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Division of Fish & Game

July 17, 1975

DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

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Mr. Lynn A. Greenwalt, Director
Fish and Wildlife Service
U. S. Department of the Interior
P. O. Box 19183
Washington, D.C. 20038

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Division of Fish & Game

Dear Mr. Greenwalt:

I take this opportunity to present our views concerning the proposed rulemaking that would place the Green Sea Turtle on the threatened species list as defined in the Endangered Species Act of 1973.

Of the marine turtles found in Hawaiian waters, the Green Sea Turtle, due to its significant numbers is the most important species that has historically and traditionally served Hawaii's subsistence, recreational and commercial interests. In view of this, the State of Hawaii and the U. S. Fish and Wildlife Service have been working cooperatively since 1950 toward compiling information on the Green Sea Turtles found within the waters of our main Hawaiian islands as well as around the Hawaiian Islands National Wildlife Refuge of the Northwestern Hawaiian Islands. Essentially, this work has involved the tagging of Green Sea Turtles.

To date, turtles tagged in the Refuge have been recovered from around the main islands but no recovery of turtles tagged in the main islands has been made in the Refuge. Nevertheless, it is the general consensus of turtle authorities here that movements of Green Sea Turtles occur in both directions along the Hawaiian Archipelago and that the Northwestern Hawaiian Islands, principally French Frigate Shoals, are used as nesting sites while the waters surrounding the main islands are used as feeding grounds.

There has been no evidence nor indication of any movement of Green Sea Turtles between the Hawaiian Islands and other islands or island groups within the Pacific. We therefore suspect that we have a discrete Hawaiian colony of Green Sea Turtle. In any event, we do have a viable nesting population, probably the largest in the United States, and a total population,

Mr. Lynn A. Greenwalt

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which we believe, can sustain controlled harvest. We, at this time, do not consider the Hawaiian population of Green Sea Turtle threatened to the degree requiring a complete moratorium on its harvest; rather, we feel strongly that the Hawaiian Green Sea Turtle population is one that could be managed judiciously.

For this reason, the State of Hawaii through the Department of Land and Natural Resources promulgated a regulation (copy attached) which became effective in May, 1974. This regulation totally protects the rare Leatherback Turtle (*Dermochelys* sp.) and the Hawksbill Turtle (*Eretmochelys* sp.) while permitting the very limited and controlled harvest of the Green Sea Turtle for home use only. Due to the restrictive nature of this regulation, only twelve turtles have been reportedly taken for home use since May of last year to the present. Although the number of turtles taken was indeed very small, the retention of some of the traditional privilege of harvesting turtle has proven to be far more acceptable to our people than would be the case if a complete closure had been imposed.

It is my understanding that should the Green Sea Turtle be placed on the Secretary of the Interior's list of threatened species without any qualification, certain provisions of our existing regulation will be in conflict with the Endangered Species Act of 1973. I, therefore, strongly recommend that the Hawaiian population of Green Sea Turtle be excluded from the proposed list of threatened fish and wildlife on the basis that the State of Hawaii through its best effort is currently managing the population through continuous research and enforcement which provide protection as well as permit controlled harvesting that is so important to the traditional life-style of our people.

Thank you for this opportunity to present our views.

With warm personal regards, I remain,

Yours very truly,



George R. Ariyoshi

Enclosure

✓ bcc: Hon. Christopher Cobb