

APR 23 2020

April 13, 2020

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Director
Office of Environmental Quality Control
State of Hawai'i
235 S Beretania Suite # 702
Honolulu, HI 96813

Re: Transmittal of Final Environmental Impact Statement

Dear Director:

With this letter, the Pet Industry Joint Advisory Council (PIJAC) hereby transmits the documents package for the Final Environmental Impact Statement (FEIS) for the Issuance of Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area situated in the West Hawai'i Regional Fishery Management Area in the Puna, South Hilo, North Hilo, Kau, Hamakua, South Kona, North Kona, South Kohala, and North Kohala districts on the island of Hawai'i. The FEIS includes responses to public comments received during the public comment period.

Also enclosed is an Adobe Acrobat PDF file containing the FEIS and a distribution list for the verification of OEQC under Section 11-200-20, Hawai'i Administrative Rules. Upon receiving verification from OEQC, we will make the FEIS available to those so indicated on the distribution list.

If you have any questions or if you need additional information, please feel free to contact me.

Sincerely,



James M. Lynch

Enclosures

From: webmaster@hawaii.gov
To: [HI Office of Environmental Quality Control](#)
Subject: New online submission for The Environmental Notice
Date: Monday, April 13, 2020 12:38:20 PM

Action Name

Issuance of Commercial Aquarium Permits, Commercial Marine Licenses, and West Hawai'i Aquarium Permits for the West Hawai'i Regional Fishery Management Area

Type of Document/Determination

Final environmental impact statement (FEIS)

HRS §343-5(a) Trigger(s)

- (1) Propose the use of state or county lands or the use of state or county funds
- (2) Propose any use within any land classified as a conservation district

Judicial district

Hawai'i - multiple districts

Tax Map Key(s) (TMK(s))

West Hawai'i Regional Fishery Management Area identified in Figure 1 of FEIS.

Action type

Applicant

Other required permits and approvals

Commercial Aquarium Fishing Permits issued pursuant to HRS §188-31, Commercial Marine License issued pursuant to HRS 189-2,3, West Hawai'i Aquarium Permit issued pursuant to HAR 13-60.4

Discretionary consent required

Commercial Aquarium Fishing Permits

Approving agency

Hawai'i Department of Land and Natural Resources

Agency contact name

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[Map It](#)

Accepting authority

Hawai'i Department of Land and Natural Resources

Applicant

Pet Industry Joint Advisory Council

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Was this submittal prepared by a consultant?

Yes

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Action summary

The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats of the West Hawai'i Regional Fishery Management Area (WHRFMA). The objective of the proposed action is for the Department of Land and Natural Resources (DLNR) to issue 10 Aquarium Permits for the WHRFMA. Since the release of the Draft Environmental Impact Statement (DEIS), the proposed action

has changed, reducing the number of Commercial Aquarium Permits from 14 to 10.

The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods in compliance with all applicable laws, rules, and regulations pertaining to the industry.

Attached documents (signed agency letter & EA/EIS)

- [193705834_Hawaii-FEIS_04.10.2020_final.pdf](#)
- [193705834_Hawaii-FEIS_04.10.2020_final1.pdf](#)
- [193705834_Hawaii-FEIS_04.10.2020_final2.pdf](#)
- [193705834_Hawaii-FEIS_04.10.2020_final3.pdf](#)
- [Appendix-D-Distribution-List-for-FEIS.pdf](#)
- [Letter-to-Sakoda-FEIS-DLNR.pdf](#)
- [Letter-to-Director-FEIS-OEQC.pdf](#)

Shapefile

- The location map for this Final EIS is the same as the location map for the associated Draft EIS.

Authorized individual

James Lynch

Authorization

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

Final Environmental Impact Statement

Issuance of Commercial Aquarium Permits, Commercial Marine Licenses, and West Hawai'i Aquarium Permits for the West Hawai'i Regional Fishery Management Area

April 10, 2019

Applicant

Name: Pet Industry Joint Advisory Council (PIJAC)
Address: 1615 Duke St., #100 Alexandria, VA 22314
Phone: 202.452.1525

Approving Agency

Hawai'i Department of Land and Natural Resources
Division of Aquatic Resources
1151 Punchbowl Street, Room 330
Honolulu, HI 96813-3088

APPLICANT PUBLICATION FORM

Project Name:	Issuance of Commercial Aquarium Permits, Commercial Marine Licenses, and West Hawai'i Permits for the West Hawai'i Regional Fishery Management Area
Project Short Name:	FEIS WHRFMA Commercial Aquarium Permits
HRS §343-5 Trigger(s):	Trigger 1 (use of state lands) and Trigger 2 (use of conservation districts)
Island(s):	Hawai'i
Judicial District(s):	Puna, South Hilo, North Hilo, Kau, Hamakua, South Kona, North Kona, South Kohala, North Kohala
TMK(s):	West Hawai'i Regional Fishery Management Area identified in Figure 1
Permit(s)/Approval(s):	Commercial Aquarium Fishing Permits issued pursuant to HRS §188-31, Commercial Marine License issued pursuant to HRS 189-2,3, West Hawai'i Aquarium Permit issued pursuant to HAR 13-60.4
Approving Agency:	Department of Land and Natural Resources
<i>Contact Name, Email, Telephone, Address</i>	David Sakoda; david.sakoda@hawaii.gov, 808-587-0104, 1151 Punchbowl Street, Room 330, Honolulu, HI 96813
Applicant:	Pet Industry Joint Advisory Council (PIJAC)
<i>Contact Name, Email, Telephone, Address</i>	Jim Lynch; jim.lynch@klgates.com; 206.370-6587; 925 Fourth Ave., Suite 2900 Seattle, WA 98104
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Status (select one)

DEA-AFNSI

Submittal Requirements

Submit 1) the approving agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEA, and 4) a searchable PDF of the DEA; a 30-day comment period follows from the date of publication in the Notice.

FEA-FONSI

Submit 1) the approving agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; no comment period follows from publication in the Notice.

FEA-EISPN

Submit 1) the approving agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; a 30-day comment period follows from the date of publication in the Notice.

Act 172-12 EISPN ("Direct to EIS")

Submit 1) the approving agency notice of determination letter on agency letterhead and 2) this completed OEQC publication form as a Word file; no EA is required, and a 30-day comment period follows from the date of publication in the Notice.

DEIS

Submit 1) a transmittal letter to the OEQC and to the approving agency, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEIS, 4) a searchable PDF of the DEIS, and 5) a searchable PDF of the distribution list; a 45-day comment period follows from the date of publication in the Notice.

XX FEIS

Submit 1) a transmittal letter to the OEQC and to the approving agency, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEIS, 4) a searchable PDF of the FEIS, and 5) a searchable PDF of the distribution list; no comment period follows from publication in the Notice.

<input type="checkbox"/> FEIS Acceptance Determination	The approving agency simultaneously transmits to both the OEQC and the applicant a letter of its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS; no comment period ensues upon publication in the Notice.
<input type="checkbox"/> FEIS Statutory Acceptance	The approving agency simultaneously transmits to both the OEQC and the applicant a notice that it did not make a timely determination on the acceptance or nonacceptance of the applicant's FEIS under Section 343-5(c), HRS, and therefore the applicant's FEIS is deemed accepted as a matter of law.
<input type="checkbox"/> Supplemental EIS Determination	The approving agency simultaneously transmits its notice to both the applicant and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is or is not required; no EA is required, and no comment period ensues upon publication in the Notice.
<input type="checkbox"/> Withdrawal	Identify the specific document(s) to withdraw and explain in the project summary section.
<input type="checkbox"/> Other	Contact the OEQC if your action is not one of the above items.

Project Summary

The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats of the West Hawai'i Regional Fishery Management Area (WHRFMA). The objective of the proposed action is for the Department of Land and Natural Resources (DLNR) to issue 10 Aquarium Permits for the WHRFMA, along with required Commercial Marine Licenses and West Hawai'i Aquarium Fishing Permits. **Since the release of the Draft Environmental Impact Statement (DEIS), the proposed action has changed, reducing the number of Commercial Aquarium Permits from 14 to 10.**

The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods in compliance with all applicable laws, rules, and regulations pertaining to the industry.

Project Summary

Project Name: Issuance of Commercial Aquarium Permits, Commercial Marine Licenses, and West Hawai'i Aquarium Fishing Permits for the West Hawai'i Regional Fishery Management Area.

Proposed Action: Collection of aquarium fish pursuant to the issuance of 10 Commercial Aquarium Permits under HRS §188-31 and related permits ensuring lawful, responsible, and sustainable commercial collection of various aquarium fish species from nearshore habitats of the WHRFMA.

[NOTE: Since the release of the DEIS, the proposed action has changed, reducing the number of Commercial Aquarium Permits from 14 to 10. This change has resulted in changes to the environmental consequences in Section 5.0 for the Limited Permit Issuance Alternative.]

Applicant: Pet Industry Joint Advisory Council (PIJAC).

Applicant Contact: Jim Lynch, KL Gates LLP, 206-370-6587

Approving Agency: Department of Land and Natural Resources

Project Location: Throughout the West Hawai'i Regional Fishery Management Area (to depths of 100 fathoms), except in those areas already designated as no collection areas such as Fish Replenishment Areas.

Land Use Classification: N/A

Land Area: N/A NON-MLCDs

Tax Map Key: N/A

State Land District: N/A

Land Owner: State of Hawai'i

Permits Required: Commercial Aquarium Fishing Permits issued pursuant to HRS §188-31, Commercial Marine License issued pursuant to HRS 189-2,3, West Hawai'i Aquarium Permit issued pursuant to HAR 13-60.4.

HRS §343-5 Trigger: Trigger 1 (use of state lands) and Trigger 2 (use of conservation districts). Review of an Environmental Assessment (EA) prepared in 2018 determined an EIS was required based on Significance Criteria #1, #2, #3, #4, and #8.

Anticipated Determination: Acceptance

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Executive Summary

In October 2017, the circuit court ruled that, based upon the Supreme Court of Hawai'i's opinion, existing Commercial Aquarium Permits (Aquarium Permits) for use of fine mesh nets to catch aquatic life for aquarium purposes are illegal and invalid. The circuit court ordered the Department of Land and Natural Resources (DLNR) not to issue any new Aquarium Permits pending environmental review. The DLNR has not issued new or additional Aquarium Permits under HRS §188-31 since September of 2017.

The Applicant initially prepared and submitted an Environmental Assessment on April 8, 2018, evaluating the impacts of issuance of Aquarium Permits on the island of Hawai'i programmatically to any applicant over a 12-month analysis period. The DLNR determined on July 26, 2018, that preparation of an Environmental Impact Statement (EIS) was required, based on five significance criteria outlined in Title II, Chapter 200, Hawai'i Administrative Rules. An evaluation of the significance criteria, including the five identified by the DLNR, is provided in Section 5.6 of this document.

A Draft Environmental Impact Statement (DEIS) evaluating the impacts of issuance of 14 Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA) was published on November 23, 2019¹. This Final Environmental Impact Statement (FEIS) evaluates the impacts of issuance of 10 Aquarium Permits for the WHRFMA. **Since the release of the DEIS, the proposed action has changed, reducing the number of Commercial Aquarium Permits from 14 to 10.** The Applicant has prepared this FEIS to inform the public of the proposed action (i.e., issuance of 10 Aquarium Permits) and the impacts of the proposed action and its alternatives, and to incorporate information gained through public involvement. The Preferred Alternative includes issuance of 10 Aquarium Permits for the WHRFMA, and implementation of a reduced bag limit for Achilles Tang of 5 per day. No Aquarium Permits would be issued for other areas of the state, including East Hawai'i. Implementation of the Preferred Alternative would ensure the lawful, responsible, and sustainable commercial collection of various fish species from the WHRFMA.

Aside from the additional conservation measure included in the Preferred Alternative, the issuance of 10 Aquarium Permits under the Preferred Alternative does not include any activities different from, or in addition to, those that have occurred in the past. There would be no construction of permanent or semi-permanent infrastructure, no discharges into coastal, surface or ground waters, no dredging, and no significant use of hazardous materials that could be released into the environment. The DLNR's issuance of 10 Aquarium Permits is not anticipated to result in significant beneficial or adverse impacts to water and air quality, geology and soil resources, aesthetics, noise, vegetation, terrestrial wildlife, and avian species, threatened and endangered species, land use, public health and safety, communications, transportation, utilities, or population and demographics from their current condition.

The Preferred Alternative does not involve an irrevocable commitment or loss or destruction of any natural or cultural resource. Both the National Oceanic and Atmospheric Administration's (NOAA) Coral Reef Ecosystems Program (CREP; now known as the Ecosystem Sciences Division) and Hawai'i's DLNR, Division of Aquatic Resources' (DAR) West Hawai'i Aquarium Project (WHAP) collect data on fish populations in nearshore waters of the island of Hawai'i that are available and appropriate for estimating

¹ http://oegc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf

population size, within the limitations of each survey, and for analysis of the impact of fish collection under Aquarium Permits. The WHAP data are collected from 25 transect survey sites located solely within the West Hawai'i Regional Fishery Management Area between depths of 30-60 feet. The CREP data are collected from 257 stationary point count locations located around the island of Hawai'i (except for collection zone 107; Figure 4), from depths of 0-98 feet. Both data sets are presented and analyzed in this FEIS. However, due to the larger spatial coverage and greater range of depths surveyed by the CREP, these data are considered to be a better estimator of island-wide fish population size, and therefore serve as the primary basis for the impact analysis in this FEIS. Nevertheless, impacts based on the WHAP Open Area population estimates can be found in Appendix B.

Analysis of the CREP data indicates that if the average catch from 2000-2017 for the 10 fishers who would be issued Aquarium Permits under the Preferred Alternative were to occur over the 5-year analysis period considered in this FEIS, the annual collection of 37 of the 38 White List Species with population estimates would be less than 1% of their respective overall island of Hawai'i populations. Collection of the remaining species, the Yellow Tang, would be approximately 1.05% of the overall population. Even if the collection rates of the 40 White List Species were closer to the maximum collection by the 10 fishers from 2000-2017, the annual collection of all species would be less than 2% of the island-wide population. Research suggests collection of between 5%-25% is sustainable for various reef species similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish). Based on the low percentage of the overall populations collected annually by commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection likely has minimal impacts on populations in general.

Based on WHAP data, the DAR has suggested decreasing population trends for the Achilles Tang in the WHRFMA, and in 2014 a bag limit of 10 Achilles Tang per day was imposed on commercial aquarium collection (recreational and non-aquarium commercial harvest are not subject to the bag limit). Under the Preferred Alternative, the daily bag limit for Achilles Tang would be reduced from 10 per day to 5 per day, and only 10 Aquarium Permits would be issued. Under the Preferred Alternative, catch of Achilles Tang is estimated to be reduced by over 50% from rates seen prior to the October 2017 ban on commercial aquarium collection, resulting in an estimated 0.85% to 1.20% of the island-wide population collected annually over the 5-year analysis period. This level of collection is below the lower end of what is considered to be sustainable reef fish harvest based on available research (5% - 25%; Ochavillo and Hodgson 2006).

Two studies have concluded that the aquarium fishery has no significant impact on coral or the reef ecosystem. In addition, herbivores collected by the aquarium fishery typically consist of the smaller size classes which are the least effective sizes for cropping algae. One study found there were no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting.

As concluded in the Cultural Impact Assessment (CIA; Appendix A), cultural impacts would occur if issuance of Aquarium Permits would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts. While not all species have a known Hawaiian cultural significance, for this analysis, it was assumed that the 33 species on the White List identified as having a cultural use for food, medicinal,

religious or ceremonial purposes could have a cultural impact if populations of those species were impacted. Populations of the White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural resources would occur as a result of the Preferred Alternative.

The Preferred Alternative does not substantially affect the economy but plays an important role as a nearshore fishery in the state. The Preferred Alternative would add an estimated \$1.8 to \$3.7 million over the 5-year analysis period (average of \$365,311 to \$746,386 per year), and another five times this value in indirect economic benefits. Loss of the fishery would result in the loss of income, tax revenue, and jobs.

Abbreviations

BIAAF	Big Island Association of Aquarium Fishermen
BLNR	Board of Land and Natural Resources
CFR	Code of Federal Regulations
CML	Commercial Marine License
CREP	Coral Reef Ecosystems Program
DAR	Division of Aquatic Resources
DEIS	Draft Environmental Impact Statement
DLNR	Department of Land and Natural Resources
DOCARE	Division of Conservation and Resources Enforcement
DOH	Department of Health
EA	Environmental Assessment
EC	Environmental Council
EIS	Environmental Impact Statement
ENSO	El Niño Southern Oscillation
EQC	Environmental Quality Commission
ESA	Endangered Species Act

FEA	Final Environmental Assessment
FEIS	Final Environmental Impact Assessment
FMA	Fisheries Management Area
FONSI	Finding of No Significant Impact
FRA	Fish Replenishment Area
HDBEDT	Hawai'i Department of Business, Economic Development & Tourism
HEPA	Hawai'i Environmental Policy Act
HAR	Hawai'i Administrative Rule
HRS	Hawai'i Revised Statute
IUCN	International Union for the Conservation of Nature
KMLAC	Ka'ūpūlehu Marine Life Advisory Committee
MLCD	Marine Life Conservation District
MHI	Main Hawaiian Islands
MPA	Marine Protected Areas
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
NPS	National Park Service
NWHI	Northwestern Hawaiian Islands

OEQC	Office of Environmental Quality Control
OHA	Office of Hawaiian Affairs
PIJAC	Pet Industry Joint Advisory Council
QUEST	Quantitative Underwater Ecological Survey Techniques
SAWCS	Statewide Aquatic Wildlife Conservation Strategy
SCUBA	Self-contained Underwater Breathing Apparatus
SGCN	Species of Greatest Conservation Need
SWAP	State Wildlife Action Plan
TL	Total Length
UH	University of Hawai'i
USFWS	United States Fish and Wildlife Service
WHAP	West Hawai'i Aquarium Project
WHFC	West Hawai'i Fishery Council
WHRFMA	West Hawai'i Regional Fishery Management Area
WHRFWG	West Hawai'i Reef Fish Working Group

1.0 INTRODUCTION

This Final Environmental Impact Statement (FEIS) has been prepared by the Pet Industry Joint Advisory Council (PIJAC; the Applicant) pursuant to the Hawai'i Environmental Policy Act (HEPA). This FEIS evaluates the impacts of issuance of 10 Commercial Aquarium Permits (Aquarium Permit) for the West Hawai'i Regional Fishery Management Area (WHRFMA; Section 1.2.2), pursuant to Hawai'i Revised Statute (HRS) 188-31 (2013; Title 12 – Conservation and Resources; 188 – Fishing Rights and Regulations; 188-31 – Permits to take aquatic life for aquarium purposes). The Applicant has prepared this FEIS to inform the public of the proposed action (i.e., issuance of 10 Aquarium Permits) and the impacts of the proposed action and its alternatives, and to incorporate information gained through public involvement in order to aid decision makers in making an informed decision regarding the proposed action. **Since the release of the Draft Environmental Impact Statement (DEIS), the proposed action has changed, reducing the number of Commercial Aquarium Permits from 14 to 10. This change has resulted in changes to the environmental consequences in Section 5.0 for the Limited Permit Issuance Alternative. Additional changes in the FEIS were made in response to comments received on the DEIS and are noted in the Applicant's response to comments.**

Hawai'i Revised Statute 188-31 states that, "Except as prohibited by law, the department (Department of Land and Natural Resources; DLNR), upon receipt of a written application, may issue an Aquarium Permit, not longer than one year in duration, to use fine meshed traps, or fine meshed nets other than throw nets, for the taking of marine or freshwater nongame fish and other aquatic life for aquarium purposes." As set down by the Supreme Court of Hawai'i (SCWC-13-0002125), issuance of an Aquarium Permit constitutes a discretionary State action by the DLNR and is thus subject to the HEPA, which requires that State agencies consider the impact of governmental actions on the environment by preparing an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) to document the potential impacts of the State action. A Draft Environmental Assessment (DEA) evaluating the impacts of the proposed action of issuing Aquarium Permits to fishermen on the island of Hawai'i and its alternatives was made available for public comment on April 8, 2018. After review of the EA, the DLNR determined on July 26, 2018, that preparation of an EIS is required, based on the significance criteria outlined in Title II, Chapter 200, Hawai'i Administrative Rules. Accordingly, the Applicant has prepared this FEIS to evaluate the potential impacts of alternatives associated with issuance of 10 Aquarium Permits for the WHRFMA, and a No Action Alternative. The consequences of these alternatives on various resources are discussed in this FEIS.

1.1 BACKGROUND

In 2017, the Hawai'i commercial aquarium fishery was the most economically valuable commercial inshore fishery in the State with fiscal year reported landings greater than \$2.2 million (DAR 2019a). In 2017, the commercial aquarium fishery on the island of Hawai'i (excluding the other islands) reported landings near \$1.4 million, with more than \$1.29 million in the WHRFMA alone (DAR 2018a). The fishery developed initially on O'ahu in the late 1940's, went through a period of expansion in the 1970's and has subsequently declined on O'ahu both in terms of catch and overall value (DAR 2014a). The West Hawai'i aquarium fishery has undergone substantial and sustained expansion over the past 40 years. As of 2017, approximately

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45% of the aquarium fish caught in the State and nearly 67% of value came from the WHRFMA (DAR 2018a).

Commercial aquarium fish collection in Hawai'i, and especially in West Hawai'i has long been a subject of controversy (DAR 2019a). As early as 1973, public concern over collecting activities prompted Hawai'i's DLNR, then Division of Fish and Game, to suspend the issuance of Aquarium Permits for a week while issues were considered and addressed (DAR 2014a). As a result, Aquarium Permit holders were required to submit monthly catch reports. However, no studies were conducted, and no 'sanctuary' areas were created at that time. The first sanctuary areas were created through a gentleperson's agreement primarily between dive/snorkel operators and commercial aquarium fishers in 1987, and four of these sanctuaries were incorporated into the Kona Coast Fisheries Management Area (FMA) in 1991 (DAR 2004). This interindustry collaboration and cooperation laid the groundwork for a more inclusive management approach to the fishery. The WHRFMA was created by Legislative Act 306 (1998) largely in response to longstanding and widespread conflict surrounding commercial aquarium fish collection (Section 1.2.3). The Act required substantive community input in management decisions (DAR 2019a).

In order to accomplish the mandates of Act 306, a community advisory group, the West Hawai'i Fishery Council (WHFC), was convened by the Division of Aquatic Resources (DAR) in 1998 (Section 1.2.3.1). Consisting of 24 voting members and 6 ex-officio agency representatives from DLNR, Sea Grant, and the Governor's Office, the WHFC's members represented diverse geographic areas and various stakeholder, community, and user groups in West Hawai'i. Four aquarium representatives (three collectors and one aquarium shop owner) were members of the WHFC, 40% of the WHFC were *maka'āinana* (i.e., native fishers) and most of the members were previously on the West Hawai'i Reef Fish Working Group (WHRFWG). The first action of the WHFC was the designation of a network of nine Fish Replenishment Areas (FRAs), in which no aquarium fish collection is allowed. The FRA's, along with existing Marine Protected Areas (MPA), comprise 35.2% of the West Hawai'i coastline (DAR 2019a). Although closed to commercial and recreational aquarium fishing, FRAs are still open to other forms of permitted fishing. Concerns over continued expansion of the commercial aquarium fishery and collecting effects in the Open Areas (i.e., areas where aquarium fish collection is allowed) prompted the DLNR in 2013 to establish a 'White List' of 40 species that can be collected by commercial aquarium fishers within the WHRFMA (Section 4.4.1). All other species are off limits within the WHRFMA (DAR 2019a) but can be collected in East Hawai'i.

1.1.1 Status of Aquarium Permits

In October 2012, Earthjustice filed a complaint under the HEPA in the First Circuit Court on behalf of four individuals and three non-governmental organizations. The complaint sought a court order to force the State to comply with the HEPA's requirement to examine commercial aquarium fish collection's effects on the environment before issuing collection permits. The complaint also asked the court to halt collection under existing Aquarium Permits and to stop DLNR from issuing new permits until the environmental review is complete (Earthjustice 2012). On June 24, 2013, the Circuit Court of the First Circuit announced their findings on the case through an 'Order Granting Department of Land and Natural Resources State of Hawai'i's, Motion for Summary Judgment filed February 4, 2013, and Denying Plaintiffs' Motion for Summary Judgment filed February 5, 2013 (Summary Judgment Order), and the Final Judgment in Favor

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of Defendant and Against Plaintiffs (Judgment), also filed on June 24, 2013. The Hawai'i Intermediate Court of Appeals upheld this decision in August 2016. Permit issuance by DLNR's DAR continued.

Through the appeals process, Earthjustice brought the case before the Supreme Court of Hawai'i. On September 6, 2017, the Supreme Court of Hawai'i ruled that aquarium collection using fine meshed traps or nets is subject to the environmental review procedures provided in the HEPA (SCWC-13-0002125). The issue was remanded to the circuit court for further proceedings. In light of the ruling, DLNR discontinued issuance of new Aquarium Permits and renewal of existing Aquarium Permits (DAR 2017).

On October 27, 2017, the circuit court ruled that, based upon the Supreme Court of Hawai'i's opinion, existing permits for use of fine mesh nets to catch aquatic life for aquarium purposes are illegal and invalid. The circuit court ordered the DLNR not to issue any new permits pending environmental review. The DLNR has not issued new or additional permits under HRS §188-31 since the Supreme Court's opinion was issued in September of 2017 (DAR 2017).

On January 5, 2018 the DLNR issued a press release clarifying that no aquatic life may be taken for commercial aquarium purposes in West Hawai'i until an environmental review is complete

1.1.2 Previous HEPA Documents

PIJAC initially prepared and submitted an EA on April 8, 2018, evaluating the impacts of issuance of Aquarium Permits on the island of Hawai'i programmatically to any applicant over a 12-month analysis period. In accordance with HEPA, the Draft EA was circulated for public review and comment through publication in The Environmental Notice and was also distributed via copies or email to a variety of elected officials, federal agencies, state, county and local offices, and individuals and organizations. Public comments were accepted during a 30-day period following publication. A total of 836 responses were received: 435 supported the conclusions of the DEA and issuance of Aquarium Permits; 398 did not support the conclusions of the DEA and opposed issuance of Aquarium Permits; and 3 did not express support or opposition. Comments received during the comment period were taken into account in assessing impacts of the proposed action and resulted in some modifications in the Final EA, which are also reflected in this EIS. Responses to comments on the DEA can be found in Appendix B of the Final EA².

In the cover letter for the publication of the DEA, the DLNR requested comment on four specific issues:

1. The effects of the Commercial Aquarium Fishery on Achilles Tang (*Acanthurus achilles*), and its sustainability given its life history characteristics, current population trends, and harvest by other fisheries.
2. The adequacy of the analysis presented in the DEA, including but not limited to removal and replenishment rates for vulnerable species; specifically, how is the estimated sustainable range of 5% to 25% annual take of the estimated total population arrived at, and should the threshold be 5% or 25%.

² http://oegc2.doh.hawaii.gov/EA_EIS_Library/2018-08-08-HA-FEA-EISPN-Hawaii-Island-Commercial-Aquarium-Permits.pdf

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3. The interpretation of data presented in the DEA, including the analysis of NOAA NMFS Coral Reef Ecosystem Project (CREP) data versus DLNR Division of Aquatic Resources West Hawai'i Aquarium Project (WHAP) data.
4. Conservation measures to minimize or avoid impacts to target species, and specifically, whether other alternatives might be proposed to minimize or avoid impacts other than the two presented of no action, with no Aquarium Permits issued, and the preferred alternative of programmatic issuance of Aquarium Permits for the Island of Hawai'i - such as consideration of specific management measures for Achilles tang and other species.

The Applicant's responses to the request for comment along with an independent scientific reviewer's comments on the responses are found in Appendix D of the Final EA. After review of the Final EA, the DLNR determined on July 26, 2018, that preparation of an EIS is required, based on the significance criteria outlined in Title II, Chapter 200, Hawai'i Administrative Rules³. Specifically, the DLNR requested further analysis related to five specific significance criteria:

- Significance Criteria #1 - Is the annual take of cumulative numbers of fish as a percentage of the estimated population an irrevocable loss or destruction of said populations?
- Significance Criteria #2 - To what extent does the take of aquarium fish curtail the use of the environment, including:
 - Aquatic invasive algae control
 - Tourism industry
 - Integrity of diverse aquatic ecosystems
- Significance Criteria #3 - Does the take of aquarium fish conflict with the state's long-term environmental goals?
- Significance Criteria #4 - To what extent does the take of aquarium fish impact cultural practices in the state?
- Significance Criteria #8 - What is the cumulative impact of the take of aquarium fish when combined with:
 - Commercial take of aquarium fish using other legal methods
 - Recreational take of aquarium fish
 - Commercial and non-commercial take of aquarium fish for consumption (particularly the Achilles Tang and Kole)

³ <https://governor.hawaii.gov/wp-content/uploads/2018/07/Final-EA-NOD-Aquarium-Permits-Hawaii-Island-7-26-18.pdf>

1.2 RELEVANT POLICIES AND CONTROLS

1.2.1 Hawai'i Revised Statute (HRS) 188-31

Hawai'i Revised Statute 188-31 (2013; Title 12 – Conservation and Resources; 188 – Fishing Rights and Regulations; 188-31 – Permits to take aquatic life for aquarium purposes) states that:

1. Except as prohibited by law, the department, upon receipt of a written application, may issue an aquarium fish permit, not longer than one year in duration, to use fine meshed traps, or fine meshed nets other than throw nets, for the taking of marine or freshwater nongame fish and other aquatic life for aquarium purposes.
2. Except as prohibited by law, the permits shall be issued only to persons who can satisfy the department that they possess facilities to and can maintain fish and other aquatic life alive and in reasonable health.
3. It shall be illegal to sell or offer for sale any fish and other aquatic life taken under an aquarium fish permit unless those fish and other aquatic life are sold alive for aquarium purposes. The department may adopt rules pursuant to HRS chapter 91 for the purpose of this section.

1.2.2 Hawai'i Environmental Policy Act⁴

The HEPA requires that State agencies consider the impact of governmental actions on the environment because humanity's activities have broad and profound effects upon the interrelations of all components of the environment, and an environmental review process would integrate the review of environmental concerns with existing planning processes of both the State and county governments. The HEPA includes the following statutes and administrative rules: a) HRS Chapter 343, Environmental Impact Statements; b) Hawai'i Administrative Rule (HAR) 11-200, Environmental Impact Statement Rules; c) HAR 11-201, Environmental Council Rules of Practice and Procedure (OEQC 2012).

The authorities governing the HEPA process include:

1. The text of the statute (Chapter 343, HRS) and its implementing administrative rules (Chapters 11-200, and 11-201, HAR, Department of Health);
2. The State Environmental Policy (Chapter 344, HRS);
3. The enumerated and written advisory opinions of the Attorney General of the State of Hawai'i;
4. The declaratory rulings of the Environmental Quality Commission (EQC) and the Environmental Council (EC); and,

⁴ The HEPA was updated in August 2019, however, the EISPN for this DEIS was published on August 8, 2018, prior to the adoption of the new rules. Therefore, as per the new rules, the previous HEPA regulations apply to this DEIS.

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5. The appellate rulings of the Intermediate Court of Appeals and the Supreme Court of the State of Hawai'i.

The HEPA process also alerts decision makers to significant environmental effects that may result from the implementation of certain actions (HRS 343-1). The specific instances when a proposing agency or an approving agency must prepare an EA (for an action not declared exempt under Section 11-200-8, HAR) derive from Section 343-5(a) HRS and are listed in Table 1-1.

Table 1-1. Statutory Triggers for Hawai'i Environmental Policy Act (HEPA).

	Instances	Responsible Agency
1.	Use of State or County lands or use of State or County funds, other than funds to be used for feasibility or planning studies for possible future programs or projects that the agency has not approved, adopted, or funded, or funds to be used for the acquisition of unimproved real property; provided that the agency shall consider environmental factors and available alternatives in its feasibility or planning studies; provided further that an EA for proposed uses under Section 205-2(d)(11) or 205-4.5(a)(13) shall only be required pursuant to Section 205-5(b).	The agency with title to the land or is using funds.
2.	Use of any land classified as conservation district by the state land use commission under Chapter 205.	Office of Conservation and Coastal Lands of the DLNR.
3.	Use within a shoreline area as defined in Section 205A-41. The shoreline area in question is defined by county ordinance and consists of a predetermined distance going inland from the certified shoreline. In the City and County of Honolulu, this is forty feet.	The respective county planning department.
4.	Use within any historic site as designated in the National Register or Hawai'i Register, as provided for in the Historic Preservation Act of 1966, Public Law 89-665, or Chapter 6E.	The respective county planning department.
5.	Use within the Waikiki area of O'ahu, the boundaries of which are delineated in the land use ordinance as amended, establishing the "Waikiki Special District".	The Department of Planning and Permitting of the City and County of Honolulu.
6.	Any amendments to existing county general plans where the amendment would result in designations other than agriculture, conservation, or preservation, except actions proposing any new county general plan or amendments to any existing county general plan initiated by a county.	The respective county planning department.
7.	Any reclassification of any land classified as a conservation district by the state land use commission under Chapter 205.	The Land Use Commission, except in cases involving less than fifteen-acres (which cases are processed by the respective county planning department).
8.	Any construction of new or the expansion or modification of existing helicopter facilities within the State, that may affect: A. Any land classified as a conservation district by the state land use commission B. A shoreline area C. Any historic site as designated in the National Register or Hawai'i Register	The respective county planning department where the project is located processes the clearance of this trigger.
9.	Propose any: A. Wastewater treatment unit, except an individual wastewater system or a wastewater treatment unit serving fewer than fifty single family dwellings or the equivalent B. Waste-to-energy facility C. Landfill D. Oil refinery E. Power-generating facility	The agencies of the State or County government that issue discretionary approvals for the listed items.

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The Supreme Court of Hawai'i ruled (SCWC-13-0002125) that an environmental review of the Aquarium Permit process is warranted based on the first (use of state lands) and second (use of conservation districts) statutory triggers identified in Table 1-1, above.

Actions that do not fall under one of the triggers are excluded by statute from the HEPA process. Any action that is not excluded by statute must undergo the HEPA environmental review process (OEQC 2012). The analysis within an EA is used to determine whether the impact on the environment would be significant enough to warrant the preparation of a full EIS or would be used to declare a Finding of No Significant Impact (FONSI) thus clearing the HEPA process.

In most cases, an agency determines that an action may have a significant impact on the environment and require an EIS if it meets any of the following 13 criteria:

1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;
2. Curtails the range of beneficial uses of the environment;
3. Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;
4. Substantially affects the economic or social welfare of the community or State;
5. Substantially affects public health;
6. Involves substantial secondary impacts, such as population changes or effects on public facilities;
7. Involves a substantial degradation of environmental quality;
8. Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;
9. Substantially affects a rare, threatened, or endangered species, or its habitat;
10. Detrimentally affects air or water quality or ambient noise levels;
11. Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;
12. Substantially affects scenic vistas and view planes identified in county or state plans or studies; or
13. Requires substantial energy consumption.

Since its inception, the HEPA process has bifurcated into two separate procedural tracks (OEQC 2012):

1. Agency actions (set forth in Section 343-5(b), HRS); refers to those proposed by a government agency; and

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2. Applicant actions (set forth in Section 343-5(c), HRS); refers to those that are initiated by a private party and “triggers” an environmental review.

The need for this FEIS is based on the proposed action (i.e., DLNR issuance of 10 Aquarium Permits) and the agency determination that an EIS is required due to possible significant impacts on the environment.

The environmental review process described in the findings and purpose section of Chapter 343, HRS, necessitates integrating citizen concerns into the planning process and forewarning decision makers of potential significant environmental effects should implementation take place. The Hawai'i Office of Environmental Quality Control (OEQC) finds that the process of reviewing environmental effects is desirable because environmental consciousness is enhanced, cooperation and coordination are encouraged, and public participation during the review process benefits all parties involved and society as a whole (OEQC 2012).

1.2.3 Act 306 SLH – West Hawai'i Regional Fishery Management Area

Act 306 Session Laws of Hawai'i (SLH 1998) directed DLNR to establish the WHRFMA along the entire west coast of the Island of Hawai'i; 'bounded by the west coast of Hawai'i Island, from Ka Lae, Ka'ū (South Point) to 'Upolu Point, North Kohala, and extending from the upper reaches of the wash of the waves on shore, seaward to the limit of the State's police power and management authority.

From Act 306:

The purpose of the WHRFMA shall be to:

1. Ensure the sustainability of the state's nearshore ocean resources;
2. Identify areas with resource and use conflicts;
3. Provide management plans as well as implementing regulations for minimizing user conflicts and resource depletion through the designation of sections of coastal waters in the WHRFMA as FRAs where certain specified fish collecting activities are prohibited and other areas where anchoring and ocean recreation activities are restricted;
4. Establish a system of day-use mooring buoys in high-use coral reef areas and limit anchoring in some of these areas to prevent anchor damage to corals;
5. Identify areas and resources of statewide significance for protection;
6. Carry out scientific research and monitoring of the nearshore resources and environment; and
7. Provide for substantive involvement of the community in resource management decisions for this area through facilitated dialogues with community residents and resource users. The DLNR shall identify the specific areas and restrictions after close consultation and facilitated dialogue with working groups of community members and resource users.

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The department shall develop a WHRFMA plan that identifies and designates appropriate areas of the management area in accordance with HRS Chapter 91 as follows:

1. Designate a minimum of thirty percent (30%) of coastal waters in the WHRFMA as FRAs in which aquarium fish collection is prohibited (other fishing still permitted);
2. Establish a day-use mooring buoy system along the coastline of the WHRFMA and designate some high-use areas where no anchoring is allowed;
3. Establish a portion of the FRAs as fish reserves where no fishing of reef-dwelling fish is allowed; and,
4. Designate areas where the use of gill nets as set nets shall be prohibited.

A review of the effectiveness of the WHRFMA plan shall be conducted every five years by the DLNR in cooperation with the University of Hawai'i (UH). The DLNR shall submit a report of its findings and recommendations based on the review to the legislature no later than 20 days before the convening of the regular session following the review. The most recent review was completed in 2014 (DAR 2014a), though data from that report has been updated as of 2019 (DAR 2019a).

1.2.3.1 West Hawai'i Fishery Council

The DAR (DAR 2014a) stated:

In order to accomplish the mandates of Act 306 with substantive community input, The West Hawai'i Fishery Council (WHFC) was convened on June 16, 1998 under the aegis of the DLNR and the University of Hawai'i Sea Grant. Consisting of 24 voting members and 6 ex-officio agency representatives from the DLNR, University of Hawai'i Sea Grant, and the Governor's Office, the WHFC's members represented diverse geographic areas and various stakeholder, community, and user groups in West Hawai'i. Four aquarium representatives (three collectors and one aquarium shop owner) were members of the WHFC, 40% of the WHFC were maka'āinana (i.e., native fishers) and most of the members were previously on the West Hawai'i Reef Fish Working Group (WHRFWG). The WHRFWG included over 70 members of the West Hawai'i community including aquarium collectors and charter operators and other stakeholders. The group held 9 meetings over a 15-month period. The WHRFWG opened a dialog between user groups and community members and provided a forum for the education of its members on social and biological issues involved in resource management.

The WHFC developed a FRA plan consisting of nine separate areas along the west coast of the Island of Hawai'i (Figure 1) encompassing a total of 35.2% of the West Hawai'i coastline (including already protected areas). The WHFC's FRA plan was subsequently incorporated by the DLNR into administrative rule. The FRA administrative rule became effective on December 31, 1999.

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Figure 1. Division of Aquatic Resources Managed Areas - Island of Hawai'i.

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The FRAs prohibit all collecting of aquarium animals within their boundaries as well as non-fishing related fish feeding. The seaward boundaries of the FRAs extend to a depth of 600 feet (100 fathoms) and distinctive signs mark the boundaries on shore; although some have fallen into disrepair and are not easily observed (Big Island Association of Aquarium Fishers [BIAAF] pers. comm.).

In addition to the development of the FRA network, the WHFC, in conjunction with the DAR and University of Hawai'i Sea Grant, also implemented the following initiatives:

1. **Sea Urchin Limited Harvest:** The WHFC developed a management plan permitting the sustainable harvest of *Wana* (long-spine/black sea urchin) at Makae'o, the Old Kona Airport Marine Life Conservation District (MLCD). This recommendation was adopted by the DLNR as an administrative rule amendment in 2005.
2. **Gill Net Rules:** The WHFC developed a set of gill net rule recommendations focused on limiting impacts of large-scale commercial netting while providing for subsistence netting. This recommendation was adopted as an administrative rule amendment in 2005 and served as a model for the statewide gill net rule (HAR §13-75-12.4) which was adopted in 2007.
3. **Day-Use Mooring Buoys:** In collaboration with the Malama Kai Foundation, the WHFC is a working partner in the site selection process and educates communities on the value of day use moorings to preserve our coral reefs.
4. **Ka'ūpūlehu Marine Reserve:** DAR worked with the WHFC and the Ka'ūpūlehu Marine Life Advisory Committee (KMLAC) to develop draft rules to re-designate the Ka'ūpūlehu Fish Replenishment Area as a Marine Reserve where the take of nearshore marine life will be prohibited for 10 years, with exceptions to allow for the continued collection of pelagic and deep benthic species using specific fishing gear. The proposal is the initial first step in complying with the statutory mandate of HRS §188F-4(3) to establish a portion of the FRAs where no fishing of reef-dwelling fish is allowed. In October 2014, the Board of Land and Natural Resources (BLNR) approved holding a Public Hearing on this rule amendment. The rule subsequently took effect on July 29, 2016. Several other local communities are actively engaged in developing management recommendations which include some form of a highly protected nearshore area.
5. **Self-contained underwater breathing apparatus (SCUBA) Spear Fishing Prohibition:** The WHFC proposed banning SCUBA (and rebreather) spear fishing in West Hawai'i as is the case in most other Pacific island jurisdictions.
6. **Pebble Beach User Conflict:** The WHFC drafted recommendations addressing a conflict between aquarium collectors and this South Kona community. It recommended creating a new FRA in the Pebble Beach area and opening up to collecting a similarly sized section of another FRA (by a non-residential area). The latter part of the 'swap' was subsequently rejected by aquarium collectors. The Big Island Association of Aquarium Fishermen (BIAAF) agreed to the creation of the Pebble Beach FRA, with nothing in return, as an act of good faith to further mitigate user conflict (BIAAF, pers. comm.). The BIAAF conceded directly with the representatives of the "Friends of Pebble Beach." The meeting was orchestrated DAR.

