Out of scope)
Communication and representation in a Sanctuary Advisory Council	To be addressed – The Constituency Building and Outreach Action Plan of the MMP will identify strategies for public participation in the Monument; the Permitting Action Plan of the MMP will include public involvement procedures.
Protection of resources through enforcement, education, policy, and management	To be addressed – Resource protection is the primary goal of the Monument and will be addressed in some manner in every Action Plan.
Restoration and enhancement of natural habitats, populations, and ecological processes in the proposed Sanctuary	To be addressed – The Habitat Management and Conservation Action Plan will cover this issue and conducting research to understand the ecological processes of the NWHI will be covered in the Conservation Science Action Plan.
Identification of potential tourism, recreational, and commercial activities	To be addressed – The IMVSP is the primary document to be incorporated into the MMP regarding this issue. Activities of this nature will be strictly limited in other areas of the Monument (see Section 4.0 for additional information)
Managing information across multiple agencies	To be addressed – Synthesis of information for management purposes will be covered in the Information Management Action Plan
Anticipation of future technologies with unforeseen impacts	Settled – All proposed activities must meet the criteria established in the Proclamation findings to minimize impacts to Monument resources To be addressed – Review and evaluation of proposed activities will be covered in the Permitting Action Plan.
Interagency coordination of NWHI permits, enforcement and research	Settled – A streamlined permitting system has been developed by the MMB. To be addressed – Coordination of enforcement activities across multiple agencies will be described in the Enforcement Action Plan and coordination of research will be described in the Conservation Science Action Plan.
Coordination with the military	To be addressed – Coordination with the military will covered in the Inter-agency Coordination Action Plan.
Development of international initiatives	To be addressed – Several international initiatives have been undertaken and will be described in the Marine Debris, Vessel Hazards, and Interagency Coordination Action Plan,
Evaluation and assessment of management activities	To be addressed – Evaluating the success of management actions to protect and conserve Monument resources is a high priority. An Evaluation Action Plan will be developed to ensure that management actions are achieving stated goals and objectives for the Monument.
Managing access to the NWHI	Settled – All access other than innocent passage without interruption, emergencies, and military requires a permit

4.0 Summary of Issues on the Draft Interim Midway Visitor Services Plan

A summary of issues related to the draft IMVSP is provided in Table 2. Each issue is summarized from the response to public comments report prepared for the IMVSP (see Appendix L of the IMVSP) followed by a response categorized as “Settled” based on Monument and other relevant regulations, “Addressed” in the final IMVSP, “To be addressed” in MMP, or “Out of scope” of the MMP. Although the IMVSP is being replaced with a longer term document included as an appendix in the MMP, the existing compatibility determinations resolved most issues for a period of 10-15 years.

Table 2. Summary of Issues on the Draft Interim Midway Visitor Services Plan

Issue	Response (Settled, Addressed, To be addressed, or Out of scope)
Visitor Services Plan Development	
FWS expertise in visitor programs	Addressed — FWS has significant experience developing and managing visitor services programs, and has many employees with education and experience in this field—including many who have worked on Midway Atoll in the past.
Public involvement in plan development	Settled – The 60-day public review provided public input. Opportunity for additional public input on this subject will be provided during a public review of the draft MMP.
Enforcement of Rules	
Need additional enforcement presence	Addressed – One full-time refuge officer will be stationed at Midway, with other FWS positions possibly incorporating enforcement into their duties as needed. Additional enforcement presence will be added for large events (such as the 65 th Anniversary of the Battle of Midway commemoration).
Regulations of various types of visitors	Addressed – Visitors, residents, and transients engaging in recreational activities at Midway all must conform to the same requirements and stipulations, ensuring natural and historic resource protection and human safety.
Specific enforcement protocols	To be addressed – The Enforcement Action Plan will provide for the assessment and fulfillment of enforcement needs throughout the Monument.
Permitting	
Cruise ship requirements	Settled – Cruise ships will be required to obtain a Special Ocean Use permit and will need to abide by specific requirements, including Vessel Monitoring System (VMS) capabilities and hull cleanings. Additional details will be identified in the Permitting Action Plan.
Commercial recreational uses	Addressed – The IMVSP has revised this title to “Additional Requirements for Special Ocean Uses.”
Permit status for rules violators	To be addressed – The penalty for permit violators will be explored in the MMP, and will encompass all permit types throughout the Monument.
Public comment	To be addressed – Public involvement in the permitting process is a Monument-wide issue and is discussed in Section 5.0.
Permit tracking and annual public use report	Addressed – A Midway recreation permit application and reporting form for overnight visitors will be posted on Midway Atoll National Wildlife Refuge website prior to its implementation. Visitors staying on Midway for a few hours will supply the information needed for an annual report via a shorter form.

