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TO: Board of Land and Natural Resources

RE: Permit application for collections to Census NWHI Coral Reef Ecosystems

I would like to express my opposition to issuing a permit to the applicant for the proposed "inventory" collections. I agree with many of the concerns already expressed by others regarding this proposal.

There is one additional, and I think very critical, question. In May 2003, the NWHI CREReserve held a workshop to develop a list of information needs that would relate to management of the NWHI and guide research and other activities. The list of all "needs" identified at that workshop was published in a workshop report in August 2004. A major concern of many at the time of the workshop was that this "shopping list" of all items that anyone at the workshop could think of would become published without any effort by the Reserve and scientific community to prioritize the list. Many, including myself, considered the prioritization to be a critical component of that list, so that the list did not encourage researchers to pursue all projects on the list, regardless of relevance to protection of these ecosystems and true management needs.

Today, to my knowledge, this prioritization has still not occurred, at least not in consultation with the larger scientific community. Yet permits are being issued with seemingly little concern for the disturbance, destruction, taking, or relevance to the long term conservation and protection of this resource. This is not responsible management of this resource.

I encourage you to delay a decision on this and other NWHI permits where taking and/or high levels of disturbance are probable until the scientific information needs for this area have been thoroughly discussed and prioritized and it is clear that the information need exceeds the associated risks to the ecosystem.

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William G. Gilmartin September 21, 2006