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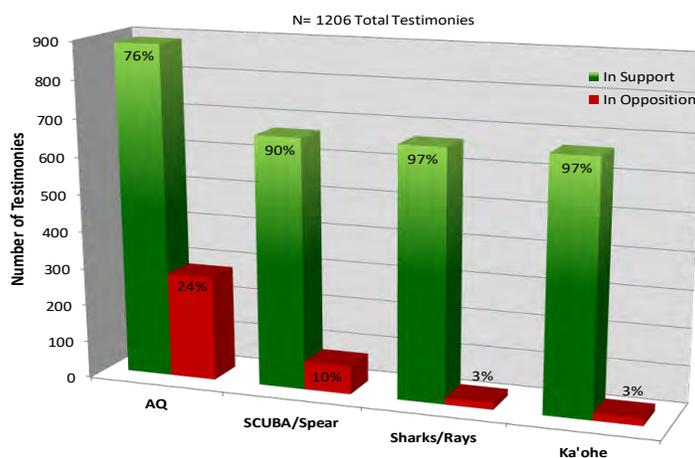
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7. Aquarium ‘White List’ (Section 4.4.1): Working with commercial aquarium collectors the WHFC established a list of 40 fish species permitted for aquarium take. Only those fish found on the White List can be collected live for aquarium use. All other fishes and all invertebrates are off-limits to collecting. Size and bag limits are also established for three of the species on the White List, Yellow Tang, Kole, and Achilles Tang.
8. Species of Special Concern: Prohibition on the take or possession of nine species of inshore sharks and rays and two invertebrate crown-of-thorns predators (Table 1-2).

Table 1-2. List of marine species for which all take or possession is prohibited.

Common Name	Scientific Name	Hawaiian Name
Spotted Eagleray	<i>Aetobatus narinari</i>	<i>Hihimanu</i>
Broad Stingray	<i>Dasyatis lata</i>	<i>Hihimanu</i>
Pelagic Stingray	<i>Pteroplatytrygon violacea</i>	<i>Hihimanu</i>
Hawaiian Stingray	<i>Dasyatis hawaiiensis</i>	<i>Hihimanu</i>
Tiger Shark	<i>Galeocerdo cuvier</i>	<i>Manō/niuhi</i>
Whale Shark	<i>Rhincodon typus</i>	<i>Lele wa'a</i>
Whitetip Reef Shark	<i>Triaenodon obesus</i>	<i>Manō lālākea</i>
Blacktip Reef Shark	<i>Carcharhinus melanopterus</i>	<i>Manō pā'ele</i>
Gray Reef Shark	<i>Carcharhinus amblyrhynchos</i>	<i>Manō</i>
Triton’s Trumpet	<i>Charonia tritonis</i>	<i>‘Ōlē</i>
Horned Helmet	<i>Cassis cornuta</i>	<i>Pū puhi</i>

Initiatives identified above and shown in Figure 2 received overwhelming support during the Hawai'i Administrative Rule public hearing process and were adopted as a new administrative rule (HAR 13-60.4) which became effective December 26, 2013.



AQ – Aquarium White List; Ka'ohe – Pebble Beach

Figure 2. Summary of all public testimonies on the WHRFMA rule (DAR 2014a).

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1.2.3.2 HAR 13-60.4

In addition to incorporating Act 306 into the Hawai'i Administrative Rules, HAR 13-60.4 identified West Hawai'i Aquarium Permit Terms and Conditions by implementing the following provisions:

- No person shall engage in aquarium collecting activities within the WHRFMA without first having been issued and possessing a West Hawai'i Aquarium Permit in addition to a valid State of Hawai'i aquarium fish permit.
- Collectors must carry either their Commercial Marine License (CML) card with both State of Hawai'i and West Hawai'i Aquarium Permit endorsements or their recreational aquarium fish permit card while collecting fish within the WHRFMA.
- In addition to applying any other penalties provided by law, the DLNR may revoke any West Hawai'i Aquarium Permit for any infraction of these rules or the terms and conditions of the permit, and any person whose permit has been revoked shall not be eligible to apply for another West Hawai'i Aquarium Permit (commercial or recreational) until one year from the date of revocation.
- Aquarium collectors (commercial and noncommercial) may take or possess only the 40 "White List" fish species.
- It is prohibited for anyone to take more than 5 Yellow Tang (*Zebrasoma flavescens*) larger than 4.5 inches in total length (TL) or more than 5 Yellow Tang smaller than 2 inches TL per day or possess more than this amount at any time while within the WHRFMA. (Note: This is called a slot limit and is meant to protect the breeding population. Yellow Tang become sexually mature at 4.5 inches TL and begin reproducing [Bushnell 2007]).
- It is prohibited for aquarium collectors to take or possess more than 5 Kole (= Goldring Surgeonfish, Yelloweye, Goldring) (*Ctenochaetus strigosus*) larger than 4 inches TL per day. Again, this measure is meant to protect the breeding population.
- It is prohibited for aquarium collectors to take or possess more than 10 Achilles Tang (*Acanthurus achilles*) of any size per day.
- It is prohibited to possess aquarium collecting gear or possess fish taken for aquarium purposes on a vessel after sunset or before sunrise without prior phone notification to the DAR Kona office. Such notification will allow the possession of more than one day's bag limit for Yellow Tang, Kole and Achilles Tang on multiple day trips.
- Aquarium collection is prohibited within FRAs, FMAs, and MLCs. Note that a new FRA has been established in South Kona at Ka'ohē Bay (Pebble Beach) where no aquarium collecting, or recreational fish feeding is allowed.
- It is prohibited to take or possess aquarium collecting gear or fish taken for aquarium purposes on a vessel that is adrift, anchored, or moored within any of the areas prohibiting aquarium collecting.

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- All aquarium collecting vessels shall be registered every year with the DAR Kona office. The current vessel identification number issued by either the DLNR or the U.S. Coast Guard (USCG) shall serve as the registration number for each vessel. After the initial vessel registration renewal can be done via mail or online.
- All aquarium collecting vessels shall permanently affix the capital letters "AQ" to both sides of the vessel. The "AQ" letters shall be no less than 6 inches high and 3 inches wide in either black or a color that contrasts with the background color of the vessel.
- Aquarium vessels must fly a "stiffened" flag or pennant from the vessel with the letter "A" as specified by the DLNR. The flag or pennant shall be displayed and clearly visible from both sides of the vessel at all times while aquarium collecting gear or collected aquarium fish, or both are onboard. The flag or pennant shall be provided at cost to West Hawai'i Aquarium Permittees.
- Aquarium vessels must display a dive flag at all times when divers are in the water.
- In the event an aquarium collecting vessel becomes inoperable while at sea, the operator of the vessel shall immediately notify the DLNR's Division of Conservation and Resources Enforcement (DOCARE) or USCG or both by VHF radio or by cellular phone.
- It is prohibited to possess or use any net or container employed underwater to capture or hold fish taken for aquarium purposes that is not labeled with the CML number (or numbers) of the person (or persons) owning, possessing, or using the equipment. Clearly mark each piece of the above gear with your CML number. There is no specific marking requirement as to size or color of lettering other than the CML number must be clearly visible and legible.
- Aquarium collectors must submit each month's daily aquarium fishing trip reports before every 10th day of the following month.
- Recreational aquarium collectors, without a valid CML, may not take more than a total of five of the White list fish specimens per person per day. Recreational aquarium collectors may not sell collected fish.
- A control date was established on August 1, 2005, to possibly limit participation in the WHRFMA commercial aquarium fishery. Persons who begin fishing in the WHRFMA commercial aquarium fishery on or after the control date will not be assured continued participation in the fishery if the DLNR establishes an aquarium limited entry program in the future. Nothing in this chapter shall prevent the DLNR from establishing another control date.
- It is prohibited to engage in or attempt to engage in SCUBA spearfishing and/or possess both SCUBA gear and a spear or speared aquatic life.

As indicated above, HAR 13-60.4 had overwhelming public support, with 76% of all testimony in favor of the rules, and 85% of testimony from West Hawai'i being supportive, the area most closely associated with the rule (Walsh 2013).

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Coral/Live Rock Damage

State law prohibits the breaking or damaging, with any implement, any stony coral from the waters of Hawai'i, including any reef or mushroom coral (HAR 13-95-70). It is unlawful to take, break or damage, any implement, any rock or coral to which marine life of any type is visibly attached or affixed (HAR 13-95-71). The taking of sand, coral rubble or other marine deposits is permitted in certain circumstances. The material may not exceed one gallon per person per day, and may be taken only for personal, noncommercial purposes (HRS § 171-58.5, § 205A-44).

Fines per specimen may be imposed for each damaged coral head or colony less than one square meter in surface area or for a colony greater than one square meter in surface area, each square meter of colony surface area and any fraction remaining constitutes an additional specimen. Penalties for damage to live rock are based on each individual rock or if the violation involves greater than one square meter of bottom area, then the penalty is based on each square meter of bottom area.

No liability shall be imposed for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral if caused by a vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or by accidental physical contact by an individual person.

Enforcement/Compliance

Enforcement and compliance are within the purview of the State of Hawai'i. DOCARE is responsible for enforcement activities and has full police powers to enforce all State laws and rules involving State lands, State Parks, historic sites, forest reserves, aquatic life and wildlife areas, coastal zones, Conservation districts, State shores, as well as county ordinances involving county parks.

Some penalties for failure to comply with regulations include the following:

- Any lay net within the West Hawai'i Regional Fishery Management Area that is not registered or does not have proper identification tags, as required in subsection (a)(1) and (a)(5), shall be subject to immediate seizure according to section 199-7, HRS, and subject to forfeiture by the department under procedures similar to chapter 712A, Hawaii Revised Statutes.
- In addition to applying any other penalties provided by law, the department may revoke any West Hawai'i aquarium permit for any infraction of these rules or the terms and conditions of the permit, and any person whose permit has been revoked shall not be eligible to apply for another West Hawai'i aquarium permit until the expiration of one year from the date of revocation.

Any person violating any provision of this chapter, or any term or condition of any permit issued pursuant to this chapter, shall be subject to the provisions of sections 187A-12.5 and 188-70, Hawaii Revised Statutes, or as may be otherwise provided by law. These include the following:

- For violations involving threatened or endangered species, the administrative fines shall be as follows: (1) For a first violation, a fine of not more than \$5,000; (2) For a second violation within five

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years of a previous violation, a fine of not more than \$10,000; and (3) For a third or subsequent violation within five years of the last violation, a fine of not more than \$15,000.

- In addition, a fine of up to \$5,000 may be levied for each specimen of threatened or endangered aquatic life taken, killed, or injured in violation of subtitle 5 of title 12 or any rule adopted thereunder.
- For all other violations the administrative fines shall be as follows: (1) For a first violation, a fine of not more than \$1,000; (2) For a second violation within five years of a previous violation, a fine of not more than \$2,000; and (3) For a third or subsequent violation within five years of the last violation, a fine of not more than \$3,000.
 - In addition, a fine of up to \$1,000 may be levied for each specimen of all other aquatic life taken, killed, or injured in violation of subtitle 5 of title 12 or any rule adopted thereunder.
- Any criminal penalty for any violation of subtitle 5 of title 12 or any rule adopted thereunder shall not be deemed to preclude the State from recovering additional administrative fines, fees, and costs, including attorney's fees and costs. [L 1998, c 243, §1]

2.0 PURPOSE AND NEED

2.1 PURPOSE FOR APPLICANT'S ACTION

The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats. The objective of the proposed action is to allow for the issuance of Commercial Aquarium Permits to 10 fishers for the WHRFMA.

2.2 NEED FOR APPLICANT'S ACTION

The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods in compliance with all applicable laws, rules, and regulations pertaining to the industry.

2.3 PURPOSE FOR APPROVING AGENCY'S (DLNR) ACTION

The purpose of an environmental review process under the HEPA is to provide the Approving Agency (DLNR) with the framework necessary for reviewing the Applicant's action and the environmental effects of issuing Aquarium Permits for the WHRFMA. The HEPA review also provides an opportunity for the public to be involved in the DLNR's decision-making process. The DLNR can also use a properly conducted HEPA analysis to review and improve plans, functions, programs, and resources under its jurisdiction. Furthermore, this FEIS is the mechanism for recording the results of a comprehensive planning and decision-making process surrounding the Applicant's action.

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The underlying purpose of the DLNR's action is to determine the level of significance that issuing 10 Aquarium Permits for the WHRFMA, may have on the environment, based on the 13 criteria listed in Section 1.2.2, with emphasis on the 5 criteria the DLNR determined to need further evaluation (Section 1.1.2). The final determination will be either acceptance or non-acceptance.

2.4 NEED FOR APPROVING AGENCY'S (DLNR) ACTION

The need for DLNR's action is the Applicant's submittal of this FEIS, to which the DLNR must respond.

2.5 SCOPE OF ANALYSIS

The scope of this FEIS's analysis incorporates accepted methods, regulations, and historical data to determine past influences the commercial aquarium fishery and its management have had on resources, including socioeconomic, cultural, and biological resources, in order to evaluate the potential direct, indirect, and cumulative impacts that the five alternatives presented in Section 3.0 would have annually over a 5-year period for the island of Hawai'i, including the WHRFMA. Regarding biological resources, this FEIS focuses primarily on the effects of aquarium fishing on wild populations of White List Species, as it is at the population level that DAR measures changes in White List Species and makes management decisions (e.g., issuance of harvest permits, implementation of bag limits). Therefore, because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population; nevertheless, post-collection mortality is discussed as an indirect effect in Section 5.4.2.

Commercial Aquarium Permits issued by DLNR under HRS §188-31 are valid for no longer than one year and, therefore, must be renewed annually. Accordingly, every year, DLNR must take an action to issue Aquarium Permits. As Aquarium Permits for the 10 fishers who would receive permits under the Preferred Alternative come up for renewal each year, DLNR will presumably evaluate whether there are significant new circumstances or information relevant to environmental concerns and bearing on the commercial aquarium fishery or its impacts requiring a supplemental HEPA review. Under this approach, any changes in resource data (e.g., increase or decrease in population estimates, unforeseen circumstances, etc.) would be addressed, as necessary, by supplemental HEPA documents, allowing for the HEPA process to quickly recognize and address any potential issues. Section 5.0 addresses the cumulative impacts of reasonably foreseeable future commercial aquarium collection.

2.5.1 Resources Evaluated and Dismissed from Further Consideration

This FEIS evaluates the impacts of five commercial aquarium fish collection alternatives on the nearshore habitat (0-600 feet; 0-100 fathoms) in which commercial aquarium fishing (or lack thereof) would take place over a 5-year period. During the evaluation process, it was determined that some resources typically evaluated in an EIS would not be impacted by any of the alternatives under consideration. The evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s. Because a significant increase in commercial aquarium fishing is not anticipated during the 5-year assessment period evaluated in this FEIS, and in fact a decrease when compared to historic conditions is anticipated due to the issuance of only 10

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Aquarium Permits, this FEIS does not anticipate a significant change in the current baseline condition of these resources.

The proposed action and resulting commercial aquarium collection does not include any activities different from or in addition to those that have occurred in the past. There would be no construction of permanent or semi-permanent infrastructure, no discharges into coastal, surface or ground waters, and no dredging, and no significant use of hazardous materials that could be released into the environment.

The DLNR's issuance of 10 Aquarium Permits is not anticipated to result in significant beneficial or adverse impacts to water and air quality, geology and soil resources, aesthetics, noise, vegetation, terrestrial wildlife and avian species, threatened and endangered species, land use, public health and safety, communications, transportation, utilities, or population and demographics from the current baseline condition, therefore, these resources will not be evaluated further.

2.5.2 Resources Retained for Further Analysis

The following resources could be impacted by the alternatives under consideration. Current baseline conditions of these resources are presented in Section 4.0 and impacts to these resources are evaluated in Section 5.0 of this FEIS:

- Socioeconomic Resources
- Cultural Resources
- Physical Resources
 - Climate
- Biological Resources
 - White List Species
 - Non-White List Species
 - Hawai'i Species of Greatest Conservation Need
 - Reef Habitat

3.0 ALTERNATIVES

Reasonable alternatives include those that are practical or feasible from cultural, scientific, technical, and economic perspectives. The HEPA recommends that applicants consider and objectively evaluate reasonable alternatives to the preferred alternative and briefly explain the basis for eliminating any alternatives that were not retained for detailed analysis.

The DLNR has been working with stakeholders (e.g., public, various fishing and tourism industries, local governments) since the 1970's, and continues to work with them to ensure the commercial aquarium fishery is environmentally sustainable and prevents degradation of fish populations and the habitats in which they occur. As a result, many aspects of the fishery have changed over the past 40+ years due to the various alternatives recommended by stakeholders and implemented by the DLNR. The Applicant has no legislative or regulatory authority and cannot create, eliminate, or alter conservation areas (e.g., MPAs, FRAs, MLCDS); create, eliminate, or alter current regulations (e.g., bag and size limits, season length, permit term); or change reporting requirements. Despite this, during the public comment period on the Draft EA

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that was published on April 8, 2018, in response to DLNR concerns and in coordination with the DLNR, the Applicant developed an alternative that required regulation creation by DLNR (i.e., implementation of bag limits). After review of the EA, the DLNR determined on July 26, 2018 that preparation of an EIS is required based on five specific significance criteria outlined in Title II, Chapter 200, Hawai'i Administrative Rules (Criteria 1,2,3,4, and 8, see Section 1.1.2). Based on public and DNLR comments on the Draft and Final EAs, the Applicant has analyzed five alternatives in the EIS, including a new Preferred Alternative based on issuance of a limited number of Aquarium Permits. These alternatives were evaluated based on their capacity to meet the purpose and need of the Approving Agency's action (Sections 2.3 and 2.4). The potential effects on the environment for each alternative are described and analyzed in Section 5.0; Environmental Consequences. The alternatives are summarized in Table 3-1 and discussed in detail in Sections 3.1 through 3.5.

Table 3-1. Summary of alternatives.

Alternative	WHRFMA	East Hawai'i
No Action	No Aquarium Permits issued; no commercial aquarium collection allowed	No Aquarium Permits issued; commercial collection allowed without the use of fine mesh nets
Pre-Aquarium Collection Ban	Unlimited # of Aquarium Permits issued	Unlimited # of Aquarium Permits issued
WHRFMA-Only Programmatic Issuance of Permits	Unlimited # of Aquarium Permits issued	No Aquarium Permits issued; commercial collection allowed without the use of fine mesh nets
Achilles Tang Conservation	Unlimited # of Aquarium Permits issued; bag limit reduced for Achilles Tang	Unlimited # of Aquarium Permits issued
Limited Permit Issuance (Preferred)	10 Aquarium Permits issued; bag limit reduced for Achilles Tang	No Aquarium Permits issued; commercial collection allowed without the use of fine mesh nets

3.1 NO ACTION ALTERNATIVE

Under the No Action Alternative, the court order would remain in place, and no Aquarium Permits would be issued for the entire island of Hawai'i and the taking of aquarium fish or other aquatic life in the WHRFMA for commercial aquarium purposes would be prohibited. The No Action Alternative meets the DLNR's objectives to ensure an applicant's actions do not lead to degradation of fish populations and the habitats in which they occur in the context of commercial aquarium collection alone (i.e., does not address impacts from other Hawaiian fisheries and influences discussed in Sections 4.0 and 5.0). Under the No Action Alternative, Aquarium Permits would not be issued for the island of Hawai'i, including the WHRFMA, and commercial collection of aquarium fish and other aquatic life in the WHRFMA would be prohibited. In East Hawai'i, aquarium collection using legal gear or methods other than fine-mesh nets would continue. However, the No Action Alternative does not meet the Applicant's purpose and need to continue fishers' livelihoods participating in lawful, responsible, and sustainable commercial collection of approved fish species from nearshore habitats (0-600 feet; 0-100 fathoms).

3.2 PRE-AQUARIUM COLLECTION BAN ALTERNATIVE

Under the Pre-Aquarium Collection Ban Alternative, the DLNR would issue an unlimited number of Aquarium Permits as was done prior to the September 6, 2017 Supreme Court ruling, thereby allowing commercial aquarium fish collection using fine mesh nets on the island of Hawai'i, including the WHRFMA, to resume. It is assumed that, upon issuance of an Aquarium Permit, a permit condition would be included in each permit limiting the geographic area covered by the permit to the island of Hawai'i. Permittees would abide by all existing rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List Species only, and reporting requirements.

3.3 WHRFMA-ONLY PROGRAMMATIC ISSUANCE OF PERMITS ALTERNATIVE

Under the WHRFMA-only Programmatic Issuance of Permits Alternative, the DLNR would issue an unlimited number of Aquarium Permits for the WHRFMA, thereby allowing commercial aquarium fishing collection, including the use of fine mesh nets, within the WHRFMA. No Aquarium Permits would be issued for areas outside of the WHRFMA (in East Hawai'i aquarium collection using legal gear or methods other than fine-mesh nets could continue but use of fine mesh nets would not be allowed). It is assumed that, upon issuance of an Aquarium Permit, a permit condition would be included in each permit limiting the geographic area covered by the permit to the WHRFMA. Permittees would abide by all rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List Species only, and reporting requirements.

3.4 ACHILLES TANG CONSERVATION ALTERNATIVE

Under the Achilles Tang Conservation Alternative, which was the preferred alternative in the Final EA, the DLNR would issue an unlimited number of Aquarium Permits, thereby allowing commercial aquarium fish collection using fine mesh nets on the island of Hawai'i, including the WHRFMA. Permittees would abide by all rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List Species only, and reporting requirements. In addition, under this alternative, the daily bag limit for commercial aquarium collection of Achilles Tang within the WHRFMA would be reduced from 10 per day to 5 per day.

3.5 LIMITED PERMIT ISSUANCE (PREFERRED) ALTERNATIVE

Under the Limited Permit Issuance Alternative, the DLNR would issue Aquarium Permits to 10 aquarium fishers in the WHRFMA, thereby allowing these 10 individuals to resume commercial aquarium fish collection in the WHRFMA, including the use of fine mesh nets. Note that this Alternative has changed from the DEIS, as the number of Aquarium Permits has been reduced from 14 to 10. No Aquarium Permits would be issued for areas outside of the WHRMA (in East Hawai'i aquarium collection using legal gear or methods other than fine-mesh nets could continue but use of fine mesh nets would not be allowed). It is assumed that, upon issuance of an Aquarium Permit, a permit condition would be included in each permit limiting the geographic area covered by the permit to the WHRFMA. Permittees would abide by all rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List Species only, and reporting requirements. In addition, under this alternative, the daily bag limit for commercial aquarium collection of Achilles Tang within the WHRFMA would be reduced from 10 per day to 5 per day.

This Alternative is based on the best available science, supports the DLNR's purpose to ensure Applicant's Actions do not lead to degradation of fish populations and the habitats in which they occur in the context of commercial aquarium collection, specifically addresses concerns related to Achilles Tang conservation, and supports the Applicant's purpose and need to continue fishers' livelihoods participating in the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats.

3.6 ALTERNATIVES CONSIDERED BUT DISMISSED

The following alternatives were considered but dismissed from further consideration:

- Full moratorium on commercial aquarium collection
 - This alternative was dismissed because it does not meet the Applicant's need to continue commercial aquarium fishers' livelihoods in compliance with all applicable laws, rules, and regulations pertaining to the industry. Furthermore, the Applicant does not have the authority to stop the DAR from issuing CML to fishers for East Hawai'i. Therefore, the No Action Alternative includes continued collection of aquarium fish in East Hawai'i using gear/methods other than fine mesh nets.
- Creation of species-specific bag limits for all 40 White List Species
 - This alternative was dismissed because the best available data on what is considered to be sustainable reef fish harvest suggests that 5% to 25% of populations is sustainable for similar reef species (Ochavillo and Hodgson 2006). Based on historic collection rates, collection under any of the alternatives analyzed is below the lower end of this range (i.e., <5%) for all species except the Yellow Tang (see Section 5.5.1). Therefore, bag limits for species that do not already have bag limits do not appear to be warranted under any of the

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alternatives considered. Bag limits already exist for the top 3 collected species (Yellow Tang, Kole, Achilles Tang), and the Preferred Alternative includes a 50% reduction in the Achilles Tang bag limit from 10/day to 5/day. Furthermore, while Yellow Tang collection under some alternatives may be higher than 5%, Yellow Tang populations have significantly increased in all management areas (including those open to commercial aquarium collection) since establishment of the WHRFMA (DAR 2019a), suggesting that current management strategies for this species have been successful.

- Moratorium on collection of herbivores
 - This alternative was dismissed, as the DAR (2019a) research indicates that aquarium collection is not causing declines in herbivores. The DAR (2019a) reported that herbivore biomass has not changed since 2003 in areas open to commercial aquarium collection, and while not significant, there has been an increasing trend, with a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019).
- Moratorium on collection of Species of Greatest Conservation Need (SGCN)
 - There are three SGCN on the White List, the Psychedelic Wrasse (*Anampses chrysocephalus*), Tinker's Butterflyfish (*Chaetodon tinkeri*), and Fisher's Angelfish (*Centropyge fisheri*). However, the Psychedelic Wrasse has remained stable in Open Areas, FRAs, and MPAs since establishment of the WHRFMA, and the Fisher's Angelfish has increased significantly in Open Areas and remained stable in FRAs and MPAs (DAR 2019a). There is no WHAP population trend data available for the Tinker's Butterflyfish, however, CREP (2018) estimated the population at 18,475 individuals (though the actual population is likely higher given that the vast majority of the population occurs well below the 98-foot depth surveyed by the CREP and is not observable by the methods of the survey). Collection of Tinker's Butterflyfish is below 5% of the estimated population under any of the alternatives analyzed in Section 5 of this EIS. This alternative was dismissed from consideration because two of the SGCN species have remained stable or increased, and the third species is estimated to have collection under 5% of the estimated population under any of the alternatives under consideration.
- Moratorium on species experiencing population declines
 - The DAR (2019a) has noted significantly declining populations in one or more management area for 12 of the White List Species, however, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection of these species would not halt the declines. In addition, for the 12 species that have shown a significant decline in population size in one or more management area since establishment of the WHRFMA in 1999, commercial aquarium collection under any of the five alternatives would collect less than 1% of the island-wide population estimates for 10 of the species

(see Table 5-14 in Section 5.5.1). For the remaining two species, Achilles Tang and the Pyramid Butterflyfish, commercial aquarium collection would collect less than 4% of the island-wide population (see Table 5-14 in Section 5.5.1). Therefore, this alternative was dismissed from consideration.

4.0 AFFECTED ENVIRONMENT

The affected environment is the area and its resources (i.e., socioeconomic, cultural, physical, biological) potentially impacted by the proposed action and the alternatives under consideration. The purpose of describing the affected environment is to define the current baseline of conditions in which the impacts would occur. To make an informed decision about which alternative to select, it is necessary to first understand which resources would be affected and to what extent each alternative would result in changes from the baseline. This section attempts to provide the baseline for this understanding. Relative to the proposed action, the affected environment includes nearshore habitats within the WHRFMA from a depth of 0-600 feet (0-100 fathoms) along the west coast of the island of Hawai'i, although most fishers collect the majority of fish at depths between 30-70 feet (5-11.7 fathoms), with minimal collecting beyond this range.

Commercial aquarium fish collection has been taking place in Hawaiian waters since the late 1940s. In 1953, the territorial government of Hawai'i enacted Act 154, which authorized the Board of Agriculture and Forestry to establish a permit system for the use of fine-mesh nets and traps for the taking of aquarium fish (DAR 2014a). Beginning in 1973, collectors were required to report their monthly catch on a detailed aquarium fish catch report. As of 2014, Aquarium Permit holders are required to keep daily trip reports and submit on a monthly basis. Since 1999 when FRA's were established, the number of commercial aquarium fishers working in West Hawai'i has ranged from 24-63, and in East Hawai'i from <3-18 (DAR 2018a). The 10 commercial fishers who are part of this proposed action made up 2 to 8 of the WHRFMA fishers in any given year from 2000 – 2017. Permitted commercial aquarium fishing has been a part of the socioeconomic, cultural, physical, and biological resources for decades and is considered a part of the baseline condition of the affected environment.

The DLNR's mission statement is to 'Enhance, protect, conserve and manage Hawai'i's unique and limited natural, cultural, and historic resources held in public trust for current and future generations of the people of Hawai'i nei, and its visitors, in partnership with others from the public and private sectors.' In pursuit of this mission, the DLNR has compiled, analyzed, and reported on the many facets of Hawai'i's socioeconomic, cultural, physical, and biological resources that make up the affected environment. The following sections rely heavily on the DLNR's *Hawai'i's Comprehensive Wildlife Conservation Strategy* (CWCS; Mitchell et al. 2005) and the DLNR's Hawai'i's State Wildlife Action Plan (SWAP; DLNR 2015), with numerous other sources cited as appropriate.

4.1 SOCIOECONOMIC RESOURCES

The state of Hawai'i has four local governments: The City and County of Honolulu (island of O'ahu and the Northwestern Hawaiian Islands), the County of Kaua'i (islands of Kaua'i and Ni'ihau), the County of Maui

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(islands of Maui, Moloka'i, Lāna'i and Kaho'olawe), and the County of Hawai'i (island of Hawai'i). Hawai'i also has a fifth county, Kalawao County, which does not have a separate government unit (Mitchell et al. 2005). Kalawao County covers the former Hansen's disease settlement at Kalaupapa (Moloka'i) and is managed by the National Park Service (NPS) under a cooperative agreement with the State Department of Health (Mitchell et al. 2005).

The population of the island of Hawai'i was estimated at 185,079 in 2010. By 2018, the population is estimated to have grown by 8.4% to 200,983 (HDBEDT 2019). The number of people on the island of Hawai'i at any given time, however, is heavily influenced by tourists. Of the approximately 9.3 million visitors who arrived by air to the state in 2017⁵, 19.0% (1.76 million people) spent time on the island of Hawai'i and 9.1% stayed entirely on the island of Hawai'i. Approximately 16.3% of visitors spent time in West Hawai'i while 7.1% spent time on the east side (HTA 2018).

In 2016, Hawai'i employed 647,544 people and generated \$31.2 billion in wages and \$84.9 billion in gross domestic product. Hawai'i's ocean economy in 2016 employed 118,083 people and generated \$4.5 billion in wages and \$8.6 billion in gross domestic product. The ocean economy accounted for 18.2% of Hawai'i's employment, 14.3% of its wages, and 10.2% of its gross domestic product (NOAA 2019).

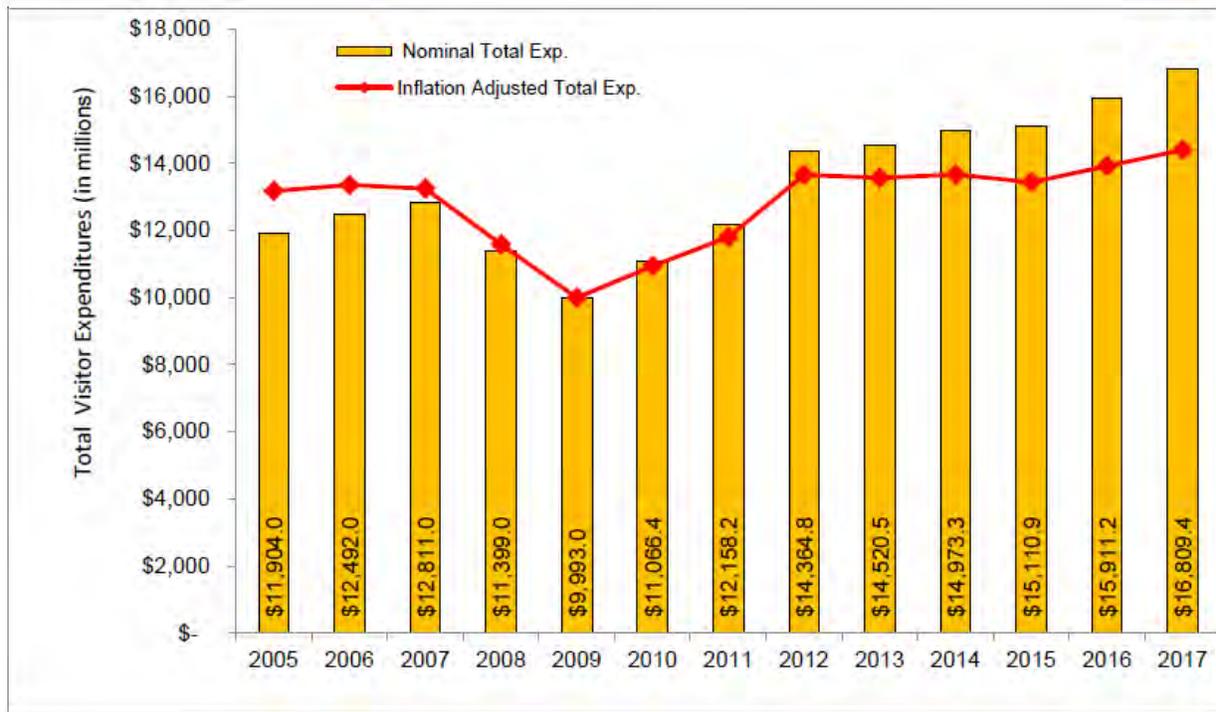
Much of the state's economy is based on the island's coastal and marine resources. Tourism accounts for the majority of the state's economy, with a significant portion of the tourist activities associated with beaches and marine wildlife (DLNR 2015). Coastal development and land values have both increased with the growth in tourism. In 2002, the Hawai'i Coral Reef Initiative funded a study regarding the economic valuation of the coral reefs of Hawai'i, where the value of coral reefs to the Hawai'i economy was estimated to be about \$380 million dollars per year (DLNR 2015). In 2001, Cesar et al. documented the annual recreational value of the coral reefs of the Hawaiian reefs for snorkelers and divers was estimated to be \$281 million and \$44 million, respectively. Although the direct expenditure per diver is much larger than the direct expenditures of snorkelers, the overall value related to the latter group is much larger due to their large numbers. According to the 2019 National Oceanic and Atmospheric Administration (NOAA) Report on the Ocean and Great Lakes Economy of the United States, in 2016 (most recent data), Hawai'i employed 647,544 people and generated \$31.2 billion in wages and \$84.9 billion in gross domestic product. Hawai'i's ocean economy then employed 118,083 people and generated \$4.5 billion in wages and \$8.6 billion in gross domestic product. The ocean economy accounted for 18.2% of Hawai'i's employment, 14.3% of its wages, and 10.2% of its gross domestic product (NOAA 2019). Commercial fish landings in Hawai'i have increased annually since 2006, and NOAA reported total landings in 2013 were valued near \$108 million dollars (DLNR 2015).

Hawai'i's tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.21 billion (HTA 2018). When adjusted for inflation, total visitor spending was up 3.5% from 2016 (Figure 3). A total of 9,404,346 visitors came by air or by cruise ship to the state, up 5.3% from the previous record of 8,934,277 visitors in 2016. Total visitor days rose 4.8%

⁵ An additional 126,733 visitors arrived via cruise ship (HTA 2018) and are not included in further analysis due to the small proportion of total tourism.

compared to 2016. The average spending per day by these visitors (\$198 per person) was also higher than 2016 (\$197 per person; HTA 2018).

Arrivals by airlines in 2017 grew 5.2% to 9,277,613 visitors. Additionally, there were 126,733 visitors who came to the islands by cruise ship, which was an increase of 12.7% from 2016 (HTA 2018).



Note: Implicit price deflator (2009=100)
 Source: 2017 State of Hawai'i Data Book Table 7.35.

Figure 3. Total visitor spending: nominal and real 2005-2017 (HTA 2018).

Total Spending by Category (HTA 2018):

- Lodging was the largest spending category by visitors to Hawai'i, rising 3.4% to \$6.96 billion and making up 41.4% of the total visitor spending in 2017.
- Food and beverage was the second largest category, increasing 6.4% to \$3.48 billion (20.7%) of total visitor spending in 2017.
- Shopping expenses rose 5.0% to \$2.36 billion.
- Transportation expenditures rose 7.9% to \$1.67 billion.
- Entertainment and recreation spending rose 10.8% to \$1.57 billion.

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- Supplemental business spending grew 5.9% to \$125.1 million. This includes additional business spending spent locally on conventions and corporate meetings by out-of-state visitors that were not included in personal spending (i.e., costs on space and equipment rentals, transportation, etc.).

The military has a significant presence in Hawai'i with large Naval installations located on estuarine and coastal areas such as Pearl Harbor and Kāne'ohe Bay on O'ahu, the Pacific Missile Range Facility on the south shore of Kaua'i, and the Pōhakuloa Training Area on the Hawai'i, the largest United States Department of Defense installation in the state of Hawai'i, or anywhere in the Pacific.

The history of Hawai'i has always included agriculture, and it continues to be an important industry, adding \$2.9 billion to the state's annual economy, and providing 42,000 direct and indirect jobs (HDA 2013). The sugar and pineapple industries boomed during the plantation era, covering thousands of acres of prime agricultural lands. As these industries have been declining, these lands are being converted to smaller farms growing diversified agricultural product (HDA 2013). Specialty exotic fruits, coffee, macadamia nuts, flowers and foliage are examples of crops that have become major exports to destinations around the globe, as well as providing fresh produce and flowers to local Hawaiian markets. High-tech aquaculture ventures have evolved from the early fishponds, farming varieties of fish, shrimp, lobster, abalone, and seaweed (HDA 2013).

4.1.1 Socioeconomic Aspects of the Commercial Aquarium Fishery

Commercial aquarium fishers on the island of Hawai'i often perform day or short overnight trips, operate individually or in small groups of two or three people, and use SCUBA and barrier nets (nets used to exclude, contain, or direct fish) to capture fish (Stevenson et al. 2011). Most aquarium fishers are between the ages of 40 and 60 years, have remained active in the fishery for more than 20 years, and fish approximately 3–4 days per week (Stevenson et al. 2011). Commercial aquarium fishers are required to report their monthly catch on an aquarium fish catch report separate from, and more detailed than, the CML reports.

The commercial aquarium fishery has contributed an average of \$2,183,880 (inflation-adjusted 2020 dollars) to the State's economy over the past 18 years (Table 4-1). According to DAR (2019a), the marine aquarium fishery is the most economically valuable commercial inshore fishery in the State of Hawai'i, with 68% of the value coming from the Island of Hawai'i, mainly West Hawai'i.

Table 4-1. Summary of commercial Aquarium Permits and values by year from 2000-2017 for the State of Hawai'i (DAR 2018a). These data include n.d. data and summation of East and West Hawai'i data, as well as the other islands that make up the state of Hawai'i.

Fiscal Year ¹	Number of Commercial Aquarium Permits	Number Reporting	Total Value	Total Value Adjusted for Inflation ²
2000	113	82	\$1,000,750	\$1,499,213
2001	128	75	\$936,811	\$1,365,368
2002	139	63	\$935,009	\$1,340,774
2003	123	68	\$1,174,168	\$1,646,203

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Fiscal Year ¹	Number of Commercial Aquarium Permits	Number Reporting	Total Value	Total Value Adjusted for Inflation ²
2004	145	77	\$1,442,946	\$1,970,557
2005	142	79	\$1,579,370	\$2,086,184
2006	186	87	\$2,093,857	\$2,679,337
2007	195	99	\$1,646,167	\$2,048,130
2008	178	94	\$2,065,816	\$2,475,212
2009	197	92	\$1,894,015	\$2,277,467
2010	178	91	\$2,282,618	\$2,700,450
2011	172	87	\$2,188,227	\$2,509,565
2012	166	77	\$2,306,179	\$2,591,215
2013	153	64	\$2,172,561	\$2,405,842
2014	165	61	\$2,322,564	\$2,530,896
2015	163	69	\$2,502,178	\$2,723,388
2016	166	66	\$2,257,021	\$2,425,954
2017	226	68	\$1,932,747	\$2,034,076
Average	163	78	\$1,818,500	\$2,183,880

¹Fiscal year runs from July 1 through June 30.

²<http://www.usinflationcalculator.com/>, adjusted for 2020 values in February 2020.

In 2017, the commercial aquarium fishery on the island of Hawai'i reported landings near \$1.4 million, with more than \$1.29 million coming from the WHRFMA (DAR 2018a). For the 10 fishers who would be issued commercial Aquarium Permits under the Proposed Action, 2 to 8 fishers reported catch in any given year between 2000 and 2017, contributing from 2.0% to 38.6% to the total overall WHRFMA fishery value (Table 4-2).