Staffing	
Use of FWS staff, volunteers, and “cooperators”	Addressed – All visitor activity will be under FWS supervision. Monument staff and qualified non-government guides will have the same expertise and commitment to resource protection as FWS staff.
Stable funding for staff	Addressed – FWS wants the visitor program to be self-sustaining in the long term. Future funding security may be improved due to Monument management.
Visitor Carrying Capacity	
Lottery system	Addressed – FWS does not anticipate needing a “lottery system; rather, we envision a “first come, first served” while staying within the restrictions outlined in the IMVSP.
Cap on total overnight and daily visitors	To be addressed – FWS lowered the maximum number of overnight visitors from 50 to 40; the maximum number of day visitors is of less concern, as these people remain on existing roads and trails, and their presence does not impact Midway’s resources.
Independent Visitors	
Oversight	Addressed – The vast majority of “independent” visitors are not violators; areas open and closed to visitors are clearly depicted on maps; and visitor services personnel will be responsible for monitoring for monk seal presence and ensuring areas to be avoided are well marked.
Not following rules	Addressed – Independent visitors must follow same rules as those for organized groups.
Introduction of Invasive Species	
Protocols for prevention	Addressed – While Midway is already a highly altered ecosystem, appropriate protocols are in place to stop the spread of invasive species— including hull inspections, snorkel/dive gear treatment, and luggage inspection of air passengers.
Visitor Orientation	
Time of orientation	Addressed – Visitors will attend an orientation session within 12 hours of arrival on Midway.
Orientation packet	Addressed – Advance materials will be provided to all visitors to Midway to acquaint them with our rules and restrictions in advance of their arrival. Upon arrival, visitors will sign a recreational permit, which will allow staff to answer questions and ensure that all visitors have read and understand the rules.
Visitor Impacts on Wildlife	
Public input	To be addressed – FWS will make the wildlife monitoring plan available to the public on its website. The public will have opportunity to provide input on all aspects of the MMP as well.
Monk seals	Addressed – Refuge staff will consult with National Marine Fisheries Service (NMFS) and review available information to minimize adverse impacts from visitors to Midway. Visitor-related powerboat traffic will be routed away from preferred monk seal sites. To be addressed –. Established protocols, monitoring, and assessment will be developed in the MMP.
Dolphins	Addressed – Power boat operators may slow to allow visitor observation of approaching spinner dolphins, but will neither pursue the dolphins nor specifically seek them out. Entering the water will not be allowed. Routes to and from snorkeling/dive sites will be plotted to avoid known resting areas of spinner dolphins (as well as monk seal and sea turtle preferred sites) in the lagoon.
Birds	Addressed – Visitors may assist biologists in research and monitoring activities (for example, holding a bird while the biologist bands it). Birds in distress would normally be assisted by monument staff or long-term volunteer(s).

Lead contamination	To be addressed – Lead-based paint on buildings at Midway Atoll is being removed as rapidly as possible at existing funding levels. This issue will be addressed in detail in the MMP.
Interpretation	
Bilingual capabilities	Addressed – Most interpretive material will be written in English. If we begin welcoming more foreign visitors, we will provide translations as needed.
Veterans	To be addressed – The U.S. Navy videotaped several Battle of Midway veterans in the mid-1990s, and that video is frequently shown to visitors at Midway. We would welcome additional opportunities to interview veterans to preserve their personal experiences at Midway.
Wildlife signs vs. historic signs	Addressed – Many sign-related concerns will be addressed in the step-down Midway Atoll sign plan to be developed by spring 2008. The IMVSP provides for installing the history-related interpretive panels before the wildlife-oriented panels because the former already have been fabricated and are in storage on Midway, awaiting installation.
Off-site exhibit and program site	To be addressed – Opportunities and locations to include information about Midway Atoll and Papahānaumokuākea Marine National Monument will be explored within the outreach action plan in the MMP.
Snorkeling and Diving	
Safety of visitors	Addressed – All snorkel trips into the lagoon will be guided by FWS or FWS-approved leaders. Visitors will be briefed during the mandatory orientation session if sharks may be present. Water-related activities will not be permitted during peak shark foraging times. All boat-based visitor activities will end 1 hour before sunset.
Disturbance of protected species	Addressed – FWS will work with NOAA to review Hawaiian monk seal “hot spots” and will avoid any areas where monk seals are seen on the emergent reef. All snorkelers will be briefed about wildlife etiquette and human safety before entering the water.
Personal dive gear as vector for alien species	Addressed – Specific snorkel and dive gear cleaning protocols developed for the monument are included in the IMVSP. These protocols were developed and reviewed by scientists and dive officers from the federal, state, and private sectors to ensure that transmission of coral disease pathogens and invasive species are prevented. All visitors bringing such equipment to Midway will be required to follow these protocols on site.
Live aboard charters	Addressed – Live-aboard dive boats will not be allowed at Midway Atoll.
Kayaking	
Distance from protected species	Addressed – The Watchable Wildlife viewing guidelines in the IMVSP require kayak tour groups to stay 150 feet from the West Beach shoreline, and 500 feet from any mother monk seal with pup. The Refuge Manager has the authority to halt kayaking tours if sharks or other threats to human safety appear, or if inappropriate impacts to wildlife or habitat occur.
Trained guides	Addressed – With the small scale of this interim program, we do not believe it necessary to seek a concessionaire to offer guided kayaking tours.
Support boats	Addressed – We do not plan to accompany kayaking tours with a support powerboat, which could cause significant wildlife disturbance and impact the tranquility of the kayaking tour.

