



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL MARINE FISHERIES SERVICE**  
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From: GeorgeBalazs:Honolulu:NMFS  
To: Phil Williams:NMFS:NOAA  
Subj: Review comments on draft status reports for sea turtles (8/3/91)

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For the green turtle:

1) The recommendation to upgrade *Chelonia mydas* to the endangered category does not appear to be supported (recommended) in the draft recovery plan for this species in the southeastern U.S.A. If the recovery team had deemed an upgrade to be biologically warranted, such a recommendation would likely have been included in the draft recovery plan. Nevertheless, for the southeastern U.S., including the Gulf of Mexico, it is my judgement that green turtles in U.S. coastal waters, as well as ones nesting ashore, should all be designated as endangered, and not just those occurring in Florida.

2) The Hawaiian population of *Chelonia mydas*, in my opinion, continues to be properly listed as threatened. There have been some encouraging signs of recovery, both at the breeding grounds of French Frigate Shoals as well as at numerous nearshore resident foraging areas throughout the southeastern segment of the Hawaiian chain. However, the situation does indeed require very close attention due to the increasing incidence of the fibropapilloma disease severely affecting certain elements of the population. The Hawaiian Sea Turtle Recovery Team did not recommend an upgraded listing in the draft recovery plan that it produced. If the situation does change to the point of warranting an endangered designation (ie, in danger of extinction), action should and will be taken at that immediate time, without having to wait for a 5-year status review period.

3) The draft status report refers to *Chelonia agassizii*. However, the July 28, 1978 Federal Register Notice (Listing and Protecting Sea Turtles) makes no legal or biological reference to a full species, *C. agassizii*. The official listing only contains *Chelonia mydas*, which includes the subspecies *C. mydas agassizii* and *C. mydas carrinegra*.

For the black turtle:

1) Same comment as #3 above.

2) I agree that the subspecies *C. mydas agassizii* or *C. mydas carrinegra* occurring in the eastern Pacific should be designated as endangered throughout its range, wherever it can be readily distinguished as a recognizable form (ie dark pigment in plastron in subadults and adults; adults with heavy black dorsal pigment; adults with constricted carapace above the hind flippers; and a small size at sexual maturity). Note: To my knowledge, hatchlings of *C. mydas*, *C. m. agassizii*, and *C. m. carrinegra* cannot be distinguished by any uniform external (or internal) appearance.



For the hawksbill:

- 1) Page 16. As one of the 50 states, Hawaii is in fact a part of the "United States." The sentence here appears to suggest otherwise.

For the loggerhead:

- 1) The following paper should be mentioned in the text and included in the Literature Cited: Bjorndal and Bolten. 1988. Growth rates of juvenile loggerheads, *Caretta caretta*, in the Southern Bahamas. *Journal of Herpetology*, Vol. 22, No. 4, pp. 480-482. [Phil- I'll send you a copy of this one in the event that you don't already have it].

General Comments:

- 1) Certainly a number of positive actions on behalf of U.S. (and international) sea turtle populations have been undertaken by NMFS, FWS and NGO's since the last status review in 1985. I think it would be nice to see more of these mentioned, along with the negatives.
- 2) The designation of both marine and terrestrial Critical Habitat for sea turtles is clearly in my view a positive action under the ESA. The status reports should assert that more such habitat should be so designated. FWS and NMFS have barely scratched the surface in this area.
- 3) The status reviews should recommend that recovery plans now being prepared and finalized for each species (or subspecies) should spell out criteria for any perceived need to upgrade (threatened to endangered) or downgrade (endangered to threatened) a listing. At present, draft recovery plans for sea turtles dealing with species (or subspecies) listed as endangered only provide criteria for complete delisting. However, the biological recovery of a species will be a gradual stepdown process, whereby an endangered species will at some point qualify as threatened prior to becoming recovered (delisted). This fact needs to be adequately addressed.

I trust that these few comments will be helpful to you in finalizing the 5-year status reviews for each species.