Since 2000, the commercial aquarium fishery within the WHRFMA on the island of Hawai'i has averaged annual landings valued at approximately \$1.5 million, with a low of approximately \$738,568 (inflation-adjusted 2020 dollars) in 2001 and a high of \$1,965,381 (inflation-adjusted 2020 dollars) in 2014 (Table 4-2; DAR 2018a).

It should be noted that the dollar value of these fisheries represents only the ex-vessel value, i.e., what the fishers are paid for their catch and does not include the value which would be generated by additional dealer and retail sales. The actual economic value of the catch is thus substantially greater than the ex-vessel value. A study done in 1994 found that the DAR reported total average value for FY 1993/FY 1994 at only \$819,957 (Miyasaka 1994), while analysis in 1993 by an aquarium trade group (Hawai'i Tropical Fish Association) estimated the total sales of Hawaiian aquarium fish (including freight and packaging) to be nearly 6 times this, at \$4.9 million (Walsh et al. 2003).

Although specific export data do not exist for the aquarium fishery, it is clear that most of the aquarium catch is shipped out of the state to dealers on the mainland United States, Europe, and Asia (Dierking 2002). This is neither surprising nor atypical for commercial fisheries in Hawai'i (DAR 2019). For example, seafood exports of various Hawaiian species exceed 3.7 million pounds annually (Loke et al. 2012).

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Table 4-2. Number of Commercial Aquarium Permits and fishery value for the WHRFMA and East Hawai'i since 2000 (DAR 2018a). n.d. indicates data not disclosed due to Hawai'i confidentiality statute (Section 5.1).

Fiscal Year ¹	WHRFMA								East Hawai'i							Total for Island of Hawai'i (adjusted for inflation ²)
	All Fishers				10 Fishers who disclosed data				All Fishers				10 Fishers who disclosed data			
	# Aquarium Permits	# Permits Reporting	Total Value	Total Value Adjusted for Inflation ²	# Permits Reporting	Total Value	Total Value Adjusted for Inflation ²	% Contribution of 10 fishers	# Aquarium Permits	# Permits Reporting	Total Value	Total Value Adjusted for Inflation ²	# Permits Reporting	Total Value	% Contribution	
2000	24 ³	25	\$491,173	\$735,821	3	\$31,891	\$47,776	6.5%	6	3	\$11,832	\$17,725	0	\$0	n/a	\$753,546
2001	26	23	\$506,749	\$738,568	2	\$9,943	\$14,492	2.0%	8	0	\$0	\$0	0	\$0	n/a	\$738,568
2002	37	19	\$529,182	\$758,831	3	\$21,435	\$30,737	4.1%	n.d.	n.d.	n.d.	n.d.	0	\$0	n/a	\$758,831
2003	30	22	\$666,153	\$933,957	4	\$56,481	\$79,187	8.5%	9	n.d.	n.d.	n.d.	0	\$0	n/a	\$933,957
2004	53	30	\$866,630	\$1,183,512	4	\$176,253	\$240,700	20.3%	n.d.	n.d.	n.d.	n.d.	0	\$0	n/a	\$1,183,512
2005	41	34	\$1,168,265	\$1,543,157	5	\$171,215	\$226,157	14.7%	11	3	\$25,263	\$33,370	0	\$0	n/a	\$1,576,527
2006	63	34	\$1,459,004	\$1,866,968	5	\$165,011	\$211,151	11.3%	11	6	\$74,519	\$95,356	0	\$0	n/a	\$1,962,324
2007	61	40	\$1,065,093	\$1,325,169	6	\$176,253	\$219,291	16.5%	14	4	\$33,648	\$41,864	0	\$0	n/a	\$1,367,033
2008	52	31	\$1,308,629	\$1,567,969	7	\$323,256	\$387,318	24.7%	17	9	\$100,304	\$120,182	1	\$179	0.2%	\$1,688,151
2009	55	30	\$1,159,746	\$1,394,542	7	\$436,046	\$524,326	37.6%	13	8	\$84,022	\$101,033	0	\$0	n/a	\$1,495,575
2010	60	36	\$1,582,644	\$1,872,346	7	\$566,795	\$670,546	35.8%	12	7	\$30,062	\$35,565	0	\$0	n/a	\$1,907,911
2011	60	42	\$1,473,530	\$1,689,916	7	\$364,123	\$417,594	24.7%	13	6	\$41,238	\$47,294	0	\$0	n/a	\$1,737,210
2012	48	28	\$1,504,487	\$1,690,436	6	\$345,418	\$388,110	23.0%	16	7	\$79,067	\$88,839	1	\$4,213	5.3%	\$1,779,275
2013	45	26	\$1,560,517	\$1,728,079	6	\$319,409	\$353,706	20.5%	15	9	\$68,234	\$75,561	0	\$0	n/a	\$1,803,640
2014	43	20	\$1,570,057	\$1,710,890	6	\$466,985	\$508,873	29.7%	18	7	\$131,086	\$142,844	1	\$1,951	1.5%	\$1,853,734
2015	38	19	\$1,701,631	\$1,852,067	7	\$461,444	\$502,239	27.1%	13	4	\$104,110	\$113,314	0	\$0	n/a	\$1,965,381
2016	37	19	\$1,582,011	\$1,700,421	8	\$522,015	\$561,087	33.0%	15	4	\$80,441	\$86,462	0	\$0	n/a	\$1,786,883
2017	57	21	\$1,290,314	\$1,357,962	8	\$498,056	\$524,168	38.6%	18	4	\$91,790	\$96,602	1	\$8,962	9.8%	\$1,454,564
Average	46	28	\$1,193,656	\$1,425,034	6	\$284,002	\$328,192	23.0%	13	5	\$63,708	\$73,067	0	\$850	1.3%	\$1,498,101

¹Fiscal year runs from July 1 through June 30

²<http://www.usinflationcalculator.com/>, adjusted for 2020 values in February 2020

³Includes permittee that captured individuals in 1999, but reported captures in 2000

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On the island of Hawai'i, the total aquarium catch and its value have continued to increase overall since the FRAs were established in 2000, while the number of reporting fishers has fluctuated (Table 4-1 and Table 4-2; DAR 2018a). Since FRAs were established, overall catch has not declined and recent work (Stevenson et al. 2013) has indicated that the economic status of West Hawai'i aquarium collectors has significantly improved since the FRA network was implemented (DAR 2019a)

Of the 40 fish species which can now be collected in West Hawai'i (i.e., White List Species), over 90% of the economic value between 2000 and 2017 was derived from four species: the Yellow Tang which made up 75.3% of the total value; the Achilles Tang which made up 7.1% of the total value; the Kole which made up 5.6% of the total value; and, the Black Surgeonfish (*Ctenochaetus hawaiiensis*; = Chevron Tang) which made up 4.9% of the total value. The remaining 36 species made up the remaining 7.2% of value during this time period (DAR 2018a).

4.2 CULTURAL RESOURCES

The cultural significance of each of the 40 White List Species is discussed in Section 4.4.1.

Cultural, historic, and archaeological resources were evaluated within the nearshore habitats (0-600 feet; 0-100 fathoms, where commercial aquarium collection occurs). A Cultural Impact Assessment (CIA) was prepared assessing the potential cultural impacts of issuance of Aquarium Permits, and is included as Appendix A. A brief overview of cultural resources is provided here.

The ocean, its ecosystem, and the practice of fishing were and continue to be important in Native Hawaiian culture and tradition. The belief system of Native Hawaiians links people with all living and non-living things (Mitchell et al. 2005). Under this belief system, because all components of ecosystems were descended from *Wākea* (sky father) and *Papahānau-moku* (earth mother) and their offspring, *kini akua* (multitude of gods), both living and non-living elements possess spiritual qualities and *mana* (spiritual power). As such, Native Hawaiians, as *kanaka maoli* (native people), are guardians of these ecosystems and their well-being is directly related to the well-being of these ecosystems (Mitchell et al. 2005).

For example, areas such as *wao akua* (upland forests) are sacred places, the realm of the gods (Mitchell et al. 2005). Native Hawaiian land ownership and resource management were often based on a unit called the *ahupua'a*, which typically corresponded with what we today call watershed areas. This understanding of the link from uplands to the ocean was ahead of its time (Mitchell et al. 2005). *Kapu* (taboo) systems that limited certain classes or sexes from eating certain animals or fishing in certain places or at certain times may have aided in the conservation of some species (e.g., only men were allowed to eat *honu* (green sea turtle) and only royalty could eat certain fishes) (Mitchell et al. 2005).

Additionally, native species in Hawai'i play a significant role in Native Hawaiian culture. Historically, feathers from forest birds were used to make elaborate capes, leis, and helmets for the *ali'i* (royalty). Whale ivory, shells, and shark's teeth were used for necklaces and other adornments (Mitchell et al. 2005). Fish and sea turtle bones were used as kitchen implements, tools, and fishhooks, while sea turtle shells and scutes were used as containers. Koa (*Acacia koa*) trees were used for the ocean-voyaging canoes (Mitchell et al. 2005).

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Native wildlife also play an important role in Native Hawaiian culture as many species such as the *pueo* (*Asio flammeus sandwichensis* [Hawaiian short-eared owl]), '*io* (*Buteo solitarius* [Hawaiian hawk]), '*elepaio* (*Chasiempis sandwichensis* [Hawaiian elepaio]), '*alalā* (*Corvus hawaiiensis* [Hawaiian crow]), sea turtles (e.g., *Caretta* spp., *Chelonia* spp., *Dermochelys* spp., *Eretmochelys*, and *Lepidochelys* spp.), and sharks (*Hexanchus* spp.) are believed to be '*aumakua* (ancestors or guardians) of certain Hawaiian families (Mitchell et al., 2005). Hawaiian names have been given to many of the native wildlife and they have been incorporated into *oli* (chants) and *mo'olelo* (legends).

Native Hawaiian culture also contains specific customs, beliefs, and practices related to fisheries and aquatic resources (Maly and Maly 2003). Historical narratives include specific references to cultural sites, such as *ko'a* (on shore and in ocean fishing shrines and station markers), resources procurement sites (both on land and in the water), and the traditional and customary laws governing the care for, and use of, the wide range of resources from the uplands to the ocean (Maly and Maly 2003). These historical accounts demonstrate that Native Hawaiians worked the land, water, and marine resources and, through a system of religious-based fisheries management protocols, were able to sustain themselves through the natural resources of the islands (Maly and Maly 2003). Native Hawaiian traditions surrounding aquatic resources demonstrate the cultural-historical importance of fisheries and land in the lives of Native Hawaiians and form the basis for Native Hawaiian's cultural attachment to the ocean and fishing today (Maly and Maly 2003).

Historical accounts demonstrate that Native Hawaiians were expert fishermen, and that fishing was a skill passed down generation to generation (Maly and Maly 2003). Native Hawaiians relied on fishing in the ocean for subsistence and consumption and employed traditional fishing methods that included the use of nets, hooks and lines, baskets, and hands (Maly and Maly 2003). In addition to serving as a source of food, aquatic resources and the practice of fishing were also linked to religious practices. Fishing was associated with religious ceremonies and fishermen traditionally worshipped fishing gods and goddesses and performed rituals related to certain species of fish (Maly and Maly 2003).

Numerous other examples of the use of native plants and animals in both daily life and ritual exist. In present day Hawai'i, the link between Native Hawaiian culture and native species has not been lost and continues to be practiced in belief systems, as well as in traditional practices such as gathering of native plants for hula, traditional medicines, carving, weaving, and ceremonies (Mitchell et al. 2005).

Today, Native Hawaiian teachings play an increasing role in natural resource management, especially in areas of cultural significance like *Kaho'olawe* or *Wao Kele o Puna* (island of Hawai'i). The CWCS recognizes that the State and its agencies are obligated to protect the reasonable exercise of customarily and traditionally exercised rights of Native Hawaiians to the extent feasible, in accordance with Public Access Shoreline Hawai'i versus Hawai'i County Planning Commission and subsequent case law (Mitchell et al. 2005).

4.2.1 Cultural Aspects of the Commercial Aquarium Fishery

4.2.1.1 In the WHRFMA

From Jokiel et al. (2011):

For the past century Hawai'i has been dominated by a "Western" model of marine environmental management. Recently, however, there has been a renewed interest in the traditional management practices of ancient Hawaiians. Throughout Hawai'i, a growing cultural, sociological, and scientific movement is working to investigate and revive some of these traditional management tools and to integrate them with modern scientific methodology. The native islanders had devised and implemented every basic form of what are now considered modern marine fisheries conservation measures centuries ago, long before the need for marine conservation was even recognized in Western nations (Johannes 1982). Traditional restrictions on fishing in Hawai'i were achieved by the use of closed seasons, closed areas, size restrictions, gear restrictions, and restricted entry. Additional social, cultural, and spiritual controls strengthened the conservation ethic under the old system. Ancient Hawaiians used a holistic approach that we might now recognize and strive for as integrated coastal management. Bridging the gap between traditional management and Western science represents a challenge to researchers, government agencies, resource managers, cultural practitioners and organizations, and to the people of Hawai'i.

Act 306 and formation of the WHFC (Section 1.2.3) played a significant role in bridging that gap by creating a new aquarium fish management plan that is much closer to the traditional Hawaiian system. Commercial aquarium fish collection has been on-going in Hawai'i since the late 1940's, with most fishers active in the fishery for more than 20 years and many active for 35 – 40 years. Protecting and preserving the reef, the fish, and the cultural heritage of both Hawai'i and the fishery, is in their best personal and business interest. Commercial aquarium fish collection is not a part of Native Hawaiian culture; however, Native Hawaiians do participate in and support the fishery and Hawaiian culture has been a significant aspect of the fishery's management since the 1970's. Although the process has been contentious at times, the WHFC has been successful. See Section 1.2.3.1 for a further description of their contributions and accomplishments. Section 4.4.1 summarizes the cultural significance of the White List Species.

4.2.1.2 Public and Private Aquariums

More than 700 million people visit zoos and aquariums worldwide each year, and these zoos and aquariums spent more than \$350 million on wildlife conservation in 2008 (Gusset and Dick 2011). Visits to aquariums may be for entertainment or educational purposes (as cited in Cracknell et al. 2015), but there are psychological benefits as well. Cracknell et al. (2015) looked at the behavioral, physiological and psychological reactions of people viewing a large aquarium exhibit, and found greater reduction in heart rate, greater increases in self-reported mood, higher interest, and longer spontaneous viewing times when species diversity within the aquarium was higher. Aquarium fish are also sold to home aquaria owners, of which 70% report that their fish are calming and stress reducing (Kidd and Kidd 1999, as cited in Cracknell et al. 2015), and for this reason aquariums are often present in health care settings as well, to provide a relaxing and calm environment (Cracknell et al. 2015).

4.3 PHYSICAL RESOURCES

The Hawaiian Archipelago is composed of 8 main islands and approximately 124 smaller islands, reefs, and shoals spanning over 1,500 miles that vary in size from fractions of acres to thousands of square miles (Mitchell et al. 2005). The Archipelago was formed over the last 70 million years through volcanic eruptions from a relatively stationary hotspot beneath the slowly moving seafloor. The island of Hawai'i is the youngest island, with island age increasing to the northwest as the Pacific plate carries the older islands away from the hotspot (Mitchell et al. 2005). Millions of years of erosion, subsidence, and reef building resulted in the formation of the atolls which form the Northwestern Hawaiian Islands and the submersion under the sea surface of the seamounts which used to be islands (Mitchell et al. 2005).

Located over 2,000 miles from the nearest continent, Hawai'i is the most remote island chain in the world (Mitchell et al. 2005). Despite its relatively small area (less than 4.1 million acres), an elevation range from sea level to 13,796 feet results in Hawai'i containing all the major known ecological zones. With a wide temperature range due to the elevational gradient and with average annual rainfall ranging from less than 15 inches to over 480 inches per year, Hawai'i displays most of the earth's variation in climatic conditions. Finally, Hawai'i possesses many natural wonders: the most active volcano in the world, the wettest place on earth, the tallest seacliffs, and extensive coral reefs (Mitchell et al. 2005).

Due to the large number and the varied geology of the islands, Hawai'i has diverse marine habitats, which range from estuaries, tidepools, sandy beaches, and seagrass beds to nearshore deep waters, extensive fringing and atoll reef systems, and smaller barrier reef systems (DLNR 2015). However, introduced mangroves have altered native coastal habitats in a number of places. The distribution of marine ecosystems in Hawai'i is a result of island age, reef growth, water depth, exposure to wave action, geography, and latitude. The marine habitats found on each island depend on the type of island: large and young, mature, or drowned islands and seamounts (DLNR 2015). Large and young islands such as the island of Hawai'i have recent lava flows and few, living structural coral reefs. Beaches are rocky except around bays, and drowned reefs may be found in deep waters or off parts of the east coast of Maui. Mature islands, such as O'ahu and Kaua'i in the Main Hawaiian Islands (MHI) and Nihoa and Necker in the Northwestern Hawaiian Islands (NWHI) are the most diverse, with habitat types ranging from estuaries and sandy beaches to rocky beaches and fringing and barrier reefs to lagoons with patch or pinnacle reefs. Drowned islands, such as atolls in the rest of the NWHI, are the remains of volcanic islands with habitats ranging from coral islets and benches to caves and terraces along the slope of the atoll (DLNR 2015).

4.3.1 Climate

Features of Hawai'i's climate include mild temperatures throughout the year, moderate humidity, persistence of northeasterly trade winds, significant differences in rainfall within short distances, and infrequent severe storms (Price 1983). For most of Hawai'i, there are only two seasons: "summer," between May and October, and "winter," between October and April. Hawai'i's length of day and temperature are relatively uniform throughout the year. Hawai'i's longest and shortest days are about 13.5 hours and 11 hours, respectively, compared with 14.5 and 10 hours for Southern California and 15.5 hours and 8.5 hours for Maine (Price 1983). Uniform day lengths result in small seasonal variations in incoming solar radiation and, therefore, temperature. On a clear winter day, level ground in Hawai'i receives at least 67% as much

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solar energy between sunrise and sunset as it does on a clear summer day. By comparison the percentages are only 33 and 20 at latitudes 40 and 50 degrees respectively (Price 1983).

Over the ocean near Hawai'i, rainfall averages between 25-30 inches per year. The islands receive as much as 15 times that amount in some places and less than one third of it in others. This is caused mainly by orographic or mountain rains, which form within the moist trade wind air as it moves from the sea over the steep and high terrain of the islands (Price 1983). Over the lower islands, the average rainfall distribution resembles closely the topographic contours. Amounts are greatest over upper slopes and crests and least in the leeward lowlands. On the higher mountains, the belt of maximum rainfall lies between 2,000-3,000 feet and amounts decrease rapidly with further elevation. As a result, the highest slopes are relatively dry (Price 1983). Another source of rainfall is the towering cumulus clouds that build up over the mountains and interiors on sunny calm afternoons. Although such convective showers may be intense, they are usually brief and localized. Hawai'i's heaviest rains are come from winter storms between October and April. While the effects of terrain on storm rainfall are not as great as on trade wind showers, large differences over small distances do occur, because of topography and location of the rain clouds. Differences vary with each storm. Frequently, the heaviest rains do not occur in areas with the greatest average rainfall. Relatively dry areas may receive, within a day or a few hours, totals exceeding half of their average annual rainfall (Price 1983). The leeward and other dry areas receive their rainfall mainly from a few winter storms. Therefore, their rainfall is usually seasonal and, their summers are dry. In the wetter regions, where rainfall comes from both winter storms and trade wind showers, seasonal differences are much smaller (Price 1983).

At the opposite extreme, drought is not unknown in Hawai'i, although it rarely affects an entire island at one time. Drought may occur when there are either no winter storms or no trade winds (Price 1983). If there are no winter storms, the normally dry leeward areas are hardest hit. A dry winter, followed by a normally dry summer and another dry winter, can have serious effects. The absence of trade winds affects mostly the windward and upland regions, which receive a smaller proportion of their rain from winter storms (Price 1983).

The waters surrounding Hawai'i are affected by seasonal variations in climate and ocean circulation. The surface temperature of the oceans around Hawai'i follow a north-south gradient and range from 75°F in the MHI to 68°F to 72°F in the NWHI in winter and spring to 79°F - 81°F throughout all the islands in the late summer and fall (DLNR 2015). The depth of the thermocline, where water temperature reaches 50°F, is 1,500 feet northwest of the islands and 1,000 feet off the island of Hawai'i. Surface currents generally move east to west and increase in strength moving southward (DLNR 2015). The seas are rougher between islands than in the open ocean, because wind and water are funneled through the channels. Waves generated by north Pacific low-pressure systems are larger in the winter months than in the spring and are generally bigger on the northern shores of the islands than the southern shores. Marine organisms have adapted to these general climatological and oceanographic conditions (DLNR 2015).

Climate and oceanographic indicators highlight long-term trends and recent anomalous conditions in West Hawai'i's natural environment. The El Niño Southern Oscillation (ENSO), an irregular, large-scale climate phenomenon that drives changes in regional oceanic and atmospheric conditions, has shifted over the last four decades towards increased frequency and severity in El Niño conditions, with the recent 2015 El Niño as one of the strongest on record (Gove et al. 2016). Rainfall, which can influence salinity, temperature,

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sediment load, and nutrient concentrations in the marine environment, has been at or below the long-term average over the past 15 years while the intensity of short-term events has increased over the same time period. Long-term sea level, an important indicator for coastal erosion and flooding, is rising by an estimated 0.15 inch per year and is expected to reach 1.6 feet higher than present day levels by 2100. Sea surface temperature, an indicator of regional and climatic forcing that is highly influential to a myriad of ecological processes, was anomalously warm in recent years and reached a record level of thermal stress in September 2015, resulting in widespread and severe coral reef bleaching in West Hawai'i (Gove et al. 2016).

4.3.2 Physical Aspects of the Commercial Aquarium Fishery

Commercial aquarium fishers typically interact with physical resources within recreational dive limits (RDL), generally from 35-70 feet deep (BIAAF, pers. comm.). Deeper waters are fished to a lesser extent, in depths beyond RDL (130 feet). Habitats most often fished are shallow water reefs consisting of rich coral growth over rocky substrate. These reefs can be adjacent to the shoreline or apart and isolated far offshore, with the distance usually dictated by how fast the bathymetric relief occurs. Deep water fish are caught off the edge (ledge) of the reefs where the depth drops off rapidly. Coral cover diminishes and typically the habitat consists of rocks and sand.

Aquarium fish collection is generally carried out by divers equipped with some form of underwater breathing apparatus (e.g., SCUBA, surface supplied air, rebreather equipment). Most fishing activity occurs off of a boat, although some shore diving does occur infrequently. Divers use hand nets, usually in combination with the placement of short, bottom-set barrier nets. Nets are typically 30 feet in length and 6 feet in height. Sometimes even smaller fence nets are used. Most often the netting is considered "fine" with a stretched mesh size less than 1 inch. The net is always made of monofilament. Other gear may include "poker sticks" (i.e., lightweight fiberglass poles used to herd fish), catch baskets or keeps (i.e., containers into which catch is transferred).

Once the fisher(s) reaches the bottom he/she quickly identify fish of interest. Fish are typically gathered into groups utilizing poker sticks to move fish along the reef until a satisfactory number have accumulated. At this point, the fisher with the barrier net looks for a natural demarcation in the reef (e.g., strip of sand or rubble) to set the net. The net is set in a "V" formation to corral the fish as they are advanced into the net. The net is pulled back, halfway up creating a "pocket" and hooked onto bare substrate with some sort of fastener (e.g., rubber band). At this point the net is set and the fisher circles back on the gathered fish. The fish are then directed to the net and into the pocket. From the pocket, the fish are either scooped with a hand net, or collected by hand and transferred into a catch basket. All incidental catch is released immediately, and the net is gathered up. At the end of the dive the catch baskets are clipped onto a line suspended off the boat for a slow decompression.

Per the DAR, in lieu of collection with fine mesh nets, other gear types that were previously allowed are still legal to use outside the WHRFMA⁶.

⁶ https://dlnr.hawaii.gov/dar/files/2017/11/aquarium_permit_faq_rev4.pdf

4.4 BIOLOGICAL RESOURCES

Because of Hawai'i's geographical isolation, many of its coastal and marine species are endemic (i.e., native or restricted to a certain country or area) to the Hawaiian Archipelago (including Johnston Atoll). Approximately 15 to 25% of the marine species are endemic to the Hawaiian Archipelago, one of the largest proportions of marine endemism for any island chain in the world (Randall 2007, DLNR 2015). Of the 612 known nearshore fish species in Hawai'i, 25% are endemic to the Hawaiian Archipelago (Randall 2007). Yet because of the isolation, Hawai'i has relatively low marine species richness (i.e., diversity), with approximately 580 shallow reef fish species in contrast to areas of the Pacific further west with thousands of species. In total though, Hawai'i still has over 6,000 marine species (DLNR 2015).

Toonen et al. (2011) conclude that the Hawaiian Archipelago is not a single, well-mixed marine community, but rather there are at least four significant multi-species barriers to dispersal along the length of the island chain, and that species that appear capable of extensive dispersal, such as Yellow Tang and Kole, show significant population differentiation within the Hawaiian Archipelago. In addition, there are significant consensus genetic breaks that restrict gene flow between islands, including a barrier between the island of Hawai'i and the rest of the Main Hawaiian Islands (MHI). Conversely, around the island of Hawai'i, there is connectivity between adjacent reefs (up to 184 km, with fish from protected FRAs being documented to seed unprotected areas, highlighting the effectiveness of protected areas (Christie et al. 2010).

4.4.1 White List Species

Concerns over continued expansion of the commercial aquarium fishery and its effects in the Open Areas prompted DLNR in 2013 to establish a 'White List' of 40 species which can be taken by aquarium fishers in the WHRFMA (Table 4-3). All other species of fish and invertebrates are off limits within the WHRFMA. Although other aquatic life is allowed to be collected from the eastern side of the island of Hawai'i, these 40 species represent the majority of fish that are collected in East Hawai'i.

Table 4-3. White List Species (DAR 2019, Appendix A).

Common Name(s)	Scientific Name	Hawaiian Name(s)	Hawaiian Status ¹
Yellow Tang	<i>Zebrasoma flavescens</i>	<i>lā'ī pala, lau'ī pala</i>	Indigenous
Achilles Tang	<i>Acanthurus achilles</i>	<i>pākukui, pākuikui, pāku'iku'i</i>	Indigenous
Black Surgeonfish (chevron tang)	<i>Ctenochaetus hawaiiensis</i>	species of <i>kole</i>	Indigenous
Shortnose (Geoffroy's) Wrasse	<i>Macropharyngodon geoffroy</i>	species of <i>hīnālea</i>	Endemic
Goldrim Tang	<i>Acanthurus nigricans</i>	unknown	Indigenous
Fourspot Butterflyfish	<i>Chaetodon quadrimaculatus</i>	<i>lauhau</i>	Indigenous
Orangeband (Shoulder) Surgeonfish	<i>Acanthurus olivaceus</i>	<i>na'ena'e</i>	Indigenous
Orangespine Unicornfish (Clown Tang)	<i>Naso lituratus</i>	<i>umaumalei, kala umaumalei</i>	Indigenous

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Common Name(s)	Scientific Name	Hawaiian Name(s)	Hawaiian Status ¹
Forcepsfish	<i>Forcipiger flavissimus</i>	<i>lauwiliwili nukunuku 'oi'oi</i>	Indigenous
Spotted Boxfish (Boxfish)	<i>Ostracion meleagris</i>	<i>pahu, moa</i>	Indigenous
Yellowtail Coris (Clown Wrasse)	<i>Coris gaimard</i>	<i>hīnālea 'akilolo</i>	Indigenous
Milletseed (Lemon) Butterflyfish	<i>Chaetodon miliaris</i>	<i>kīkākapu</i>	Endemic
Kole (Goldring Surgeonfish, Yelloweye, Goldring)	<i>Ctenochaetus strigosus</i>	<i>kole, kole makaonaona</i>	Endemic
Pencil Wrasse	<i>Pseudojuloides cerasinus</i>	species of <i>hīnālea</i>	Indigenous
Bird Wrasse	<i>Gomphosus varius</i>	<i>hīnālea 'i'iwi</i>	Indigenous
Blacklip Butterflyfish (Coral Butterflyfish)	<i>Chaetodon kleinii</i>	<i>kīkākapu, kapuhili, lauhau, lauwiliwili</i>	Indigenous
Potter's Angelfish	<i>Centropyge potteri</i>	unknown	Endemic
Ornate Wrasse (Pinkface)	<i>Halichoeres ornatissimus</i>	<i>lā'ō</i>	Endemic
Black Durgon	<i>Melichthys niger</i>	<i>humuhumu 'ele'ele</i>	Indigenous
Gilded Triggerfish (Blue-throat Triggerfish)	<i>Xanthichthys auromarginatus</i>	species of <i>humuhumu</i>	Indigenous
Lei Triggerfish	<i>Sufflamen bursa</i>	<i>humuhumu lei, humuhumu umaumalei</i>	Indigenous
(Forster's) Blackside Hawkfish	<i>Paracirrhites forsteri</i>	<i>hilu, hilu piliko'a</i>	Indigenous
Thompson's Surgeonfish	<i>Acanthurus thompsoni</i>	species of <i>kala</i>	Indigenous
Pyramid Butterflyfish	<i>Hemitaurichthys polylepis</i>	<i>kapuhili</i>	Indigenous
Multiband (Pebbled) Butterflyfish	<i>Chaetodon multicinctus</i>	<i>kīkākapu</i>	Endemic
Hawaiian Dascyllus (Domino)	<i>Dascyllus albisella</i>	<i>'ālo'ilo'i</i>	Endemic
Saddle Wrasse	<i>Thalassoma duperrey</i>	<i>hīnālea lauwiili</i>	Endemic
Redbarred Hawkfish	<i>Cirrhitops fasciatus</i>	<i>piliko'a</i>	Endemic
Eightline Wrasse	<i>Pseudocheilinus octotaenia</i>	species of <i>hīnālea</i>	Indigenous
Fourlined Wrasse	<i>Pseudocheilinus tetrataenia</i>	species of <i>hīnālea</i>	Indigenous
Brown Surgeonfish (Lavender, Forktail Tang)	<i>Acanthurus nigrofuscus</i>	<i>mā'i'i'i, mā'i'i</i>	Indigenous
Hawaiian Whitespotted Toby (Puffer)	<i>Canthigaster jactator</i>	unknown	Endemic
Bluestripe Snapper (Taape)	<i>Lutjanus kasmira</i>	unknown	Invasive
Peacock Grouper (Roi, bluespot Peacock Grouper)	<i>Cephalopholis argus</i>	unknown	Invasive
Psychedelic Wrasse	<i>Anampses chrysocephalus</i>	species of <i>hīnālea</i>	Endemic
Tinker's Butterflyfish	<i>Chaetodon tinkerii</i>	<i>kīkākapu, kapuhili, lauhau, lauwiliwili</i>	Indigenous
Longfin Anthias	<i>Pseudanthias hawaiiensis</i>	unknown	Endemic

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Common Name(s)	Scientific Name	Hawaiian Name(s)	Hawaiian Status ¹
Flame Wrasse	<i>Cirrhilabrus jordani</i>	species of <i>hīnālea</i>	Endemic
Fisher's Angelfish	<i>Centropyge fisheri</i>	unknown	Indigenous
Eyestripe Surgeonfish (Palani)	<i>Acanthurus dussumieri</i>	<i>palani</i>	Indigenous

¹Indigenous species are species that are native to Hawaii (but may also be found elsewhere). Endemic species are found only within the Hawaiian Islands (including Johnston Atoll). Invasive species were introduced due to humans.

The following sections provide a brief overview of the ecology and cultural significance of each White List Species. Further details on the cultural significance can be found in Appendix A. Population estimates presented below are based on the NOAA Coral Reef Ecosystem Program (CREP; now known as the NOAA's Ecosystem Science Division) and the DAR West Hawaii Aquarium Project (WHAP) (see Section 4.4.7 for discussion of CREP and WHAP). Population estimates derived from both data sets have varying degrees of variability (described in Section 4.4.7) and are not a measure of absolute abundance. In addition, the CREP estimates are island-wide in depths of 0-98 feet (0-30 meters). The WHAP population estimates include only the Open (fished) Areas of the WHRFMA in depths of 30-60 feet. The difference in survey methods and area often leads to large differences in population estimates between the two data sets.

4.4.1.1 Yellow Tang (*Zebrasoma flavescens*)

Ecology

The Yellow Tang is one of the most popular aquarium species, growing to 8 inches, oval in shape and laterally compressed, with a small mouth and eyes set high on the head. Adults are bright yellow and have modified scales along the base of the tail which can be exposed when the fish flexes its tail. These modified scales or spines are used for defense from predators and competition for feeding areas. At night, the yellow color darkens, and a white band appears along the lateral line (University of Hawai'i 2016). The Yellow Tang is found from shallow surge zones to a depth of 130 feet and occur in the Pacific Ocean: Ryukyu, Mariana, Marshall, Marcus, Wake, and Hawaiian Islands (Froese and Pauly 2019)

The Yellow Tang is the only solid yellow fish common throughout Hawai'i. This species is found in subtropical waters and is rare on the western extremes of its range. Flexible comb-like teeth are used to pick algae and seaweed that grow along the reefs. Young Yellow Tangs are associated with finger coral (*Porites compressa*) which is abundant in the coastal waters of the island of Hawai'i, but less so on O'ahu (Dr. Bruce Carlson, pers. comm.). They spend a large amount of time feeding and aggressively protect prime feeding territories (University of Hawai'i 2016).

Yellow Tang are broadcast spawners. Many broadcast spawners migrate to the edge of the reef-drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Yellow Tang at the 0-98-foot depth in hardbottom habitats was approximately 8,262,144 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Yellow Tang at the 30-60-foot depth was approximately 1,663,775

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individuals and in 2017/2018 was approximately 2,867,048 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

The yellow tang, called *lāʻī pala* or *lauʻī pala* in Hawaiʻi, although small was considered a delicacy and also involved in healing rituals.

4.4.1.2 Achilles Tang (*Acanthurus achilles*)

Ecology

A member of the surgeonfish family, the Achilles Tang grows to 10 inches, is laterally compressed, and has a small mouth and eyes set high on the head. Adults are recognized by the bright orange patch at the base of the tail, where modified scales can be exposed when the fish flexes its tail. These modified scales or spines are used for defense from predators and competition for feeding areas (University of Hawaiʻi 2016).

The Achilles Tang is known in the West Pacific, Oceanic Islands of Oceania to the Hawaiian Islands and Pitcairn Islands as well as Wake, Marcus, and Mariana Islands. In the Eastern Central Pacific, they are found around the southern tip of Baja, California, Mexico, and other offshore islands (Froese and Pauly 2018). The Achilles Tang is present throughout Hawaiʻi and found near exposed coral reefs and rocky shores. Flexible comb-like teeth are used to pick algae and seaweed that grow along the reefs. They spend a large amount of time foraging and aggressively protecting prime feeding territories (University of Hawaiʻi 2016).

Achilles Tang are broadcast spawners. Many broadcast spawners migrate to the edge of the reef-drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawaiʻi population of Achilles Tang at the 0-98-foot depth in hardbottom habitats was approximately 231,377 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Achilles Tang at the 30-60-foot depth was approximately 21,627 individuals and in 2017/2018 was approximately 13,796 individuals (DAR 2014a, 2019a). As discussed and analyzed in Section 5.0, the WHAP estimate is low because it does not assess the primary habitat and location of the Achilles Tang population on the island of Hawaiʻi. Since the establishment of the WHRFMA, this species has remained stable in MPAs (though shown a non-significant negative trend) and declined significantly in both FRAs and Open Areas (DAR 2019a).

Cultural Significance

The Achilles Tang is commonly referred to in Hawaiʻi as *pākuʻikuʻi*. The spelling and pronunciation of the Hawaiian names, which include *pākukui*, *pākuikui*, and *pākuʻikuʻi*, vary. They were considered “good eating” (Pukui and Elbert 1986) and were also noted to be associated with Hawaiʻi Island and correlated with the *kukui* tree (*Aleurites moluccana*) that grows on land.

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4.4.1.3 Black Surgeonfish (Chevron Tang) (*Ctenochaetus hawaiiensis*)

Ecology

The Black Surgeonfish is widespread throughout the tropical waters of the Pacific Ocean. Juveniles have blue and purple patterns on an orange to red background, these colors fade as the individual matures. Modified scales are present along the base of the tail which can be exposed when the fish flexes its tail. These modified scales or spines are used for defense from predators and competition for feeding areas (Randall and Clements 2001). The Black Surgeonfish is the 5th most collected aquarium fish in Hawai'i (DAR 2010).

Black Surgeonfish inhabits high energy shallow surge zones (IUCN 2017). The genus *Ctenochaetus* feed on fine detrital material. They whisk the sand or rocky substratum with their teeth and utilize suction to draw in the detrital material that consists of diatoms, small fragments of algae, organic material, and fine inorganic sediment (Randall and Clements 2001). Species of *Ctenochaetus* share the presence of a thick-walled stomach (Randall and Clements 2001), this character is significant with respect to the nutritional ecology of this genus (Choat et al. 2002).

Black Surgeonfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Black Surgeonfish at the 0-98-foot depth in hardbottom habitat was approximately 549,462 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Black Surgeonfish at the 30-60-foot depth was approximately 34,678 individuals, and in 2017/2018 was approximately 98,067 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

The Black Surgeonfish, also called *ukole* or *pākole*, is a species in the *kole* (meaning "raw" or "red") family. Its cultural significance is tied to another surgeonfish commonly known as Kole (see Section 4.4.1.13).

4.4.1.4 Shortnose (Geoffroy's) Wrasse (*Macropharyngodon geoffroy*)

Ecology

The Shortnose Wrasse is endemic throughout the Hawaiian Islands and Johnston Atoll (Lobel 2003) and is found at depths between 20 and 100 feet. It has dark blue spots on a yellow to orange background. Research suggests that the Shortnose Wrasse is common throughout its range (Craig 2010). This species inhabits mixed sand, rubble patches, and coral reefs where it feeds on mollusks (Lieske and Myers 1994). Distinct pairs are formed during breeding (Breder and Rosen 1966).

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Shortnose Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Shortnose Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 307,032 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Shortnose Wrasse at the 30-60-foot depth was approximately 3,222 individuals, and that estimate remained the same for 2017/2018 (3,222 individuals; DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

Hīnālea, occasionally shortened to *ālea*, is a name broadly applied to various species known commonly as wrasses and is applied to most of the smaller wrasses that have no known Hawaiian names (Hoover 2007). There are specific traditional fishing methods associated with wrasses. *Melomelo* involved using a carefully curated stick to attract the fish (Kahā'ulelio 2006). They were also caught in basket traps woven from plant-based fibers, including a diving basket known as *hīna'i ho'olu'ulu'u* which was made from the vines of the *'āwīkīwīkī* (*Canvalia galeata*). Standing nets known as *kūkulu 'upena* and 18-foot long fishing poles called *ke kāmākoi* made of bamboo or *hau* (*Hibiscus tiliaceus*) were also used to catch *hīnālea* (Manu et al. 2006). The *ke kāmākoi* were used in the nearshore reefs where the fisher could cast from shore. Yet another traditional method of catching *hīnālea* involved poison, a net called *'upena holahola* was used with certain piscicidal plants (i.e., containing a substance poisonous to fish) that were crushed and placed around a fishing hole, where the toxins from the crushed plants would diffuse into the water and paralyze the trapped fish, causing the *hīnālea* to float to the surface into the *holahola* net (Manu et al. 2006).

The *hīnālea* is considered a popular fish of the Hawaiian diet, and they are referenced in many *mo'olelo*, or stories. They were also considered important for ceremonies, including as offerings for gods responsible for conceiving a child, and were also noted in several accounts of gods and goddesses.

4.4.1.5 Goldrim Tang (*Acanthurus nigricans*)

Ecology

The Goldrim Tang has a black to purplish-blue body with a small white mark on the cheek between the mouth and eyes. The fins are dark blue with lighter blue highlights along the edges. The tail is blue with a yellow vertical bar. A yellow stripe runs along the body, against the anal and dorsal fins, forming a wishbone-shaped marking. This species can be found throughout the eastern Indian Ocean to the Hawaiian Islands. Adults grow to about 8 inches and have a spine along the base of the tail used for defense against predators (Myers 1991). The Goldrim Tang is found along outer reefs at water depths between 6 and 220 feet and feed almost entirely on algae.

Spawning occurs in monogamous pairs during which time they can be alone or in small groups. Initially, larvae develop among plankton and then move to reefs where juveniles develop to adults (Kuitert and Tonzuka 2001). Goldrim Tang are broadcast spawners. Many broadcast spawners migrate to the edge

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of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Goldrim Tang at the 0-98-foot depth in hardbottom habitat was approximately 97,924 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Goldrim Tang at the 30-60-foot depth was approximately 7,517 individuals, and in 2017/2018 was approximately 5,966 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

While the Goldrim Tang is indigenous to Hawai'i, there are no known Hawaiian names or known cultural significance (Appendix A).

4.4.1.6 Fourspot Butterflyfish (*Chaetodon quadrimaculatus*)

Ecology

The upper half of the Fourspot Butterflyfish is black with two white spots. The lower half is yellow with a light blue trim around the dorsal and anal fins. They are sometimes confused with angelfish but lack a cheek spine. This species is found throughout the Indian Ocean.