Trails	
Monk seals on land	Addressed – We do not anticipate major changes to the West Beach trail will be necessary. The original trail was designed in consultation with monk seal biologists, and much of it is behind dunes and in the midst of the ironwood forest. As wildlife interpretive panels are developed, we will emphasize the need to be alert for resting monk seals, even in the vegetation, and to maintain the required distance from them at all times. These same signs can be used along the South Beach trail, if necessary.
Bird watching	Addressed – The Eastern Island tour route varies according to the presence of wildlife. Sooty and gray-backed terns blanket portions of the island from April to August and are very susceptible to disturbance. Therefore, Eastern Island tours are generally rerouted and shortened to minimize disruptions. It is more appropriate for humans to adapt rather than to expect the wildlife to adapt.
Volunteers	
Involvement in restoration and monitoring	Addressed – Volunteers will continue to be involved in activities on Midway to increase the satisfaction of the visit and impress a conservation ethic on visitors.
Volunteer protocols	Addressed – No changes are made in the volunteer strategies, as refuge or other designated biologists ensure no Hawaiian monk seals or sea turtles are present on a beach to be cleaned prior to allowing visitors access.
Means of Transportation	
Airplane	To be addressed – Visitors to Midway will use charter planes separate from those bringing FWS or contractor employees. Visits to Midway are generally for one week, as this maximizes the economy of the flights. Few companies (currently only one) are willing to fly to Midway, limiting options for visitors.
Cruise ships	Addressed – Cruise ships will have to apply for a Special Ocean Use permit, and will need to meet all Monument regulations and permit requirements, including hull inspections prior to entering Monument waters. A maximum of three individual cruise ship visits will be allowed at Midway during any year. Anchoring will be permitted only in the area immediately outside the entrance to the channel. The use of anti-fouling paints should be addressed in the permitting requirements. Both the Refuge Manager and cruise ship captain have the authority to decide not to offload passengers in order to ensure passenger safety.
On island/harbor transportation	Addressed – Most visitors walk or ride bicycles, but golf carts are provided for those who cannot keep up with a tour group. The carts will be driven by FWS staff or tour guides who are given explicit instructions regarding how to drive during albatross season. Permitted boat speeds within the harbor are 6 mph or 10 knots, based on Section 7 consultations.
Other Issues	
Adequacy of funding to implement the program	Addressed – Operating a self-funded visitor program is a great challenge, but given limited federal dollars, this must be the goal. FWS will not sacrifice monitoring and management efforts or the protection of our natural and historic resources to achieve self-funding. Settled – There are no plans to provide a private recreational fishing concession at Midway to increase revenue as this would not comply with the Proclamation establishing the Monument.
Safety protocols for visitors	Addressed – Midway has a well-equipped medical facility; kayak and snorkel guides are well trained and will follow specific safety protocols; all vessels will return to pier one hour prior to sunset in case a search and rescue mission is needed because of visitor activities.

Costs to the visitor	Addressed – Visitor costs reflect the high cost of operating a remote atoll. Charter flight costs are fixed, maintenance of buildings is high, and flying in food is expensive. FWS continues to look for efficiencies that will reduce overall costs, but the Atoll will always be expensive to oversee. FWS also encourages educational groups to seek grants to offset costs.
Use of amateur radios	Addressed – An evaluation of this activity deemed it “Appropriate” for the refuge, and a compatibility determination (that is, the process that FWS uses to assess activities) has been approved. We will be pleased to work with amateur radio users to develop a protocol for their operations on Midway.
Enhancing visitation	Settled – The language in the IMVSP was taken directly from the White House fact sheet issued with Proclamation 8031.
Protect Cold War facilities	Settled – Midway’s Cold War facilities are not designated as eligible for listing on the National Register of Historic Places.
Market nature photography groups	Addressed – Identifying and contacting such companies is included under Objective 2.6 of the IMVSP.

5.0 Issues Raised During Public Scoping for the Preparation of the Monument Management Plan

A total of 298 letters from the public were received during the public comment period that ended on June 4, 2007, of which 294 letters were form letters. Each issue is described below based on the comments received, followed by a response categorized as “Settled” based on Monument and other relevant regulations, “To be addressed” in MMP, or “Out of scope” of the MMP.

5.1 Monument Management Plan Development

Issue: Lack of transparency in Management Plan process

The last opportunity for members of the public to participate in the development of a management plan was at a workshop for the draft SMP held in Mākaha, O‘ahu, in April 2005. No further review from the public has occurred. Since the establishment of the Monument in June 2006, there have been few opportunities for public comment. A citizen's advisory council for Monument management and management plan development is needed, including a process for transparent decision-making and full public participation. The Co-trustees should incorporate public comments made to date, establish an open transparent review process with public participation for each section of the MMP, and solicit public comment on a draft and final MMP.

