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University of Hawaii at Manoa

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August 22, 1978

Mr. Richard B. Roe
Acting Chief, Marine Mammals and
Endangered Species Division
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
3300 Whitehaven Street, NW
Washington, D. C. 20235

Dear Mr. Roe:

I have had the opportunity to review the Final Rules and Final Environmental Impact Statement for the listing of sea turtles which was originally proposed in December 1973 and April 1974. Although federal action on this matter is long overdue, I believe that the NMFS and FWS should be commended for their efforts in the preparation of these final documents. The goal of protecting sea turtles without unduly restraining shrimp and other commercial fisheries can hopefully now be achieved in the near future.

There is one point concerning the subsistence use of green turtles that I would like to bring to your attention before the final rules go into effect. Under the State of Hawaii's sea turtle regulation that became effective in May of 1974, green turtles 36 inches and larger may be taken for home consumption with a free permit issued by the Division of Fish and Game. The records indicate that the following numbers of turtles have been legally taken under this provision: May - December, 1974 - 9; 1975 - 6; 1976 - 21; January - June, 1977 (my most recent data) - 16. Although not stated in the records, food preference and recreation/sport are undoubtedly the major reasons that these turtles were taken. Several of the turtles, however, may indeed have been taken for true subsistence purposes. In view of such a small number (perhaps less than 5 per year), you may want to give further consideration to allowing subsistence fishing in Hawaii in the same manner that will be permitted in the Trust Territory. The estimated five turtles per year that would be legally taken under such a provision could not be expected to have a significant adverse impact on our green turtle population. At the same time, the protein available from these animals may be nutritionally important to diets of a few residents.

Sincerely,

George H. Balazs
Assistant Marine Biologist

GHB:md