Individuals are frequently found on exposed reefs between 6 and 140 feet where they feed mainly on coral polyps. Fourspot Butterflyfish are often observed alone; however, they form district pairs during breeding (Breder and Rosen 1966).

Fourspot Butterflyfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Fourspot Butterflyfish at the 0-98-foot depth in hardbottom habitat was approximately 797,673 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Fourspot Butterflyfish at the 30-60-foot depth was approximately 22,000 individuals, and in 2017/2018 was approximately 15,034 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in FRAs, and has decreased significantly in Open Areas and MPAs (DAR 2019a).

Cultural Significance

The Fourspot Butterflyfish was named *lauhau*, which has been translated as "brightly colored butterfly fish". They are known for a characteristic of creating disturbances in the sea pool, and this can also be used to reference a boisterous person (Pukui 1983). They were traditionally caught using the *kūkulu 'upena* method, or a standing net, which was cast from the shore. Conflicting reports exist as to whether or not this species was valued as a food fish.

4.4.1.7 Orangeband (Shoulder) Surgeonfish (*Acanthurus olivaceus*)

Ecology

The Orangeband Surgeonfish occurs in tropic waters of the Indo-west Pacific. The head and anterior half of the Orangeband Surgeonfish are distinctly paler than that of the dark grayish brown posterior. Juveniles are bright yellow. Orangeband Surgeonfish are commonly found in small groups near reefs at depths of 30 to 150 feet (Randall and Clements 2001) where they feed on detritus, diatoms, and algae (Myers 1991).

Orangeband Surgeonfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Orangeband Surgeonfish at the 0-98-foot depth in hardbottom habitat was approximately 1,319,924 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Orangeband Surgeonfish at the 30-60-foot depth was approximately 26,101 individuals, and in 2017/2018 was approximately 53,694 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas and MPAs and has remained stable in FRAs (and shown a non-significant increasing trend in density; DAR 2019a).

Cultural Significance

The Orangeband Surgeonfish is commonly referred to as *na'ena'e* ("quick, alert") (Pukui and Elbert 1986). The name *na'ena'e* is also applied to a native daisy known for its small yellow, orange, purple, or white flower (Pukui and Elbert 1986). A review of cultural-historical literature (see Appendix A) did not reveal any additional cultural information for the Orangeband Surgeonfish.

4.4.1.8 Orangespine Unicornfish (Clown Tang) (*Naso lituratus*)

Ecology

The Orangespine Unicornfish has a black dorsal fin, with the black continuing onto the back as a pointed projection, with a pale blue line at base. The anal fin is mainly orange while the caudal fin is yellow. The caudal peduncle bears two forward-directed spines (Randall and Clements 2001). Orangespine Unicornfish are found at depths of 16 to 100 feet along coral, rock, and rubble of seaward reefs. They feed mostly on leafy brown algae and sometimes in groups (Randall and Clements 2001). Distinct pairs are formed during breeding.

Orangespine Unicornfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

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The species is found throughout the Indo-Pacific from the Red Sea (except the Gulf of Oman and Persian Gulf) south to Natal and east to Hawai'i and French Polynesia. In the western Pacific from Suruga Bay to the southern Great Barrier Reef (Randall and Clements 2001).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Orangespine Unicornfish at the 0-98-foot depth in hardbottom habitat was approximately 897,085 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Orangespine Unicornfish at the 30-60-foot depth was approximately 150,642 individuals, and in 2017/2018 was approximately 180,099 individuals (DAR2014a, 2019a). Since the establishment of the WHRFMA, this species has increase significantly in Open Areas and MPAs and has remained stable in FRAs (DAR 2019a).

Cultural Significance

The Orangespine Unicornfish is also known as the *umaumalei*. This species has been paired with its land counterpart the 'ūlei (Hawaiian Rose; *Osteomeles anthyllidifolia*) (Beckwith 1951; Liliuokalani 1978). While the *umaumalei* is a specific species within the family Acanthuridae, some traditional accounts classify it under the name *kala* or *kala umaumalei* (Ka Nupepa Kuokoa 1867; Titcomb 1972).

Kala in all of its forms was a popular Hawaiian delicacy, containing white meat and usually eaten broiled over coals and rarely eaten raw. The soft parts of the fish are described as good *palu* (fish bait). *Kala* is very abundant and easy to catch which is why it is eaten often (Titcomb 1972). The skin of the *kala* was also used to cover the *pūniu*, a small drum that was lashed onto the thigh of a *hula* dancer.

During the spawning seasons, certain fish were prohibited from being caught and consumed, which included *kala* (Titcomb 1972). They were traditionally caught in the 'ie *kala* (lit. *kala* basket), which has been described as the largest type of *hīna'i* (basket fish trap) (Manu et al. 2006). Additional methods for catching *kala* included the use of a *holoholo*, a net tied to a 12-foot-long piece of *alahe'e* (*Canthium odoratum*) wood. The net was lowered down in an area with swift-ebbing tides with one person holding the net and the other corralling fish into it (Manu et al. 2006). *Hina'i pai kala*, was a method of using a plaited basket as a net. The basket was filled with *limu kala* (seaweed), *kalo* (taro) and pumpkin and then let down for the fish to feed. This process was continued until the fish became plump and accustomed to feeding in the basket, then a "catching net" was lowered down to collect *kala*.

4.4.1.9 Forcepsfish (*Forcipiger flavissimus*)

Ecology

The Forcepsfish has a long black snout, and the head is dark brown to black above and white below. The body is yellow with a black spot on the anal fin. Adults can grow up to 8 inches. This species is widespread throughout the Hawaiian Islands and the tropical waters of the Indo-Pacific area (University of Hawai'i 2016).

The Forcepsfish typically lives along exposed outer reefs containing abundant coral growth, caves, and ledges, and occasionally within lagoon reefs. This species usually occurs in pairs but may also be encountered as solitary animals or in small groups. It feeds on a variety of small animals including hydroids,

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fish eggs, and crustaceans, but prefers tube feet of echinoderms, pedicellaria of sea urchins, and polychaete tentacles (Myers 1991).

Forcepsfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Forcepsfish at the 0-98-foot depth in hardbottom habitat was approximately 435,954 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Forcepsfish at the 30-60-foot depth was approximately 43,999 individuals, and in 2017/2018 was approximately 39,734 (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas and MPAs and has increased significantly in FRAs (DAR 2019a).

Cultural Significance

The Forcepsfish is also known as the *lauwiliwili nuku 'oi'oi*. A review of cultural-historical literature (see Appendix A) did not reveal any additional cultural information related to this species.

4.4.1.10 Spotted Boxfish (Boxfish) (*Ostracion meleagris*)

Ecology

The Spotted Boxfish is Hawai'i's most common boxfish. Juvenile and female Spotted Boxfish are brown to green with white spots while the males have orange bands and spots on the side of the body. They are found throughout the Hawaiian Islands and inhabit clear lagoons and seaward reefs from 3 to 100 feet. Juveniles are often observed among rocky boulders (Myers 1991).

Spotted Boxfish live in small harem groups, usually one male to several females. They forage alone within their home ranges for sponges, worms, mollusks, copepods, and algae. Males defend territories against other males (Myers 1991).

Spotted Boxfish are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Spotted Boxfish at the 0-98-foot depth in hardbottom habitat was approximately 94,937 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Spotted Boxfish at the 30-60-foot depth was approximately 9,322 individuals, and in 2017/2018 was approximately 12,877 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, MPAs, and FRAs (DAR 2019a).

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Cultural Significance

The Spotted Boxfish, commonly known as *pahu*, meaning “box” or moa (a Proto Polynesian word; Pakui and Elbert 1986) were traditionally *kapu* (forbidden) for women to eat (Kent 1986). Titcomb (1972) adds that there was little flesh on this fish and that they were not eaten.

4.4.1.11 Yellowtail Coris (Clown Wrasse) (*Coris gaimard*)

Ecology

Juvenile Yellowtail Coris are bright red with white spots, as individuals mature into females they fade to orange with blue spots and a bright yellow tail. Like other wrasses (Family Labridae) adults may undergo a sex change from female to male. Males are distinguished by a green bar on the side of the body and a dark band on the upper and lower fins and numerous blue spots (University of Hawai'i 2016).

The Yellowtail Coris is a solitary species that is found in mixed coral, sand and rubble of outer reefs, lagoons, and seaward reefs. They feed primarily on mollusks, crabs, and tunicates (Myers 1991). Prominent canine teeth help this fish pick small crustaceans and mollusks from the reef. Active during the day, they take shelter in reef crevices or bury in sand at night (University of Hawai'i 2016).

Distribution ranges are from Western Australia, Cocos – Keelings Islands, Christmas Island in the eastern Indian Ocean, Southern Japan to New South Wales, Lord Howe Island and east to Hawaiian Islands (Randall 2007). Phylogeographic analyses show that the Hawaiian population is genetically distinct from elsewhere in the Pacific (Ahti et al. 2016).

Yellowtail Coris are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Yellowtail Coris at the 0-98-foot depth in hardbottom habitat was approximately 391,507 individuals. WHAP data indicate the 2104 WHRFMA Open Area population of Yellowtail Coris at the 30-60-foot depth was approximately 19,762 individuals, and in 2017/2018 was approximately 18,256 (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

The Yellowtail Coris is also known as the *hinālea 'akilolo*, which were noted for their medicinal value. The word *'akilolo* means “brain biting,” (Pukui and Elbert 1986), and this species was used by *kahuna* (priests) as a *pani*, or closing medicine, for someone suffering from a head sickness or disease. This variety was also a highly favored delicacy for eating because of its sweet taste. It was traditionally “eaten with salt, dried, broiled over coals or wrapped in *ti* leaves and then baked or broiled” (Titcomb 1972). See also Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which include Yellowtail Coris.

4.4.1.12 Milletseed (Lemon) Butterflyfish (*Chaetodon miliaris*)

Ecology

The Milletseed Butterfly fish is endemic to Hawai'i and the most common species of butterflyfish in Hawai'i including the Johnston Atoll (Lobel 2003). The species is named for the seed-sized black specks that are distributed in vertical rows on its lemon-yellow body. Other distinctive features are a black mask through the eye and a black spot near the tail. Adults reach lengths of 6.5 inches (University of Hawai'i 2016).

Habitat for this species includes coastal fringing reefs, lagoons, and outer reefs, with juveniles found on shallow inner reefs from April to June (IUCN 2017). The Milletseed Butterflyfish feeds primarily on zooplankton above the reef, but sometimes cleans other fishes and is also known to feed on nests of damselfish eggs if left unprotected.

Milletseed Butterflyfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Milletseed Butterflyfish at the 0-98-foot depth in hardbottom habitat was approximately 122,588 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Milletseed Butterflyfish at the 30-60-foot depth was approximately 7,085 individuals. However, much of the Milletseed Butterflyfish population occurs below the 60-foot depth surveyed by the WHAP and below the 98-foot depth surveyed by the CREP, and therefore the population is underestimated by both surveys.

Cultural Significance

The name *kīkākapu* is used to describe a number of butterflyfish species and were considered sacred (Titcomb 1972). Fornander (1916) reported the name is used in many chants. The Milletseed Butterflyfish is called *lau wiliwili* or *lauhau wiliwili*, meaning "wiliwili leaf," because its shape is believed to resemble the endemic *wiliwili* tree (*Erythrina sandwicensis*).

4.4.1.13 Kole (Goldring Surgeonfish, Yelloweye, Goldring) (*Ctenochaetus strigosus*)

Ecology

The Kole is endemic to the Hawaiian Islands (Randall and Clements 2001) and Johnston Atoll (Lobel 2003). It is brown with light blue to yellow horizontal stripes over its body which change into spots towards the face. It also has a yellow ring surrounding the eye.

Individuals are usually solitary and mainly found in shallow water, although it has been recorded at depths of 370 feet. This species is herbivorous, grazing on diatoms and algae from the sand or reef (Randall and Clements 2001), and has also been commonly observed to clean algal growths from the shells of sea turtles (Work and Aeby 2014).

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Kole are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Kole at the 0-98-foot depth in hardbottom habitat was approximately 11,697,561 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Kole at the 30-60-foot depth was approximately 3,616,529 individuals and in 2017/2018 was approximately 5,312,745 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

Kole, meaning "raw" or "red" (Pakui and Elbert 1986), are also known as *ukole* or *pākole*. The *kole makaonaona* (specifically, *Ctenochaetus strigosus*), is the more popular eating variety of *Kole*. Pukui (1983) explains that the English word "story" was Hawaiianized to "*kole*," and that this proverbial saying uses *kole* as a metaphor for describing the excitement of getting together to share stories.

Although the *kole* is known as being tough-skinned, it is considered a favorite fish to eat raw. *Kole* was also important for traditional practices and customs relating to the home, as it was believed to *hole*, or strip, the house of unwanted spiritual energy (Titcomb 1972).

4.4.1.14 Pencil Wrasse (*Pseudojuloides cerasinus*)

Ecology

Body color and pigmentation has been shown to vary geographically in the Pencil Wrasse; however, the most common coloration is a salmon pink body with yellowish fins. A blue to yellow double stripe extends from the head to the tail. Adults can grow up to 5 inches (Myers 1991). This species is found throughout Indian and Pacific oceans from east Africa to the Hawaiian Islands.

The Pencil Wrasse is found in clear lagoons, outer reef faces, and coral rubble at depths of 7 to 200 feet. They are also common among live coral and areas with large algae clumps (Myers 1991). When threatened, they will hide among the rubble, bury in the sand, or try to out-swim predators. Pencil Wrasses feed on small, benthic invertebrates, mainly fan worms and small crustaceans that they pluck from the substrate. The Pencil Wrasse is found in areas with abundance of sand and gradual bathymetric relief; typically, north western region of the Big Island (BIAAF pers. comm.).

Pencil Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Pencil Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 169,025 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Pencil Wrasse at the 30-60-foot depth was approximately 19,390 individuals, and in 2017/2018 was approximately 17,182 (DAR 2014a, 2019a). Since the establishment of

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the WHRFMA, this species has remained stable in FRAs and MPAs, and has increased significantly in Open Areas (DAR 2019a).

Cultural Significance

See Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which includes the Pencil Wrasse.

4.4.1.15 Bird Wrasse (*Gomphosus varius*)

Ecology

The Bird Wrasse has an elongated body and is laterally compressed. Adults can reach 12 inches and are easily recognized by their long snout; juveniles lack the snout and are thus difficult to identify. The first third of the body is lightly colored and the posterior is grayish with a dark border. Males tend to be more uniformly colored (Myers 1999).

The Bird Wrasse is commonly found along external slopes, reefs, and lagoons at depths of 6 to 100 feet (Myers 1991). This wrasse feeds mainly on small benthic crustaceans, and sometimes on small fishes, brittle stars, and mollusks. The Bird Wrasse is a sequential hermaphrodite, meaning juveniles develop first into females and then change to males based on external stimuli (Randall et al 1990).

Bird Wrasse are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Bird Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 877,224 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Bird Wrasse at the 30-60-foot depth was approximately 43,254 individuals, and in 2017/2018 was approximately 66,581 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas and has increased significantly in MPAs and FRAs (DAR 2019a).

Cultural Significance

See Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which includes the Bird Wrasse.

4.4.1.16 Blacklip Butterflyfish (Coral Butterflyfish) (*Chaetodon kleinii*)

Ecology

The body of the Blacklip Butterflyfish is yellow/brown with one or two broad lighter vertical bars, one running from the dorsal spine to the belly, and one from the middle of the back to the center of the body. A black bar runs vertically across the eye, the part before this is whitish, with a black snout. The color varies somewhat across its range (Burgess 1978).

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The Blacklip Butterflyfish is found along rocky reefs and coral-rich areas of lagoons, channels, and outer reef slopes at depths of 6-200 feet. This species is mostly solitary but has been observed in pairs, and occasionally in large groups of up to about 30 individuals, sometimes high in the water column. It is a facultative corallivore, feeding on hard and soft corals, as well as algae, hydroids, and zooplankton (Myers 1991). Distinct pairing has been observed during breeding (Breder and Rosen 1966). Its range includes the east coast of Africa to the Hawaiian Islands and South Wales (Randall 2007).

Blacklip Butterflyfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Blacklip Butterflyfish at the 0-98-foot depth in hardbottom habitat was approximately 131,260 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Blacklip Butterflyfish at the 30-60-foot depth was approximately 5,593 individuals, and in 2017/2018 was approximately 39,734 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas and FRAs and has remained stable in MPAs (DAR 2019a).

Cultural Significance

The Blacklip Butterflyfish is a member of the butterflyfish genus, which were sometimes eaten, but more commonly caught and used for certain rituals and ceremonies. The Blacklip Butterflyfish, along with Tinker's Butterflyfish, were commonly referred to as *kīkākapu*, *kapuhili*, *lauhau*, or *lauwiliwili*. The term *kapuhili* translates as "...many taboos inherited from chiefly ancestors or from the gods; person with many taboos" (Elbert and Pukui 1986). The name *kīkākapu* is used to describe a variety of butterflyfish species which were considered sacred (Titcomb 1972). Fornander (1916) reported the name is used in many chants.

4.4.1.17 Potter's Angelfish (*Centropyge potteri*)

Ecology

The bright orange and blue Potter's Angelfish is an endemic species found along Hawaiian reefs and the Johnston Atoll (Lobel 2003). Like other angelfishes, this species is recognized by a heavy, curved spine on its "cheek" near the edge of the gill cover. However, because it generally only reaches approximately 5 inches, it is considered a 'pygmy' angelfish. Its slender, disc-shaped body is well-suited to life on a coral reef.

Individuals limit their movements to a well-defined area close to the shelter of finger coral branches, usually at depths of at least 15 feet. Active by day, it feeds on algae and detritus on dead coral surfaces. At night, it remains alert but inactive, protected within the coral. Angelfishes are very dependent upon the protection of coral caves and crevices and are rarely seen over sandy stretches or other areas that offer little cover. They are often territorial and spend most of their time near the bottom in search of food. They have small mouths and many flexible, comb-like teeth used for plucking or scraping food from the rocks (University of Hawai'i 2016).

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Peak reproductive activity occurs from mid-December through May. They spawn at dusk during the week before full moon (Allen 1985a). Among angelfishes, a sex reversal from female to male can be part of the life history. Most small individuals are female and larger, more colorful individuals are male. Larger, brighter males are usually accompanied by smaller, drabber females, forming a harem. A dominant female Potter's Angelfish changes sex to become the harem master if the male is removed (University of Hawai'i 2016).

Potter's Angelfish are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Potter's Angelfish at the 0-98-foot depth in hardbottom habitat was approximately 1,087,709 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Potter's Angelfish at the 30-60-foot depth was approximately 237,149 individuals, and in 2017/2018 was approximately 265,488 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

The Potter's Angelfish is named after Frederick A. Potter, who was the first Director of the Honolulu Aquarium. The species is endemic, but a review of cultural-historical literature (see Appendix A) did not reveal any specific Hawaiian names or any specific cultural information related to this species.

4.4.1.18 Ornate Wrasse (Pinkface) (*Halichoeres ornatissimus*)

Ecology

This small wrasse has a pinkish head that is marked with horizontal green lines. The throat and belly are blue; scales on the sides are marked by a vertical, crescent-shaped stripe followed by blue. The dorsal fin is dark red with green spots and is traced by green and blue lines. A large dark spot on the dorsal fin and one just behind the eye are common identifiers. Males usually have more intense coloration than females (University of Hawai'i 2016). The Ornate Wrasse range extends from the Philippines to the Great Barrier Reef, New Caledonia, and east to the Hawaiian Islands (Randall 2007).

The Ornate Wrasse has an elongate soft body that is tapered and spindle-shaped. The dorsal fin is continuous, rounded, and soft. The pectoral fins are used extensively for swimming with up and down motions. The snout has a pointed mouth, fleshy lips, and canine teeth used in plucking small crustaceans and mollusks from the reef. Special bones in the gill area called pharyngeal bones help the wrasse crush the shells of their prey. The Ornate Wrasse is diurnal, feeding during the day, and sheltering in reef crevices or burying in sand patches at night. The Ornate Wrasse, like others within this family (Labridae) undergo sex changes as they develop (University of Hawai'i 2016).

Ornate Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

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CREP (2018) data indicate that the 2016 island of Hawai'i population of Ornate Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 1,630,224 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Ornate Wrasse at the 30-60-foot depth was approximately 192,404 individuals, and in 2017/2018 was approximately 196,879 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has significantly declined in Open Areas and FRAs and has increased significantly in MPAs (DAR 2019a).

Cultural Significance

The Ornate Wrasse is also referred to as *lā'ō* (Titcomb 1972). A review of cultural-historical literature (see Appendix A) did not reveal any additional cultural information for the Ornate Wrasse.

4.4.1.19 Black Durgon (*Melichthys niger*)

Ecology

The Black Durgon is a triggerfish with bright white lines running along its dorsal and anal fins. The body is mottled dark blue or green with an orange head (Hoover 2008).

The habitat preference of the Black Durgon includes open waters and shallow exposed reefs at water depths of 15 to 115 feet. The diet consists primarily of calcareous algae and zooplankton. A study conducted in the Fernando de Noronha Archipelago showed the feces and vomit of Spinner dolphins (*Stenella longirostris*) formed part of the diet of Black Durgon. The study showed individuals could discern the postures dolphins assumed prior to voiding and would position themselves for effective feeding (Sazima et al. 2003). The Black Durgon has a circumtropical distribution (Randall 2007).

The Black Durgon produce demersal eggs that may or may not be tended by a parent, usually the female. Unlike most other families of reef fishes, the balistids (i.e., triggerfish) exhibit extensive maternal care of eggs. Eggs are typically deposited in shallow pits excavated by the parents as an adhesive egg mass containing bits of sand and rubble. Triggerfish eggs hatch in as little as 12 hours and no more than 24 hours (WPRFMC 2005).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Black Durgon at the 0-98-foot depth in hardbottom habitat was approximately 1,354,454 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Black Durgon at the 30-60-foot depth was approximately 38,033 individuals, and in 2017/2018 was approximately 92,354 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

The *humuhumu*, meaning "to sew, stitch," is a general name used to refer to many different varieties of trigger fish, including, but not limited to, the *humuhumu 'ele'ele* or the Black Durgon (Titcomb 1972). The species was historically eaten, using a variety of methods, and with varying reports on its tastiness or

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popularity. If *humuhumu* were caught in large numbers, then the remains, particularly the head, would be tossed into the fire to help keep the fire burning because of its oils.

Titcomb (1972) documents a gathering method for these fish that involved lowering a basket with cooked pumpkins or sweet potatoes as bait onto a school of fish. While the fish attacked the bait in a frenzy the basket would be hoisted up and the fish caught.

4.4.1.20 Gilded Triggerfish (Bluethroat Triggerfish) (*Xanthichthys auromarginatus*)

Ecology

The Gilded Triggerfish is found throughout the Indian and Pacific oceans from east Africa to the Hawaiian Islands. The female Gilded Triggerfish lacks the blue patch on the throat and yellow tail of the male. Both sexes have a blue ring around the eye and a lavender/gray blue body with gray to white spots that make a linear pattern. Adults can grow up to 12 inches.

This species is found along drop-offs and ledges at water depths of 75 to 480 feet. This species prefers current-swept areas with abundant invertebrate growth. Small groups have been observed at 10-20 feet above the bottom feeding on zooplankton, specifically copepods (Breder and Rosen 1966).

The Gilded Triggerfish produce demersal eggs that may or may not be tended by a parent, usually the female. Unlike most other families of reef fishes, the balistids (i.e., triggerfish) exhibit extensive maternal care of eggs. Eggs are typically deposited in shallow pits excavated by the parents as an adhesive egg mass containing bits of sand and rubble. Triggerfish eggs hatch in as little as 12 hours and no more than 24 hours (WPRFMC 2005).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Gilded Triggerfish at the 0-98-foot depth in hardbottom habitat was approximately 129,089 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Gilded Triggerfish at the 30-60-foot depth was approximately 11,186 individuals, and in 2017/2018 was approximately 3,222 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has decreased significantly in Open Areas, MPAs, and FRAs (DAR 2019a).

Cultural Significance

The Gilded Triggerfish is a species of *humuhumu*. See Section 4.4.1.19 for a discussion of the cultural significance.

4.4.1.21 Lei Triggerfish (*Sufflamen bursa*)

Ecology

The Lei Triggerfish is found throughout the Indian and Pacific oceans from east Africa to the Hawaiian Islands. This species is also known as the boomerang triggerfish for the characteristic V-shaped mark behind the eye which is yellow-orange or brown-green. Adults can grow up to 9.5 inches.

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This species is common on clear inner and outer reefs and drop-offs from 10 to 300 feet, where they feed on crabs, bivalves, gastropods, algae, echinoids, tunicates, worms, eggs, and detritus. Lei Triggerfish have been shown to form distinct pairing during breeding (Breder and Rosen 1966).

The Lei Triggerfish produce demersal eggs that may or may not be tended by a parent, usually the female. Unlike most other families of reef fishes, the balistids (i.e., triggerfish) exhibit extensive maternal care of eggs. Eggs are typically deposited in shallow pits excavated by the parents as an adhesive egg mass containing bits of sand and rubble. Triggerfish eggs hatch in as little as 12 hours and no more than 24 hours (WPRFMC 2005).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Lei Triggerfish at the 0-98-foot depth in hardbottom habitat was approximately 1,299,027 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Lei Triggerfish at the 30-60-foot depth was approximately 76,440 individuals, and in 2017/2018 was approximately 92,354 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas and FRAs and has increased significantly in MPAs (DAR 2019a).

Cultural Significance

The *humuhumu lei* or *humuhumu umaumalei*, or the Lei Triggerfish (Titcomb 1972) is a species of *humuhumu*. See Section 4.4.1.19 for a discussion of the cultural significance.

4.4.1.22 (Forster's) Blackside Hawkfish (*Paracirrhites forsteri*)

Ecology

The Blackside Hawkfish is yellow with a broad black or dark brown lateral band on the rear half of the body. The sides of the head and the front of the body are whitish or grey, with red speckles but there is considerable color variation among adults (Randall 1986). Geographical differences in color have also been recorded in juveniles (Myers 1999). This species ranges throughout the Indian and Pacific oceans. Adults can grow up to 8 inches.

The Blackside Hawkfish is commonly found in clear lagoons or seaward reefs at a depth of 15 to 115 feet (Lieske and Myers 1994). To hunt, the hawkfish perches on branches of coral and ambushes small fish, crustaceans, and shrimp. This species is a sequential hermaphrodite, meaning juveniles develop into females and then change to males based on external stimuli (Myers 1999).

Blackside Hawkfish are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Blackside Hawkfish at the 0-98-foot depth in hardbottom habitat was approximately 246,727 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Blackside Hawkfish at the 30-60-foot depth was approximately 20,508 individuals, and in 2017/2018 was approximately 23,625 individuals (DAR 2014a, 2019a). Since the

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establishment of the WHRFMA, this species has remained stable in MPAs and FRAs, and has decreased significantly in Open Areas (DAR 2019a).

Cultural Significance

The Blackside Hawkfish is known by many names, including *hilu*, *'ele'ele*, *lauwili*, *melemele*, *moelola*, *pano*, *pāni'o*, *piliko'a*, *'ula* and *uli*, but is most commonly referred to as *hilu* (Pukui and Elbert 1986). Considered an “excellent eating” fish, *hilu* was traditionally either eaten raw, dried or salted and baked or broiled (Malo 1951). Because of the quiet demeanor of the species, it was associated with quiet children or ladylike behavior (Titcomb 1972; Handy and Pukui 1998).

4.4.1.23 Thompson's Surgeonfish (*Acanthurus thompsoni*)

Ecology

The body of the Thompson's Surgeonfish is uniformly black to dark brown. The caudal fin is pale with a small dark spot below the pectoral fin. This species ranges throughout the Indian and Pacific Oceans.

This species inhabits steep outer reef slopes and drop-offs of 16 to 230 feet deep. Thompson's Surgeonfish have been observed schooling in groups feeding on zooplankton, fish eggs and crustaceans (Randall 1956).

Thompson's Surgeonfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Thompson's Surgeonfish at the 0-98-foot depth in hardbottom habitat was approximately 405,776 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Thompson's Surgeonfish at the 30-60-foot depth was approximately 91,728 individuals, and in 2017/2018 was approximately 271,693 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, FRAs, and MPAs (DAR 2019a).

Cultural Significance

The Thompson's Surgeonfish is a species of *Kala* (Pukui and Elbert 1986). See Section 4.4.1.8 for more information on *kala*.

4.4.1.24 Pyramid Butterflyfish (*Hemitaurichthys polylepis*)

Ecology

The Pyramid Butterflyfish has a dark brown-yellow area that fully masks the head and extends to a line from the first rays of the dorsal fin to the start of the pelvic fins. The rest of its body is white. Large yellow-orange areas at the top of the side form a characteristic pyramidal pattern, giving this species its name.

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This species is found throughout the tropical and subtropical waters of the Indian and Pacific oceans (Myers 1999).

This fish aggregates in large schools in open water at the edges of steep outer reef slopes at depths of 10 to 200 feet (Lieske and Myers 1994). The Pyramid Butterflyfish feeds mostly on plankton and forms pairs during breeding (Breder and Rosen 1966).

Pyramid Butterflyfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Pyramid Butterflyfish at the 0-98-foot depth in hardbottom habitat was approximately 23,217 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Pyramid Butterflyfish at the 30-60-foot depth was approximately 56,677 individuals, and in 2017/2018 was approximately 37,586 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has decreased significantly in Open Areas and MPAs and has remained stable in FRAs (DAR 2019a).

Cultural Significance

Butterflyfish, while sometimes eaten, appear to have been more commonly caught and used for certain rituals and ceremonies. The Pyramid Butterflyfish, along with other species of butterflyfish, were known as *kapuhili*, which translates as "...many taboos inherited from chiefly ancestors or from the gods; person with many taboos" (Elbert and Pukui 1986, as cited in Appendix A).

4.4.1.25 Multiband (Pebbled) Butterflyfish (*Chaetodon multicinctus*)

Ecology

The Multiband Butterflyfish is endemic to the Hawaiian Islands and Johnston Atoll (Lobel 2003). The body is white with five or six brown vertical bands. A dark vertical bar runs along the eye and a black band along the tail fin. The distinguishing feature is an overall covering of small spots which create a pattern of horizontal and vertical lines along the body.

The Multiband Butterflyfish inhabits heavy coral areas of lagoon and seaward reefs at depths of 15 to 100 feet. This species mainly feeds on the polyps of small corals but also supplement their diet with worms, shrimps, hydroids, and algae fragments. This species is often seen in monogamous pairs and defending an established territory (Breder and Rosen 1966).

Multiband Butterflyfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

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CREP (2018) data indicate that the 2016 island of Hawai'i population of Multiband Butterflyfish at the 0-98-foot depth in hardbottom habitat was approximately 1,788,604 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Multiband Butterflyfish at the 30-60-foot depth was approximately 580,196 individuals, and in 2017/2018 was approximately 378,843 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species declined significantly in Open Areas, FRAs, and MPAs (DAR 2019a).

Cultural Significance

The name *kīkākāpu* is used to describe a number of butterflyfish species and were considered sacred (Titcomb 1972). See also Section 4.4.1.16 for a discussion of the cultural significance of *kīkākāpu*, which includes the Multiband Butterflyfish.

4.4.1.26 Hawaiian Dascyllus (Domino) (*Dascyllus albisella*)

Ecology

The Hawaiian Dascyllus is endemic to shallow, protected coral reefs around the Hawaiian Islands and Johnston Atoll (Lobel 2003). The center of the body is pale white, and the edges are dark gray to black.

This species feeds on zooplankton, invertebrates, and algae at water depths of 3 to 160 feet. Adults are most often observed in protected areas of shallow water with coral or rocky bottoms (Lieske and Myers 1994). Breeding occurs in pairs with eggs deposited in substrate and the males guarding and aerating (Breder and Rosen 1966).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Hawaiian Dascyllus at the 0-98-foot depth in hardbottom habitat was approximately 225,153 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Hawaiian Dascyllus at the 30-60-foot depth was approximately 57,796 individuals, and in 2017/2018 was approximately 63,359 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas and MPAs and has increased significantly in FRAs (DAR 2019a).

Cultural Significance

The Hawaiian Dascyllus is also known as the *'ālo'ilo'i*. The young stages of the fish are called *'a*, or *'a'a* and also referred to as "*'a'akimakau* (bait nibbling) which "is a term for a variety or perhaps an alternative name" (Malo 1951). The *'ālo'ilo'i* is referenced in the *'ōlelo no'eau*, "*he 'ālo'ilo'i, ka i'a waha iki o ke kai*," literally translated as "an *'ālo'ilo'i*, a fish of the sea that has a small mouth" (Pukui 1983). Pukui (1983) relates that this was "said of one who always has little to say." *'Ālo'ilo'i* were considered "a tasty fish," and were preferred "eaten raw or cooked on hot ashes" (Titcomb 1972). A method of collecting *'ālo'ilo'i* for consumption was the *kūkulu 'upena*, or a standing net, which was cast from shore.

4.4.1.27 Saddle Wrasse (*Thalassoma duperrey*)

Ecology

The Saddle Wrasse is a common and endemic reef fish of Hawai'i and Johnston Atoll (Lobel 2003). It is found at depths ranging from 16 to 98 feet. This species has a blue head, green body with a prominent red saddle and purple highlights around the edges of the fins (University of Hawai'i 2016).

This species is commonly observed alone, in pairs, or in small groups close to the reef where they forage for small crustaceans, mollusks, worms, urchins, and brittlestars. Canine teeth are used to pick these invertebrates from the reef. Most individuals begin life as females, when older they show the typical blue, red, and green pattern. Females that change to males, which is common in the wrasse family (Labridae) and have a white bar behind the red saddle. These sex-changed males are called "terminal phase" males and become dominant territory holders that maintain a harem of females (University of Hawai'i 2016).

Saddle Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Saddle Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 6,396,052 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Saddle Wrasse at the 30-60-foot depth was approximately 537,688 individuals, and in 2017/2018 was approximately 140,947 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has declined significantly in Open Areas and FRAs and has remained stable in MPAs (DAR 2019a).

Cultural Significance

The Saddle Wrasse is also known as *hinālea lauwili*, which is believed to have been named in reference to the *wiliwili* tree which has bright orange flowers. The species is often mentioned in *mo'olelo* (stories) and is referenced in traditional fishing practices as well. The fish was historically eaten, though the hard scales on the fish meant that it was usually skinned, and it was often eaten raw. See also Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which include the Saddle Wrasse.

4.4.1.28 Redbarred Hawkfish (*Cirrhitops fasciatus*)

Ecology

The Redbarred Hawkfish is found throughout the Hawaiian Islands and Indo-Pacific oceans in a variety of reef habitats at depths of 3 to 170 feet. Primary habitats include seaward reefs and areas with abundant coral growth (Lieske and Myers 1994). Bright red bands and speckles are found on the body, adults grow to 5 inches. This species feeds primarily on small fish, shrimp, and crab and occasionally on zooplankton (Randall 1985). The name hawkfish comes from their habit of "swooping" down on prey or invaders from "perches".

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Redbarred Hawkfish are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Redbarred Hawkfish at the 0-98-foot depth in hardbottom habitat was approximately 231,580 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Redbarred Hawkfish at the 30-60-foot depth was approximately 9,665 individuals, and in 2017/2018 was approximately 6,443 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, FRAs, and MPAs (DAR 2019a).

Cultural Significance

The Redbarred Hawkfish is also known as *piliko'a*, which means "clinging to coral" (Titcomb 1972). A review of cultural-historical literature (see Appendix A) did not reveal any additional cultural information for the Redbarred Hawkfish.

4.4.1.29 Eightline Wrasse (*Pseudocheilinus octotaenia*)

Ecology

The Eightline Wrasse is widespread from east Africa to the Hawaiian Islands. This species has variable color patterns from yellowish/orange to a pink/reddish body. The distinguishing feature of this species are the eight horizontal stripes, ranging from orange to a maroon red. They have a pointed head and mouth which enable them to feed on coral reef invertebrates such as, mollusks, sea urchins, fish eggs, and crab larvae (Myers 1991, 1999).

The Eightline Wrasse inhabits corals and seaward reefs at depths of 6 to 164 feet (Myers 1991) and forms distinct mating pairs (Breder and Rosen 1966). This species is diurnal, feeding during the day and resting at night.

Eightline Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Eightline Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 689,221 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Eightline Wrasse at the 30-60-foot depth was approximately 187,557 individuals, and in 2017/2018 was approximately 187,930 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has declined significantly in Open Areas, FRAs, and MPAs (DAR 2019a).

Cultural Significance

See Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which include the Eightline Wrasse.

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4.4.1.30 Fourline Wrasse (*Pseudocheilinus tetrataenia*)

Ecology

The Fourline Wrasse is found in the tropical waters of the north and south Pacific. This species has a green body with blue and purple fins and four horizontal stripes that run across the upper half of the body. Each stripe is made up of three smaller stripes: one black, one blue and one red stripe. The eye is red with two white lines on it.

This species is secretive and inhabits seaward reefs, among coral or rubble at depths of 20 to 144 feet. This species uses the small heads of live coral to hide from predators (Myers 1991) and is thought to mainly feed on demersal eggs, copepods, amphipods, alpheid shrimp, crabs, larval shrimp, and gastropods (Myers 1999). The Fourline Wrasse forms distinct pairing during breeding (Breder and Rosen 1966).

Fourline Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Fourline Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 1,253,164 individuals. WHAP data indicate the 2104 WHRFMA Open Area population of Fourline Wrasse at the 30-60-foot depth was approximately 327,758 individuals, and in 2017/2018 was approximately 227,663 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas and FRAs and has decreased significantly in MPAs (DAR 2019a). Due to this species' secretive behavior, visual counts usually underestimate its numbers,

Cultural Significance

See Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which includes the Fourline Wrasse.

4.4.1.31 Brown Surgeonfish (Lavender, Forktail Tang) (*Acanthurus nigrofuscus*)

Ecology

The Brown Surgeonfish is one of the 10 most collected aquarium fish in West Hawai'i (DAR 2018a). This species is common throughout the Indo-Pacific oceans and is one of the most abundant surgeon fishes (Randall 2002). It is a small but aggressive fish with bluish gray vertical stripes along the body. The pectoral fins are pale with the upper edge narrow and black; pelvic fins are brown. Lips blackish brown, and the dorsal fin base has a prominent black spot larger than 1/2 the eye diameter; a smaller spot is present on base of the anal fin.

The Brown Surgeonfish is often found on hard substrates of lagoons and seaward reefs at depths of 6 to 82 feet (Domeier and Colin 1997) where it feeds exclusively on filamentous algae. Adults are usually observed in small groups but can also form large schools in open water. Juveniles are often associated with mixed species aggregations (Kuitert and Tonzuka 2001) and forms large spawning groups of up to

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several thousand individuals (Domeier and Colin 1997). Phylogeographic analyses reveal that the Hawaiian population is genetically connected to other locations in the Central Pacific, comprising a very large management unit in terms of both geography and numbers of individuals (Eble et al. 2011).

Brown Surgeonfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Brown Surgeonfish at the 0-98-foot depth in hardbottom habitat was approximately 14,439,543 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Brown Surgeonfish at the 30-60-foot depth was approximately 1,646,996 individuals, and in 2017/2018 was approximately 2,980,402 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas, FRAs, and MPAs (DAR 2019a).

Cultural Significance

The Brown Surgeonfish is also known as the *mā'i'i*. The name *mā'i'i* is also applied to a taro variety (*Colocasia* spp.) and has sometimes been used to refer to other species of surgeonfish (Pukui and Elbert 1986). Traditionally, the *mā'i'i* was considered a good eating fish that could be eaten both raw and cooked but was best when broiled (Titcomb 1972).

4.4.1.32 Hawaiian Whitespotted Toby (Puffer) (*Canthigaster jactator*)

Ecology

The Hawaiian Whitespotted Toby is endemic to Hawai'i and the Johnston Atoll (Lobel 2003). This species belongs to the pufferfish family (Tetraodontidae) and reaches lengths of 4 inches. The body is brown with white spots, the eye is green.

Hawaiian Whitespotted Toby are common in lagoon and seaward reefs at depth of 3 to 290 feet (Mundy 2005). This species has also been found to utilize man-made structures (Brock 1981) and has been shown to feed on sponges, algae, detritus, tunicates, polychaetas, bryozoans, sea urchins, brittle stars, crabs, peanut worms, shrimps, zoanths, fishes, amphipods and foraminiferans (Randall 1985). It often is afflicted with parasitic worms (nematodes), causing it to become inflated (Deardorff and Stanton 1983).

Breeding behavior has not been documented for the Hawaiian Whitespotted Toby; however, the eastern pacific white-spotted toby (*Canthigaster punctatissima*) has been found to be sexually dimorphic. It is likely that the toby's breeding behavior is similar. Males and females guard their territories against others of the same sex. Male areas include the smaller territories of multiple females. Males mate with a female from their harem one at a time.

The Hawaiian Whitespotted Toby is a broadcast spawner, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

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CREP (2018) data indicate that the 2016 island of Hawai'i population of Hawaiian Whitespotted Toby at the 0-98-foot depth in hardbottom habitat was approximately 685,517 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Hawaiian Whitespotted Toby at the 30-60-foot depth was approximately 250,573 individuals, and in 2017/2018 was approximately 249,141 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has decreased significantly in Open Areas and MPAs and has remained stable in FRAs (DAR 2019a).