Response: Settled. *The public was provided an opportunity to comment on the draft SMP that will form the basis for the draft MMP. The draft MMP augments the marine components addressed in the SMP by incorporating FWS refuge comprehensive conservation planning requirements, State Department of Land and Natural Resources (DLNR) planning needs, and other elements to reflect the area’s status as a marine national monument. Upon completion of the draft MMP, the MMB will solicit public comment on the plan.*

Issue: Monument Goals and Objectives

The original, publicly vetted Goals and Objectives for the proposed Sanctuary, approved by the RAC, should serve as a basis for guiding management of the Monument. It is also important that the cultural and spiritual connections of Native Hawaiian people with the NWHI are recognized and supported within these goals and objectives, and throughout the management plan.

Response: To be addressed. *Based on the language from the Monument Proclamation, the Goals and Objectives from the draft SMP are the starting point from which the MMB will develop the Goals and Objectives for the MMP. These new Goals and Objectives will need to satisfy requirements to which each Co-Trustee is bound through given mandates.*

Issue: Re-institute citizens’ advisory council in the Monument Management Plan

There is a general concern for the lack of public involvement over the past 2 years, with all decisions relating to MMP development having come from agencies without public participation. The formulation of an independent body is recommended to provide advice to the agencies regarding all aspects of Monument management. Members of this body should be drawn from a cross-section of the public and stakeholders groups—including scientists, Native Hawaiians, and

conservationists. A citizens' advisory committee is considered essential not only for advice on management but also for promoting transparency and accountability in the management of the Monument.

Response: To be addressed. *The MMB is working together on a Constituency Building and Outreach Action Plan that will describe strategies and activities to engage a broad range of stakeholders in providing advice and input on management of the Monument. This Action Plan will be the basis for the public's involvement with activities and associated management of the Monument. The opportunity for public input on this Action Plan will be provided during the review of the draft MMP.*

Issue: Weak management plan

The draft SMP posted online for the "Notice of Monument Plan preparation" public comment period (April 4 - June 4, 2007) is weaker than the ROP. The ROP, and not the draft SMP, should be used as the basis for the MMP. If the draft SMP is to be used as the basis for the MMP, it should incorporate the strongest conservation elements of the sanctuary plan into the MMP, and rigorously apply the precautionary principle to Monument protection and management. The plan must develop strong and clear policies and guidelines—tied to conservation, protection, and restoration goals that will dictate how all new activities and impacts will be reviewed, evaluated, and managed in the future. Only those activities demonstrated not to cause significant harm to the Monument or compromise the ecological health, integrity, and resilience of its ecosystem should be permitted.

Response: Settled. *The Proclamation that established the Monument stipulates that the draft SMP is to be used as the basis for the MMP.*

Issue: Inconsistency in rules

The current plan has significant inconsistencies with rules promulgated for the State NWHI Marine Refuge (HAR Ch. 13-60.5), including proposed types of permitted activities, exemptions for waste discharge, and mechanism for issuing permits.

Response: Settled. *The MMB acknowledge the differences between the existing State NWHI Marine Refuge rules and the joint regulations issued by NOAA and FWS. While the monument encompasses state waters, it does not diminish or enlarge the State's jurisdiction, so the federal rules do not supersede the State rules in their waters. The MMP will be developed with this understanding and to the extent possible, with an integrated management approach. Future efforts to reconcile the regulatory differences may be pursued at a later time.*

5.2 Permitting

Issue: Permitting process and public notice

Permitting is the critical element in managing human uses in the Monument. Standards for what types of human activity and under what conditions these will be conducted have been mandated by Executive Orders, developed under the ROP and the draft SMP, and codified into both state and federal law. Because of the importance of this issue, numerous recommendations related to permitting were made by the public as follows:

- **Establish a 90-day public notice period for all permits to allow adequate time for review** – Given that activities occurring within the Monument take 12-18 months of planning, and that the number of permit applications is growing, a 90-day public review period is not unreasonable or difficult to provide.
- **Ensure transparency in the permit review process** – The permitting process developed by the State Department of Land and Natural Resources (DLNR) for the State’s NWHI Marine Refuge represents the benchmark for ensuring maximum transparency and public involvement. This includes disclosure of pre-decisional information to the extent possible by law. State and federal staff must implement and abide by all sunshine law requirements and the DLNR’s commitment to the greatest level of transparency.
- **Establish review panels of independent experts to evaluate the merits and risks of all proposed projects** – An independent panel will be free of political pressures that may compromise the permitting process. In addition, independent experts can focus on cumulative impacts, which federal and state agencies do not appear to be doing.
- **Establish a single annual application period to avoid or minimize cumulative and carrying capacity impacts.**
- **Develop and update a Research Management Plan with prioritization of research projects that are necessary for effective management of the region and improve management-decision making** – Given the increased interest in conducting research in the NWHI, permitted research should be incorporated into an annual research Management Plan based on the Goals and Objectives of the Monument.
- **Adopt the conditions, terms, and instructions for State permits for all permit applications for the Monument** – These general conditions are: (1) requirements for tracking waste via waste logs, (2) daily impact logs (collections, incidents) collected and held by state or federal authorities, (3) improved disease and alien species protocols, (4) anchoring protocols, (5) intentional and unintentional interaction requirements for endangered species and large natural assemblages of fish, (6) collecting practices, (7) requirements for all individuals covered by a permit to sign the permit indicating comprehension of permit conditions, and 8) reporting responsibilities.

