

Appendix 11. Comments received from George Balazs on 5/14/23 during public comment period for MTBAP’s PEA and NMFS’s responses.

COMMENT	Section	RESPONSE
<p>1) In my view, the draft PEA can be improved considerably in terms of clarity, cohesion and explanation as to what research is being focused upon, why, and how. Including how the results of the work will be useful to managers in NOAA and the USFWS and the State of Hawaii in achieving PIRO and ESA recovery objectives especially in the Hawaiian Islands, but everywhere referred to in the document where MTBAP is working and/or proposes to work. MTBAP became the program it is at the PIFSC in 2015. A formal External Program Review, led by Dr. David Helweg USGS, was held at that time. Perhaps that Review should be referred to in the draft PEA, including major publications and reports providing results of research achieved since 2015.</p>	1.1	<p>A <a href="#">link to PIFSC’s staff publications</a> and a link to the <a href="#">external review publication</a> was included in section 1.1.</p>
<p>2) In 2011 a PEA was prepared and approved for MTRP. Please see:</p> <p>2011- Marine Turtle Research Program (MTRP)- Programmatic Environmental Assessment (PEA) by Stacy Hargrove, George Balazs et al.</p> <p>The list of preparers appears on page 60 of the above. Please note that a professional consulting company (Environmental Planning Strategies, Inc) was contracted to provide professional assistance so that the PEA would be of the highest standards possible. In addition, the PIFSC had a NEPA and Permits Coordinator (as part of the Director's Office) to assist in the PEA preparation. I recommend that the 2011 PEA serve as a model for substantially improving your draft document.</p>	n/a	<p>The 2011 and 2012 MTAP/MTRP PEAs were used as templates for this PEA. Since the past PEAs were published, new NEPA guidelines were instituted and our PEA was subsequently revamped. This PEA was thoroughly reviewed and approved by the Pacific Islands Region NEPA coordinator, the PIFSC NEPA and permits coordinator, the PIFSC Director’s Office, and NOAA General Counsel.</p>
<p>3) There is no Summary/Executive Summary to your draft PEA.</p>	n/a	<p>New NEPA guidelines do not require a summary or executive summary for NEPA documents. As</p>

		stated in our response to comment 2, this PEA was reviewed and approved without one.
4) Chapter 2, 2.1.- "With continuous data collection since 1973, the MTBAP provides technical insight, ..." Please know that neither MTBAP, nor NOAA, provided continuous data collection since 1973. Continuous green turtle data collection was started in 1973 at the French Frigate Shoals nesting colony and elsewhere in Hawaii by HIMB. NOAA did not have a sea turtle program until 1981, when NMFS Lab Director Richard Shomura created the MTRP. This same error in fact appears at the top of page 14 e.g., "...experience gained by MTBAP since 1973." Historical accuracy is important so that future generations can understand what was done, where, and by what agency. So please kindly correct.	2.1 2.1.1. 7	The text in these sections (2.1 and 2.1.1.7) were reworded to include "the MTBAP, building from the work of its predecessors and alongside many collaborators..." where noted.
5) The proposed relocation "...of any nest for conservation/management purposes" (Table 3, 2.2.2 & elsewhere) is far too broad and really needs to specify where and why in the document. Will egg nests be relocated from French Frigate Shoals to the Main Hawaiian Islands? If so, why and how? Ship? Helicopter? The request is very "blanket" all encompassing. Who will do the oversight, checks and balances? Including by the Hawaiian community?	n/a (2.2.2)	MTBAP has and currently is having internal discussions with USFWS and other PMNM co-managers (including cultural biologist expertise) about assisted migration. MTBAP would undertake this action only if requested by the PMNM Lalo resiliency working group and PMNM co-managers. The details and logistics would be described in an action plan prior to implementation.  In this PEA, MTBAP was proactively requesting this activity based on a request from USFWS.
6) Concerning the proposed use of nest probing, while this methodology may be used within certain other nations globally, I'm not convinced it's needed nor	2.2.2	Text was added to section 2.2.2 that states:

<p>appropriate for conditions in the Hawaiian Islands. There is the real risk of breaking an egg or two during probing, hence leakage of fluid contents onto other eggs of the clutch causing contamination. Eggs can be located expeditiously, if in absolute need for relocation to high ground on the same beach or nearby beach, through careful excavation without the need for probing.</p>		<p>This method is not intended to be the initial method for identifying nests. Instead, it may be used when digging for a nest has proven unsuccessful (e.g. digging for more than 45 minutes). Probing would be used to locate nests that were not observed being laid during the night, instead they would be found during surveys after being laid (e.g. during the day).</p> <p>MTBAP is having internal discussions with USFWS and other stakeholders about the use and approval of this technique. Our intent would be to increase efficiency in locating nests. Researchers using this technique would be trained, and there would be strict conditions when this technique would be used, as agreed upon with USFWS.</p>
<p>7) Is the probing of nests, such as being proposed in the draft PEA, approved in any other sea turtle research or management permit issued in the USA?</p>	<p>n/a</p>	<p>Several projects in the U.S. have been approved to use nest probing techniques. For example, projects occur in <a href="#">Texas</a>, <a href="#">South Carolina</a>, and <a href="#">Georgia</a>.</p>