Cultural Significance

The Hawaiian Whitespotted Toby is one of three endemic pufferfish that inhabit Hawai'i's waters (Hoover 2007). The common name "Toby" originated in Australia. A review of cultural-historical literature (see Appendix A) did not reveal any specific Hawaiian names or cultural information related to the Hawaiian Whitespotted Toby; however, tobies are sometimes referred to generally as *makimaki* (Hoover 2007). Other names traditionally used for pufferfish include *ʻoʻopu hue*, possibly an alteration of *ōpūhue* (calabash, gourd), and *kēkē* (potbelly).

4.4.1.33 Bluestripe Snapper (Taape) (*Lutjanus kasmira*)

Ecology

The Bluestripe Snapper is an introduced species in Hawai'i. It has a bright yellow body and fins with four horizontal blue stripes. The yellow fades to white in the lower third of the body. The body is moderately compressed laterally, with an average length of 13.5 inches (Allen 1985b). This species is found throughout the Indo-Pacific oceans.

The Bluestripe Snapper inhabits shallow-water reefs (100 to 500 feet) where it feeds on shrimp, cephalopods, gastropods, crabs, and small fish. This species also utilizes artificial structures in shallow bays throughout its range. Juveniles have been found to use seagrass beds until reaching maturity (Lieske and Myers 1994). The introduction of this fish into Hawai'i included at least one non-native parasite that has spread to local fishes (Gaither et al. 2013).

Bluestripe Snapper are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Allen 1985b, Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Bluestripe Snapper at the 0-98-foot depth in hardbottom habitat was approximately 7,092,851 individuals. However, this is a low estimate because much of the Bluestripe Snapper population occurs below the 98-foot depth surveyed by the CREP (2018) and is not observable by the methods of the survey. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Bluestripe Snapper at the 30-60-foot depth was approximately 7,830 individuals, and in 2017/2018 was approximately 33,290 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas and FRAs and remained stable in MPAs (DAR 2019a). The large difference in these estimates results from the larger survey area of the CREP survey which samples more of the population.

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Cultural Significance

Introduced initially from the Marquesas to the Hawaiian Islands in 1958 for commercial fishing purposes, the Bluestripe Snapper, more commonly known by its Tahitian name *ta'ape*, has not fared well in Hawai'i's fish consumer market. These fish, which tend to school in great numbers, are often regarded by local fishermen as a pest. Given that it arrived in Hawaiian waters so recently, there are currently no known Hawaiian names for this fish or any traditional cultural uses.

4.4.1.34 Peacock Grouper (Roi, Bluespot Peacock Grouper) (*Cephalopholis argus*)

Ecology

The Peacock Grouper is widely distributed throughout the Indo-Pacific oceans and has been introduced to the Hawaiian Islands. Individuals can reach a length of up to 24 inches and are identified by white vertical stripes on the back half of a brown colored body. Peacock Grouper was thought to present a risk to native species of Hawai'i (Dierking 2007). However, a recently completed 5.5-year study found that removal of the Peacock Grouper did not translate into sustained increases in prey, nor to increases in total fish biomass (Giddens et al. 2017).

This Peacock Grouper prefers exposed reef front habitats with a water depth of 3 to 30 feet, while juveniles utilize thick pockets of coral (Myers 1999). Individuals use a variety of hunting techniques to capture prey. They may hover and wait, stalk prey, and follow larger predators such as eels and attack missed prey (Hoover 2008). Dierking et al. (2009) found reef fishes were the principal diet component (97.7% by % Index of Relative Importance [IRI]) of Peacock Grouper, with all 10 of the most abundant species on West Hawai'i reefs found in the stomachs of Peacock Grouper. Some fishes that were rare in the reef environment in West Hawai'i were found to be important components of the diet, while others, although highly abundant on West Hawai'i reefs, had low dietary importance. Crustaceans were the only other higher taxonomic group in the diet but were of minor importance (2.3% by %IRI) (Dierking et al. 2009).

Peacock Grouper are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984). Males defend territories and their harem of up to six females from other males.

CREP (2018) data indicate that the 2016 island of Hawai'i population of Peacock Grouper at the 0-98-foot depth in hardbottom habitat was approximately 476,556 individuals. WHAP data indicate the 2012/2013 WHRFMA Open Area population of Peacock Grouper at the 30-60-foot depth was approximately 24,610 individuals, and in 2017/2018 was approximately 51,546 individuals (DAR 2014a, 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, FRAs, and MPAs (DAR 2019a).

Cultural Significance

The Peacock Grouper, more commonly known as the roi, and was introduced to Hawai'i from French Polynesia in 1956 to enhance the local fisheries. Because this species was so recently introduced to

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Hawaiian waters, a review of cultural-historical literature (see Appendix A) did not reveal any specific Hawaiian names or cultural information related to it.

4.4.1.35 Psychedelic Wrasse (*Anampses chrysocephalus*)

Ecology

The Psychedelic Wrasse is endemic to the Hawaiian Islands and is found among seaweed coral reefs at depths from 40 to 450 feet (Lieske and Myers 1994). This species is dark brown with white spots and a red tail. However, like others in the wrasse family, as the females mature they undergo a color and sexual transition to the “terminal phase” male. These males have a bright orange head covered in blue spots and radiating lines. Psychedelic Wrasse terminal phase males are usually only found in depths greater than 50 feet (DLNR 2015). The main prey for the Psychedelic Wrasse are macro-invertebrates found among the rocks and corals it inhabits. Females usually form small groups with a single male (Lieske and Myers 1994).

Psychedelic Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Psychedelic Wrasse at the 0-98-foot depth in hardbottom habitat was approximately 36,770 individuals. However, the Psychedelic Wrasse occupies habitat below the 98-foot depth surveyed by the CREP (2018) study. As such, this is likely a low estimate, because much of the population is not observable by the methods of the study. WHAP estimated a population size of 1,071 in 2017/2018 but noted that this is a deeper water species that is only occasionally recorded on surveys, and thus the population is underestimated (DAR 2019a). Since the establishment of the WHRFMA, this species has remained stable in Open Areas, FRAs, and MPAs (DAR 2019a).

The Psychedelic Wrasse is a DLNR SGCN (Section 4.4.3), but is considered a species of ‘Least Concern’ by the International Union for the Conservation of Nature and Natural Resources (IUCN; 2017).

Cultural Significance

See Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which includes the Psychedelic Wrasse.

4.4.1.36 Tinker's Butterflyfish (*Chaetodon tinker*)

Ecology

The Tinker's butterflyfish is identified by a gold mask over the eye, with a diagonal demarcation separating a white lower/front part of the body and head from a black upper rear portion. Tinker's Butterflyfish is found from Hawai'i Island through O'ahu (DLNR 2015), and the Johnston Atoll to the Marshall Islands (Lobel 2003). Tinker's Butterflyfish can be found at least as deep as 400 feet on O'ahu and Hawai'i (Richard Pyle, Bernice Pauahi Bishop Museum, pers. comm.) on coral reef slopes. Common prey species for Tinker's Butterflyfish include small invertebrates, crabs, and worms (Pyle 2001).

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Tinker's Butterflyfish are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Tinker's Butterflyfish at the 0-98-foot depth in hardbottom habitat was approximately 18,475 individuals. However, the vast majority of the population occurs well below the 98-foot depth surveyed by the CREP and is not observable by the methods of the survey. WHAP could not produce estimates of this species because the species occurs in habitats not adequately surveyed by WHAP transects (DAR 2014a, 2019a).

The Tinker's Butterflyfish is a DLNR SGCN (Section 4.4.3) but is considered a species of 'Least Concern' by the IUCN (2017).

Cultural Significance

See Section 4.4.1.16 for a discussion of the cultural significance of *kīkākāpu*, which includes the Tinker's Butterflyfish.

4.4.1.37 Longfin Anthias (*Pseudanthias hawaiiensis*)

Ecology

The Longfin Anthias can grow up to 4 inches and is bright yellow to orange with red and purple along the fins. It is endemic to Hawai'i and the Johnston Atoll (Lobel 2003) and is found in caves or coral rubble along steep drop-offs from 85 to 400 feet deep (Randall 2007). This species feeds primarily on larvae of crustaceans and fish eggs (Bachhet et al. 2006).

Longfin Anthias are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

Most of the Longfin Anthias population occurs below the 98-foot depth surveyed by the CREP and the 60-foot depth surveyed by the WHAP, and therefore the species is not observable by the methods of either survey. As such, data are not available to produce a reliable WHRFMA or island-wide population estimate.

Cultural Significance

Although endemic to the islands, a review of cultural-historical literature (see Appendix A) did not reveal any specific Hawaiian names or cultural information for the Longfin Anthias.

4.4.1.38 Flame Wrasse (*Cirrhilabrus jordan*)

Ecology

The Flame Wrasse is endemic to the Hawaiian Islands and the Johnston Atoll (Lobel 2003, Lieske and Myers 1994). Females are bright red on the dorsal part of the body fading to a light pink on the ventral

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side. The fins are opaque with some yellow features on the face. Females grow to about 3 inches before they begin to transform into a male. As the male matures the dorsal remains bright red fading into a vibrant yellow orange.

The Flame Wrasse utilizes seaward reefs and forms groups above large drop-offs at a depth of 15 to 600 feet, where it feeds exclusively on zooplankton along the ocean floor (Lieske and Myers 1994). Prime Flame Wrasse habitat became an FRA when Act 306 was implemented (BIAAF, pers. comm.). During breeding males and females form pairs for mating (Breder and Rosen 1966).

Flame Wrasse are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

Most of the Flame Wrasse population occurs below the 60-foot depth surveyed by the WHAP and below the 98-foot depth surveyed by the CREP, and therefore the species is not observable by the methods of either survey. As such, data are not available to produce a reliable WHRFMA or island-wide population estimate.

Cultural Significance

See Section 4.4.1.4 for a discussion of the cultural significance of *hinālea*, which includes the Flame Wrasse.

4.4.1.39 Fisher's Angelfish (*Centropyge fisheri*)

Ecology

The Fisher's Angelfish is mostly orange with a thin blue outline highlighting the belly and anal fin, the caudal fin is pale yellow. Adults attain a length of only 2 inches. This angelfish is found throughout Hawai'i and the Johnston Atoll (Lobel 2003). Small groups have been observed feeding on algae and small shrimp associated with coral along outer reef slopes at depths between 10 and 200 feet (Pyle 2001). This species is hermaphroditic and changes sex as it matures. It is distributed from the east coast of Africa to the islands of French Polynesia and Hawaiian Islands and in the western Pacific from southern Japan to New South Wales (Randall 2007).

Fisher's Angelfish are broadcast spawners, with males and females simultaneously releasing eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Fisher's Angelfish at the 0-98-foot depth in hardbottom habitat was approximately 666,209 individuals. WHAP estimated the Open Area population of this species in 2017/2018 at 59,064 individuals but noted that the species typically occurs at deeper depths, and is only occasionally encountered during surveys, and the population is thus underestimated (DAR 2019a). Since the establishment of the WHRFMA, this species has increased significantly in Open Areas and remained stable in FRAs and MPAs (DAR 2019a)

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The Fisher's Angelfish is a DLNR SGCN (Section 4.4.3) but is considered a species of 'Least Concern' by the IUCN (2017).

Cultural Significance

A review of cultural-historical literature (see Appendix A) did not reveal any specific Hawaiian names or cultural information for the Fisher's Angelfish.

4.4.1.40 Eyestripe Surgeonfish (Palani) (*Acanthurus dussumieri*)

Ecology

The Eyestripe Surgeonfish is found throughout the Indo-Pacific region. This large surgeon fish can reach lengths of 21 inches with a body that is mostly yellow with purple highlights. A characteristic bright yellow band goes behind each eye to the gill cover (Myers 1991). The tail is blue to dark purple.

The Eyestripe Surgeonfish feeds on both green and brown algae and detritus from the ocean floor (Myers 1991), and are commonly found along clear corals, lagoons, and outer reefs at depths of 13 to 430 feet. Adults are usually observed alone and pair only for mating (Myers 1999).

Eyestripe Surgeonfish are broadcast spawners. Many broadcast spawners migrate to the edge of the reef drop off to spawn at dusk or dawn (Thresher 1984). Males and females simultaneously release eggs and sperm into the water column where the eggs are fertilized before floating to the surface until they hatch 20-30 hours later (Thresher 1984).

CREP (2018) data indicate that the 2016 island of Hawai'i population of Eyestripe Surgeonfish at the 0-98-foot depth in hardbottom habitat was approximately 578,835 individuals. WHAP could not produce estimates of this species because the species occurs in habitats not adequately surveyed by WHAP transects.

Cultural Significance

The Eyestripe Surgeonfish is also known as *palani*. *Palani*, meaning "to stink, smell sour or rancid" (Pukui and Elbert 1986), is a well-recognized trait of this fish that is documented in *mo'olelo* and *'ōlelo no'eau*. *Palani* were commonly raised in fishponds, particularly for ceremonial uses or were reserved for the *ali'i* and were kept for breeding, while the offspring were raised tame so that they could be easily removed by hand (Handy and Handy 1972). *Palani* were considered *kapu* (taboo) to men (Titcomb 1972).

4.4.2 Non-White List Wildlife Species

Marine species in Hawai'i include over 1,200 species of fishes, with around 500 species adapted to live on coral reefs, and the rest adapted to the pelagic open surface waters, mesopelagic, or bathypelagic zones (middle or deep waters), estuaries, or sandy bottoms (DLNR 2015). At the top of the food chain are the apex predators such as the many sharks and large predatory reef and pelagic fishes of Hawai'i. Over 5,000 marine invertebrates are known from Hawai'i and include over 100 species of hard, soft, and precious corals as well as hundreds of types of snails, crabs, shrimps and small numbers of worms, jellyfish, sponges, starfish, and tunicates (DLNR 2015). Five marine turtles occur in Hawai'i; two are common residents that nest on Hawai'i's beaches and three others are more occasional visitors. All sea turtles are listed as threatened or endangered under the federal Endangered Species Act (ESA) of 1973, as amended. Federal- and state-listed species are discussed in Section 4.4.4.

Approximately 26 species of marine mammals, mostly cetaceans, are considered resident or occasional visitors to Hawai'i. These include the Humpback Whale or *koholā* (*Megaptera noveangliae*), which migrates during the winter months to Hawaiian waters to breed and give birth each year before returning to feed in Alaskan waters during spring and summer, False Killer Whale (*Pseudorca crassidens*), and the Spinner Dolphin (*Stenella longirostris*) and Bottlenose Dolphin (*Tursiops truncatus*). Humpback Whales and Hawaiian Monk Seals (*Monachus schauinslandi*) are common marine mammals in Hawai'i and are listed as endangered under the ESA (DLNR 2015). All marine mammals are protected by the Marine Mammal Protection Act. Many of the resident whales and dolphins feed on fishes and squids that occur in the moderately deep waters off Hawai'i's coasts.

Approximately 4,100 species of marine invertebrates are known from Hawai'i. Marine invertebrates collected under Aquarium Permits generally include those species that are colorful or aesthetically pleasing. Between 2000 and 2017 over 93% (2,066,025 individuals) of all invertebrates collected under Aquarium Permits were collected from the island of O'ahu, based on data provided by the DAR (2014a). This is likely due to White List restrictions in West Hawai'i. In East Hawai'i, non-White List Species may be collected, and invertebrates made up approximately 58% of the total catch of White List and non-White List Species combined.

Of the approximately 249,000 invertebrates collected in East Hawai'i since 2000, over 73% (182,710 individuals) were Red Pond Shrimp (species not specified). Red Pond Shrimp (primarily *Halocaridina rubra*) also make up 42.5% of all species collected in East Hawai'i. Other common species of invertebrates captured in East Hawai'i include hermit crabs (species not specified), Feather Dusters Worms (*Sabellastarte spectabilis*), and Zebra Hermit Crabs (*Calcinus laevimanus*).

4.4.2.1 Red Pond Shrimp

This group of species live in underground (hypogean) environments and in anchialine ponds (landlocked ponds with a mix of freshwater and seawater through underground connections to the sea). Of the eight known species to occur in Hawai'i, all are endemic to the Hawaiian Archipelago (including Johnston Atoll) except *Antecaridina lauensis*, *Calliasmata pholidota*, and *Metabetaeus lohena* which are found throughout Hawai'i and also in Chile (US Fish and Wildlife Ecos Environmental Conservation 12/2015). *Halocaridina rubra* ('*Ōpae 'ula*, an endemic shrimp species known to be ideal '*ōpelu* bai) reaches 0.5 inch in length and

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is an herbivore that grazes on algal, bacterial, and diatom films growing on rocks and other hard substrates. They can also filter feed in mid-water and at the surface. The other species are all larger (up to two inches long) and some are predatory. All have red color and reduced appendages. 'Ōpae 'ula carry about 12 fertilized eggs under their abdomen for a brood period of about 38 days. They reproduce 1-2 times per year. Lifespan of 'Ōpae 'ula is long, up to 20 years in captivity. Less is known about the life history of the other species, but they are relatively long-lived for species in their taxa.

No population estimates are available for Red Pond Shrimp.

4.4.2.2 Hermit Crab (various species)

Because specific species of hermit crabs are not reported on Aquarium Permit reporting forms, it is not possible to know which species are collected, with the exception of zebra hermit crabs (Section 4.4.2.3). However, hermit crabs are one of the most common types of tide pool animals. They rely on empty snail shells for protection. Most species will scavenge the reefs consuming fish, other invertebrates, or algae. Some will display a variety of coloration and elaborate eye colors. Approximately 23 species of hermit crabs are known from Hawai'i shorelines.

No population estimates are available for hermit crabs.

4.4.2.3 Zebra Hermit Crab (*Calcinus laevimanus*)

This species of hermit crab is found in a large area of the Indo-Pacific, extending from Africa to Australia and Japan to Hawai'i. The common name comes from the coloration, black and white pincers, and white bands on dark legs. They also have orange and sky-blue eyestalks. They prefer to inhabit gastropod shells in intertidal flats, reef flats, and rock platforms, and may also be found in mangrove areas on sand mud bottoms and on rocky shores (Rahayu 2000).

No population estimates are available for Zebra Hermit Crabs.

4.4.3 Hawai'i Species of Greatest Conservation Need

Species of Greatest Conservation Need (SGCN) are identified in Hawai'i's State Wildlife Action Plan (SWAP) but are not threatened, endangered, or otherwise legislatively protected species. In fact, all three SGCN species noted below (and further discussed in Section 5.0) are listed as species of 'Least Concern' by the IUCN (2017). However, recognizing the need to act to protect endemic species, the DLNR identified Hawai'i's indigenous SGCN in Exhibit 1 of Hawai'i Administrative Rules Chapter 124. This list includes terrestrial mammals, marine mammals, and marine reptiles only. Additional native species were identified and added based on their presence on the following lists (DLNR 2018):

- The Federal list of threatened, endangered, candidate and concern species;
- Species protected by the U.S. Marine Mammal Protection Act;
- The State list of threatened and endangered species;

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- The Checklist of the Birds of Hawai'i; and
- Species identified as present in Hawai'i by groups or organizations with significant experience or expertise (e.g., Audubon Watch List; national and regional Bird Plans, such as the U.S. Shorebird Conservation Plan, Waterbird Conservation for the Americas; Regional Seabird Conservation Plan).

In addition to the above lists, for any terrestrial indigenous species not represented by any of the lists, their status as indigenous automatically included them as Hawai'i's SGCN. For aquatic fishes and invertebrates, endemic species were added to the list (DLNR 2018). The DAR also included native species on the IUCN Threatened Red List, and the Convention on International Trade in Endangered Species (CITES) list. A Statewide Aquatic Wildlife Conservation Strategy (SAWCS) Advisory Council was developed to advise on additional species that were at risk due to specific threats. The SAWCS Advisory Council is a panel with representatives from federal and state agencies, resource user groups, and non-profit organizations that helps the DAR develop its CWCS (DLNR 2018).

Additional species considered must meet one or more of the following biological criteria (DLNR 2018):

- Species with low or declining populations;
- Species indicative of the diversity and health of the state's wildlife;
- Species with small, localized "at-risk" populations;
- Keystone species;
- Indicator species;
- Species with limited dispersal;
- Disjunct species;
- Vulnerable species;
- Species of conservation concern;
- "Responsibility" species, (i.e., species that have their center of range within a state); and,
- Species with fragmented or isolated populations.

Currently 25% of fish, 20% of mollusks, 18% of algae, and 20% of the corals are considered endemic to Hawai'i and listed as SGCN species (Randall 2007, DLNR 2015).

Based on these parameters, three White List Species occur on Hawai'i's SGCN list:

1. Psychedelic Wrasse
2. Tinker's Butterflyfish

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3. Fisher's Angelfish.

The DLNR SWAP (2015) addresses these species and identifies the following actions to ensure the species conservation and sustainability:

1. Conservation Actions: The goals of conservation actions are to not only protect current populations, but to also establish further populations to reduce the risk of extinction. Commercial licenses are required for aquarium collectors. In addition to common statewide and island conservation actions, specific actions include:
 - Restoration of habitat; and,
 - Maintaining healthy populations with appropriate fishing regulations and education.
2. Monitoring:
 - Continue to survey for populations and distribution in known and likely habitats.
3. Research Priorities:
 - Improve understanding of factors affecting the species population size and distribution; and,
 - Support aquaculture research to develop captive breeding for species used in the aquarium trade.

4.4.4 Threatened and Endangered Wildlife Species

A total of 8 federal and 10 state-listed threatened or endangered marine species, consisting of one seal, four whales, and five sea turtles, occur in Hawai'i (Table 4-4). Federal endangered species are those species that the US Fish and Wildlife Service (USFWS) define as being in danger of becoming extinct, while threatened species are those likely to become endangered in the foreseeable future. State endangered species are those defined by the DLNR as in danger of becoming extinct at a state level, while threatened species are those likely to become endangered in the foreseeable future at the state level. No species collected by aquarium fishers occur on the state or federal list of threatened and endangered species.

Table 4-4. Threatened and endangered marine species of Hawai'i.

Common Name	Scientific Name	State Status	Federal Status
Mammals			
Hawaiian Monk Seal	<i>Neomonachus schauinslandi</i>	E	E
Fin Whale	<i>Balaenoptera physalus</i>	E	NA
Humpback Whale	<i>Megaptera novaeangliae</i>	E	E
Sperm Whale	<i>Physeter catodon</i>	E	E
False Killer Whale	<i>Pseudorca crassidens</i>	E	NA
Reptiles			
Pacific Leatherback Sea Turtle	<i>Dermochelys coriacea schlegelii</i>	E	E

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Common Name	Scientific Name	State Status	Federal Status
Pacific Hawksbill Sea Turtle	<i>Eretmochelys imbricata bissa</i>	E	E
Loggerhead Sea Turtle	<i>Caretta</i>	T	T
Green Sea Turtle	<i>Chelonia mydas</i>	T	T
Olive Ridley Sea Turtle	<i>Lepidochelys olivacea</i>	T	T

4.4.5 Reef Habitat

Stretching for more than 1,200 miles in the Central Pacific, Hawaiian coral reefs account for about 85% of all coral reefs in the United States. More than 500 species of algae also live in Hawai'i's coral reefs providing food for fish and oxygen for all marine life. The oceans' algae provide more oxygen than all land plants worldwide combined. There are 78 species of endemic marine algae, 24 species of endemic freshwater algae, and two aquatic plants included on Hawai'i's list of SGCN (DLNR 2015).

Hawai'i's reefs are unique among the world's reef ecosystems. Compared to coral reefs in the Indo-Pacific or Caribbean, Hawaiian reefs are relatively young. Hawai'i reefs are therefore dominated by hard corals (as opposed to sponges, tunicates, and soft corals) and are inhabited by distinctive reef fish and other marine life. Most stony corals grow very slowly. Hawai'i hosts about 40 species of hard, reef building corals (MRC 2017). Due to Hawai'i's extreme isolation, an estimated 25% of the coral reef species are found nowhere else.

Stony corals are defined by Hawai'i Administrative Rule 13-95 as any species belonging to the Order Scleractinia (marine corals which generate a hard skeleton). All reef corals, including mushroom corals, belong to this order (DAR 2014b). The animals which form stony corals belong to the same major group as jellyfish and anemones. Most of them are colonial, and all secrete a hard skeleton made of calcium carbonate. The animals themselves, called polyps, form the outer living layer of a coral colony. Each polyp sits in a cup-like depression called a calyx. Most stony corals grow very slowly and can take hundreds of years to recover from damage (DAR 2014b).

The characteristic color of many living corals is due to the presence of single-celled algae, called zooxanthellae, which live inside the coral polyp. The coral and algae have a symbiotic relationship. Most stony corals produce colonial forms that are attached to the substrate, but a few are solitary and unattached (DAR 2014b).

Ecosystem indicators related to benthic reef community integrity indicate a shift in West Hawai'i towards lowered reef accretion and reduced structural complexity. Hard coral cover, an indicator of reef topographic complexity, habitat structure, and reef accretion, decreased from an average of 44% to 31% cover in the North from 2003 to 2014, a decline of roughly one-third in just 12 years (Gove et al. 2016). However, over the same time period, hard coral cover remained relatively constant in the South (Gove et al. 2016). The ratio between the cover of calcifying to non-calcifying organisms – an indicator of coral reef community dynamics and the extent to which a given system is dominated by organisms that contribute to coral reef development and persistence – declined across West Hawai'i since 2003 (Gove et al. 2016). The North experienced the biggest change in this indicator, with the a calcified: non-calcified ratio decreasing by approximately half to a present value of <1, indicating the benthic community is currently dominated by non-calcifying benthic organisms (Gove et al. 2016).

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4.4.5.1 Corals Common to Hawai'i (DAR 2014b)

Rose or Cauliflower Coral (*Pocillopora meandrina*)

The most common *Pocillopora* in Hawai'i, this coral prefers wave-agitated environments, and is found at depths to about 150 feet. Commonly called "rose coral" or "cauliflower coral," the colonies form cauliflower-shaped heads about 10 to 20 inches in diameter. Branches are heavy and leaf-like and fork bluntly near the ends. All branches have wart-like projections called verrucae that are covered with calices. Color of living colonies ranges from brown to pink.

Lace Coral (*Pocillopora damicornis*)

This delicate and fragile coral forms small bushy clumps up to about 6 inches in diameter. Colonies consist of fine branches covered with calices. These branches range from long and slender in calm waters to more robust forms in areas of wave action. Sometimes the skeleton will create pocket formations around a crab that lives among the branches. Usually found in protected areas and inner portions of large reef flats, this species appears to strongly depend on sunlight, as it is rarely found below about 30 feet. Colonies range in color from light brown in shallow waters to dark brown in deeper waters.

Antler Coral (*Pocillopora eydouxi*)

Colonies consist of thick pipe-like branches that resemble moose antlers. This species also possesses verrucae and is usually found in depths of 35 to 150 feet. Live colonies are brown in color and usually darker than other Pocilloporid corals.

Lobe Coral (*Porites lobata*)

This coral produces many encrusting or massive forms on the reef from the intertidal zone to depths of over 180 feet. Long narrow cracks found on the coral heads are produced by a type of alpheid shrimp. Calices have a snowflake-like appearance and are shallow and flush to the surface. Living colonies range in color from yellowish-green to brown and sometimes blue.

Finger Coral (*Porites compressa*)

Distinguishing features are the finger-like branching and shallow snowflake-shaped calices. This species is most common in wave-protected areas like bays or deeper reef slopes to depths of about 150 feet. It has many growth forms, but all of them show some sort of fingerlike branching. Color of live colonies ranges from light brown to light yellowish-green.

Rice Coral (*Montipora capitata*)

The most obvious characteristic of this coral is the nipple-like projections (papillae) that cover the surface. These papillae are smooth with no calices on them. Calices are found on the upper surface of the coral between the papillae. The image of the calices and papillae create a "rice & pepper" appearance. This species is found at depths up to about 150 feet. It has a number of growth forms ranging from plate-like to branchlike and encrusting types. Color of living colonies is usually brown. If the colony is growing in a plate form, the edges may be white.

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Mushroom or Razor Coral (*Fungia scutaria*)

This solitary (single polyp), free-living (unattached) coral is most commonly found on reef flats, frequently between cracks and crevices. It has also been found at depths of over 75 feet. Its disk-like, elliptical shape resembles a mushroom cap and ranges from 1.5 to 7 inches in diameter. Some adults may form a high arch in the middle. Immature forms are attached to the substrate or an adult mushroom coral by a stalk. It grows into a disk and, when large enough, breaks off the stalk and becomes free-living. The color of live specimens ranges from pale brown in bright sunlight to dark brown in shady areas or deeper water.

Cup or Tube Coral (*Tubastraea coccinea*)

This is a common non-reef building coral found in shallow Hawaiian waters. This species forms large calices and occurs in clumps that are 2 to 4 inches in diameter. Living tissue is usually bright orange in color but may also appear pink or even black. The bright coloration is not produced by zooxanthellae. This coral is usually found on steep ledges, in caves and in shady tidepools.

4.4.6 Invasive Species

From *A Guidebook of Introduced Marine Species in Hawai'i* (DeFelice et al. 2001):

Through the Hawai'i Biological Survey at Bishop Museum, a count of the total number of species in the Hawai'i Archipelago has been compiled. In 1999, there were 23,150 known species of terrestrial and aquatic algae, plants, and animals, including 5,047 nonindigenous species (~ 20%). The total number of marine and brackish water alien species in the Hawaiian Islands was 343, including 287 invertebrates, 24 algae, 20 fish, and 12 flowering plants.

The 287 alien marine invertebrate species make up about 7% of the known marine and brackish water invertebrate fauna in the Hawaiian Islands (4,099 species). Arthropods have been the most successful marine invaders, with 71 suspected alien crustacean species, while 53 alien mollusks have made it to Hawai'i. Limited information exists for these invasive species.

The greatest number of introduced marine invertebrates have arrived to Hawai'i through hull fouling, but many have also arrived with solid ballast and in ballast water. DeFelice et al. (2001) considered 201 species (70%) to be introduced, and 86 species (30%) cryptogenic (not demonstratively native or introduced). Two hundred forty-eight (87%) have become established, 15 (5%) arrived but failed to become established, 6 (2%) were intercepted, and the population status of 18 species (6%) is unknown.

The nonindigenous invertebrate species in the Hawaiian Islands are primarily of Indo-Pacific/Philippines Islands region origin. A surprising number of species from the tropical western Atlantic/Caribbean region have invaded Hawai'i as well.

Invasive algae pose the largest threat to Hawai'i's reef ecosystem. The five most common algae species posing the largest threat include Smothering Seaweed (*Kappaphycus* and *Euchema* spp.), Gorilla Ogo (*Gracilaria salicornia*), Leather Mudweed (*Avrainvillea amadelpa*), Hook Weed (*Hypnea musciformis*), and

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Prickly Seaweed (*Acanthophora spicifera*). Marine debris arriving from other countries and regions and ballast water/biofouling are the primary threat for invasion in the Hawaiian Islands.

Invasive fish species of concern in Hawai'i include two White List Species, the Bluestripe Snapper (Taape), and Peacock Grouper (= Roi, Bluespot Peacock Grouper), and a non-White List Species, the Blacktail Snapper (*Lutjanus fulvus*). All three species were introduced between 1956-1961, mostly as game fish (IUCN 2017).

The Peacock Grouper (Section 4.4.1.34) is a known carrier of Ciguatera (a foodborne illness), which is well known by the local fishermen and therefore its use as a food fish is intentionally very limited (BIAAF, pers. comm., also reviewed in Appendix A). It has become a dominant predator species in the Main Hawaiian Islands and is known to have negative ecological impacts on other endemic and culturally valued species (Dierking 2007). In recent years, efforts to minimize populations of this species have led to statewide events often dubbed "roi round-ups," where local spear fishers are encouraged to catch and remove as many roi from the reefs as possible. However, a recently completed 5.5-year study found that removal of the Peacock Grouper did not translate into sustained increases in prey, nor to increases in total fish biomass (Giddens et al. 2017).

The Bluestripe Snapper (Section 4.4.1.33) and Peacock Grouper (Section 4.4.1.34) are well established in Hawai'i. The Blacktail Snapper occurs at low densities only in the lower Hawaiian Islands (Randall 1987, Gaither et al. 2010 as cited in IUCN 2017). From 2008 through 2014, regional estimates of the density of Blacktail Snapper ranged from 1.8 to 14.1 individuals per 2.5 acres over hard bottoms to 98.5 feet depth in Pacific coral reef areas surveyed by NOAA (NOAA unpublished data as described in Heenan et al. 2014 as cited in IUCN 2017). The highest recorded density was in the MHI region (0.3 to 45.1 individuals per 2.5 acres) as compared to the lowest in the Southern Mariana Islands region (0 to 4.3 individuals; IUCN 2017).

4.4.7 Biological Aspects of the Commercial Aquarium Fishery

4.4.7.1 West Hawai'i Aquarium Project (WHAP) Surveys

To monitor and gauge the effects of the aquarium fishing industry, the West Hawai'i Aquarium Project (WHAP) established 25 study sites (Figure 4) along the West Hawai'i coastline in early 1999 at 9 FRA sites, 8 Open Area sites (aquarium fish collection areas) and 6 previously established MPAs to collect baseline data both prior to and after the closure of the FRAs. The MPAs are MLCs and FMAs, which have been closed to aquarium collecting for at least 9 years and were presumed to have close to "natural" levels of aquarium fish abundances (DAR 2019a). They serve as a reference or 'control' to compare with the FRAs and Open Areas. It should be noted that after several years of study and observation, one of the MPA sites (Lapakahi MLC – subzone B), was found not to be closed to aquarium collecting due to its remoteness and poorly defined seaward boundaries (i.e., 500 feet offshore). As such, the Lapakahi survey site was considered an Open Area for data analysis purposes (DAR 2014a, 2019a).

The overall goals of the WHAP were two-fold: 1) To evaluate the effectiveness of the FRA network by comparing targeted aquarium fishes in FRAs and Open Areas relative to adjacent control sites and, 2) To evaluate the impact of the FRA network on the commercial aquarium fishery (DAR 2019a).

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Detailed explanations of the study sites and survey methods are found in Tissot et al. (2004) and Walsh (2013). To briefly summarize: Densities of all fish and selected invertebrate species were visually estimated along four 82x13 foot strip transects at each of 25 permanent sites located at depths between 30-60 feet in the three types of management areas. All survey divers either had extensive experience in conducting underwater fish surveys in Hawai'i or received training through the UH's Quantitative Underwater Ecological Survey Techniques (QUEST) training course prior to collecting data (Hallacher and Tissot 1999). In addition to the transect surveys, a 10 minute 'free-swim' survey is also conducted by two divers in the areas surrounding the actual transects. The purpose of this survey is to better census uncommon or rare species and species of particular ecological interest such as Bluestripe Snapper, Peacock Grouper, terminal phase parrotfish (Family Scaridae), cleaner wrasses (*Labroides* spp.) and Crown-of-Thorns Starfish (*Acanthaster solaris*). All sites are presently surveyed four times per year. Through 2018 (the most recent year for which data are available), a total of 8,712 transects had been completed (DAR 2019a). Six rounds were conducted prior to FRA closure in 1999 (DAR 2014a).

Table 4-5 provides West Hawai'i Open Area population estimates of those species on the White List based on the WHAP data. It is important to note that population estimates provided in the table and previous life histories sections, only include West Hawai'i estimates of fish from Open Areas at depths of 30-60 feet (the depth at which WHAP surveys are conducted); thus, the actual population size of each species is likely greater due to individuals at other depths, or in unsurveyed areas. Island-wide population estimates for each species are described in Section 4.4.1 and summarized in Table 4-5.

Table 4-5. West Hawai'i Open Area population estimates of all White List Species based on average WHAP data from 2012/2013 and 2017/2018 and percent of that population collected annually by aquarium fishers at the 30'-60' depth in 2013/2014 (DAR 2014a) and 2017/2018 (DAR 2019a). Data in this table (recreated from DAR 2014a, 2019a) may differ from other publications due to the time of year data were analyzed, number of monthly reports available to the DAR at that time, and Hawai'i's confidentiality laws.

Common Name	2013-2014			2017-2018		
	Catch ¹	30'- 60' Open Area Population ²	Catch as % of 30'-60' Open Area Population	Catch ¹	30'- 60' Open Area Population ²	Catch as % of 30'-60' Open Area Population
Achilles Tang	7,073	21,627	32.70%	5,437	13,796	39.67%
Yellow Tang	273,778	1,663,775	17.26%	264,870	2,867,048	9.24%
Black Surgeonfish (chevron tang)	4,045	34,678	11.66%	3,878	98,067	3.95%
Shortnose (Geoffroy's) Wrasse	258	3,222	8.01%	582	3,222	18.07%
Goldrim Tang	439	7,517	5.83%	1,324	5,966	22.19%
Fourspot Butterflyfish	699	22,000	3.18%	319	15,034	2.12%
Orangeband (Shoulder) Surgeonfish	698	26,101	2.67%	1,293	53,694	2.41%
Orangespine Unicornfish (Clown Tang)	4,026	150,642	2.67%	6,078	180,099	3.37%
Forcepsfish	1,045	43,999	2.38%	840	39,734	2.11%
Spotted Boxfish (Boxfish)	175	9,322	1.88%	57	12,887	0.44%
Yellowtail Coris (Clown Wrasse)	288	19,762	1.45%	623	18,256	3.41%
Milletseed (Lemon) Butterflyfish	61	7,085	0.85%	98	2,148	4.56%
Kole (Goldring Surgeonfish, Yelloweye, Goldring)	28,407	3,616,529	0.79%	30,901	5,312,745	0.58%
Pencil Wrasse	108	19,390	0.56%	278	17,182	1.62%
Bird Wrasse	180	43,254	0.42%	265	66,581	0.40%
Blacklip Butterflyfish (Coral Butterflyfish)	23	5,593	0.40%	81	39,734	0.20%
Potter's Angelfish	945	237,149	0.40%	2,245	265,488	0.85%
Ornate Wrasse (Pinkface)	724	192,404	0.38%	1,602	196,879	0.81%
Black Durgon	71	38,033	0.19%	11	92,354	0.01%
Gilded Triggerfish (Blue-throat Triggerfish)	19	11,186	0.17%	20	3,222	0.62%
Lei Triggerfish	128	76,440	0.17%	78	92,354	0.08%
(Forster's) Blackside Hawkfish	31	20,508	0.15%	30	23,625	0.13%
'Thompson's Surgeonfish	130	91,728	0.14%	148	271,693	0.05%
Pyramid Butterflyfish	73	56,677	0.13%	42	37,586	0.11%
Multiband (Pebbled) Butterflyfish	670	580,196	0.12%	470	378,843	0.09%
Hawaiian Dascyllus (Domino)	43	57,796	0.07%	89	63,359	0.14%
Saddle Wrasse	327	537,688	0.06%	538	140,947	0.10%

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Common Name	2013-2014			2017-2018		
	Catch ¹	30'- 60' Open Area Population ²	Catch as % of 30'-60' Open Area Population	Catch ¹	30'- 60' Open Area Population ²	Catch as % of 30'-60' Open Area Population
Redbarred Hawkfish	6	9,665	0.06%	21	6,443	0.33%
Eightline Wrasse	35	187,557	0.02%	97	187,930	0.05%
Fourlined Wrasse	47	327,758	0.01%	54	227,663	0.02%
Brown Surgeonfish (Lavender, Forktail Tang)	180	1,646,996	0.01%	957	2,980,402	0.03%
Hawaiian Whitespotted Toby (Puffer)	20	250,573	0.01%	26	249,141	0.01%
Bluestripe Snapper (Taape)	0	7,830	0.00%	0	33,290	0.00%
Peacock Grouper (Roi, Bluespot Peacock Grouper)	0	24,610	0.00%	0	51,546	0.00%
Psychedelic (Redtail) Wrasse	236	N/A	N/A	599	1,071	55.78% ³
Tinker's Butterflyfish	206	N/A	N/A	290	N/A	N/A
Longfin Anthias	130	N/A	N/A	0	N/A	N/A
Flame Wrasse	67	N/A	N/A	0	N/A	N/A
Fisher's Angelfish	58	N/A	N/A	288	59,064	0.49% ³
Eyestripe Surgeonfish (Palani)	1	N/A	N/A	0	N/A	N/A

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A summary of the DAR 1999 to 2019 study findings is presented below (DAR 2019a):

- Of the 40 collected aquarium species, prior to the closure of aquarium collecting, Yellow Tang made up 81.6% of the total and Kole 9.5% (2017).
- In the 20 years since FRA establishment, the population of Yellow Tang has increased 165% in the FRAs, 74% in existing MRAs, and 101% in the Open Areas where fishing effort has been concentrated, with a current population estimate of approximately 5.7 million fish in the 30-60-foot depth range in the WHRFMA.
- Outward movement of adult Yellow Tang from protected areas into surrounding areas ('spillover') augments adult stocks in Open Areas up to a 0.6 mile or more away.
- Overall Kole abundance in the 30-60-foot depth range over the entire West Hawai'i coast increased by almost 5.2 million fish (118%) since FRA establishment (1999/2000), with a current population of about 9.6 million fish.
- Commercial aquarium landings of Achilles Tang have declined in West Hawai'i over the past two decades in association with a recent dramatic increase in its value (192% since 2008). This is strongly suggestive of declining availability (i.e., abundance). (Addressed in Section 5.4.1.2 – Achilles Tang).
- Achilles Tang have declined significantly in FRAs and Open Areas over the last 20 years. Open Area populations have usually been higher than FRA populations in the past decade. Achilles Tang has had low levels of recruitment over the past two decades, and because of its popularity as a food fish as well as an aquarium fish, this species is harvested both as juveniles and adults.
- Of the remaining 7 of the top 10 collected aquarium species, 1 species (Goldrim Surgeonfish) had no significant change in population, 6 species (Orangespine Unicornfish, Chevron Tang, Orangeband Surgeonfish, Brown Surgeonfish, and Potter's Angelfish) increased significantly in one or more of the management areas, and 1 species (Ornate Wrasse (Pinkface)) declined significantly in both FRA and Open areas. These results suggest that factors other than aquarium collecting are also affecting populations of these fish.
- For 26 other species on the White List, 10 showed a significant population increase in one or more of the management areas while 11 decreased. Of the species which declined (11), only a single one, Blackside Hawkfish, declined exclusively in the Open Areas, indicating that factors other than aquarium collecting were also affecting the populations of these species.
- For most of the species on the White List, collecting impact, in terms of the percentage of the population being removed annually, is relatively low with 9 species having single digit percent catch and 21 species having catch values <1%.
- Survey data are lacking for four species which typically occur in deep water (Tinker's Butterflyfish, Psychedelic Wrasse, Flame Wrasse and Hawai'i Longfin Anthias), as well as the Eyestripe Surgeonfish (which is typically found over sand during the day, a habitat not surveyed by WHAP).