Response: To be addressed. *Developing a unified permit process is one of the biggest tasks for the MMB. This process will be fully developed and described in the Permitting Action Plan, and will address unification of applications, provide for public input and provide a mechanism to track all permitted activities and assess the potential of cumulative impacts on the ecosystem. The opportunity for public input on this Action Plan will be provided during the review of the draft MMP.*

5.3 Extractive Activities

Issue: Bioprospecting

Bioprospecting should not be allowed in the Monument. This ban was not carried through in the draft SMP.

Response: To be addressed. *All proposed activities that are approved will be issued a permit under one of the existing permit types, must meet Proclamation findings, and abide by the same strict requirements that will be developed for all permitted activities.*

Issue: Sustenance Fishing

As there is little information on the magnitude or impact of sustenance fishing, this activity should not be permitted. If it is determined to be permitted, careful, thorough, and rigorous monitoring must take place to determine its impact; and subsequent decisions on permitting this activity must be based on that information and the best science available.

Response: To be addressed. *Sustenance fishing is specifically defined in Proclamation 8031, and directs the Co-trustees to develop procedures for systematic reporting of sustenance fishing. As sustenance fishing would be permitted as a term or condition of a valid Monument permit, it can be restricted or allowed on a permit-by-permit basis. The MMB will develop the protocols and monitoring mechanisms in the MMP that will be available for public comment with the draft MMP.*

Issue: Bottomfishing

Although the Proclamation effectively ends commercial bottomfishing by 2011, this activity is not compatible with the Goals and Objectives of the Monument and should stop immediately. Recent evidence that the critically endangered monk seal population relies on at least two species of bottomfish, and the lack of understanding as to the ongoing decline in their population, requires this fishery to be suspended or much more closely regulated.

Response: Settled. *While the remaining federally permitted commercial bottomfishers will be allowed to fish through 2011, regulations restrict fishing in some locations, set an annual catch limit and require these vessels to abide by the same vessel restrictions placed on all other Monument-permitted vessels. No changes to these regulations are being considered, so this issue will not be addressed in the MMP and EA.*

5.4 Research

Issue: Ecosystem Impacts of Research

The worldwide interest that has developed since the establishment of the Monument has generated a substantial increase in research activities, with NOAA vessels carrying a crew of 50 researchers for an estimated 200 days in the Monument. There is a need for a risk assessment analysis for all activities in the NWHI, followed by the design and implementation of an ongoing risk monitoring protocol.

Response: To be addressed. *Research and monitoring are important activities to support effective management of the NWHI. Many biological resource monitoring protocols already exist and more are being developed. New research and monitoring initiatives will be designed to minimize adverse impacts to the sensitive resources of the NWHI. The MMB is developing a stand-alone Monument living resources Science Plan. This Plan will prioritize key management questions, assess the risk of proposed research to do harm to monument resources, and describe an appropriate suite of research methods that may be used to address the existing data gaps needing to be filled to answer these questions. The accompanying Environmental Assessment will analyze the potential impacts of these research activities. The draft Monument Research Plan and draft MMP are on approximately parallel timelines, and the opportunity for public input will be provided during the review of these documents.*

5.5 Military Activities in the Monument

Issue: Discussion of Military Activities

There is no discussion of activities of the Missile Defense Agency (MDA), whose activities may put debris within the Monument boundaries. During the public scoping for the proposed sanctuary, a concern was raised over the potential impacts military activities have on the health of the ecosystem. Activities of the armed forces that impact the Monument resources should be discussed appropriately in the EA. Text from the Proclamation that discusses “Armed Forces Actions,” as well as any relevant language from Executive Orders, should be incorporated into the MMP and associated EA. A description of past military activities is included in the draft SMP.

Response: To be addressed. *The MMP and associated EA will describe coordination with the military to identify their present and future activities in the NWHI in order to minimize any potential adverse effects to monument resources.*

5.6 Funding Allocation

Issue: Allocation of funds for management

The draft SMP includes a proposed budget that would allocate 70 percent of its 5-year \$59 million budget equally between research and overhead, with minimal budget allocated for actual ecosystem protection. This budget, developed between 2004 and 2005, earmarks only 9 percent for enforcement, 7 percent for ecosystem protection, and 3 percent for Native Hawaiian activities. This budget does not reflect the vision, missions, and goals upon which the MMP should be based.

