

**Public Comments on the U.S. Commission on Ocean Policy's
Preliminary Report**

Topic Area: Turtles

Comments Submitted by:

- Nicolas Pilcher and Rod Mast, IUCN Marine Turtle Specialist Group
- Gary Appleson, Caribbean Conservation Corporation
- James R. Spotila, The Leatherback Trust

Comment Submitted by Dr. Nicolas Pilcher and Rod Mast, IUCN Marine Turtle Specialist Group

U.S. Commission on Ocean Policy
1120 20th Street, NW
Suite 200 North
Washington, D.C. 20036

Ref. Public Comment on Preliminary Report

Dear Sirs:

We are particularly concerned with the lack of attention and importance placed on marine turtles in your recent US Commission on Ocean Policy Preliminary Report. In particular we are concerned that if this document guides US policy toward marine conservation over the coming years, marine turtles might well face extinction in US waters for lack of attention.

While we realize that a comprehensive review of each species group is beyond the limitations of this document, marine turtles have proven time and time again that they possess the same charismatic attraction as do marine mammals, and have garnered the support and compassion of peoples around the globe in their plight for survival. To be barely mentioned throughout the Report fails to do justice to the amount of effort the United States Federal and State governments have invested in their protection and management, and the untold millions in expenditures and effort that have gone into the conservation of these critically endangered animals throughout their range by US organizations, universities and NGOs.

In addressing the situation with regard to marine turtles, your report indicates that “the threats to endangered marine species such as marine turtles ... are myriad and not easily categorized” (paragraph 4, page 252). We beg to differ: There exists a voluminous wealth of information about the threats to marine turtles, many of them clearly summarized and consolidated for those with an interest. Your own National Research Council published in 1990 a very comprehensive and useful guide to threats to marine turtles and since that time various organizations have worked relentlessly to make new threats, such as long-line fishery bycatch, prominent issues. The US Western Pacific Fishery Management Council and NOAA have invested heavily in the study and amelioration of these threats for leatherback turtles *Dermochelys coriacea* in the Pacific, for instance. The IUCN Marine

Turtle Specialist Group would be happy to provide further substantiation of threats to marine turtles should you need.

The only major reference to them comes as an aside in a chapter on marine mammals, as a token mention of other species in an attempt to be all-inclusive, but it fails dramatically in portraying the importance marine turtles have in ecosystems, and people's values of conservation. Marine turtles are integral components of many ecosystems you list in your report, such as coral reefs, seagrass meadows, and open ocean migratory corridors. They serve as ambassadors to ocean conservation issues worldwide, garnering the attention and interest of governments and conservationists alike, and have proven invaluable in raising awareness of conservation issues over a much broader platform than just turtles themselves.

Marine turtles are critically threatened and imperiled by numerous activities within and outside US waters, from long-line fisheries to trawl fisheries, from explosive underwater exploration to beachfront lighting, from habitat destruction to illegal consumption and trade. The US Government has already recognized the importance of marine turtles through another legal instrument, the "Marine Turtle Conservation Act of 2003", a bill introduced to the Senate in June, 2003, and expected to pass the House Resources Committee markup scheduled for May 5. The Bill is expected to be signed soon by the President, having demonstrated good bipartisan support, industry, NGO and federal agency support.

We urge you to reconsider the attention to and importance of marine turtles in your Report of the US Commission on Ocean Policy to more accurately reflect the importance of marine turtles already recognized by the international community, your Government, at both Federal and State levels, and by people at large.

Specifically, we would suggest that the Report include recommendations on bycatch reduction methods, such as requirements for the use of circle hooks on long-line vessels (even those from foreign countries who sell to the US – as in the case of Trawler Efficiency Devices), supporting continued research into bycatch reduction methods, and developing and enacting further Protected Areas to safeguard critical marine turtle habitats.

Respectfully,
Dr. Nicolas Pilcher and Rod Mast
Co-Chairs, IUCN SSC Marine Turtle Specialist Group

Comment Submitted by Gary Appelson, Caribbean Conservation Corporation

Thank you for your great work in producing the just released Draft Report on Ocean Policy!

I work with Caribbean Conservation Corporation (www.cccturtle.org) The oldest sea turtle conservation organization in the country. We are based in Florida- sea turtle country. How our coastline is managed is having a direct impact on sea turtles. Lighting on the beach, construction on the frontal dune, inlet mismanagement and consequent beach erosion, massive and repetitive beach dredging projects, the proliferating of coastal armoring, etc are all coastal management issues impacting sea turtle nesting habitat and off shore reef habitats. These activities are well documented and probably pose the most significant long-term risk to threatened and endangered sea turtles in Florida and to the beach/dune/water interface in Florida. While the Draft Report does an amazing job of addressing many policy issues it seems to fall very short in its description of threats to sea turtles and the impacts from coastal management policies.

I wanted to let you know our organization will be submitting comments to the Commission and to the governor of Florida.

Again - thanks for all your work in producing this great report.
Regards, Gary Appelson

Comment Submitted by James R. Spotila, Ph.D., The Leatherback Trust

Dear Sirs:

I have reviewed the Preliminary Commission Report and find it woefully inadequate in its treatment of sea turtles. The report states that there are myriad threats to sea turtles and that they are hard to quantify. In fact there is an enormous literature on the threats to sea turtles including a very accessible National Research Council report. The threats are well documented and the solutions known as well. This report should be modified to include accurate information about threats to sea turtles and solutions that are proposed by both private NGOs and government agencies to counteract those threats. It appears that no one very knowledgeable about sea turtles had a serious input to this report. I suggest that you engage the Marine Turtle Specialist Group of the IUCN for help as well as the International Sea Turtle Society. Contact Rod Mast at Conservation International for both groups.

Sincerely yours,

James R. Spotila, Ph.D.
President
The Leatherback Trust

www.leatherback.org