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- In terms of reef fish biomass caught by the different fisheries in West Hawai'i, considerably more biomass is taken by the combined recreational and commercial (non-aquarium) fisheries either including Yellow Tang (2.8 times) or excluding it (8.6 times). The total take of reef fish by commercial and non-commercial ('recreational') fishers on other Main Hawai'i Islands greatly exceeds the numbers and biomass of the fish collected by aquarium collectors.
- The 2010 and 2014 Hawai'i Island aquarium catch report validation did not indicate substantial underreporting of catch by aquarium collectors.

The Psychedelic Wrasse, Tinker's Butterflyfish, and Fisher's Angelfish are all listed as SGCN in Hawai'i (Section 4.4.3). They are not federal- or state-listed as threatened or endangered species (Section 4.4.4) and are not currently afforded any protection from collection. The Psychedelic Wrasse is endemic to the Hawaiian Islands and is found among seaweed coral reefs at depths from 40-450 feet (Lieske and Myers 1994) and are the most abundant on the Northwestern side of the island (BIAAF, pers. comm.); Tinker's Butterflyfish is found deeper than 100 feet on coral reef slopes (Pyle 2001); and, Fisher's Angelfish have been observed feeding on algae and small shrimp associated with coral along outer reef slopes at depths between 10 and 200 feet (Pyle and Myers 2010). Adequate population estimates based on WHAP data (30-60 feet depth) are not available to assess the impact of continued aquarium collection on these three species due to their deeper water habitats. However, based on deep diver observations, Tinker's Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs; DAR 2019a). Commercial aquarium fishers generally do not fish in the deeper waters in which these species occur. In 2017, there were 599 Psychedelic Wrasse, approximately 290 Tinker's Butterflyfish (n.d. in East Hawai'i), and 288 Fisher's Angelfish collected by aquarium fishers on the island of Hawai'i (DAR 2018a).

4.4.7.2 Coral Reef Ecosystems Program (CREP; now known as the Ecosystem Sciences Division) Surveys

The NOAA has been involved in a large-scale monitoring program that surveys coral reef fish assemblages and habitats, including White List Species, encompassing the bulk of the US-affiliated tropical Pacific. This effort, formerly known as the Coral Reef Ecosystem Program (CREP), has included over 5,500 surveys around 39 islands, including the island of Hawai'i. The dataset was developed as a resource that could be used to understand how human, environmental, and oceanographic conditions influence coral reef fish community structure, providing a basis for research to support effective management outcomes (CREP 2018).

In 2010, the Pacific Reef Assessment and Monitoring Program (RAMP) developed and implemented a standardized survey methodology focusing on reef fish and paired benthic habitat-monitoring using monitoring methods specified in the National Coral Reef Monitoring Plan (NCRMP). The aim of the current systematic sampling design is to maximize survey site replication, while the overarching goal was to generate data representative of coral reef hardbottom substrate at the islands-scale (CREP 2018).

Surveys were conducted around the island of Hawai'i in 2010 and 2013–2016 at 257 stationary point count locations (Figure 4) with a randomized depth-stratified design, at depths from 0-98 feet (approximately 0-30 meters). At each point count location, divers conducted fish counts, estimated benthic cover, and habitat

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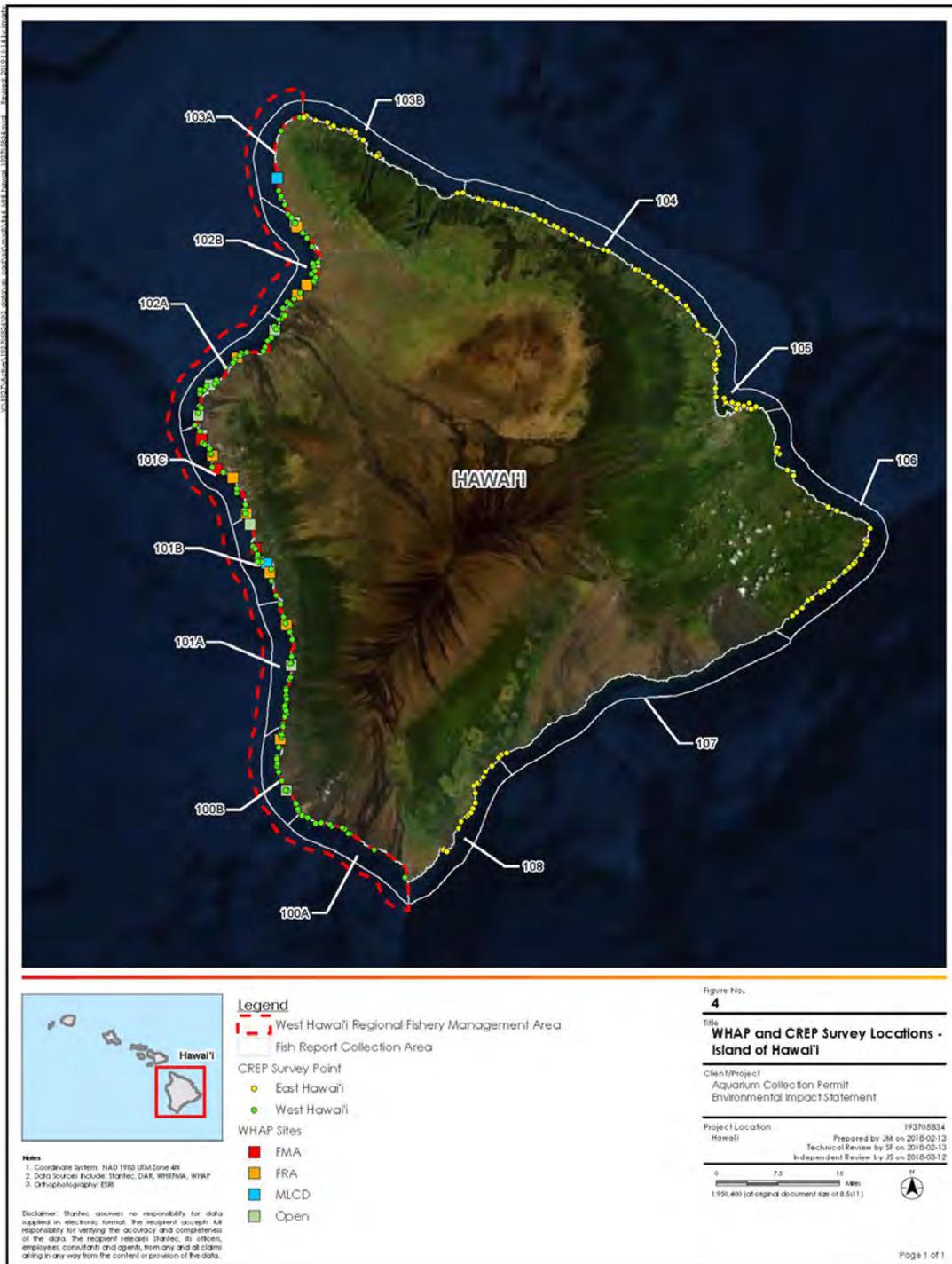


Figure 4. WHAP and CREP survey locations – Island of Hawai'i.

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structural complexity. Typically, 3–5 days were spent at each island during each visit (generally once every 3 years), conducting 30–50 fish surveys during that time. Detailed explanations of the study sites and survey methods are found in Heenan et. al (2017). To establish survey points, an approximately 98-foot (30-meter) transect is measured out along the substrate. For each point count, a pair of divers conducts simultaneous counts in adjacent 49.2 foot (15 meter) cylindrical plots along the transect (i.e., diver 1 surveys from the 7.5 meter mark along the transect and diver 2 surveys from the 22.5 meter mark) extending from the substrate to the limits of vertical visibility (Heenan et. al 2017).

Each fish count consists of two parts, a 5-minute species enumeration in which divers generate a list of taxa observed within their cylinder to species when possible; and, a tally portion in which divers systematically work through their species list recording the number and estimated size of fish present within the cylinder. Tallying is done by conducting a series of rapid visual sweeps of the plot with one species-group (e.g., mid-water, surgeonfish, benthic butterflyfish) counted per sweep. At the end of the sweeps, divers carefully search for small, site-attached, and semi-cryptic species. Surveys were not conducted if horizontal visibility was <25 feet (Heenan et. al 2017).

To facilitate analysis in this FEIS, estimated population size for each White List Species for the island of Hawai'i was calculated using CREP data by converting survey counts to abundance per unit area, and then multiplying by the estimated area of hardbottom habitat in <30 meters of water (16,840 Ha).

Although CREP data are the most comprehensive data publicly available for the island of Hawai'i, certain limitations of the surveys may lead to an underestimate of some populations of aquarium fish. Specifically, surveys are concentrated into a short period of survey effort (about one month each year) located in different locations from one year to the next, allowing for a larger coverage of the entire island, but over five years during a seven-year period. Also, population estimates may be an underestimate for certain species as surveys were only conducted at depths <30 meters (approximately 98 feet) in areas of hardbottom habitat. No data were collected from softbottom habitat, as these tend to not be important habitats for most aquarium species, but certain species may utilize these areas, and therefore are not represented in the population estimate. No data were collected from depths greater than 30 meters (approximately 98 feet), but certain species may utilize these areas as well, and are therefore not represented in the population estimate. In addition, divers are trained in the identification of aquarium fish; however, certain species may be cryptic, skittish, or difficult to identify in the field, which may lead to underestimates of the population of those species. All data collection methods have a range of variation, or uncertainty. For the CREP data, this results in a high and low range for population estimates (Table 5-11). For the purposes of this FEIS, we used the mean of those ranges to assess impacts.

4.4.7.3 WHAP and CREP Survey Comparison

Both the WHAP and CREP collect data on fish populations in nearshore waters of the island of Hawai'i that are available and appropriate for estimating population size, within the limitations of each survey (e.g., spatial coverage, depth range), and for analysis of the impact of fish collection under Aquarium Permits. In addition, both surveys collect data on the physical conditions at each survey site. The following provides a side by side comparison of some of the parameters of each survey method.

WHAP	CREP
<ul style="list-style-type: none"> • 25 survey sites with 4 transects (82x13 foot long) each (100 transects total), in specific areas (FRAs, MPAs, Open Areas) along west coast of Hawai'i • 30-60-foot depth survey area • 4-6 survey rounds per year • 8,712 transects completed (1999-2018) • Visually estimated fish density, benthic cover, and habitat structural complexity 	<ul style="list-style-type: none"> • 257 point counts covering entire island of Hawai'i except collection zone 107 • 0-98-foot depth survey area • 30-50 surveys once every 3 years • Surveys conducted in 2010, 2013, 2014, 2015, and 2016 • Fish counts, estimated benthic cover, and habitat structural complexity

The WHAP data are collected from 25 transect survey sites located within the WHRFMA (Figure 4) and are designed to estimate fish densities over time within the WHRFMA between depths of 30-60 feet. By design, the WHAP focuses on the WHRFMA and does not have full spatial coverage of the island of Hawai'i; therefore, data generated by the WHAP cannot be used to develop population estimates for East Hawai'i. In addition, because WHAP estimates population size at depths from 30-60 feet, shallow- and deep-water species (or life phases of species) that spend time outside the 30-60-foot depth range are not adequately surveyed by WHAP transects.

The CREP data are collected on all reef fish species for the Pacific islands, including from 257 stationary point count locations located around the island of Hawai'i, with the exception of collection zone 107 (Figure 4), from depths of 0-98 feet, providing an assessment of fish populations in both shallow and some deep-water habitats. Deep-water species (or life phases of species) that spend time below the 98-foot depth range are not adequately surveyed by CREP.

Differences in study design between the two surveys result in differences in how data are collected and analyzed. However, when CREP data collected at a similar depth as those collected by the WHAP are compared, the population estimates collected by the two surveys are more similar. Both data sets are presented and analyzed in this FEIS. However, due to the larger spatial coverage and greater range of depths surveyed by the CREP, CREP data were considered to be a better estimator of island-wide fish populations, and therefore serve as the primary basis for the impact analysis found in Section 5.0. Analysis of impacts based on the WHAP Open Area population estimates is provided for comparison purposes in Appendix B.

5.0 ENVIRONMENTAL CONSEQUENCES

This section discusses the impacts of implementing the No Action Alternative, the Pre-Aquarium Collection Ban Alternative, the WHRFMA-only Programmatic Permit Alternative, the Achilles Tang Conservation Alternative, and the Limited Permit Issuance Alternative on resources retained for further analysis. Aspects of the environment that may be affected by the alternatives are discussed to the level of detail

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commensurate with the potential effect. Those aspects of the environment that would not be affected are discussed briefly. The content, intensity, and likelihood of the impact were taken into consideration in the making of these ratings. **The environmental consequences have been updated since publication of the DEIS. Changes include updates to the inflation-adjusted values for socioeconomics, as well as updates to the analysis of biological resources for the Limited Permit Issuance Alternative due to the change from 14 to 10 Aquarium Permits under that alternative.**

Direct, indirect, and cumulative impacts are evaluated for each resource. The temporal scope of the impacts analysis is five years, because the WHRFMA management plan is reviewed every five years by the DLNR in cooperation with the University of Hawai'i (DAR 2019a). Reviews have been completed for the 2010 and 2015 Legislatures, the 2020 Legislature review is drafted (DAR 2019a), and the next review will occur for the 2025 Legislature.

The HEPA does not specifically define direct and indirect impacts. As such, for the purposes of this FEIS, the National Environmental Policy Act (NEPA) definitions are used. The NEPA defines direct effects as those effects that are caused by the action and occur at the same time and place (40 Code of Federal Regulations [CFR] § 1508.8(a)). Indirect effects include effects later in time or farther removed in distance but are still reasonably foreseeable (40 CFR § 1508.8(b)). Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems (40 CFR § 1508.8).

The HEPA does not specifically define mitigation. As such, for the purposes of this FEIS, the NEPA definition is used. According to the CEQ regulations (40 CFR 15008.20), mitigation means:

- Avoiding impact altogether
- Minimizing impact
- Limiting the degree or magnitude of action
- Rectifying impact
- Repairing, rehabilitating, restoring
- Reducing or eliminating impact over time
- Preservation and maintenance activities
- Compensating for the impact
- Replacing or providing substitutes

However, the HEPA Guide (OEQC 2014) indicates that an EIS needs to consider all mitigation measures to avoid, minimize, rectify, or reduce adverse impacts. Therefore, mitigation is only considered for alternatives with a significant adverse impact.

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The HEPA defines cumulative impacts as the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (HAR Section 11-200-2).

Cumulative impacts were analyzed according to a tiered approach, which allows for a resource-specific analysis of regional and local actions and narrows the focus to those impacts with direct influence on the proposed action and agency decision-making. Following this approach, the cumulative impacts analysis focused on potential impacts to White List Species, non-White List Species, SGCN, and reef habitat as these are the resources with the potential for on-going impacts due to commercial aquarium fish collection. The spatial analysis area for cumulative impacts is the nearshore waters of the island of Hawai'i down to 600 feet (100 fathoms), with emphasis on the WHRFMA. As stated in Section 4.4, there is evidence that reef fish around the island of Hawai'i are genetically separated from the rest of the MHI, therefore, the spatial extent of cumulative impacts was limited to the island of Hawai'i.

Conclusions of significance are based on the best available data as analyzed in this FEIS. The HEPA standards for a significant impact are described in Section 1.2.2. For the purposes of this FEIS, impacts were assessed on a descending scale:

1. Significant impact (HEPA standards);
2. Significant impact that is mitigable to less than significant;
3. Less than significant impact;
4. No impact; and
5. Beneficial impact.

5.1 HRS §189-3 AND DATA ANALYSIS

HRS §189-3 states:

(a) Upon the demand of the department, every commercial marine licensee shall furnish to the department a report or reports with respect to the marine life taken and any other information the department may require for the purposes of this section.

(b), "Any information submitted to the department by any person in compliance with any requirement under this section shall be confidential and shall not be disclosed, except when required under court order or pursuant to subpoena issued by the department of the attorney general, or with the prior written consent of the person submitting the information, or under cooperative agreements with government agencies of the United States for exchange and use of the information specifically to manage marine life. The department, by rule, may establish procedures necessary to preserve the confidentiality, except that the department may release or make public any of the information in the aggregate or summary form which does not directly or indirectly disclose the identity of any person who submits information."

The DAR complies with this statute by keeping confidential any catch data when less than three collectors report from an individual collection zone (Figure 1). Collection zones depicted in Figure 1 correspond to areas defined by the monthly report fishers are required to provide to DAR. Confidential data are identified as *n.d.* (not disclosed) in the tables in Section 5.0. The impact of this statute on data analysis is minimal but can cause confusion when numbers in the text or in the tables do not exactly match up, or do not match previously published reports for which the *n.d.* data were available (i.e., DAR reports). Although it is possible for 1-2 aquarium fishers to collect large numbers of fish and skew the data, this concern was minimized by the manner in which data were analyzed. Data provided by the DAR for this FEIS were evaluated using many parameters, thereby minimizing bias due to confidentiality. The data were also viewed in aggregate and over extended time periods (i.e., 2000-2017) to further minimize confidentiality issues. Additionally, the 10 fishers who would receive Aquarium Permits under the Proposed Action waived their right to confidentiality, so all data from these 10 fishers were released for analysis in the EIS for the WHRFMA and East Hawai'i from 2000 through 2017.

5.2 SOCIOECONOMIC RESOURCES

5.2.1 Direct Impacts

As noted in Section 4.1.1, the East Hawai'i aquarium fishery represents only a small portion (4.5%) of the overall value of the fishery on the island of Hawai'i and an even smaller portion of the overall value of the fishery in the state of Hawai'i. Table 4-2 (Section 4.1.1) shows the annual average of the East Hawai'i fishery for the period from 2000-2017 was approximately \$73,067 (inflation-adjusted 2020 dollars), as compared to the \$1.5 million (inflation-adjusted 2020 dollars) of the WHRFMA. Since the closure of the WHRFMA to commercial aquarium collection in October 2017, data disclosed from fishers in East Hawai'i reported sales of \$366,434 of finfish during the 2018 calendar year (DAR 2019b), which is 5 times the historic average value and 2.6 times the maximum reported value from 2000 to 2017 (Table 5-1). Therefore, while the focus of this section is on the WHRFMA and its socioeconomic impacts, East Hawai'i data are included due to their importance for the No Action Alternative, under which no commercial aquarium collection would be allowed to occur within the WHRFMA, as well as other alternatives which would include collection in East Hawai'i either with or without the use of fine mesh nets.

Total ex-vessel value (i.e., price received by a fisher for the catch) for the 10 fishers in the WHRFMA ranged from a low of \$14,492 in 2001 to a high of \$670,546 in 2010, with an average of \$328,192 (inflation-adjusted 2020 dollars; Table 5-1). During the period from 2000 – 2017, the 10 fishers made up from 2.0% to 38.6% of the total economic value of the WHRFMA aquarium fishery (Table 5-1). Total ex-vessel value for all aquarium collectors in the WHRFMA ranged from a low of \$735,821 in 2000 to a high of \$1,872,346 in 2010, with an average of \$1,425,034 (inflation-adjusted 2020 dollars; Table 5-1). Total ex-vessel value for the state of Hawai'i ranged from a low of \$1,340,774 in 2002 to a high of \$2,723,388 in 2015, with an average of \$2,183,880 (inflation-adjusted 2020 dollars) (Table 5-1). The 2017 ex-vessel inflation-adjusted value for the 10 fishers within the WHRFMA was \$524,168; all aquarium fish collection in the WHRFMA was \$1,357,962; and aquarium fish collection in the state of Hawai'i was \$2,034,076 (Table 4-1 and Table 4-2).

Table 5-1. Minimum, maximum and average market values of the commercial aquarium fishery from 2000 through 2017 (inflation-adjusted 2020 values). See Table 4-2 for additional data by year.

		Minimum	Maximum	Average
East Hawai'i	All Fishers	\$17,725	\$142,844	\$63,708
WHRFMA	All Fishers	\$735,821	\$1,872,346	\$1,193,656
	10 Fishers	\$14,492	\$670,546	\$328,192
State of Hawai'i	All Fishers	\$1,340,774	\$2,723,388	\$2,183,880

It should be noted that the dollar value of these fisheries represents only the ex-vessel value, what the fishers are paid for their catch, and does not include the value which would be generated by additional dealer and retail sales. The actual economic value of the catch is thus substantially greater than the ex-vessel value and is discussed in further detail in the indirect impacts section below.

According to data presented in DAR (2019a), the market value of the WHRFMA has increased by 143% between 2000 and 2017, growing from a value of \$530,842 in 2000 to a value of \$1,290,316 in 2017 (DAR 2019a)⁷, representing a 5.36% annual growth rate⁸.

All commercial aquarium collectors must obtain a state Aquarium Permit and a CML, which allows them to offer the fish for sale. The Aquarium Fish Catch Report requirement is triggered by the CML. Some collectors participate in a dive team. To avoid duplicate fish catch reporting, only a principal diver is required to report the catch and effort for the dive team (DAR, pers. comm., 2018). This process ensures that reported catch data are not duplicated in the State's system. However, this reporting mechanism can lead to confusion by outside observers, as the total number of permit holders is higher than the number of permit holders reporting data (Table 4-1), giving the appearance of under reporting. Analysis by the DAR (2014a) has shown that actual underreporting of catch is small, with a 3.5% difference between the number of animals reported caught and sold in 2010 and a 0.4% difference in 2014, which likely represent live releases and mortality. For the period 2000 to 2017, the total number of permit holders for the WHRFMA ranged from 24 to 63 (average = 46), while the number of permit holders reporting ranged from 19 to 42 (average = 28). In 2017, it is estimated that up to 57 individuals were directly employed in the commercial aquarium fishery in the WHRFMA (up to 226 employed in the state of Hawai'i).

5.2.1.1 No Action Alternative

Under the No Action Alternative, commercial collection of aquarium fish would not occur in the WHRFMA. In East Hawai'i, aquarium collection using legal gear or methods other than fine-mesh nets would continue. Commercial aquarium fishers may no longer find it feasible to target aquarium fish and may begin to participate in other fisheries, but this is not possible to quantify at this time.

⁷ This value does not match our reported value from 2000, likely due to confidentiality rules (see Section 5.1).

⁸ $Annual\ Percent\ Growth = \left[\frac{2017\ value^{1/17}}{2000\ value} - 1 \right] * 100$

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Under the No Action Alternative, some aquarium collection may continue using legal gear or methods other than fine mesh nets. Since the closure of the WHRFMA to commercial aquarium collection in October 2017, based on data disclosed by the DAR, East Hawai'i reported sales of \$366,434 during the 2018 calendar year (DAR 2019b), which is 5 times the historic average value and 2.6 times the maximum reported from 2000 to 2017 (Table 5-1).

In East Hawai'i, under the No Action Alternative, it is estimated that the commercial aquarium fishery would add approximately \$366,434 to the state of Hawai'i's economy in the first year of the 5-year analysis period based on what occurred in 2018 (DAR 2019b). Assuming a 5.36% annual growth rate, this would total approximately \$2 million over the 5-year analysis period (average of \$407,878 per year) and an unknown number of jobs (assumed to be <57) under the No Action Alternative. This would represent an increase in East Hawai'i of over \$1.6 million compared to the Pre-Aquarium Collection Ban Alternative, though there would also be a loss of approximately \$7.9 million in the WHRFMA when compared to the Pre-Aquarium Collection Ban Alternative.

An increase in the East Hawai'i commercial aquarium fishery value may offset some of the loss from the WHRFMA fishery under the No Action Alternative, but the fishery as a whole would still add approximately \$6.3 million less to the economy over the 5-year analysis period than under the Pre-Aquarium Collection Ban Alternative, or \$1,259,660 less per year (on average). This represents an annual loss of approximately 0.01% of the \$8.6 billion ocean economy in Hawai'i, and an even lesser percentage of the overall Hawai'i economy.

The No Action Alternative would have a **less than significant impact** on Hawai'i's overall and ocean socioeconomic, and a **less than significant impact** compared to the Pre-Aquarium Collection Ban Alternative.

5.2.1.2 Pre-Aquarium Collection Ban Alternative

Under the Pre-Aquarium Collection Ban Alternative, an unlimited number of Aquarium Permits would be issued for the use of fine-mesh nets within the WHRFMA and East Hawai'i, and it is assumed for this analysis that fishing trends, including the value and sales of fish, would follow historic trends (see Table 4-2). Based on historic data collected prior to the October 2017 ban on commercial aquarium collection, under the Pre-Aquarium Collection Ban Alternative the commercial aquarium fishery is estimated to create approximately 57 jobs, and add an average of approximately \$1,498,101 (inflation-adjusted 2020 dollars, based on \$1,425,034 from the WHRFMA and \$73,067 from East Hawai'i) to the state of Hawai'i's economy during the first year of the 5-year analysis period. Assuming an annual growth rate of 5.36%, this would total over \$8.3 million over the 5-year analysis period (average of \$1.67 million per year). This represents less than 0.02% of the \$8.6 billion ocean economy in Hawai'i, and even less of Hawai'i economy overall.

The Pre-Aquarium Collection Ban Alternative would have a minimal, but **beneficial direct impact** on Hawai'i's overall and ocean socioeconomic resources.

5.2.1.3 WHRFMA-only Programmatic Issuance of Permits Alternative

Under the WHRFMA-only Programmatic Issuance of Permits Alternative, an unlimited number of Aquarium Permits would be issued for the use of fine-mesh nets within the WHRFMA, but fine-mesh nets would not be allowed in East Hawai'i. The impact on socioeconomics within the WHRFMA would be creation of an estimated 57 jobs, as well as the addition of approximately \$1,425,034 (inflation-adjusted 2020 dollars) to the state of Hawai'i's economy during the first year of the 5-year analysis period. This value would likely grow by approximately 5.36% each year, for a total value of \$7.9 million over the 5-year analysis period (average of \$1,586,208 per year).

In East Hawai'i, given that the WHRFMA would be open to fishing with the use of fine mesh nets, impacts to the economy would be anticipated to be similar to the Pre-Aquarium Collection Ban Alternative, or even potentially decrease since fishing in the WHRFMA may provide more favorable given the use of fine mesh nets. Therefore, it is anticipated that aquarium fish collection in East Hawai'i would add, at most, \$73,067 in the first year, and given an annual growth rate of 5.36%, a total of \$406,655 over the 5-year analysis period (average of \$81,331 per year), or less. Thus, this alternative overall would add \$7.9 to \$8.3 million to the economy over the 5-year analysis period.

Assuming an average of \$1,586,208 per year from the WHRFMA, and \$81,331 per year from East Hawai'i, the total of \$1.67 million represents less than 0.02% of the \$8.6 billion ocean economy in Hawai'i, and even less of Hawai'i economy overall.

The WHRFMA-only Programmatic Issuance of Permits Alternative would have a minimal, but **beneficial direct impact** on Hawai'i's overall and ocean socioeconomic resources, and would have a **less than significant direct impact** compared to the Pre-Aquarium Collection Ban Alternative.

5.2.1.4 Achilles Tang Conservation Alternative

The Achilles Tang Conservation Alternative would include issuance of an unlimited number of Aquarium Permits for the WHRFMA and East Hawai'i, and implementation of a bag limit of 5 Achilles Tang per day, resulting in an estimated 50% reduction in the number of Achilles Tang collected by the commercial aquarium fishery (due to a 50% reduction in the current bag limit of 10 Achilles Tang). Estimated value of the Achilles Tang catch in the WHRFMA since the 2014 bag limit was imposed has been \$135,627 (2015), \$129,876 (2016), and \$130,853 (2017). The worst-case scenario under the Achilles Tang Conservation Alternative would be that the income from Achilles Tang would be cut in approximately half (average of \$66,059 decrease in income based upon the past three years). This represents approximately 4.6% of the average economic value of the WHRFMA (\$1,425,034 per year).

This impact may be buffered however, as the cost per fish may increase as the supply of Achilles Tang decreases, negating any socioeconomic impact to the fishers. If this were to be case, the socioeconomic impact of the bag limit would be seen on the consumer side (i.e., those purchasing aquarium fish, who would have to pay a higher premium due to decreased supply).

However, assuming that the impact is \$60,059 of the WHRFMA value, the Achilles Tang Conservation Alternative would add approximately \$1,364,975 in the first year of analysis, and assuming an annual

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growth rate of approximately 5.36%, the WHRFMA would add approximately \$7.6 million over the 5-year analysis period (average of \$1,519,356 per year).

Impacts in East Hawai'i would remain the same as the Pre-Aquarium Collection Ban Alternative (as no bag limit would be implemented there), for a total of \$406,655 over the 5-year analysis period (average of \$81,331 per year). Combined, the WHRFMA and East Hawai'i would add approximately \$8 million to the economy over the 5-year analysis period (average of \$1,600,687 per year). This represents less than 0.02% of the \$8.6 billion ocean economy in Hawai'i, and even less of Hawai'i economy overall.

The Achilles Tang Conservation Alternative would have a minimal, but **beneficial direct impact** on Hawai'i's overall and ocean socioeconomic resources, and a **less than significant impact** on Hawai'i's overall and ocean socioeconomic resources compared to the Pre-Aquarium Collection Ban Alternative.

5.2.1.5 Limited Permit Issuance (Preferred) Alternative

Under the Limited Permit Issuance (Preferred) Alternative, Aquarium Permits would be issued to 10 fishers for the use of fine-mesh nets within the WHRFMA. No fine mesh nets would be allowed in East Hawai'i, though collection of aquarium fish would still be permitted using other legal means. This would create a minimum of 10 jobs for the 10 fishers who would have permits.

The 10 fishers who would receive permits averaged \$328,192 per year in the WHRFMA between 2000 and 2017, up to a maximum of \$670,546 (based on the maximum from 2010) (inflation-adjusted 2020 dollars; see Table 4-2). Assuming that the first year of the 5-year analysis period would have a market value of \$328,192 to \$670,546, and applying a 5.36% annual growth rate, the Limited Permit Issuance (Preferred) Alternative would add from \$1.8 to \$3.7 million over the 5-year analysis period (average of \$365,311 to \$746,386 per year). Therefore, under this alternative, the commercial aquarium fishery in the WHRFMA would represent up to approximately 0.01% of the \$8.6 billion ocean economy in Hawai'i, and an even smaller percentage of the overall economy in the State (see Section 4.1).

The Limited Permit Issuance (Preferred) Alternative would have a minimal, but **beneficial direct impact** on Hawai'i's overall and ocean socioeconomic resources compared to the No Action Alternative, and a **less than significant impact** compared to the Pre-Aquarium Collection Ban Alternative.

5.2.2 Indirect Impacts

Indirect socioeconomic impacts of the commercial aquarium fishery would primarily involve the additional profits from the aquarium fish market (including freight and packaging), as well as other tourist businesses such as snorkel and dive operations that rely on seeing and interacting with a healthy reef ecosystem. The presence of a healthy reef ecosystem may also impact overall land/home values on the island of Hawai'i.

As described in Section 4.1.1, the total sales of the Hawaiian aquarium fishery (including freight and packaging) is nearly six times the ex-vessel value (Walsh et al. 2003). Therefore, it is estimated that the commercial aquarium fishery indirectly adds approximately five times the direct socioeconomic costs described in Section 5.2.1 to the economy.

5.2.2.1 No Action Alternative

Under the No Action Alternative, no commercial aquarium fishing would occur in the WHRFMA, but aquarium fishing in East Hawai'i would continue using methods other than fine-mesh nets.

The commercial aquarium industry in East Hawai'i is expected to add approximately \$2 million over the 5-year analysis period to the economy under the No Action Alternative, for an indirect economic benefit of approximately \$10 million over the 5-year analysis period, or an average of \$2 million per year, representing approximately 0.2% of the annual \$84.9 billion gross domestic product of Hawai'i.

Based on the direct economic loss of approximately \$6.3 million over the 5-year analysis period under the No Action Alternative when compared to the Pre-Aquarium Collection Ban Alternative (this loss is described in Section 5.2.1.2), approximately \$31 million in indirect economic benefits of this fishery would not occur over the 5-year analysis period, or an average of \$6.3 million per year, representing <0.01% of the annual \$84.9 billion gross domestic product of Hawai'i.

Under the No Action Alternative, no interaction between other tourist operations and commercial aquarium fishers would occur in the WHRFMA; however, interactions in East Hawai'i would continue and may increase due to increased use of the area by aquarium fishers.

No scientific data exist to suggest that in the absence of aquarium fishers an increase in other tourist operations would occur. Nevertheless, the No Action Alternative would have a ***less than significant impact*** on Hawai'i's overall and ocean socioeconomic resources.

5.2.2.2 Pre-Aquarium Collection Ban Alternative

Under the Pre-Aquarium Collection Ban Alternative, commercial aquarium fishing would occur in the WHRFMA and East Hawai'i using fine mesh nets, and it is assumed for this analysis that fishing trends, including the value and sales of fish, would follow those prior to the October 2017 commercial aquarium collection ban (see Table 4-3). Based on the direct economic value of \$8.3 million over the 5-year analysis period, the commercial aquarium fishery would indirectly add an additional \$41.7 million under the Pre-Aquarium Collection Ban Alternative to the economy of Hawai'i, or an average of \$8.3 million per year, representing <0.01% of the annual \$84.9 billion gross domestic product of Hawai'i.

Indirect socioeconomic impacts between commercial aquarium fishers, dive tour operators and subsistence/cultural fishers are possible if the commercial aquarium fishing leads to a decrease in demand for snorkel and scuba tours or a decrease in availability of species of fish targeted for subsistence/cultural fishing activities. As the number of commercial aquarium collectors in West Hawai'i began to rise in the 1980s conflicts between dive tour operators and commercial aquarium collectors began to increase. A short-lived informal "Gentleperson's Agreement" was reached in 1987 whereby aquarium collectors agreed to refrain from collecting in certain areas. In return, charter operators agreed not to initiate legislation opposing collecting and to cease harassment. In 1991, four of the areas from the Gentleperson's Agreement were established as the Kona Coast Fisheries Management Area (FMA) within which aquarium collecting is prohibited (Walsh et al. 2003; HAR §13-58). This, in part, led to the development of the WHRFWG and the WHRFMA, minimizing indirect impacts to other, tourist related industries (e.g., dive and

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snorkel operations), and subsistence and/or cultural fishing. In addition, the average collection of 37 of the 40 White List Species is below 1% of their overall island of Hawai'i populations and collection of the remaining three species would be less than 5% of their overall population (Section 5.4.1.2). The small percentage of fish collected over multiple areas would be imperceptible to the average observer.

Available data do not suggest that the Pre-Aquarium Collection Ban Alternative has impacted the tourism industry or land values in Hawai'i. Hawai'i's tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). When adjusted for inflation, total visitor spending was up 3.5% from 2016 (Figure 3). A total of 9,404,346 visitors came by air or by cruise ship to the state, up 5.3% from the previous record of 8,934,277 visitors in 2016. Total visitor days rose 4.8% compared to 2016. The average spending per day by these visitors (\$198 per person) was also higher than 2016 (\$197 per person; HTA 2018).

Despite the housing crisis and recent recession, the average sale price of homes steadily increased in Hawai'i from 2011 to 2014 after a few years of year-to-year fluctuation. The average sale price of homes in 2014 was \$594,440, which was 26.4% higher than the average sale price in 2011. A rapid price increase was observed particularly in 2013 and 2014. The average sale price in 2013 and 2014 was about 10% higher than the price in the prior year. In 2015, the total number of home sales increased by 9.3%, but the average sale price was 0.3% lower than the previous year (HDBEDT 2016). These price increases occurred while commercial aquarium collection was also occurring, suggesting that collection is not impacting home values.

Under the Pre-Aquarium Collection Ban Alternative, a portion of the direct and indirect income from this fishery (total of \$50 million over the 5-year analysis period) would continue to be put back into Hawai'i's economy through re-investment efforts in terms of equipment, maintenance, supplies, and personnel.

In addition, while the aquarium fishery directly employs permitted collectors, these collectors hire staff/assistants, sell their catch to wholesalers, who in turn get the fish to the market, which includes pet stores and their customers (Dierking 2002). This economic value is represented in the \$41.7 million indirect economic benefit, but there are also jobs, which cannot be quantified at this time.

The Pre-Aquarium Collection Ban Alternative would have a **less than significant impact** on Hawai'i's tourist industry, and a minimal, but **beneficial indirect impact** on Hawai'i's overall economy through re-investment efforts in terms of equipment, maintenance, supplies, and personnel.

5.2.2.3 WHRFMA-only Programmatic Issuance of Permits Alternative

Under the WHRFMA-only Programmatic Issuance of Permits Alternative, it is assumed that the indirect socioeconomic impacts in the WHRFMA would be similar to the Pre-Aquarium Collection Ban Alternative (Section 5.2.2.2). In East Hawai'i, the impacts may be similar to the No Action Alternative, though with the WHRFMA open to fishing with the use of fine mesh nets, aquarium fish collection in East Hawai'i may return to levels seen under the Pre-Aquarium Collection Ban Alternative, or even decrease since fishing in the WHRFMA may prove more favorable given the use of fine mesh nets. Based on the \$7.9 to \$8.3 million in direct economic benefits under the WHRFMA-only Programmatic Issuance of Permits Alternative, the indirect

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economic benefits would range from \$39.7 to \$41.7 million (\$7.9 to \$8.3 million per year), representing <0.01% of the annual \$84.9 billion gross domestic product of Hawai'i.

The WHRFMA-only Programmatic Issuance of Permits Alternative would have a **less than significant impact** on Hawai'i's tourist industry, and a minimal, but **beneficial indirect impact** on Hawai'i's overall economy through re-investment efforts in terms of equipment, maintenance, supplies, and personnel.

5.2.2.4 Achilles Tang Conservation Alternative

The indirect impacts of the Achilles Tang Conservation (Preferred) Alternative would be similar to those of the Pre-Aquarium Collection Ban Alternative (Section 5.2.2.2), though the indirect economic benefits may decrease to \$40 million in line with the direct economic decrease, representing <0.01% of the \$84.9 billion annual gross domestic product of Hawai'i. The reduction in the Achilles Tang bag limit may make the species more visible to divers and snorkelers, but the impact would be **less than significant**. A minimal, but **beneficial indirect impact** on Hawai'i's overall economy would occur under the Achilles Tang Conservation Alternative through re-investment efforts in terms of equipment, maintenance, supplies, and personnel.

5.2.2.5 Limited Permit Issuance (Preferred) Alternative

Under the Limited Permit Issuance (Preferred) Alternative, Aquarium Permits would be issued for 10 fishers for the use of fine-mesh nets within the WHRFMA. Based on the direct economic benefit of \$1.8 to \$3.7 million over the 5-year analysis period, an indirect economic benefit of \$9.1 to \$18.7 million would be added to the economy, representing <0.01% of the \$84.9 billion annual gross domestic product of Hawai'i.

No fine mesh nets would be allowed in East Hawai'i, though collection of aquarium fish would still be permitted using other legal means. It is anticipated that indirect impacts in East Hawai'i would be similar to the No Action Alternative, though with the WHRFMA open to fishing with the use of fine mesh nets for the 10 fishers, who represented nearly 40% of the fishery in 2017, aquarium fish collection in East Hawai'i may return to levels seen under the Pre-Aquarium Collection Ban Alternative, or even decrease since fishing in the WHRFMA may prove more favorable given the use of fine mesh nets.

Other indirect impacts of the Limited Permit Issuance (Preferred) Alternative would be similar to those of the Pre-Aquarium Collection Ban Alternative (Section 5.2.2.2).

The Limited Permit Issuance (Preferred) Alternative would have a **less than significant impact** on Hawai'i's tourist industry, and a minimal, but **beneficial indirect impact** on Hawai'i's overall economy through re-investment efforts in terms of equipment, maintenance, supplies, and personnel.

5.2.3 Cumulative Impacts

For the period 2000 to 2017, the commercial aquarium fishery within the WHRFMA added an average of \$1,425,034 (inflation-adjusted 2020 dollars) annually to the state of Hawai'i's economy, while the overall aquarium fishery within the state of Hawai'i added an average of \$2,183,880 (inflation-adjusted 2020 dollars) (Table 4-3). Thus, the WHRFMA aquarium fishery accounts for approximately 65% of the overall aquarium fishery within Hawai'i. In 2016, the overall Gross Domestic Product (GDP) of Hawai'i was \$84.9

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billion, of which, the commercial aquarium fishery contributed \$2,257,021 (0.003%), of which \$1,582,011 was from the WHRFMA. Over the 5-year analysis period, it is estimated that the aquarium fishery on Hawai'i would directly add \$2 million (under the No Action Alternative) to \$8.3 million (under the Pre-Aquarium Collection Ban Alternative or the WHRFMA-only Alternative) to the state's economy.