Response: To be addressed. *The proposed budget from the 2005 SMP was based on the needs for the NWHI to be incorporated into NOAA’s National Marine Sanctuary System, and does not reflect the Monument’s focus on joint management, collaborative efforts, and shared resources for the MMB.*

5.7 Habitat and Ecosystem Impacts

Issue: Human presence (Impact of activities)

Given the fragility of the environment, vessel traffic and human activity of any kind can cause irreparable damage to the resources of the Monument. Vessel groundings in particular pose a serious risk to Monument resources. Given the existing and proposed level of vessel-based activities in the Monument, a high priority should be placed on developing management protocols that minimize this risk. For this reason, the MMB should conduct a detailed risk assessment of individual and cumulative impacts of current and proposed activities in the NWHI, and implement a risk assessment monitoring protocol. In addition, all permitted activities must be continually, independently, and rigorously monitored to assure that these are not causing significant harm to the Monument resources. The MMP should include mechanisms for taking action to modify or suspend permits when evidence is obtained that indicates an activity is causing harm.

Response: To be addressed. *The Proclamation specifically restricts the Co-trustees from issuing any permit that does not employ adequate safeguards for Monument resources. The permitting process that will be described in the Permitting Action Plan will include the development of a tracking system to monitor the cumulative level and types of activities occurring on a spatial and temporal scale throughout the Monument. Permittees will be required to provide detailed information about their activities to allow for analyses of cumulative impacts to Monument resources. Safe operating protocols and informational briefings will be provided for permittees and vessel captains prior to entering the Monument. Emergency response protocols will also be developed. The opportunity for public input on this Action Plan will be provided during the review of the draft MMP.*

6.0 Summary of Issues to be Addressed in the MMP and Associated EA

This section provides a summary of specific public comments (Tables 3 and 4) and issue statements and responses with a broader perspective based on all comments reviewed (Table 5) that will be addressed in the MMP and associated EA based on comments received from all public and agency outreach efforts described in previous sections. Issues are organized by topic and location (Monument-wide and Midway-specific).

Table 3. Summary of Monument-wide Issues to be Addressed

Topic	Monument-wide Issues
Monument Management Plan Development	<ul style="list-style-type: none"> ▪ The primary purpose is conservation and protection of the natural and cultural resources of the Monument. These original goals need to be reincorporated, and further development of the plan should occur through an open process that includes a Citizen Advisory Council based on the RAC model. ▪ The MMP should provide specific mechanisms for partnerships among government agencies and between government and the public.
Permitting	<ul style="list-style-type: none"> ▪ The permitting process should provide for the maximum transparency; include a 90-day public review; employ independent expert panel reviews; and in unifying the permit system, adopt conditions, terms, and instructions based on the State’s permitting system. The system should be structured to allow for cumulative impact analyses. ▪ The MMP should facilitate multiple public and private uses. ▪ As per State NWHI rules, permit violators should not be granted additional permits and, in the case of a permit violation, a long-term permit should be revoked.
Extractive Activities	<ul style="list-style-type: none"> ▪ The impacts on this ecosystem from sustenance fishing, bioprospecting, and bottomfishing are poorly understood and inconsistent with the primary purpose of the Monument; these should be prohibited in all forms immediately. ▪ Commercial bottomfishing and sustenance fishing should be overseen by rigorous monitoring programs.
Research	<ul style="list-style-type: none"> ▪ Research activities in the NWHI have dramatically increased, primarily in sensitive nearshore and land habitats as a result of increased funding. Research activities should require a risk assessment analysis, followed by implementation of an ongoing risk monitoring protocol. ▪ Monitoring and research of the ecosystem and cultural resources are needed.
Military Activities	<ul style="list-style-type: none"> ▪ Military activities and their impacts were not discussed in the draft SMP and should be addressed in MMP and associated EA. ▪ Interagency coordination should include, as appropriate, the interests and activities of the Navy and MDA.
Education and Outreach	<ul style="list-style-type: none"> ▪ Increased emphasis should be placed on building public understanding and appreciation of the NWHI through education and outreach.
Habitat and Ecosystem Impacts	<ul style="list-style-type: none"> ▪ Impacts of marine debris, vessel groundings, pollution, alien species introduction, and general human presence in the Monument, collectively, are an ongoing concern because of effects on species and habitats in the NWHI. ▪ The MMP should focus on the restoration and enhancement of natural habitats, populations, and ecological processes. ▪ The economic cost of these threats should be calculated and planned for.
Funding Allocation	<ul style="list-style-type: none"> ▪ Allocation of funds should reflect the primary purpose of the Monument, with substantial percentages of the overall budget going to enforcement, ecosystem protection, and Native Hawaiian activities. ▪ Overhead and research should not dominate the budget allocation.
Enforcement	<ul style="list-style-type: none"> ▪ A greater enforcement presence is needed to ensure compliance with regulations and permit conditions. Resources need to be protected through enforcement, education, policy, and management.
Native Hawaiian Management Concepts and Access	<ul style="list-style-type: none"> ▪ Native Hawaiian management concepts should be employed in managing resources of the Monument. ▪ Access to Native Hawaiians must be ensured.