<p>8) Table 4 page 14- It seems odd (e.g. incorrect) to describe offshore waters (commercial fishing vessels) as a Research Category titled "Stranding Response and Research". Should not this be re-worded?</p>	<p>2.1.1.7 Table 4</p>	<p>The research location text in table 4 for the stranding response and research category was revised to state: "Activities conducted in Hawai'i, Guam, CNMI, American Sāmoa, and from commercial fishing vessels in the PIR"</p>
<p>9) Table 4 on page 15- Research Category "Nesting and Basking Beach Monitoring"- Is there basking in "Guam, CNMI, American Samoa, PRIA" as seems to be indicated?</p>	<p>2.1.1.7 Table 4</p>	<p>The nesting and basking beach monitoring text in table 4 was revised to state: "Nesting and Basking (where applicable) Beach Monitoring"</p>
<p>10) Page 16- "...previously undocumented occurrence." Olive ridleys have been previously documented at several sites in the Main Hawaiian Islands. Ms. Joy Browning USFWS is aware of a nest (at Pyramid Beach) a few years back at the Marine Corps Base in Kaneohe. Also, please see:</p>	<p>2.2.2</p>	<p>The text in 2.2.2 was updated to state: "Both green turtles and hawksbill turtles nest on islands in Hawai'i and across the PIR. Rarely, olive ridley and loggerhead sea turtles attempt to conduct nesting activities in the Hawaiian Islands."</p>
<p>11) Re 2.3 Alternatives Considered-- Was the Alternative considered to experimentally restore sand to one or more of the islets at French Frigate Shoals through pumping of submerged sand in areas where corals and other living bottom habitat would not be adversely impacted? If not why not, please?</p>	<p>2.3</p>	<p>This action does not meet the purpose and need of this PEA, since it is a management action, not a research activity. However, the action proposed is being considered by the PMNM</p>

		co-manager's working group and was discussed by the Lalo Working Group at the USFWS Climate Adaptation Workshop, which will inform the PMNM action plan.
12) page 30 top- Re "Rose Atoll Marine National Monument"- including Rose Atoll. Is this location Co Managed equally at present by the USFWS and the Indigenous Government of American Samoa? If yes, please include. If not, please indicate when change officially occurred.	n/a (3.2.3.1 )	We refer the reader to 4 other environmental assessment documents that describe the areas and management strategies in this list of Marine Protected Areas (see NMFS 2014a, NMFS 2014b, NMFS 2023, and 85 FR 79928). This section (3.2.3.1) does not list the co-managers of these Marine Protected Areas, but they can be found at the <a href="#">Rose Atoll Marine National Monument website</a> .
13) Table 11 Page 42 Re "Oxytetracycline Injection"- requesting 500 green turtles in the CNP (Hawaiian Islands)- What is the purpose of these injections given that the validation of the annual nature of Arrested Lines of Growth (ALG) using Oxytetracycline injections in Hawaii over past decades of research has already been elucidated in two major journal publications. Please see:  Goshe et al. 2016.Validation of back-calculated body lengths and timing of growth mark deposition in Hawaiian green sea turtles. Ecology and Evolution. and Snover, Hahn, Goshe and Balazs (2011) Validation of annual skeletal marks in green sea turtles using tetracycline labeling. Aquatic Biology.	n/a (4.1.2.6 table 11)	We have USFWS and NMFS permit approval to continue using this technique, which allows continued calibration of the method over time, further validating the skeletochronology technique for aging turtles, in addition to other survey/handling objectives & methods. The values provided in Table 11 are the maximum sample size, not the proposed annual number.

		Furthermore, we only use this technique in conjunction with other research projects.
14) Satellite tracking involving breeding females and males originating in, or return to, the Main Hawaiian Islands from French Frigate Shoals is mentioned in the draft PEA. However, no mention nor citing is included of the highly relevant journal paper: Balazs et al. 2017. Ocean pathways and residential foraging locations for satellite tracked green turtles breeding in Hawaii. Micronesica Please kindly consider incorporating.	3.2.1.1	This citation was added to Section 3.2.1.1 and to the References section.
15) Page 20 Re discussion of green turtle sex ratios in Hawaii- Please consider including N=2411 turtles necropsied for gender determination showing no male/female bias. Please consider doing this to provide proper perspective to the statement in the following sentence- "..preliminary results (n=35) showing a female bias.."	3.2.1.1	We added the sample size to the text in 3.2.2.1.