All alternatives under consideration would have a minimal, but beneficial cumulative impact on Hawai'i's overall and ocean socioeconomic resources. The reduction in Achilles Tang bag limit under the Achilles Tang Conservation Alternative and the Limited Permit Issuance (Preferred) Alternative may have an effect on the non-aquarium commercial fishery; however, given that known catch of Achilles Tang made up less than 1.5% of the White List Species collected by commercial fishers on the island of Hawai'i, and average only 222 per year on the Island (or 592 state-wide) (see Section 5.4.3.2, Table 5-12), the impact is anticipated to be *less than significant*.

5.2.4 Mitigation

No significant adverse socioeconomic impacts are anticipated under any of the five alternatives under consideration. Therefore, no mitigation is required or proposed.

5.3 CULTURAL RESOURCES

5.3.1 Direct and Indirect Impacts

A full analysis of the cultural impacts of commercial aquarium collection is found in the Cultural Impact Assessment (CIA) located in Appendix A. As part of the CIA, extensive oral interviews were conducted with numerous individuals from multiple user groups (including cultural practitioners, aquarium collectors, subsistence and commercial fishers, charter boat operators, and researchers) who represent various communities within the WHRFMA. While some of the consulted individuals expressed specific cultural concerns with respect to the White List Species, others stressed the ecological importance of the fish, and the need for them to live out their life cycles in their natural habitats. As evident in the statements made by multiple individuals, the take of fishes for commercial aquarium purposes within the WHRFMA has a long and contentious history, and it remains a point of conflict. As discussed in Section 4.2 and detailed in the CIA, many of the 40 White List Species have a cultural significance in Hawai'i, and there are distinct differences between the traditional Native Hawaiian approach to fish harvest and management and the western model approach.

As concluded in the CIA, cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts. However, some interviewees expressed the belief that collection for aquarium purposes, regardless of impact or sustainability, is a violation of traditional beliefs (see Appendix A). Table 4-3 lists the 40 White List Species, and Section 4.4 includes a brief summary of known cultural significance by species. While not all species have a known Hawaiian cultural significance, for this analysis, it was assumed that the 33 species on the White List identified as having a cultural use for food, medicinal, religious or ceremonial purposes could have a cultural impact if populations of those species were impacted.

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As detailed in Section 5.4, populations of the White List Species are not anticipated to significantly decline under any of the five alternatives under consideration. Therefore, direct and indirect impacts to cultural resources as a result of commercial aquarium collection under any of the five alternatives under consideration would be *less than significant*.

5.3.2 Cumulative Impacts

It is acknowledged that cultural resources, including traditional practices specific to both species and places, have been impacted by past and current actions, and will continue to be impacted by reasonably foreseeable future actions. The cumulative impacts of the five alternatives under consideration are addressed in this section.

It is not possible to fully quantify the cumulative effects of past and ongoing actions on cultural practices and beliefs. Many users and user groups have collected fish in the waters around the island of Hawai'i for various purposes for centuries. The commercial aquarium fishery has existed in Hawai'i since the late 1940s and in the past the fishery has impacted cultural resources by virtue of the fact that commercial aquarium collection occurs in a culturally significant area (the ocean), and in some instances involves culturally significant species. However, commercial aquarium collection is not the only fishery occurring in the ocean and affecting some of the White List Species, including those with cultural significance (e.g., Achilles Tang) (see Section 5.4.3). Harvest of some of the White List Species by other non-regulated users (e.g., subsistence fishers, non-aquarium commercial and recreational fishers) occurs and is anticipated to continue under any of the five alternatives under consideration. In addition, other ocean users may indirectly affect reef fish and the reefs they depend on, such as beachgoers using sunscreen, scuba divers and snorkelers affecting fish behavior, and boaters anchoring on top of reefs (see Section 5.4.3.4). Beach and shoreline development may also have effects on reefs and reef fish. In addition to effects on culturally significant White List Species by the various user groups discussed above, climate change resulting in warming ocean temperatures and habitat loss due coral bleaching also affects reef fishes including population effects (see Section 5.4.3.5).

As concluded in the CIA (Appendix A), cultural impacts would occur if a significant decline in the population of a White List Species considered to be a cultural resource occurs. The DAR (2019a) has noted significantly declining populations in one or more management area for 12 of the White List Species, and cumulatively, all of the factors discussed above likely contribute to the declines. Therefore, cumulative cultural resource impacts to these 12 White List Species would occur under any of the five alternatives under consideration and would be **significant** (including the No Action Alternative). No cumulative cultural resource impacts to the remaining 28 White List Species are anticipated, given that populations have remained stable or increased for 24 of those species, and population trend data is not available for the other four species⁹.

⁹ Species not adequately surveyed by WHAP include Tinker's Butterflyfish, Longfin Anthias, Flame Wrasse, and Eyestripe Surgeonfish. Tinker's Butterflyfish have a CREP (2018) population estimate of 18,475, and collection under any of the alternatives would be less than 5% of the island-wide population (though it should be noted that the vast majority of the population occurs well below the 98-foot depth surveyed by the CREP and thus the population estimate is likely low). Eyestripe Surgeonfish has a CREP (2018) population estimate of 578,835, and collection under any of the alternatives would be less than 0.3% of the island-wide population. Flame Wrasse do not have a

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However, as noted above and in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines. In addition, for the 12 species that have shown a significant decline in population size in one or more management area since establishment of the WHRFMA in 1999, commercial aquarium collection under any of the five alternatives would collect less than 1% of the island-wide population estimates for 10 of the species (Table 5-14). For the remaining two species, Achilles Tang and the Pyramid Butterflyfish, commercial aquarium collection would collect less than 4% of the island-wide population (Table 5-14). Based on this, while commercial aquarium collection does contribute to the cumulative impact, it is a **less than significant** factor in the observed declines.

Additionally, measures included in the Preferred Alternative (e.g., limited permit issuance, reduced Achilles Tang bag limit) may mitigate potential impacts to cultural resources by limiting the number of Aquarium Permits issued as well as the number of Achilles Tang that can be collected by commercial aquarium collectors each day. These measures may increase the number of Achilles Tang available for cultural practices and traditional subsistence fishers, and potentially decrease user conflict between commercial collectors and subsistence fishers or cultural practitioners.

5.3.3 Mitigation

No significant adverse direct or indirect cultural resource impacts are anticipated under any of the five alternatives under consideration. Significant cumulative impacts are anticipated; however, commercial aquarium collection is a less than significant factor in the cumulative impact. Therefore, no mitigation is required or proposed.

Nevertheless, the Preferred Alternative includes mitigative measures (see Section 5.0) such as a reduction in the number of Aquarium Permits that would be issued, limiting collection using fine mesh nets to the WHRFMA, and reducing the bag limit for the Achilles Tang, all of which would minimize impacts to cultural resources.

CREP population estimate, but collection has been less than 175 individuals per year for the island of Hawai'i between 2000 and 2017. Longfin Anthias also do not have a CREP population estimate, but collection has been less than 150 individuals per year for the island of Hawai'i.

5.4 BIOLOGICAL RESOURCES

5.4.1 Direct Impacts

According to data presented in DAR (2019a), the number of collected fish in the WHRFMA has increased by 29% between 2000 and 2017, growing from a collection of 252,290 in 2000 to a collection of 324,565 in 2017 (DAR 2019a)¹⁰, representing an annual growth rate of 1.49%¹¹.

Table 5-2 summarizes the historic collection data for East Hawai'i and the WHRFMA by year for all commercial aquarium collectors, as well as for the 10 fishers who would receive Aquarium Permits under the Preferred Alternative.

Table 5-2. Total fish and invertebrates collected under Aquarium Permits from East Hawai'i and total White List Species collected from the WHRFMA annually from 2000-2017 (DAR 2018a). Also included for comparison are data from collection of fish within East Hawai'i in 2018.

Fiscal Year	East Hawai'i		WHRFMA			Combined	
	10 fishers	All fishers (White List Species in parenthesis)	10 fishers	All fishers	Percent contribution of 10 fishers	10 fishers	All fishers
2000	0	6,685 (6,673)	16,893	241,070	7.0%	16,893	247,755
2001	0	<i>n.d.</i>	4,405	243,085	1.8%	4,405	243,085
2002	0	<i>n.d.</i>	9,917	192,102	5.2%	9,917	192,102
2003	0	<i>n.d.</i>	29,449	233,930	12.6%	29,449	233,930
2004	0	<i>n.d.</i>	88,176	336,436	26.2%	88,176	336,436
2005	0	7,942 (7,807)	78,657	433,270	18.2%	78,657	441,212
2006	0	22,371 (21,613)	73,310	478,122	15.3%	73,310	500,493
2007	0	11,036 (10,893)	56,636	337,287	16.8%	56,636	348,323
2008	29	36,924 (35,946)	85,737	342,954	25.0%	85,766	379,878
2009	0	21,494 (20,819)	105,112	284,537	36.9%	105,112	306,031
2010	0	9,232 (8,074)	155,729	377,805	41.2%	155,729	387,037
2011	0	39,058 (5,462)	93,200	361,452	25.8%	93,200	400,510
2012	1,047	104,670 (5,763)	86,399	349,971	24.7%	87,446	454,641
2013	0	55,945 (3,389)	85,150	362,444	23.5%	85,150	418,389

¹⁰ The numbers in 2000 do not match the number presented elsewhere in the text, likely due to confidentiality of data (Section 5.1).

¹¹ $Annual\ Percent\ Growth = \left[\frac{2017\ value^{1/17}}{2000\ Value} - 1 \right] * 100$

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Fiscal Year	East Hawai'i		WHRFMA			Combined	
	10 fishers	All fishers (White List Species in parenthesis)	10 fishers	All fishers	Percent contribution of 10 fishers	10 fishers	All fishers
2014	446	52,799 (16,946)	115,867	338,848	34.2%	116,313	391,647
2015	0	25,272 (0)	125,657	358,671	35.0%	125,657	383,943
2016	0	15,504 (0)	160,832	377,479	42.6%	160,832	392,983
2017	3,771	22,002 (16,887)	150,500	324,565	46.4%	154,271	346,567
2018 ¹	26,013	55,815 (unknown, data not provided)	N/A, aquarium fishing closed as of October 2017			26,013	55,815
Total (2000-2017)	5,293	430,934 (160,272)	1,521,626	5,974,028	25.5%	1,526,919	6,404,962
Average (2000-2017)	294	30,781 (10,017)	84,535	331,890	25.5%	84,829	355,831

¹Data from 2018 were provided for the calendar year for all fishers, and for the fiscal year for the 10 fishers. However, both datasets contain 12 calendar months, and are considered comparable for analysis.

5.4.1.1 No Action Alternative

Under the No Action Alternative issuance of Aquarium Permits would not occur and commercial aquarium fishing would not be permitted in the WHRFMA. Therefore, collection of all White List Species in the WHRFMA would be zero and reef habitat would not be affected.

In East Hawai'i, aquarium collection using legal gear or methods other than fine-mesh nets would continue. Since the closure of the WHRFMA to commercial aquarium collection in October 2017, commercial aquarium collectors in East Hawai'i collected 55,815 fish in the 2018 calendar year (based on data provided by the DAR), and an additional 32,331 fish to-date in 2019 (data provided on October 21, 2019, DAR 2019b). Assuming 55,815 fish are collected in the first year of the 5-year analysis period, and an annual growth rate of 1.49% in collection, a total of 287,516 fish would be collected over the 5-year analysis period (average of 57,503 per year).

Of the 88,146 fish collected in East Hawai'i in 2018 and 2019, nearly 86% were Yellow Tang (Table 5-3). Due to confidentiality laws (Section 5.1), information on species collected is limited, however the species composition for 93% of all collection is provided in Table 5-3. Assuming that similar collection would occur annually over the 5-year analysis period under the No Action Alternative, collection of each species would result in impacts to 1.11% or less of the estimated population per year. Ochavillo and Hodgson (2006) suggest collection of between 5% and 25% is sustainable for various reef species in the Philippines that are similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish), and all 7 species fall below the lower end of this threshold. Similar data for the White List Species are not available to determine species-specific sustainable thresholds; therefore, this research represents the best available science. See "Impact of Collection on White List Species Populations" in Section 5.4.1.2 for a further discussion on population impacts.

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No collection of invertebrates was provided for 2018 or 2019 from East Hawai'i, though this could be due to Hawai'i confidentiality laws (see Section 5.1). Therefore, we assume that the collection of invertebrates would follow historic trends from 2000-2017, and would not increase under the No Action Alternative, as collection of invertebrates has not and would not be allowed in the WHRFMA (i.e., there has been no change in laws/regulations regarding invertebrate collection on the island of Hawai'i). The only invertebrate with catch data provided from 2000-2017 was the Red Pond Shrimp, which had an average collection of 20,301 individuals per year, and a maximum of 97,730 in 2012 (DAR 2018a). Therefore, while still applying a 1.49% annual growth rate for collection, it is anticipated that 20,301 to 97,730 invertebrates (mainly Red Pond Shrimp) would be collected during the first year of the 5-year analysis period, and a total of 104,575 to 503,430 would be collected over the 5-year analysis period (average of 20,915 to 100,686 per year).

Table 5-3. Projected annual and total collection of fish species collected in East Hawai'i over the 5-year analysis period, based on an average collection of 57,503/year total fish, and impact on the CREP (2018) population estimates.

Species	CREP (2018) Population Estimates (lower-upper estimate limit)	% of total catch in East Hawai'i (2018-2019)	Projected Average Annual Collection Under No Action Alternative	% of the CREP population collected annually
Yellow Tang	8,262,144 (6,849,295-9,674,993)	85.7%	49,280	0.60%
Achilles Tang	231,377 (113,989-348,765)	4.5%	2,588	1.11%
Kole, Goldring Surgeonfish	11,697,561 (9,547,971-13,847,152)	2.0%	1,150	<0.01%
Black Surgeonfish (Chevron Tang)	549,462 (355,535-743-388)	0.3%	173	0.03%
Tinker's Butterflyfish	18,475 (1,556-38,505)	0.3%	173	0.94%
Orangespine Unicornfish	897,085 (758,978-1,035,192)	0.2%	115	0.01%
Goldrim Tang	97,924 (10,276-185,573)	<0.1%	58	0.06%
All Others (White List and non-White List)	NA	7.0%	4,025	NA

Without the use of fine mesh nets, the size class of fish collected may increase over that which is caught with fine mesh nets (i.e., the smaller fish would escape the larger mesh), but again this impact cannot be quantified at this time.

The No Action Alternative would have a **less than significant direct impact** on reef fish populations and the reefs in which they occur, and a **minor beneficial impact** when compared to the Pre-Commercial Aquarium Ban Alternative.

5.4.1.2 Pre-Aquarium Collection Ban Alternative

Under the Pre-Aquarium Collection Ban Alternative issuance of an unlimited number of Aquarium Permits would occur and commercial aquarium fishing would take place in both the WHRFMA and East Hawai'i. Based on historic trends, it is assumed that between 113 and 226 Aquarium Permits would be issued in the State of Hawai'i (minimum and maximum of the last 18 years, Table 4-1), and between 24 and 60 Aquarium Permits would be issued for fishers in the WHRFMA (Table 4-2). Impacts to invertebrates, including the Red Pond Shrimp, would be similar to the No Action Alternative, with a total of 104,575 to 503,430 invertebrates (mostly Red Pond Shrimp) collected over the 5-year analysis period (average of 20,915 to 100,686 per year).

It is likely that fishing pressure on the species collected in the past would remain relatively the same as what occurred prior to the October 2017 ban on commercial aquarium collection, resulting in an estimated 331,890 (18-year average) individual fish collected from the WHRFMA. Prior to October 2017, an average of 30,781 fish and invertebrates were collected from East Hawai'i (Table 5-2). Based on data provided, 42.4% were Red Pond Shrimp, while the rest were fish species or other invertebrates (DAR 2018a). However, no other invertebrate species' catch data were provided due to confidentiality, and therefore, we conservatively assume that the remaining 57.6% of the catch was fish. Therefore, of the 30,781 fish and invertebrates collected in an average year, it is assumed that 57.6% of those are fish (17,730). Assuming a 1.49% annual growth rate on the average collection from the WHRFMA (331,890 per year) and East Hawai'i (17,730 per year), a total of 1.8 million fish would be collected from the Island of Hawai'i over the 5-year analysis period, with 1.7 million of those collected in the WHRFMA and 91,000 from East Hawai'i (average of 341,929 and 18,266 per year).

White List Species

WHRFMA (Only White List Species Collected)

The top 10 collected species in the WHRFMA made up 98.2% of all fishes collected in fiscal year 2017 (DAR 2019a):

- Yellow Tang (81.6% of the total catch)
- Goldring Surgeonfish, Kole (9.5% of the total catch)
- Orangespine Unicornfish (1.9% of the total catch)
- Achilles Tang (1.7% of the total catch)
- Black Surgeonfish (1.2% of the total catch)
- Potter's Angelfish (0.7% of the total catch)
- Ornate Wrasse (0.5% of the total catch)
- Goldrim Surgeonfish (0.4% of the total catch)
- Orangeband Surgeonfish (0.4% of the total catch)
- Brown Surgeonfish (0.3% of the total catch)

The remaining 30 White List Species made up the remaining 1.8% of collected fish (DAR 2019a). Total abundance of nearshore fishes has had a significant positive trend in all management areas (open areas, FRAs and MPAs) since 2003 (DAR 2019a).

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WHAP data indicate that establishment of the FRAs has had a significantly positive impact on Yellow Tang and Kole populations in the WHRFMA (DAR 2019a; Table 5-4). Achilles Tang have decreased in both FRAs and Open Areas, suggesting that factors other than aquarium collection are also affecting their population (DAR 2019a; Table 5-4). Of the remaining 7 of the top 10 collected aquarium species, 1 species (Goldrim Surgeonfish) had no significant change in population since establishment of the FRAs in 1999, 6 species (Orangespine Unicornfish, Black Surgeonfish, Orangeband Surgeonfish, Brown Surgeonfish, and Potter's Angelfish) increased significantly in one or more of the management areas, and 1 species (Ornate Wrasse (Pinkface)) declined significantly in both FRAs and Open areas, suggesting that factors other than aquarium collecting were also affecting the Ornate Wrasse population. It is acknowledged that, in addition to the number of fish collected, incidental mortality may occur in fish that are released. However, while there are no data available to analyze these impacts, it is assumed that the magnitude of these impacts would not change from what has historically occurred, and thus these impacts are already accounted for in the analysis of population trend data.

Additionally, a comparison of West Hawai'i with Maui using 2002-2010 WHAP data and CREP data found that for the 10 most collected species in the WHRFMA (not the same 10 species listed above, as this list can vary by year), all were more abundant within the Open Areas of the WHRFMA (where aquarium collection occurs) than in the Maui MPA closed areas, and five of the species were significantly more abundant (DAR 2019a).

Table 5-4. Change in density of the top 10 collected species in the WHRFMA based on WHAP data. 'Before' = Mean of 1999-2000; 'After' = Mean 2017-2018. Young-of-year (YOY) not included. Bold = statistically significant t-test (DAR 2019a).

COMMON NAME	AREA	MEAN DENSITY (No./100m ²)		OVERALL% CHANGE IN DENSITY	ρ
		Before	After		
Yellow Tang	FRA	12.73	33.79	+165.4%	<0.001
	Open	10.24	20.53	+100.6%	<0.001
	MPA	23.08	40.07	+73.6%	<0.001
Kole (Goldring Surgeonfish, Yelloweye, Goldring)	FRA	28.38	52.60	+85.4%	<0.001
	Open	21.18	41.65	+96.6%	<0.001
	MPA	28.53	62.64	+119.6%	<0.001
Orangespine Unicornfish	FRA	0.81	0.67	-16.8%	0.26
	Open	1.12	1.59	+42.6%	<0.001
	MPA	1.59	2.88	+81.4%	<0.001
Achilles Tang	FRA	0.26	0.05	-82.7%	<0.001
	Open	0.31	0.09	-70.5%	<0.001
	MPA	0.42	0.22	-48.3%	0.05
Black Surgeonfish	FRA	0.18	0.76	+319.2%	<0.001
	Open	0.17	0.84	+402.1%	<0.001
	MPA	0.53	0.98	+83.7%	<0.001
Potter's Angelfish	FRA	1.38	2.28	+66.0%	<0.001
	Open	1.65	2.47	+49.9%	<0.001
	MPA	1.54	2.39	+55.4%	<0.001
Ornate Wrasse	FRA	0.94	0.66	-30.1%	<0.001
	Open	2.20	1.83	-16.6%	<0.001
	MPA	1.24	1.59	+28.5%	<0.05
Goldrim Surgeonfish	FRA	0.04	0.09	+156.6%	0.46
	Open	0.01	0.06	+605.9%	0.42
	MPA	0.11	0.21	+102.4%	0.45
Orangeband Surgeonfish	FRA	0.13	0.22	+73.9%	0.24
	Open	0.31	0.50	+60.0%	<0.01
	MPA	0.56	0.87	+56.3%	<0.05
Brown Surgeonfish	FRA	8.57	13.90	+62.1%	<0.001
	Open	11.20	25.77	+130.1%	<0.001
	MPA	7.68	22.21	+189.3%	<0.001

YELLOW TANG

The Yellow Tang has been the most collected species every year since 1976 (DAR 2018a). Since 2000, 5,972,413 individuals of all White List Species have been collected in the WHRFMA; 4,885,736 (81.8%) of those were Yellow Tang. The average number of Yellow Tang captured each year since 2000 was 271,430 individuals, ranging between a minimum catch of 152,047 individuals (2002) and maximum of 386,767 (2006). Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that between 152,047 and 387,767 Yellow Tang would be collected each year, for a total of approximately 760,000 to 1.9 million Yellow Tang over the 5-year analysis period.

Based on data collected between 2010 and 2016 by the CREP (2018), the island of Hawai'i Yellow Tang population is estimated at 8,260,141 individuals (Table 5-5). The WHAP estimates the 2017/2018 Open Area Yellow Tang population in the WHRFMA at 2,867,048 at the 30'-60' depth, an increase of over 1.2 million fish since 2012/2013. Collection of Yellow Tang between 152,047 and 386,767 individuals would remove approximately 2% to 5% of the current estimated population for the island of Hawai'i (Table 5-5). While this collection would occur only within the WHRFMA, there is evidence for connectivity between FRAs and Open Areas (Christie et al. 2010), therefore, analyzing the impacts on just the Open Area populations is not representative of the impact, nevertheless, that analysis is provided for comparison purposes in Appendix B. See "Impact of Collection on White List Species Populations" below.

Table 5-5. CREP (2018) estimated population of Yellow Tang for the island of Hawai'i and percentage of population collected by commercial aquarium fishers in the WHRFMA (DAR 2018a).

Island of Hawai'i Pop (CREP 2018)	WHAP Open Area Pop. Est. 30'-60' Depth in WHRFMA Only ¹		Minimum WHRFMA Collection per Year ²	Maximum WHRFMA Collection per Year ²	Minimum % of Hawai'i Population	Maximum % of Hawai'i Population
	2012/2013	2016/2017				
8,262,144	1,663,775	2,867,048	152,047	386,767	1.84%	4.68%

¹Include both adults and young-of-the-year. Data for 2012/2013 are from DAR 2014a. Data for 2016/2017 are from DAR 2019a.

²From 2000 – 2017

The DAR (2019a), stated:

- Since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish.
- There were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.

Figure 5 illustrates the population trends for Yellow Tang since the FRAs were established, illustrating the upward trend in all areas, even with commercial aquarium collection of 4,885,736 Yellow Tang between 2000 and 2017 in the WHRFMA.

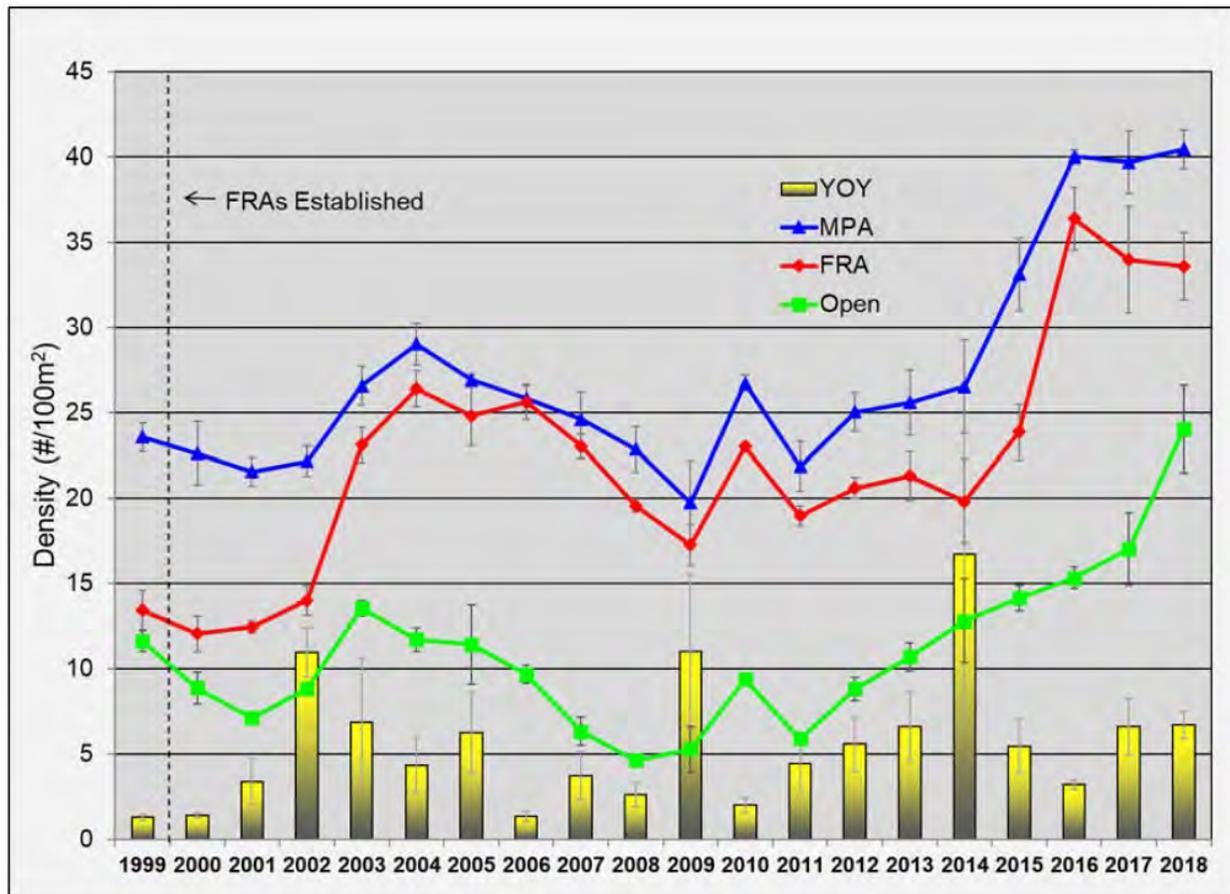


Figure 5. Overall changes in Yellow Tang density (Mean ± SE) in FRAs, MPAs, and Open Areas, 1999-2018. Yellow vertical bars indicate mean density (MAY-NOV) of Yellow Tang YOY. YOY are not included in trend line data (DAR 2019a).

It is important to note that the Yellow Tang breeding population (larger, adult fish), reflected in the trend lines in Figure 5, is not collected by commercial aquarium fishers, nor is this age/size class desired as a food fish. The brood stock is therefore protected and not significantly reduced as a result of aquarium fish collection. The vertical bars (YOY = young of the year) essentially represent the replacement/recruitment rate of the species (i.e., when juvenile fish survive to be added to a population). It is these juveniles up to several years of age that are targeted by the aquarium fishery, as there is no market for the larger fish.

Even with the targeting the smaller fish by the commercial aquarium collectors, juvenile Yellow Tang densities have significantly increased by 60.8% within Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019).

GOLDRING SURGEONFISH, KOLE

The Kole has been the second most collected species every year since 1976 (DAR 2018a). Since 2000, 5,972,413 individuals of all White List Species have been collected in the WHRFMA; 552,603 (9.3%) of those were Kole. The average number of Kole captured each year since 2000 was 30,700 individuals, ranging between a minimum catch of 15,961 (2001) and maximum of 42,112 (2006). Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that between 15,961 and 42,112 Kole would be collected each year, for a total of approximately 80,000 to 210,500 over the 5-year analysis period.

Based on data collected between 2010 and 2016 by the CREP (2018), the island of Hawai'i Kole population is estimated at 11,697,561 individuals (Table 5-6). The WHAP estimates the 2017/2018 Open Area Kole population in WHRFMA at 5,312,745 at the 30-60-foot depth, an increase of nearly 1.7 million fish since 2012/2013. Collection of between 15,961 and 42,112 Kole individuals would remove less than 0.4% of the current estimated population for the island of Hawai'i (Table 5-6). While this collection would occur only within the WHRFMA, there is evidence for connectivity between FRAs and Open Areas (Christie et al. 2010), therefore, analyzing the impacts on just the Open Area populations is not representative of the impact; nevertheless, that analysis is provided for comparison purposes in Appendix B. See "Impact of Collection on White List Species Populations" below.

Table 5-6. CREP (2018) estimated population of Kole for the island of Hawai'i and percentage of population collected by commercial aquarium fishers in the WHRFMA (DAR 2018b).

Island of Hawai'i Pop (CREP 2018)	WHAP Open Area Pop. Est. 30'-60' Depth in WHRFMA Only ¹		Minimum WHRFMA Collection per Year ²	Maximum WHRFMA Collection per Year ²	Minimum % of Hawai'i Population	Maximum % of Hawai'i Population
	2012/2013	2017/2018				
11,697,561	3,616,529	5,312,745	15,961	42,112	0.14%	0.36%

¹Includes both adults and young-of-the-year

²From 2000-2017

The DAR(2019), stated:

- The FRAs have also been very successful in increasing Kole populations. The number of Kole increased significantly in all management areas, including Open Areas, from 1999/2000 to 2012/2013. Overall Kole abundance in 30-60-foot depth range over the entire West Hawai'i coast increased 118% (nearly 5.2 million fish) during this time period with a population of about 9.6 million fish in 2019.
- Long-term West Hawai'i studies have found Kole populations had decreased 14% in South Kona and 71% in South Kohala. Given the length of protection at these sites and the overall decline in habitat quality and fish populations in South Kohala, it seems unlikely that the declines are due primarily to aquarium collecting. Comparative surveys utilizing DAR and NOAA data indicate Kole are substantially more abundant in West Hawai'i over most size ranges than in any of the other islands in the MHI or the Northwestern Hawaiian Islands.

Figure 6 illustrates the population trends for Kole since the FRAs were established, illustrating the upward trend in all areas, even with commercial aquarium collection of 552,603 Kole between 2000 and 2017 in the WHRFMA.

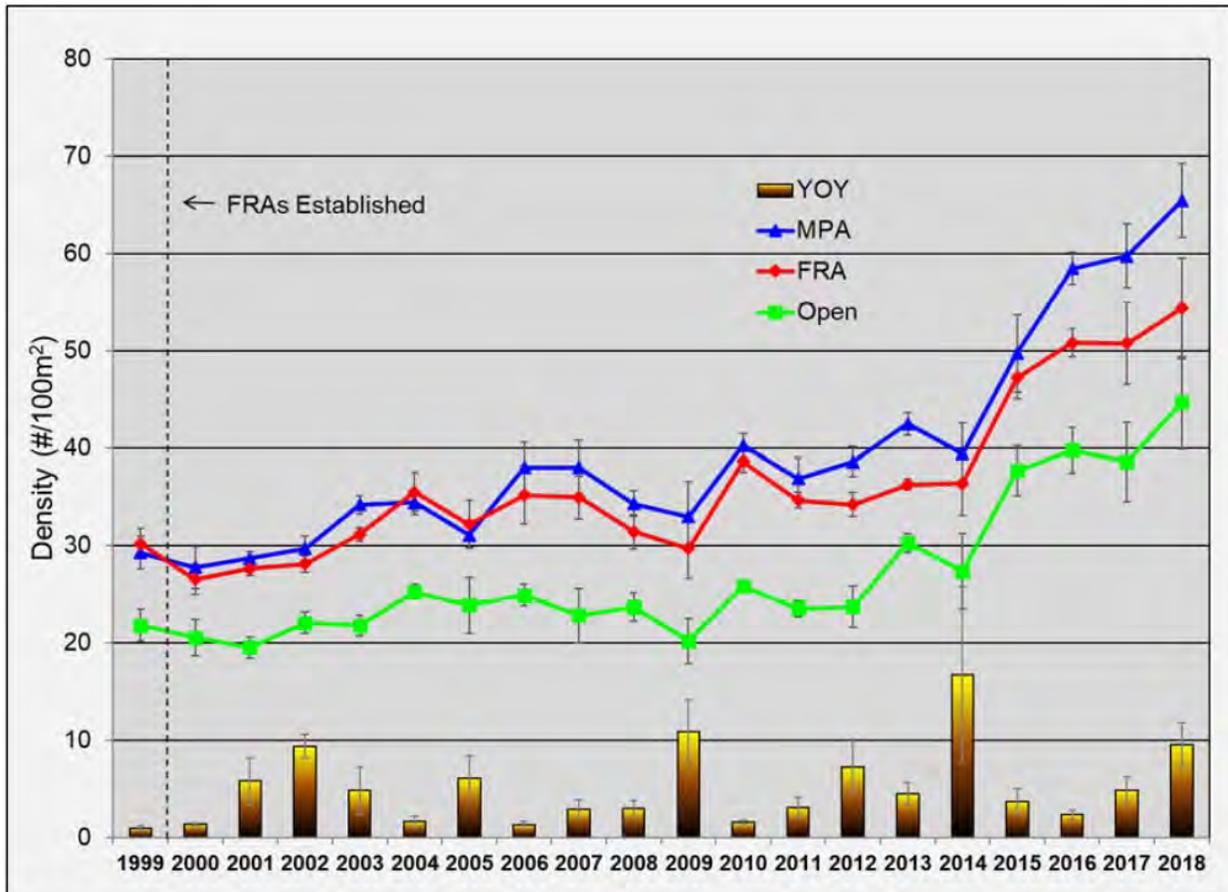


Figure 6. Overall changes in Kole density (Mean ± SE) in FRAs, MPAs, and Open Areas, 1999-2018. Vertical bars indicate mean density (JUN-NOV) of Kole YOY. YOY are not included in trend line data (DAR 2019a).

Trend lines in Figure 6 reflect Kole brood stock, i.e., large sized fish not collected by commercial aquarium fishers. The brood stock is therefore protected and not significantly reduced as a result of aquarium fish collection. The vertical bars (YOY = young of the year) essentially represent the replacement/recruitment rate of the species (i.e., when juvenile fish survive to be added to a population). It is these juveniles up to several years of age that are targeted by the aquarium fishery, as there is no market for the larger fish.

OTHER TOP 10 WHITE LIST SPECIES (CATCH RANKED 3-10)

These 8 species (Orangespine Unicornfish, Achilles Tang, Black Surgeonfish, Potter’s Angelfish, Ornate Wrasse, Goldrim Surgeonfish, Orangeband Surgeonfish, and Brown Surgeonfish) made up 7.1% of the catch in fiscal year 2017. When abundances of these eight collected species are combined, they have increased in all management areas since the FRAs were established (Figure 7). Abundances have been

consistently higher in Open Areas for five of these species, and no consistent pattern was observed for the other three species (Table 5-4).

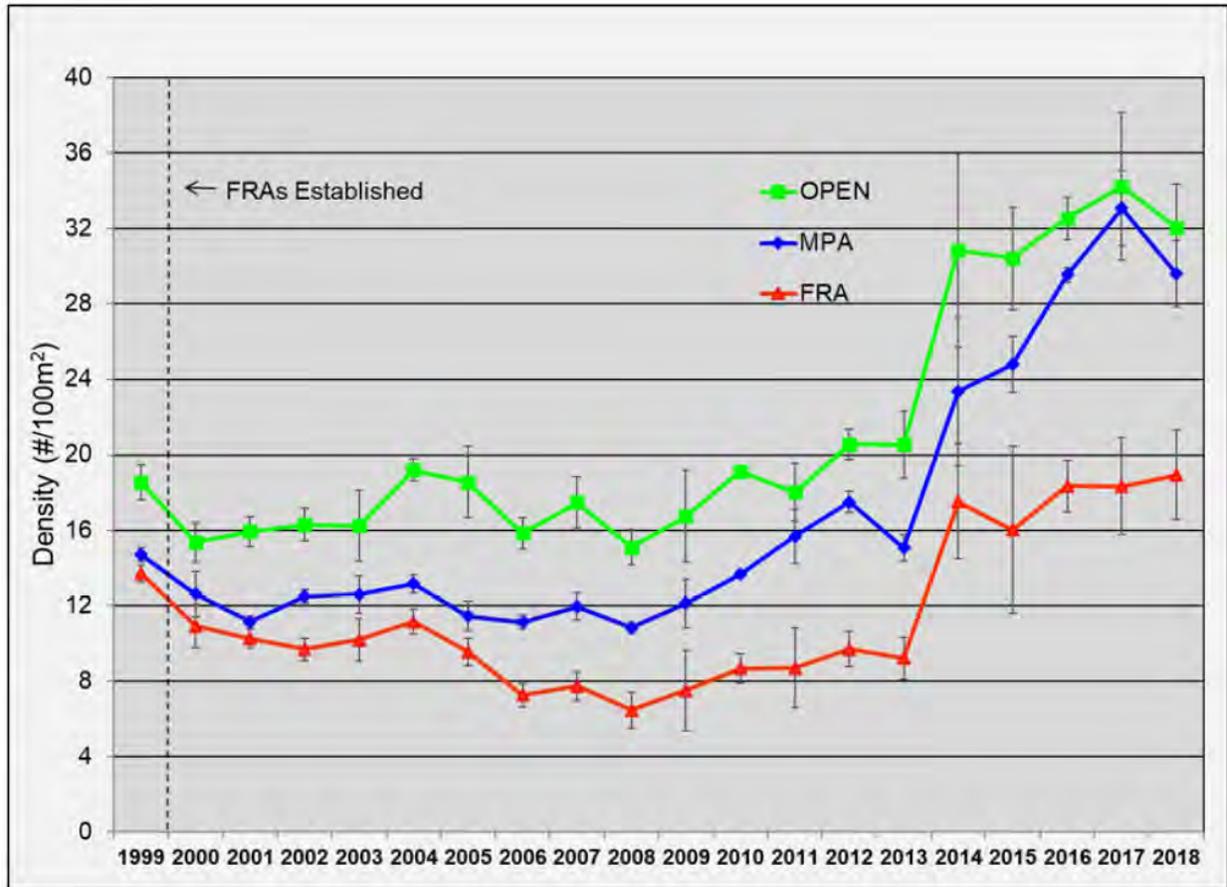


Figure 7. Overall changes in density (Mean \pm SE) for the top 3-10 collected aquarium species combined in FRAs, MPAs, and Open Areas, 1999-2018. YOY are not included in trend line data (DAR 2019a).

Six of these species had long-term population increases in one or more of the management areas (Table 5-4). For the other two species, the Ornate Wrasse and the Achilles Tang, there were long-term population declines in both FRAs and Open Areas, with larger declines seen in FRAs than in Open Areas (Table 5-4), suggesting that some factor other than commercial aquarium collection was driving the decline. The Achilles Tang is discussed in more detail below.

ACHILLES TANG

The Achilles Tang has generally been the third most collected species every year since 1976, with a few exceptions (4th most captured fish from 2008-2009 and again 2015-2017; DAR 2018a). Since 2000, 5,972,413 individuals of all White List Species have been collected in the WHRFMA; 132,775 (2.2%) of those were Achilles Tang. The average number of Achilles Tang captured each year since 2014 (when the

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current bag limit of 10 was implemented) was 5,600 individuals, ranging between a minimum catch of 5,568 (2015) and maximum of 5,757 (2016). Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that approximately 5,600 Achilles Tang would be collected each year.

Based on data collected between 2010-2016 during CREP (2018) surveys, the Achilles Tang population on the island of Hawai'i is estimated at 231,000 individuals (Table 5-7). The WHAP estimates the 2017/2018 Open Area Achilles Tang population in WHRFMA at 13,796 at the 30-60-foot depth, a decrease of 7,831 since 2012/2013 (Table 5-7). Collection of 5,600 Achilles Tang would remove approximately 2.42% of its current estimated population for the island of Hawai'i (Table 5-7). While this collection would occur only within the WHRFMA, there is evidence for connectivity between FRAs and Open Areas (Christie et al. 2010), therefore, analyzing the impacts on just the Open Area populations is not representative of the impact; nevertheless, that analysis is provided for comparison purposes in Appendix B. See "Impact of Collection on White List Species Populations" below. In addition, as noted below in this section, the WHAP surveys underestimate Achilles Tang population size for a variety of reasons.

Table 5-7. CREP (2018) estimated population of Achilles Tang for the island of Hawai'i and percentage of population collected by commercial aquarium fishers in the WHRFMA (DAR 2018a).

