

Comment from George Balazs

This is a Comment on the **National Oceanic and Atmospheric Administration** (NOAA) Proposed Rule: **Endangered and Threatened Wildlife and Plants: Identification and Proposed Listing of Eleven Distinct Population Segments of Green Sea Turtles (*Chelonia mydas*)**.

For related information, [Open Docket Folder](#) 

Comment Period Closed

Sep 25 2015, at 11:59 PM ET

ID: NOAA-NMFS-2012-0154-0356

Tracking Number: 1jz-8lc2-s74f

Document Information

Date Posted:

Sep 30, 2015

RIN:

Not Assigned

[Show More Details](#) 

Submitter Information

Submitter Name:

George Balazs

City:

Honolulu

Country:

United States

State or Province:

HI

Comment

I declare that I have been professionally and personally involved in the research and conservation of marine turtles in the Hawaiian Islands, and elsewhere in Oceania and globally since 1972. In my professional scientific capacity involving marine turtles I have worked in leadership roles for the University of Hawaii (1972-1982), and the National Marine Fisheries Service based in Hawaii (1982-present). In my personal but professionally-focused capacity I have been a member of the IUCN SSC Marine Turtle Specialist Group since 1976. I am presently the Co-Chair of the Oceania Region of the IUCN Marine Turtle Specialist Group, again in the professional capacity of my personal life. For the record, I declare that the professional views expressed in this testimony are mine alone, in my personal capacity as a 50-year resident of the Hawaiian Islands. In this capacity, I express disagreement with the proposed rulemaking for the listing status of DPS10 (Central North Pacific that includes exclusively the Hawaiian Islands and range of the genetically discrete green turtle population). My disagreement is based on the fact that the proposed listing is scientifically discordant, contradictory, incongruent, and simply at odds with the biological and population assessment findings and information presented in the NMFS NOAA document by Seminoff et al. (2015) "Status Review of the Green Turtle under the Endangered Species Act." I further declare that I am a co-author of this report, however I had no involvement in the listings being proposed. The principal reason given relating to the proposed rule making for DPS 10 is climate-change induced sea level rise, hence eventual submergence of nesting beaches at French Frigate Shoals. This opinion runs oppositional to the fact that green turtles are highly resilient and adaptable resulting in short and long term successful nesting beach and other changes for millennia. The rationale simply "does not hold water" in that no science-based information of support was presented in the rule-making proposal.

The proposed rulemaking for DPS 1 (North Atlantic), DPS 7 (Central West Pacific), and DPS 9 (Central South Pacific) are also viewed in my professional view as discordant with the findings presented in Seminoff et al. 2015.

For the record, and for the sake of historical events, I am also taking this opportunity to re-submit testimony that I wrote to the NMFS Office of Protected Resources in September 2012. To the best of my knowledge that testimony on R.I.N. NOAA-NMFS-2012-0154 was

never incorporated into the official record. Hence, I repeat that testimony as follow: "I attest to the following direct personal observations, submitted here as testimony based on a significant span of time- nearly 48 years- 1965-2012- living in Hawaii and devoting attention, as an astute observer in, on, and by the ocean. During the mid-1960's to the mid-1980's it was uncommon to ever see green turtles when snorkeling, scuba diving, boating, or walking along the shoreline. Starting in the late 1980's and early 1990's sightings of turtles increased prominently- including the occurrence of terrestrial basking. By the mid-1990's through to the present, with increasing frequency, it has become *common* to see turtles. My observations are applicable to the Hawaiian Islands of Oahu where I live, as well as Maui, Kauai, Lanai, Molokai, and the Big Island of Hawaii (including East Hawaii and the Kohala/Kona Coast). By green turtles being "common" I mean widespread, general, ordinary, of frequent occurrence, and usual. George H. Balazs, IUCN Marine Turtle Specialist Group, 992-A Awaawaanoa Place, Honolulu, Hawaii 96825"