Table 4. Summary of Midway-specific Issues to be Addressed

Topic	Issues
Enforcement of Rules	<ul style="list-style-type: none"> ▪ Specific enforcement protocols need to be developed.
Visitor Carrying Capacity	<ul style="list-style-type: none"> ▪ The established cap should be critically analyzed and realistically based on staffing levels and potential impacts to resources.
Visitor Impacts on Wildlife	<ul style="list-style-type: none"> ▪ Monitoring measures need to be implemented to detect and evaluate possible visitor impacts on monk seals and other wildlife; these measures should derive from NMFS and FWS consultations, and perhaps should enact recommendations from the Gilmartin and Antonelis study (1998). ▪ The impact of lead paint on the Midway's wildlife is disturbing, and the recently appropriated money should be spent removing or cleaning all structures at Midway covered with lead paint, as well as the soil around them, before hiring new staff or developing outreach materials.
Interpretation	<ul style="list-style-type: none"> ▪ Historic artifacts and records of Midway veterans should be prominent in interpretive materials and overall preservation of Midway's resources. Consider and reference Kilauea Point NWR as a logical offsite exhibit and program site.
Means of Transportation	<ul style="list-style-type: none"> ▪ The use of larger aircraft to Midway could reduce cost to visitors.
Lead Contamination	<ul style="list-style-type: none"> ▪ FWS should fund and complete the removal of lead-based paint from buildings and the soil before funding the visitor services program.

Table 5. Issues Statements for the Monument Management Plan and Environmental Assessment

Topic	Issue	Response
Access and Permitted Activities	<i>What decisions will be made in the MMP regarding Monument access and permitting of activities?</i>	The types of activities allowed and requirements for access are regulated through a permitting process detailed in 50 CFR 404. The MMP's Permitting Action Plan will identify strategies to develop a streamlined and effective permit approval and issuance process and describe how data obtained from permits will be used to assess cumulative impacts and improve long-term monitoring and protection of Monument resources. Other action plans will identify strategies and activities related to human access, types of activities allowed, limits and controls.
	<i>Will commercial fishing be permitted?</i>	Commercial Bottomfishing will be permitted by NOAA Fisheries for the eight active vessels grandfathered until June 15, 2011 through Presidential Proclamation 8031. The Proclamation also includes regulations that restrict fishing in Ecological Reserves and Special Preservation Areas, set an annual catch limit and require the fishing vessels to comply with the same rules as other Monument permit holders.
Management Capacity and Operations	<i>What facilities, vessels and levels of staffing and funding are needed to effectively operate and protect the resources of the Monument?</i>	Each action plan will identify the specific needs required to accomplish the goals and objectives of that plan. The MMP will also identify areas where needs overlap and resources can be shared while still accomplishing the goals of each action plan. In these cases, references will be made to other action plans, providing a more accurate overall needs assessment.
	<i>What decisions will be made in the MMP regarding how the Co-Trustee agencies will operate as a management body and how they will coordinate with other agencies and the public?</i>	The coordinated management regime creating the MMB was outlined in a Memorandum of Agreement and signed by the Co-Trustees in December 2006. It will be the basis for further defining roles and responsibilities in carrying-out the operational and management activities of the MMP. Several mechanisms for future coordination with other agencies, community organizations, and the public will also be identified in the plan.
	<i>How will law enforcement needs for Monument management be addressed?</i>	The Enforcement Action Plan will outline the shared and coordinated responsibilities among the MMB enforcement agencies and the U.S. Coast Guard, and identify barriers to and opportunities for effective law enforcement. It will also address improving compliance through effective outreach and education.
	<i>How will military activities be managed in the MMP?</i>	Activities of the Armed Forces that could occur within the Monument are beyond the scope of MMB management activities.
Research and Monitoring	<i>What type of research programs will be established and how will they be coordinated and directed to ensure we gather information that will help to protect and manage Monument resources while minimizing damage to the ecosystem?</i>	The MMP will have action plans as well as a separate Monument Science Plan that requires research to be management-driven – by furthering an ecosystem-level understanding of the Monument or improving detection of and response to human-created threats and restoration of damaged ecosystems. Scientists must comply with the findings outlined in the Proclamation in designing their projects, while the MMP will establish a process to identify criteria and assess impacts for evaluating all proposed research and monitoring activities in the Monument.

