

Peter Bennett & Ursula Keuper-Bennett

24 Reid Drive, Unit 3
Mississauga, ON
L5M 2A6

Comments on Endangered and Threatened Wildlife and Plants: Identification and Proposed Listing of Eleven Distinct Population Segments of Green Sea Turtles (*Chelonia mydas*).

Thanks to the NMFS for extending the comment period for this important topic.

My wife, Ursula Keuper-Bennett, and I spent 25 years observing and documenting the Hawaiian green turtle population of Honokowai, West Maui. Over that span, we spent more than 100 24-hour days underwater with the honu, accumulating over 750 hours of video and 8-10,000 pictures. In 1995, we published the first ever marine turtle website at <http://www.turtles.org>, and for almost 15 years it remained the top search result for "turtle". We developed a system for identifying individuals and used it to compile a database for over 750 turtles. At the 19th Annual Symposium on Sea Turtle Biology and Conservation, held on South Padre Island, Texas, 2-6 March 1999, we presented a summary of our findings entitled "[Photographic Evidence for the Regression of Fibropapillomas Afflicting Green Turtles at Honokowai, Maui, in the Hawaiian Islands](#)" (p. 37-39 in [Kalb, H.J. and T. Wibbels, compilers. 2000. Proceedings of the Nineteenth Annual Symposium on Sea Turtle Biology and Conservation. U.S. Dept. Commerce. NOAA Tech. Memo. NMFS-SEFSC-443, 291 p.](#)) showing that many honu spontaneously recovered from the disease. In 2008, the University of Hawaii Press published "[The Book of Honu](#)", our book about the Hawaiian green turtle and our experiences with them. In it, on page 125 we expressed our feelings about de-listing the honu:

"Our affection for the honu means that of course we don't want to see them hunted. If, however, their numbers have recovered to the point where a regulated harvest would not threaten the overall population, then we find it hard to oppose. Our objections would be strictly emotional, not scientific. We'd insist that such a hunt be strictly controlled and that safeguards be put in place to prevent hunting in areas where human contact has acclimated the turtles. If these conditions met, we wouldn't like the idea, but we'd be forced to accept it."

Over the years, we have always been pleased and impressed by the protection extended to the honu by first, the State of Hawaii, and later by the US government through the Endangered Species Act. The intent of the protections was to allow the honu population to recover its numbers. The fact that these measures resulted in a spectacular recovery speaks to their effectiveness and the diligence of their administration. The honu have become so plentiful that, regardless of the truth, it is easy to see why people conclude that some reefs have reached carrying capacity. In our area [West Maui] the honu have begun feeding throughout the day. We count fewer honu resting on the reef, and our snorkel/diver surveys have found that the foragers are competing for a diminishing supply of food. It is tempting to reason that this is happening throughout the Islands, thus explaining at least in part the increase of reports of daytime foraging along the shorelines.

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We therefore find it puzzling that the wisdom of the conservation policies is undermined by a concerted effort to deny the final step: de-listing the Hawaiian turtle. In 2012, the Marine Turtle Specialist Group of the IUCN concluded an assessment of the Hawaiian green turtle and pronounced it a species of Least Concern, which I'm sure you know is the lowest threat rating possible. If the honu can have this status and still be listed under the ESA, something is drastically wrong with your system.

There have been attempts to justify continuing the listing on the basis of rising sea levels and potential loss of the primary honu nesting beaches in the French Frigate Shoals. This theory requires a belief that faced with the complete loss of the East Island nesting beach, the honu would stop nesting—despite an abundance of suitable beaches throughout the Hawaiian archipelago. As the wonderful story of 5690 illustrates, a turtle who can't return to her natal beach simply finds another, in this case on the busiest beach in Lahaina, Maui. If this is the strongest argument against de-listing that opponents can bring, you have no choice but to de-list the honu.

In reviewing other comments, we have also noticed many appeals to the heart rather than the science. While we love the honu as dearly as anyone, we would like to point out that F&WS has already responded to such comments. The Federal Register, Vol. 76, No. 249 for Wednesday, December 28, 2011, Rules and Regulations, announces the de-listing of the gray wolf: [Endangered and Threatened Wildlife and Plants; Revising the Listing of the Gray Wolf \(Canis lupus\) in the Western Great Lakes](#). On page 81682, please see this reponse:

"(7) Comment: A number of comments expressed opposition to delisting, making statements such as "wolves should always be protected" by the Act and "why do wolves have to be delisted."

"Our Response: The Act provides the Federal Government with authority to protect and recover threatened and endangered species. When a species has been recovered to the extent that it no longer meets the definition of "threatened" or "endangered," the Act provides that it should be removed from the Federal List of Endangered and Threatened Wildlife and Plants and its management be returned to the appropriate States and tribes (in cases where treaties identify such authorities for tribes). The goal of the Act is to recover listed species and then to delist them when they no longer qualify as threatened or endangered, thereby allowing the Service to focus its efforts on the many other species that do qualify as threatened and endangered. The WGL gray wolf DPS no longer meets the definition of a threatened or endangered species, as it has achieved long-standing recovery criteria by greatly expanding in numbers and geographic range and threats to its longterm viability have been reduced or eliminated. Therefore, the Act requires delisting the species, but it also requires that we continue to monitor the status of the species for a minimum of 5 years after delisting, and we can list it again if the monitoring results show that to be necessary."

Thank you for considering our input.

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