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May 28, 1982

Mr. Dale Coggeshall
Pacific Islands Administrator
Fish and Wildlife Service
P. O. Box 50167
Honolulu, Hawaii 96850

Dear Mr. Coggeshall:

This letter is in response to the request you sent to me here at the Hawaii Institute of Marine Biology on 22 April 1982 asking for comments on the draft Fish and Wildlife Service Pacific Islands Strategy Plan. The following review deals mostly with sea turtles, since this wildlife component has been the focus of my research over the past 10 years. In making these suggestions and remarks, I have assumed that the July 1977 "Memorandum of Understanding" between your agency and the National Marine Fisheries Service is still in effect. That is, that the Fish and Wildlife Service has primary responsibility for sea turtles while they are on land (nesting-basking), and the National Marine Fisheries Service has primary responsibility when they are in the ocean. While it would be unrealistic to adhere to such a strict partition under all circumstances, the jurisdictional assignment nevertheless gives your agency a defined segment of life history and habitat where emphasis should be placed.

p. 2, lines 10-11: "reptiles" should be included in "FWS responsibilities for management of resident fishes, mammals, and non-migratory birds . . ."

lines 31-32: The resource category "Endangered Species" would be more appropriately titled "Endangered and Threatened Species."

p. 23, lines 22-24: "environmental contaminants" are a clear and recognized threat to the "fragile island ecosystems and the Pacific Basin." The use of the word "perceived" (threat) seems inappropriate and unnecessary.

lines 32-37: If "Direct mortality and repetitive harrassment of nesting birds result from bombing activities" at Farallon de Medinilla Island (N. Mariana Islands), then the Strategy Plan should identify the specific steps FWS must take to mitigate the problem. Paragraph 5.3.2.1 on p. 33 is vague and does not fulfill the above.

p. 25, lines 19-20: I suggest that this sentence be modified to state - "The significance of this harvest on localized seabird populations, along with its modern-day cultural importance to the islanders, remains to be determined."

Mr. Dale Coggeshall
May 28, 1982
Page 2

p. 32, 5.1.3.4: Farallon de Medinilla Island should be added to this paragraph.

p. 33, 5.3.2.1: Kaneohe MCAS should be added to this paragraph. (However, please note my above comment for p. 23, lines 32-37).

p. 34, 5.3.3.2: The Polynesian rats at Kure are a native species. Why is eradication being considered?

"Endangered Species, I. Overview,

A. Status and Distribution" p. 37-50: The organization and content of this section does not fully reflect the title headings. Also, please note that the Table of Contents does not list the various sub-headings, as a reader would expect. A distinct category entitled "Endangered and Threatened Sea Turtles" is clearly needed in this section so that consistency will exist with the other categories present (e.g. "Endangered Hawaiian Plants", "Endangered Hawaiian Seabirds"). As it is now written, sea turtles appear only in a secondary manner within the categories "Northwestern Hawaiian Islands Species", "Mariana Islands Species" and "Caroline Island Species". This fails to give proper emphasis to the species as an Endangered/Threatened group. At the same time, it also prevents the undertaking of the adequate discussion called for by the headings "I. Overview" and "A. Status and Distribution". For example there is no mention, or focus of attention, on nesting by hawksbills at certain sites in the main Hawaiian Islands, the nesting of green turtles (and probably hawksbills) at Rose Atoll, Guam (Tarague Beach), Howland, Jarvis, Bikar (and several other sites in the Marshalls), plus the specific known nesting sites of the Caroline Islands (see Pritchard 1977 & McCoy 1974). In addition, mention should be given to the unique land basking behavior of green turtles in the Northwestern Hawaiian Islands. It would seem important to note that the World Conference on Sea Turtle Conservation (sponsored in part by FWS and NMFS) designated French Frigate Shoals as a green turtle breeding area worthy of special attention and high priority by reason of its isolation and unique ecology (basking behavior).

p. 48, lines 22-23: Hawksbills are not found in the vicinity of the Northwestern Hawaiian Islands. While leatherbacks have been documented in the waters of the Northwestern Hawaiian Islands, there are no records of nesting. The mention of leatherbacks in this paragraph may serve to confuse the reader, since the Fish and Wildlife Service's primary responsibility for sea turtles covers nesting and nesting habitat.

p. 51-53: The placement of green turtles and hawksbills in "Priority 3", the lowest priority ranking afforded by your office for the Endangered/Threatened species under your jurisdiction, is unjustified and potentially

very harmful to the recovery of these species here in the Pacific. Since the Fish and Wildlife Service's primary responsibility for sea turtles covers the critically important nesting and basking phases, it seems to me that the species warrant Priority 1 emphasis. If this change in designation is not made in the final draft, I recommend that the reasons for the low priority designation be spelled out in the text.

- "II. Area Objectives", p. 53 - No specific mention is made of an area objective that focuses on nesting sea turtles and their habitat.
- "III. Problems affecting objective attainment", p. 54-56 - No specific mention is made of nesting sea turtles and their habitat (please note my above comments for p. 37-50).
- "IV. Strategies", p. 56 - It is stated that ". . . strategies available to the FWS (contained in the ESA) will provide sufficient authority for attempting to prevent extinction of endangered species, preventing threatened ones from becoming endangered, and others from becoming endangered or threatened." Two of the major strategies shown to be available (listed on p. 56) include "development and implementation of Recovery Plan Section 4(g)" and Critical Habitat declaration Section 4(a)". It is therefore appropriate for this reviewer to point out that neither of these major strategies have been undertaken for nesting sea turtles and habitat here in the Pacific. This would apply to the hawksbill and the green turtle. The hawksbill was listed as Endangered under the ESA over 11 years ago, and the green turtle as Threatened 3 1/2 years ago.

"Fishery Resources", p. 67 - The inclusion of "Turtles" as a full category under "Fishery Resources" does not seem appropriate or warranted in view of the Fish and Wildlife Service's primary responsibilities being nesting turtles and habitat. A full category (and complete discussion) for sea turtles should appear in the "Endangered and Threatened Species" section (p. 37-50), as previously suggested. I should also point out that the capture of turtles in the TTPI for "subsistence" purposes (as defined by ESA regulations) is only allowed for green turtles when they are in the water. Nesting turtles may not be legally taken. These important facts are not included on page 67.

p. 69, lines 28-33 - "sea turtles" should be included in this sentence.

p. 74, 2.1.1 - A definition for the word "subsistence" should be provided so the reader has a clear understanding of the term as it is being used in this section. "Subsistence" also appears in five subsequent places in Table 2.

Mr. Dale Coggeshall
May 28, 1982
Page 4

I hope that these comments and suggestions will be helpful to your agency.

Sincerely,

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Assistant Marine Biologist

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cc
UH Environmental Center
William Gilmartin-NMFS
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