<p>Outreach, Education, and Visitation</p>	<p><i>How will the MMP address public use, interpretation, and environmental education opportunities for the Monument?</i></p>	<p>Midway Atoll, with its existing infrastructure and history of human activity, will serve as the on-site “window to the Monument,” and visitation opportunities will be described in the Midway Interim Visitor Services Plan of the MMP. The Mokuāpapa: Discovery Center in Hilo, the National Marine Sanctuaries office in Honolulu, and lectures and other types of outreach from Monument staff and trained volunteers will provide opportunities to “bring the place to the people rather than the people to the place” and will be discussed in the Ecosystem Literacy Action Plan.</p>
<p>Public Involvement</p>	<p><i>How can the public be involved in managing and conserving the Monument?</i></p>	<p>The Constituency Building and Outreach Action Plan will explore strategies for involving the public in promoting protection and awareness of Monument resources, which could include public meetings, workshops, establishing citizen advisory groups, volunteering opportunities, and other possibilities.</p>
<p>Habitat and Ecosystem Impacts</p>	<p><i>How will terrestrial and marine habitats, fish and wildlife be managed in the Monument?</i></p>	<p>The MMP will identify a range of proposed strategies and activities to address local threats (e.g., spread of alien species, contaminant spills) as well as global threats (e.g., sea level, temperature and chemistry changes) to understand and protect Monument resources. Management actions will be aimed at maintaining biological integrity, diversity, and ecosystem health and will be performed in a manner that does not cause any significant impacts to Monument natural and cultural resources.</p>
	<p><i>What type of information and direction will be provided in the MMP regarding global climate change and sea level rise?</i></p>	<p>The MMP and Monument Science Plan will present activities specific to the threat of global climate change, including new research models to help predict sea level rise and the possible impacts to Monument species and habitats, and will consider options for monitoring climate change and sea level rise as a part of a global network of information.</p>
	<p><i>How will the MMP address threats to the Monument’s ecosystem?</i></p>	<p>The MMP will identify known threats to the ecosystems of the Monument, such as marine debris, environmental contaminants, and invasive species, and propose actions and activities that can reduce or potentially eliminate damage to marine and terrestrial resources.</p>
	<p><i>How will the MMB prevent the discharge of contaminants into the Monument and respond to unforeseen incidents?</i></p>	<p>The Presidential Proclamation established strict standards to prevent pollution from vessels while operating in the Monument. The MMP will establish procedures for coordinated emergency response in event of an accidental or negligent pollution event and will identify a process to assess natural resource damages and implement compensatory restoration projects.</p>
	<p><i>What will the MMB do to cleanup contamination caused by past human activities in the Monument?</i></p>	<p>Contamination hazards exist across the NWHI, with particular issues at Midway that are known to impact the health of the Laysan Albatross. The Restoration Action Plan will identify and assess known hazards, and provide cleanup strategies, funding requirements and detail other relevant factors to remediate hazards at the most critical of these sites.</p>
<p>Native Hawaiian Culture</p>	<p><i>How will the MMB take care of Native Hawaiian cultural resources?</i></p>	<p>The MMP will outline a range of strategies and activities for cultural resource protection, identification, documentation, preservation, traditional use, interpretation, and education that will implement Native Hawaiian cultural and historic resource preservation, protection and perpetuation methods. Through the Office of Hawaiian Affairs, Native Hawaiian Working Group, and Action Plans specific to Native Hawaiian interests, the MMB will incorporate Native Hawaiian resource management skills and knowledge across all programs.</p>

<p>Historic Preservation Issues</p>	<p><i>How will the Monument manage post-contact (historic period) cultural resources?</i></p>	<p>The MMP will outline a range of strategies and activities to identify, document, preserve, reuse, and interpret post-contact historic resources 1) from Midway Atoll, 2) submerged under the ocean, and 3) from exploration, commerce, war, and conservation throughout the Monument. Many of these activities, particularly for structures and buildings at Midway and sunken ships, are currently ongoing.</p>
<p>Midway Atoll NWR – Access and Permitting</p>	<p><i>What is the appropriate total number of people (to visit, work and volunteer) that Midway Atoll can support?</i></p>	<p>Midway’s Interim Visitor Services Plan has identified up to 40 overnight visitors at one time and at least 300 visitors per year as appropriate given the current staffing and infrastructure. NOAA has identified Midway as a potential operational hub and location for new programs and staff, which would cause more waste generated, more electricity required, additional infrastructure built, more water and food consumed, and potentially more disturbance to wildlife. The MMP will propose a maximum number of people on Midway, a site plan for the allocation of land uses, and facilities needed to balance people and wildlife.</p>
<p>Midway Atoll NWR – Management Capacity and Operations</p>	<p><i>How will the Management needs of Co-Trustees be incorporated into Midway operations without negative consequences to the natural and historic resources?</i></p>	<p>The MMP presents strategies and activities in a Site and Operations Action Plan that address facility and operational needs throughout the Monument, including at Midway. Conserving natural resources, preserving historic resources, and incorporating cultural considerations are all components of the action plan.</p>
<p>Midway Atoll NWR – Interpretation</p>	<p><i>How will visitors be provided information to introduce and sensitize them to the fragile Midway Atoll ecosystem and history? To what extent should new interpretive and educational exhibits be placed at Midway?</i></p>	<p>The Midway Interim Visitor Service Plan offers several opportunities to interpret the natural and cultural features of the Monument, including guided tours, self-guided interpretive walks, guided boat trips, interpretive exhibits and signs, and programs and presentations, focusing on wildlife, historic structures, artifacts, memorials, and key sites. The MMP will address expanding the current visitor program at Midway to represent the entire Monument.</p>
	<p><i>To what extent should historic structures be preserved and restored for interpretation on Midway?</i></p>	<p>Decisions to preserve, restore, reuse or demolish buildings will be determined on a case-by-case basis, as the state of each building, its relative historic importance, interpretive opportunities, and the cost to restore and maintain vary widely. An appropriate balance of on-island and off-island interpretation is needed and will be further addressed in the MMP.</p>