



# University of Hawaii at Manoa

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June 9, 1983  
RR:0070

Mr. Eugene T. Nitta  
Western Pacific Program Office  
National Marine Fisheries Service  
P.O. Box 3830  
2570 Dole Street  
Honolulu, Hawaii 96812

Dear Mr. Nitta:

## Review of Regulations Concerning the Taking of Sea Turtles For Subsistence Purpose

Thank you for the opportunity to review and comment on the above cited regulations. Our preliminary comments were presented at the Public Hearing in Honolulu, Hawaii, May 18, 1983 by Sheila Conant. The Environmental Center review has been prepared with the assistance of Sheila Conant, General Science; Edward Stroup, Tom Clarke and Keith Chave, Oceanography; Albert Banner and Phillip Helfrich, Hawaii Institute of Marine Biology; Kirk Smith, East West Center; Ted Pettit, Physiology; and Lee Hannah, Mark Ingolia and Jacquelin Miller, Environmental Center.

Sea turtles, which are presently endangered or threatened, are in need of the fullest possible protection. The full range of factors responsible for the decline in Sea Turtle populations is not completely understood, yet it is estimated that harvesting and destruction of nesting sites has caused up to 90% of the current decline in Sea Turtle populations. All pressures which can be reasonably removed should be, until these species are no longer endangered. Subsistence allotments are difficult to limit and difficult to rescind should they be found to be detrimental. Such regulations are also particularly subject to abuse. Modern technology permits taking and capturing turtles in far greater numbers and more frequently than under native "subsistence" fishing conditions. For these reasons, and because no traditional culture in Hawaii or Guam seems dependent on the taking of sea turtles, we would find revision of Special Rule 50-CFR-227-D inadvisable.

With proper management now, the sea turtle population may be expected to rebound sufficiently to withstand "subsistence" taking in the future. Without adequate safeguards now, sea turtles may well be lost to all cultures forever. Even at present, it is difficult to enforce existing restrictions. Expansion of the subsistence taking rule would seem worthy of consideration if current restrictions threatened the existence of true traditional cultures, but this is not the case. Expanding permissible taking under the present circumstances risks possible permanent loss of a resource in exchange for the temporary pleasure of a few. This is an unwise bargain. Perhaps in the interest of equity, subsistence taking should be banned in all areas, but expanding subsistence taking seems clearly unreasonable.

The potential consuming populations in Hawaii and Guam are too large to assume that these markets could be breached without very serious detriment to sea turtle populations. Consistency with the letter and intent of the Endangered Species Act would seem to preclude this option. We would suggest that the prudent action for the present is no less than maintenance of the current stringency of subsistence taking rules.

Yours truly,

Doak C. Cox  
Director

cc: OEQC	Tom Clarke
Sheila Conant	Phil Helfrich
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