

**Group A: Bulletlist of topics to include in response to decision on Presidential Executive Orders 13792 and 13795**

- Make case that public participation did occur before the decisions were made for all Monuments
- Do not mention Rose/PRI/Obama by-name, not the RAC/SAC kuleana
- Concept of Marine Monuments in general
- Separate letter for PMNM
- Hawaiian concept of land and horizon of our ‘āina. Complete ecosystem.
- Larger size for management reasons
- New seamounts and other deep resources – contain new species to science- “objects of scientific interest”
- New scientific evidence of length of some of these deep-sea resources in the ecosystem they inhabit
- Not enough is known about those species – could jeopardize their very existence of many of these species (example of Casper)
- Islands within these Monuments are critically important habitats for millions of seabirds-density of seabird colonies and foraging areas required
- Economic opportunity costs for mining are very high because of fish populations
- Cumulative impacts of unintended consequences such as undersea mining will impact not only the localized area but a large area and the surrounding water column
- Easier to notify mariners of importance of the resources when there are boundaries with a designation
- Economic value of keeping the current state is greater than extraction
- Keep the seabirds to find the fish
- Deeper areas replenish the nearshore areas used for sustenance fishing
- Scientific and Culturally Important sites
- Not economically feasible to extract the minerals currently
- Inappropriate for Fisheries Advisory Councils to manage these areas.
- Recommend that the letters are forwarded to the appropriate parties

**Group B: Bulletlist of topics to include in comment letter for The Draft Hawaii-Southern California Test and Training Environmental Impact Statement/Overseas EIS**

- Decision to write 2 letters on the EIS making the same points
  - Highlight the fact that the RAC and SAC met jointly to discuss
- The Navy EIS is insufficient for the following reasons...
  - More transparency/species specificity on threshold modeling
  - Information presented in the EIS needs to be more species specific
  - Cleanup debris left behind
  - e.g., Unexploded ordinance
  - Insufficient details on training activities
  - Include information on all Navy (and other countries) involved in RIMPAC activities
  - No evidence that activities covered under the EIS are inclusive of those of foreign navies
  - Independent observers
  - Show that Navy is consulting with other science/ state of the art acoustic studies
  - e.g., warning sound
  - Look into alternatives to active sonar/ other ways to detect submarines
  - Take limits should be reduced as they are arbitrarily high
- Summary statement: Given our concerns laid out in this letter, we support the no action alternative.
- Lumping of the species and areas between Hawaii and California are a concern. Would prefer two separate EIS for the two separate areas.
- High seas migratory (highly migratory species) species, how are they impacted? Not just marine mammals but also the other species in the area need to be considered. Not sufficient detail on this.
- Affirmative duty to protect under MMPA, a failure to minimize impact to “the least practicable adverse impact”. Quote from MMPA-Section 1371(a)(5)(A)(i)(II)(aa).
- Monitoring techniques including aerial surveys are not the best way to analyze the impacts.