Island of Hawai'i Pop (CREP 2018)	WHAP Open Area Pop. Est. 30'-60' Depth in WHRFMA Only ¹		Average WHRFMA Collection per Year ²	Average % of Hawai'i Population
	2012/2013	2018/2019		
231,377	21,627	13,796	5,600	2.42%

¹Includes both adults and young-of-the-year. See discussion below.

²From 2015-2017, after the daily bag limit of 10 Achilles Tang was implemented. This data ranges from 5,473 to 5,757, with an average of 5,600. Due to the small range, the average was used.

The DAR (2019a) stated:

- Commercial aquarium landings of Achilles Tang have declined in West Hawai'i over the past two decades in association with a 192% increase in its value since 2008. This is suggestive of declining availability (i.e., abundance). Achilles Tang has declined in FRAs and Open Areas over the last 20 years but have generally been more abundant in Open Areas than protected FRAs. Achilles Tang has had low levels of recruitment over the past two decades (mean Yellow Tang recruitment has been 57 times greater, and Kole recruitment has been 54 times greater).
- An important caveat is that the reef areas where the WHAP transects are located are not the prime habitat for adults of this species. As such the bulk of the population is not adequately surveyed by WHAP monitoring.
- Results from the WHAP monitoring program and long-term studies suggest there should be concern for the sustained abundance of this species. Achilles Tang are a very popular food fish as well as an aquarium fish and thus are being harvested both as juveniles and adults. Low levels of recruitment over the past 11 years appear insufficient to compensate for the existing levels of harvest. In order to address concerns regarding aquarium impacts on this species, the new West Hawai'i Regional Fishery Management Area Rule (HAR § 13-60.4) includes an Achilles Tang bag

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limit of 10 fish/person/day which applies only to aquarium collectors (2014). (Addressed below in this section).

Although the most recent DAR report (2019a) suggests there should be concern for the sustained abundance of Achilles Tang in the WHRFMA, the report concedes that WHAP transects are not located in prime habitat for adult Achilles Tang (i.e., high energy shallower surge zones), and therefore the bulk of the Achilles Tang population is not adequately surveyed by WHAP monitoring (DAR 2019a). In addition, WHAP transects are not located in all collection zones found within the WHRFMA (Figure 4), including the two zones (100A and 108) with the highest percentage of the Achilles Tang collection, suggesting that the population of Achilles Tang in the WHRFMA is likely higher than estimated by the WHAP. This is supported by CREP (2018) data which show approximately 43% (approximately 79,000 individuals) of the island of Hawai'i Achilles Tang population (approximately 184,000 individuals) resides in collection zones 100 and 108.

The island of Hawai'i is divided into 14 collection zones for reporting purposes (Zones 100-108; Figure 4). The WHAP has survey transects only on the west side of the island as far south as collection zone 100B, but no transects within collection zones 100A and 108 located on the southwest and southeast portions of the island, respectively (Figure 4). Since 2000, 56% of all Achilles Tang catch data provided were from collection zones 100 and 108, and since 2012 when collection zone 100 was subdivided into 100A and 100B, 51% of all Achilles Tang catch data provided have been from collection zones 100A and 108 (DAR 2018a). Since 2000, less than two fishers have reported catch of Achilles Tang in collection zones 104, 105, and 106 (all n.d. data), and only in one year did more than two commercial aquarium fishers report Achilles Tang collection from zone 107 (DAR 2018a).

Because WHAP transects are not located in prime habitat, and no transects are located in areas where the majority of Achilles Tang collection occurs and over 40% of the population occurs, Achilles Tang population estimates based on WHAP data are likely underestimated (this is supported by the DAR [2019a] report), which thus results in the impact of the collection being overestimated when based solely on WHAP data. These issues related to the WHAP data support the use of the CREP population estimate for evaluating the impact of the collection (Table 5-7), as CREP surveys have good spatial coverage in all West Hawai'i collection zones and in the shallower water zones occupied by Achilles Tang. Nevertheless, an analysis of collection based on the WHAP Open Area population estimate is provided for comparison purposes in Appendix B.

The most recent DAR report (2019a) states that commercial aquarium landings of Achilles Tang have declined in West Hawai'i over the past two decades in association with a dramatic increase in its value (DAR 2019a). The results presented by Stevenson et al. (2013) suggest the MPA network significantly displaced fishing effort from the central to the northern and southern coastal regions of the island of Hawai'i farther from ports of entry, and that estimated catch revenues and experimental catch per unit effort were statistically greater as distance from port of entry increased. These findings suggest that commercial aquarium fishers are traveling farther to reach suitable habitat areas open to Achilles Tang collection (e.g., Collection Zones 100A and 108), resulting in increased collection costs due to increased fuel consumption, equipment wear and tear, business expenses, time, etc., which is then passed on to wholesalers (i.e., increased cost per fish). At the same time, the bag limit on Achilles Tang implemented in 2014 has resulted

in reduced Achilles Tang catch (average of 5,600 per year since 2014, down from 7,740 in 2014), affecting the number of fish brought to market (i.e., supply), which may also raise the price per fish. Therefore, the conservation measures that have been implemented to manage aquarium fish harvest (i.e., establishment of MPA network, bag limits) are more likely the cause of lower catch and increased value of Achilles Tang than declining availability.

Figure 8 illustrates the population trends for Achilles Tang since the FRAs were established, illustrating the downward trend in all areas. This downward trend has also been documented by the Shallow Water Resource Fish Surveys (SWRF), which survey the shallower reef areas utilized by this species and have indicated a significant (90%) decline in Achilles Tang biomass in their primary adult habitat since 2008 (DAR 2019a). However, unlike aquarium collectors in West Hawai'i, there has never been a bag limit on this species for other fisheries. It is also important to note that these surveys only count Achilles Tang larger than 10 cm in size¹².

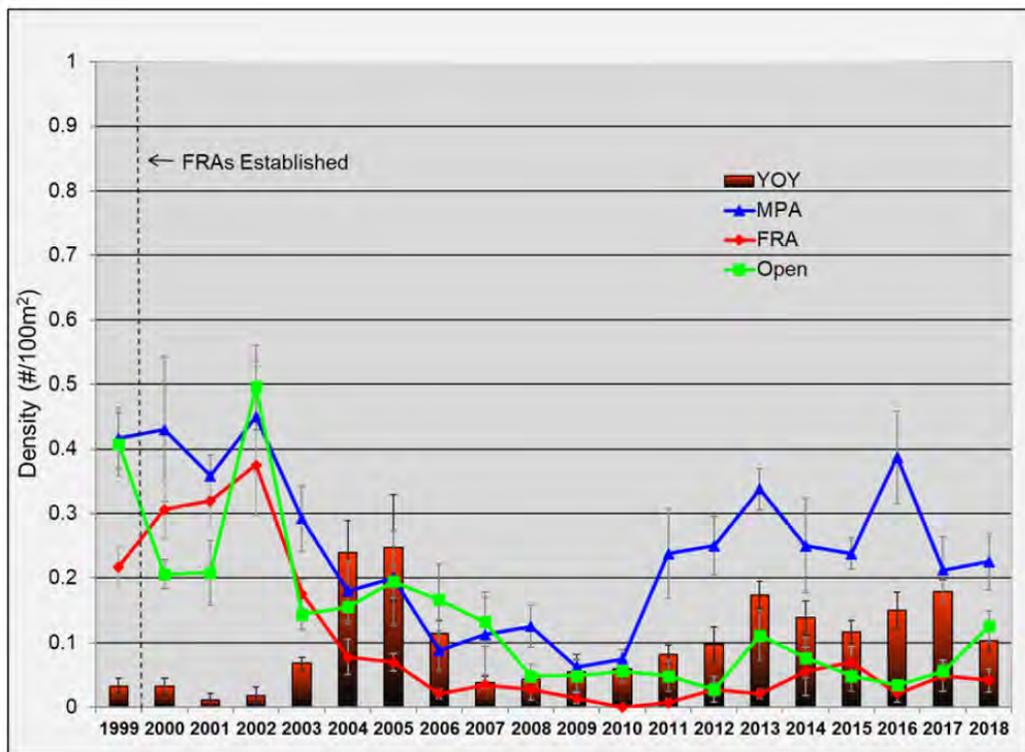


Figure 8. Overall changes in Achilles Tang density in FRAs, MPAs, and Open Areas, 1990-2018. Vertical bars indicate mean density (JUN-NOV) of Achilles Tang YOY. YOY are not included in trend line data (DAR 2019a).

¹² <https://nmspapahanaumokuakea.blob.core.windows.net/papahanaumokuakea-prod/media/archive/council/meetings/2018/rac-dar-report-07-19-18.pdf>

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The catch of Achilles Tang decreased from 7,740 in 2014 to an average of 5,600 per year from 2015-2017. It is important to note that the Achilles Tang bag limit of 10 fish per day began in 2014, which likely accounts for the reduced catch after 2014. Additionally, unlike the Yellow Tang and Kole, Achilles Tang have generally been more abundant over the past decade in Open Areas compared to the protected FRAs, which may reflect habitat differences or differential non-aquarium fishing pressure in various areas (DAR 2019a).

As discussed above, due to WHAP survey locations, Figure 8 is likely an underestimate of the overall WHRFMA Achilles Tang population (DAR 2019a), as it represents only those Achilles Tang observed at a depth of 30-60 feet (not prime adult habitat) and does not include areas where most Achilles Tang are collected (Collection Zones 100A and 108; prime habitat for all sizes, Figure 4).

OTHER 30 WHITE LIST SPECIES

The top 10 collected species made up 98.2% of the collected fish in the WHRFMA in 2017, and the remaining 30 White List Species made up the remaining 1.8% of collected fish.

These each made up less than 1% of the overall catch in the WHRFMA since 2000. Of these species, four do not have WHAP data due to occurring in deeper habitats not surveyed by WHAP (Tinker's Butterflyfish, Hawaiian Longfin Anthias, Flame Wrasse) or being found in different habitat during the daytime which is not surveyed (Eyestripe Surgeonfish). Two additional species, the Psychedelic Wrasse and the Fisher's Angelfish, tend to be in deeper waters, but are also recorded in WHAP transects (though these estimates are considered to be substantially lower than their actual abundances; DAR 2019a).

Thus, there are good long-term survey data for an additional 26 White List Species (Table 5-8). Of these, 10 showed a significant increase in population size in one or more management area, while 9 showed a decrease, though only one of the decreases was exclusively in the Open Areas, and 1 species had both an increase and a decrease in different management areas. Six species had no significant changes in population in any of the areas. Aquarium collection of the one species that declined exclusively in the Open Areas, the Blackside Hawkfish, is low, and is only 0.13% of the Open Area Population, making it unlikely that aquarium collecting alone is the cause of this species decline in Open Areas (DAR 2019a). In addition, the Open Area population increased from 20,508 in 2012-2013 (DAR 2014a) to 23,625 in 2017-2018 (DAR 2019a), indicating that recruitment of this species is occurring even in the presence of commercial aquarium collection, given that the population estimates include young-of-year, compared to the density estimates which do not. It is acknowledged that, in addition to the number of fish collected, incidental mortality may occur with fish that are released. However, while there are no data available to analyze these impacts, it is assumed that the magnitude of these impacts would not change from what has historically occurred, and thus these impacts are already accounted for in the analysis of population trend data.

Table 5-8. Change in density of 26 additional White List Species in the WHRFMA based on WHAP data. 'Before' = Mean of 1999-2000; 'After' = Mean 2017-2018. Young-of-year (YOY) not included. Bold = statistically significant t-test (DAR 2019a).

COMMON NAME	AREA	MEAN DENSITY (No./100m ²)		OVERALL CHANGE IN DENSITY	ρ
		Before	After		
Forcepsfish	FRA	0.41	0.59	+0.19	<0.05
	Open	0.41	0.37	-0.04	0.58
	MPA	0.84	0.79	-0.05	0.71
Yellowtail Coris	FRA	0.17	0.20	+0.02	0.61
	Open	0.13	0.17	+0.04	0.53
	MPA	0.30	0.44	+0.14	0.24
Psychedelic Wrasse	FRA	0.01	0.01	0.00	1.00
	Open	0.01	0.01	0.00	1.00
	MPA	0.01	0.03	+0.02	0.63
Shortnose Wrasse	FRA	0.02	0.01	-0.01	0.73
	Open	0.02	0.03	+0.01	0.77
	MPA	0.01	0.08	+0.06	0.31
Saddle Wrasse	FRA	3.66	2.91	-0.74	<0.001
	Open	5.93	4.23	-1.70	<0.001
	MPA	4.39	3.93	-0.46	0.17
Multiband Butterflyfish	FRA	5.20	2.69	-2.51	<0.001
	Open	4.00	3.28	-0.17	<0.001
	MPA	4.94	3.19	-1.75	<0.001
Fourspot Butterflyfish	FRA	0.05	0.03	-0.02	0.65
	Open	0.54	0.14	-0.40	<0.001
	MPA	0.43	0.20	-0.23	<0.05
Fisher's Angelfish	FRA	0.00	0.00	0.00	1.00
	Open	0.00	0.55	+0.54	<0.001
	MPA	0.00	0.00	0.00	1.00
Pencil Wrasse	FRA	0.14	0.16	+0.02	0.78
	Open	0.05	0.16	+0.11	<0.05
	MPA	0.04	0.08	+0.03	0.82
Bird Wrasse	FRA	0.67	0.84	+0.17	<0.05
	Open	0.64	0.62	-0.01	0.82
	MPA	1.04	1.53	+0.48	<0.01
Thompson's Surgeonfish	FRA	0.72	1.64	+0.92	<0.001
	Open	0.69	2.53	+1.84	<0.001
	MPA	0.66	1.55	+0.89	<0.01
Milletseed Butterflyfish	FRA	0.00	0.00	0.00	1.00
	Open	0.04	0.02	-0.02	0.57
	MPA	0.44	0.01	-0.43	<0.001
Eightline Wrasse	FRA	2.20	1.14	-1.05	<0.001

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COMMON NAME	AREA	MEAN DENSITY (No./100m ²)		OVERALL CHANGE IN DENSITY	ρ
		Before	After		
	Open	3.31	1.75	-1.56	<0.001
	MPA	3.17	1.83	-1.34	<0.001
Hawaiian Dascyllus	FRA	0.02	0.33	+0.31	<0.001
	Open	0.51	0.59	+0.08	0.41
	MPA	0.12	0.15	+0.04	0.70
	FRA	0.00	0.07	+0.07	<0.05
Blacklip Butterflyfish	Open	0.00	0.29	+0.29	<0.001
	MPA	0.02	0.04	+0.02	0.68
Lei Triggerfish	FRA	0.53	0.69	+0.16	0.07
	Open	0.75	0.86	+0.11	0.24
	MPA	0.57	1.06	+0.50	<0.001
Spotted Boxfish	FRA	0.05	0.08	+0.03	0.49
	Open	0.10	0.12	+0.02	0.73
	MPA	0.10	0.19	+0.08	0.25
Fourline Wrasse	FRA	1.36	1.81	+0.45	<0.01
	Open	1.66	2.12	+0.46	<0.01
	MPA	2.95	1.76	-1.19	<0.001
Pyramid Butterflyfish	FRA	0.02	0.07	+0.04	0.37
	Open	0.66	0.35	-0.31	<0.01
	MPA	0.59	0.10	-0.49	<0.05
Blackside Hawkfish	FRA	0.34	0.23	-0.11	0.08
	Open	0.41	0.22	-0.19	<0.01
	MPA	0.26	0.26	0.00	1.00
Hawaiian Whitespotted Toby	FRA	1.13	1.00	-0.13	0.34
	Open	3.48	2.32	-1.16	<0.001
	MPA	2.87	2.14	-0.73	<0.01
Redbarred Hawkfish	FRA	0.03	0.04	+0.01	0.84
	Open	0.16	0.06	-0.09	0.63
	MPA	0.06	0.02	-0.04	0.49
Gilded Triggerfish	FRA	0.14	0.03	-0.11	<0.05
	Open	0.31	0.03	-0.27	<0.001
	MPA	1.26	0.36	-0.90	<0.001
Black Durgon	FRA	0.53	0.82	+0.29	<0.05
	Open	0.43	0.86	+0.42	<0.01
	MPA	2.21	4.36	+2.14	<0.001
Bluestripe Snapper	FRA	0.07	0.80	+0.73	<0.001
	Open	0.12	0.31	+0.18	<0.01
	MPA	0.19	0.17	-0.02	0.83
Peacock Grouper	FRA	0.57	0.72	+0.16	0.09
	Open	0.57	0.48	-0.09	0.28
	MPA	0.89	0.83	-0.06	0.72

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Capture data from 2000-2017 (DAR 2018a), CREP (2018) population estimates, and estimated catch percentages for all White List Species in both West and East Hawai'i can be found in Section 5.4.1.3.

East Hawai'i

Commercial aquarium fish collection in East Hawai'i is significantly less than in the WHRFMA, in both level of effort and number of individuals kept. Between 2000 and 2017, approximately 160,272 White List Species were collected from East Hawai'i (DAR 2018a), compared to the 5,972,413 fish collected in the WHRFMA. The number of commercial aquarium fishers reporting catch is also significantly lower in East Hawai'i with an average of 5 permitted fishers reporting each year since 2000, compared to an average of 28 permitted fishers reporting from the WHRFMA over the same time period (this number does not include any permit reports that fall under the *n.d.* category).

Of the approximately 160,272 White List Species fish collected in East Hawai'i over the past 18 years, approximately 75% (119,959) were Yellow Tang. Seventy-seven percent (77%) of the Yellow Tang were captured from 2000- 2011. From 2011-2014 (the last year for which data are available due to data confidentiality), the average catch of Yellow Tang was 6,836 per year ranging between a minimum of 2,774 (2013) and a maximum of 14,269 (2014) individuals. Kole and Achilles Tang captures in East Hawai'i since 2000 have averaged 1,047 and 703 individuals per year, respectively.

The island of Hawai'i population estimates for Yellow Tang, Kole, and Achilles Tang based on data collected between 2010 and 2016 during CREP (2018) surveys are shown in Table 5-9. Based on these estimates, and the minimum and maximum collection of each species over an 18-year period, the proportion of the overall population removed by the East Hawai'i fishery is less than 1% for each species.

Table 5-9. CREP (2018) estimated populations of Yellow Tang, Kole, and Achilles Tang for the island of Hawai'i and percentage of population collected by commercial aquarium fishers in East Hawai'i (DAR 2018a).

Species	Island of Hawai'i Pop (CREP 2018)	East Hawai'i (DAR2018a)			
		Minimum Collection per Year ¹	Maximum Collection per Year ¹	Minimum % of Hawai'i Population	Maximum % of Hawai'i Population
Yellow Tang	8,262,144	2,774	14,269	0.03%	0.17%
Kole	11,697,561	76	3,601	<0.001%	0.03%
Achilles Tang	231,377	525	1,525	0.23%	0.66%

¹From 2000-2017

Of the remaining fish species collected in East Hawai'i, none averaged more than 53 individuals collected per year since 2000; most averaged less than 25 individuals per year. Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that the collection of White List Species in any year of the 5-year analysis period would be similar to the 18-year annual average.

Capture data from 2000-2017 (DAR 2018a), CREP (2018) population estimates, and estimated catch percentages for all White List Species in both East and West Hawai'i can be found in Section 5.4.1.3.

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Based on the analysis presented in this section, the Pre-Aquarium Collection Ban Alternative would have a **less than significant direct impact** on White List Species.

Non-White List Species WHRFMA

Only White List Species are allowed to be collected from the WHRFMA and any non-target, non-White List Species captured incidentally during fishing activities are to be immediately released at the capture site (Act 306; Section 1.2.3.1). Incidental captures are limited due to the capture methods implemented by fisherman, which focus on target species. Any incidental captures would therefore be negligible, and no significant direct impacts to non-White List Species in the WHRFMA are anticipated.

East Hawai'i

East Hawai'i is not restricted to the White List Species and many additional forms of aquatic life can be collected. Based on collection data between 2000 and 2017, a single invertebrate species, Red Pond Shrimp (unidentified species), made up the majority of the catch (DAR 2018a). Of the 249,007 non-White List aquatic animals collected in East Hawai'i over the past 18 years, approximately 73% (182,710 individuals) of the provided catch data were Red Pond Shrimp (this value is likely even higher, given the large number of years that could not disclose Red Pond Shrimp numbers due to data confidentiality, and Red Pond Shrimp made up over 99% of the collection when looking only at disclosed data). On average, more than 20,000 Red Pond Shrimp are collected annually from East Hawai'i (DAR 2018a). All remaining 79 non-White List Species collected in East Hawai'i averaged three or less individuals collected per year since 2000 based on the data reviewed. Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that annual collection of non-White List Species over the 5-year analysis period would be similar to the catch from 2000 to 2017.

Based on the analysis presented in this section, the Pre-Aquarium Collection Ban Alternative would have a **less than significant direct impact** on Non-White List Species.

Hawai'i Species of Greatest Conservation Need WHRFMA

Although listed as a Hawaiian SGCN, the IUCN (2017) provides this assessment of the Psychedelic Wrasse:

This species has a relatively restricted distribution in the east-central and north-western Pacific Ocean, being found only around the Hawaiian Islands Chain. Although there is no evidence for any population declines, the species is taken in the marine aquarium fish trade. However, more than two thirds of its range are enclosed by the Papahānaumokuākea Marine National Monument. This species is therefore listed as Least Concern.

A total of 4,931 Psychedelic Wrasse were collected in the WHRFMA from 2000 to 2017 (DAR 2018a), representing 0.08% of the total White List Species collected over that same period. The average number of Psychedelic Wrasse captured each year since 2000 was 274 individuals, ranging between 97 (2003) and 599 (2017) individuals collected (Table 5-10). Under the Pre-Aquarium Collection Ban Alternative, it is

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anticipated that between 100 and 600 Psychedelic Wrasse would be collected annually. The population of Psychedelic Wrasse in the WHRFMA has remained relatively stable between 1999/2000 and 2017/2018 (Table 5-8), with no statistically significant changes in either the Open Areas or protected areas.

Although listed as a Hawaiian SGCN, the IUCN (2017) provides this assessment of the Tinker's Butterflyfish:

The species is common and fairly widespread. Although it is occasionally collected for the aquarium trade, its deep-water habitat likely prevents the harvest of many specimens. Therefore, harvesting does not appear to be a major threat and there are no signs of significant decline. It is listed as Least Concern.

A total of 5,561 Tinker's Butterflyfish were collected in the WHRFMA from 2000 to 2017 (DAR 2018a), representing 0.09% of the total White List Species collected over the same period. The average number of Tinker's Butterflyfish captured each year since 2000 was 309 individuals, ranging between 166 (2013) and 586 (2015) individuals collected (Table 5-10). Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that between 170 and 590 Tinker's Butterflyfish would be collected annually over the 5-year analysis period.

Although listed as a Hawaiian SGCN, the IUCN (2017) provides this assessment of the Fisher's Angelfish:

Listed as Least Concern in view of its wide distribution, large overall population, relatively limited collection for the aquarium fish trade, no substantial habitat loss, and no major threats overall.

A total of 1,538 Fisher's Angelfish were collected in the WHRFMA from 2002 to 2017 (DAR 2018a)¹³, representing 0.03% of the total White List Species collected over the same period. The average number of Fisher's Angelfish captured each year since 2000 was 96 individuals, ranging between 22 (2004) and 288 (2017) individuals collected (Table 5-10). Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that between 20 and 290 Fisher's Angelfish would be collected annually. Fisher's Angelfish have shown a significant increase in population within the Open Areas (Table 5-8), though it should be noted that this species tends to be a deeper water species, and the population estimates for WHAP are considered to be substantial underestimates (DAR 2019a).

Island of Hawai'i population estimates for Psychedelic Wrasse, Tinker's Butterflyfish, and Fisher's Angelfish based on data collected between 2010 and 2016 by the CREP (CREP 2018) are shown in Table 5-10. Based on these estimates, and the minimum and maximum catch for each species over an 18-year period (all within the WHRFMA; fewer than three collectors reported these species in any given year in East Hawai'i, therefore, data were not disclosed¹⁴), the proportion of the overall population removed by the WHRFMA fishery ranges from less than 1% for Fisher's Angelfish to 3.2% for Tinker's Butterflyfish. In addition, Kane and Tissot (2017) demonstrate that densities of all three species are greater at depths below the 98-foot survey depth of the CREP surveys, suggesting that the actual populations of all three species

¹³ Data not available for 2000 and 2001.

¹⁴ Some collection data in East Hawai'i were disclosed by the 10 fishers (see Section 5.1), these data and the impacts on the population are provided in Table 5-11.

are higher than those reported by the CREP surveys, and the actual impact of commercial aquarium collection is lower than reported in Table 5-10.

Table 5-10. CREP (2018) estimated populations of Psychedelic Wrasse, Tinker’s Butterflyfish, and Fisher’s Angelfish for the island of Hawai’i and percentage of populations collected by commercial aquarium fishers in the WHRFMA (DAR 2018a).

Species	Island of Hawai’i Pop ¹ (CREP 2018)	30’-60’ Open Area Population (2017/2018) ²	Minimum Collection per Year ³	Maximum Collection per Year ³	Minimum % of Hawai’i Population	Maximum % of Hawai’i Population
Psychedelic Wrasse	36,770	1,071	97	599	0.26%	1.63%
Tinker’s Butterflyfish	18,475	N/A	166	586	0.9%	3.17%
Fisher’s Angelfish	666,209	59,064	22	288	0.003%	0.04%

¹All species population estimates are likely low due to the depths at which they occur.

²Psychedelic Wrasse and Fisher’s Angelfish are only occasionally recorded on surveys, so these population estimates are underestimated. Tinker’s Butterflyfish generally occurs in deeper habitats not adequately surveyed by transects.

³From 2000-2017

Based on deep diver observations, Tinker’s Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs) (DAR 2019a). Tinker’s Butterflyfish is observed more often in Open Areas when compared to FRAs, while Psychedelic Wrasse observations are equivalent between these two areas (DAR 2019a).

Based on the analysis presented in this section, the Pre-Aquarium Collection Ban Alternative would have **less than significant direct impacts** on SGCN species in the WHRFMA.

East Hawai’i

Due to the low number of individual Aquarium Permits and low number of areas fished in East Hawai’i, reliable catch and population numbers are not available for the Psychedelic Wrasse in East Hawai’i. However, no Psychedelic Wrasse have been collected from East Hawai’i in 9 of the 18 years between 2000 and 2017 (DAR 2018a). It is likely that Psychedelic Wrasse are primarily collected as a result of opportunistic collection by fishers while targeting other species. For the 10 fishers who disclosed their catch data (see Section 5.1), collection of Psychedelic Wrasse averaged 2 individuals per year between 2000 and 2017, with a maximum collection of 16 in one year (see Table 5-11), representing 0.04% of the island-wide population. This level of collection is below the lower end of what is considered to be sustainable reef fish harvest based on available research (5% - 25%; Ochavillo and Hodgson 2006).

The same data limitations apply to the Tinker’s Butterflyfish in East Hawai’i, though data from two years between 2000 and 2017 were disclosed (DAR 2018a). Collection of Tinker’s Butterflyfish for these two years averaged 36 individuals per year collected in East Hawai’i, with a maximum of 38 individuals. Additional data disclosed by the 10 fishers (see Section 5.1) have collection of Tinker’s Butterflyfish in East Hawai’i averaging 22 individuals per year, with a maximum collection of 94 individuals, representing approximately 0.5% of the island-wide population estimate (Table 5-11). This level of collection is below

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the lower end of what is considered to be sustainable reef fish harvest based on available research (5% - 25%; Ochavillo and Hodgson 2006). As noted in other sections, the CREP population estimate for the Tinker's Butterflyfish is likely low, so the actual impact to this species is likely even smaller.

No Fisher's Angelfish have been reported as collected from East Hawai'i during the period 2000-2017.

Under the Pre-Aquarium Collection Ban Alternative, it is anticipated that annual collection of SGCN species over the 5-year analysis period would be similar to the catch from 2000 to 2017.

Based on the analysis presented in this section, the Pre-Aquarium Collection Ban Alternative would have a ***less than significant direct impact*** on SGCN species in East Hawai'i.

Reef Habitat

Herbivores, which feed on marine algae, and especially coral scraping herbivores such as parrotfish (Scaridae), are widely considered to play a key role in the overall health and subsequent recovery of coral reefs after disturbances such as bleaching. Herbivorous fish constitute roughly 50% of total fish biomass in West Hawai'i (DAR 2019a, Gove et al. 2019). The four largest groups of herbivorous coral reef fishes are the parrotfishes, damselfishes (Pomacentridae), rabbitfishes (Siganidae), and surgeonfishes (Acanthuridae). No parrotfishes or rabbitfishes (none in Hawai'i) are included on the White List, and therefore cannot be collected by commercial aquarium fishers in the WHRFMA. Only one damselfish, the Hawaiian Dascyllus (Section 4.4.1.26), is included on the White List and can be collected. However, Hawaiian Dascyllus are not herbivores and the average number collected per year since 2000 is 1 in East Hawai'i and 119 in the WHRFMA (Table 5-11).

Herbivores collected by the aquarium fishery typically consist of the smaller size classes, either by regulation (e.g., HAR 13-60.4 prohibits the collection of more than 5 Yellow Tang/day larger than 4.5 inches) or by market demand (i.e., minimal market for large adult fish in the aquarium trade). In addition, bag limits are in place for the three White List Species (5 Yellow Tang >4.5" and 5 fish <2"; 5 Kole >4" [AQ fishers only] ; and Achilles Tang [10 fish/day]) that have made up 93.3% of all individuals collected by commercial aquarium fishers in the WHRFMA since 2000 (Section 5.4.1.2). Even with making up the highest proportion of the catch, WHAP data indicate populations of Yellow Tang and Kole continue to increase (Section 5.4.1.2) and based on CREP population estimates the average annual collection of the three species represents less than 4% of the overall island of Hawai'i population of Yellow Tang and Achilles Tang and less than 1% of the overall island of Hawai'i population of Kole (Table 5-11). Additionally, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time. Therefore, it is not anticipated that a significant reduction in herbivores as a result of commercial aquarium collection would occur under the Pre-Aquarium Collection Alternative.

Similar to any other boat user group, it is possible that coral could be inadvertently damaged by an anchor. In addition, similar to other user groups who interact with the reefs, the activities of aquarium collectors

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could inadvertently damage coral. However, in a study analyzing the effects of aquarium collectors on coral reefs in Kona, Hawai'i, Tissot and Hallacher (2003) concluded that there were no significant differences in damaged coral between control and collected sites (i.e., sites where aquarium collection occurs) to indicate the presence of destructive fishing practices. In addition, they found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting.

The DAR has been conducting related observations since 2003 (DAR 2018c). Monitoring of coral reef benthic cover is conducted approximately every four years at 25 permanent monitoring sites. Monitoring is conducted more frequently if substantial benthic change occurs between regular sampling years (e.g. after a coral bleaching event). The analysis compares the presence or absence of commercial aquarium collecting in West Hawai'i relative to overall coral cover and changes in coral cover. Major results of the study are presented below:

- Coral cover was slightly higher within areas closed to the commercial aquarium fishery compared to Open Areas, but the difference was not statistically significant for any year of monitoring (2003: $p = 0.276$; 2007: $p = 0.275$; 2011: $p = 0.496$; 2014: $p = 0.554$; 2016: $p = 0.673$; 2017: $p = 0.782$). Additionally, there was no apparent trend of declining coral cover in the Open Areas over time.
- From 2003 to 2017, overall mean coral cover declined less within Open Areas compared to areas closed to commercial aquarium collection (Closed areas: $-22.5\% \pm 3.4\%$; Open Areas: $-15.5\% \pm 2.3\%$), but this difference in change in coral cover was not significant ($p = 0.093$).
- From 2014 to 2016, West Hawai'i experienced a severe coral bleaching and mortality event, which peaked in the fall of 2015. Over this time-period, overall mean coral cover decline was slightly less in the areas open to commercial aquarium collection, but again, the difference was not significant (Closed areas: $-19.6\% \pm 6.0\%$; Open Areas: $-17.6\% \pm 1.3\%$; $p = 0.605$).
- From 2016 to 2017, approximately one year after coral post-bleaching mortality subsided, minimal change in coral cover was documented within areas open to commercial aquarium collection (Open Areas: $0.07\% \pm 2.1\%$), compared to a slight decline in mean coral cover in areas closed to collection (Closed: $-1.94\% \pm 2.3\%$), and this difference was statistically significant ($p = 0.038$).

Based on the analysis presented in this section, the Pre-Aquarium Collection Ban Alternative would have a ***less than significant direct impact*** on reef habitat or the resilience of corals to respond to widespread bleaching events.

Impact of Collection on White List Species Populations

This Section summarizes the White List Species collection data under the Pre-Aquarium Collection Ban Alternative, as well as population estimates, into tabular format (Table 5-11). The primary purpose of the data analysis in regard to White List Species was to estimate, as accurately as possible, what the current populations of White List Species are, what level of collection was occurring in those populations prior to the 2017 ban on aquarium collection, and the average and maximum proportion of the population collected annually for the period 2000-2017 for each species. It should be noted that the average is based only on years with reported catch, and therefore results in potentially high estimates due to excluding years in which zero were caught. The CREP (2018) data compiled by the NOAA are comprehensive in both scope and

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Table 5-11. Summary of CREP (2018) population estimates, disclosed catch data from East and West Hawai'i since 2000 (DAR 2018a), and the impact of average (including only years with reported catch) and maximum annual collection by species for the 40 White List Species. n.d. = Not Disclosed (Section 5.1); NA = Insufficient data available

Common Name	Island of Hawai'i Pop. Mean (lower-upper estimate limit) (CREP 2018)	East Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				Island of Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year	Maximum Catch per Year ¹	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year ²	Maximum Catch per Year ²	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.
Achilles Tang ³	231,377 (113,989-348,765)	703 (52)	1,525 (142)	0.30% (0.02%)	0.66% (0.04%)	5,600 (1,809)	5,757 (2,157)	2.42% (0.78%)	2.49% (0.93%)	6,303 (1,861)	7,282 (2,299)	2.72% (0.80%)	3.15% (0.99%)
Bird Wrasse	877,224 (686,135-1,068,313)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	345 (55)	624 (103)	0.04% (<0.01%)	0.07% (0.01%)	345 (55)	969 (103)	0.04% (<0.01%)	0.11% (0.01%)
Black Durgon	1,354,454 (991,054-1,717,854)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	64 (9)	143 (69)	<0.01% (<0.01%)	0.01% (<0.01%)	64 (9)	207 (69)	<0.01% (<0.01%)	0.02% (<0.01%)
Black Surgeonfish	549,462 (355,535-743-388)	n.d. (9)	n.d. (15)	NA (0.01%)	NA (0.03%)	3,535 (619)	8,598 (1,813)	0.64% (0.11%)	1.56% (0.33%)	3,535 (628)	12,133 (1,828)	0.64% (0.11%)	2.21% (0.33%)
Blacklip Butterflyfish	131,260 (53,712-208,807)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	72 (22)	129 (64)	0.05% (0.02%)	0.10% (0.05%)	72 (22)	201 (64)	0.05% (0.02%)	0.15% (0.05%)
Blackside Hawkfish	246,727 (201,538-291,917)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	42 (14)	85 (43)	0.02% (<0.01%)	0.03% (0.02%)	42 (14)	127 (43)	0.02% (<0.01%)	0.05% (0.02%)
Bluestripe Snapper - Taape	7,092,851 (-265,739-14,451,440)	0 (0)	0 (0)	0.00% (0.00%)	0.00% (0.00%)	43 (19)	98 (52)	<0.01% (<0.01%)	<0.01% (<0.01%)	43 (19)	141 (52)	<0.01% (<0.01%)	<0.01% (<0.01%)
Brown Surgeonfish	14,439,543 (12,820,405-16,058,680)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	891 (243)	2,476 (600)	<0.01% (<0.01%)	0.02% (<0.01%)	891 (243)	3,367 (600)	0.01% (<0.01%)	0.02% (<0.01%)
Eightline Wrasse	689,221 (535,601-842,842)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	119 (26)	390 (69)	0.02% (<0.01%)	0.06% (0.01%)	119 (26)	509 (69)	0.02% (<0.01%)	0.07% (0.01%)
Eyestripe Surgeonfish	578,835 (438,301-719,369)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	403 (18)	1,143 (30)	0.07% (<0.01%)	0.20% (<0.01%)	403 (18)	1,546 (30)	0.07% (<0.01%)	0.27% (<0.01%)

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Common Name	Island of Hawai'i Pop. Mean (lower-upper estimate limit) (CREP 2018)	East Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				Island of Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year	Maximum Catch per Year ¹	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year ²	Maximum Catch per Year ²	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.
Fisher's Angelfish	666,209 (382,769-949,648)	0 (0)	0 (0)	0.00% (0.00%)	0.00% (0.00%)	96 (66)	288 (257)	0.01% (<0.01%)	0.04% (0.04%)	96 (66)	384 (257)	0.01% (<0.01%)	0.06% (0.04%)
Forcepsfish	435,954 (366,537-505,372)	21 (0)	27 (0)	<0.01% (0.00%)	0.01% (0.00%)	1,831 (484)	3,152 (864)	0.42% (0.11%)	0.72% (0.20%)	1,852 (484)	4,987 (864)	0.43% (0.11%)	1.14% (0.20%)
Fourline Wrasse	1,253,164 (798,831-1,707,496)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (<0.01%)	73 (23)	171 (64)	<0.01% (<0.01%)	0.01% (0.01%)	73 (23)	244 (64)	<0.01% (<0.01%)	0.02% (<0.01%)
Fourspot Butterflyfish	797,673 (678,338-917,008)	30 (1)	30 (1)	<0.01% (<0.01%)	<0.01% (<0.01%)	889 (202)	1,630 (377)	0.11% (0.03%)	0.20% (0.05%)	919 (203)	2,524 (378)	0.12% (0.03%)	0.32% (0.05%)
Gilded Triggerfish	129,089 (80,159-178,020)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	45 (6)	157 (19)	0.03% (<0.01%)	0.12% (0.01%)	45 (6)	202 (19)	0.03% (<0.01%)	0.16% (0.01%)
Goldrim Tang	97,924 (10,276-185,573)	27 (2)	55 (2)	0.03% (0.01%)	0.06% (0.02%)	554 (156)	1,324 (651)	0.57% (0.34%)	1.35% (1.43%)	581 (334)	1,891 (1,420)	0.59% (0.34%)	1.93% (1.45%)
Kole	11,697,561 (9,547,971-13,847,152)	1,047 (21)	3,601 (27)	0.01% (<0.01%)	0.03% (<0.01%)	30,700 (9,066)	42,112 (23,014)	0.26% (0.08%)	0.36% (0.20%)	31,747 (9,087)	73,626 (23,041)	0.27% (0.08%)	0.63% (0.20%)
Hawaiian Dascyllus	225,153 (91,266-359,040)	12 (0)	12 (0)	<0.01% (0.00%)	<0.01% (0.00%)	119 (47)	231 (125)	0.05% (0.02%)	0.10% (0.06%)	131 (47)	351 (125)	0.06% (0.02%)	0.16% (0.06%)
Hawaiian Whitespotted Toby	685,517 (566,297-804,737)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	257 (100)	896 (539)	0.04% (0.01%)	0.13% (0.08%)	257 (100)	1,153 (539)	0.04% (0.01%)	0.17% (0.08%)
Lei Triggerfish	1,299,027 (1,182,364-1,415,690)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	172 (67)	301 (252)	0.01% (<0.01%)	0.02% (0.02%)	172 (67)	473 (252)	0.01% (<0.01%)	0.04% (0.02%)
Longfin Anthias	NA	n.d. (0)	n.d. (0)	NA	NA	102 (3)	102 (5)	NA	NA	102 (3)	204 (5)	NA	NA
Milletseed Butterflyfish	122,588 (69,611-175,565)	n.d. (1)	n.d. (1)	NA (<0.01%)	NA (<0.01%)	106 (68)	421 (402)	0.09% (0.06%)	0.34% (0.33%)	106 (69)	527 (403)	0.09% (0.06%)	0.43% (0.33%)
Multiband Butterflyfish	1,788,604 (1,601,944-1,975,264)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	1,206 (227)	2,951 (651)	0.07% (0.01%)	0.16% (0.04%)	1,206 (227)	4,157 (651)	0.07% (0.01%)	0.23% (0.04%)

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Common Name	Island of Hawai'i Pop. Mean (lower-upper estimate limit) (CREP 2018)	East Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				Island of Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year	Maximum Catch per Year ¹	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year ²	Maximum Catch per Year ²	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.
Orangeband Surgeonfish	1,319,924 (962,298-1,677,550)	16 (0)	16 (0)	<0.01% (0.00%)	<0.01% (0.00%)	828 (226)	2,306 (631)	0.06% (0.02%)	0.17% (0.05%)	844 (226)	3,136 (631)	0.06% (0.02%)	0.24% (0.05%)
Orangespine Unicornfish	897,085 (758,978-1,035,192)	36 (8)	59 (8)	<0.01% (<0.01%)	<0.01% (<0.01%)	5,827 (1,419)	8,813 (3,330)	0.65% (0.16%)	0.98% (0.37%)	5,863 (1,427)	14,654 (3,338)	0.65% (0.16%)	1.63% (0.37%)
Ornate Wrasse	1,630,224 (1,403,166-1,857,282)	15 (1)	15 (1)	<0.01% (<0.01%)	<0.01% (<0.01%)	1,657 (361)	12,445 (1,130)	0.10% (0.02%)	0.76% (0.07%)	1,672 (362)	14,104 (1,131)	0.10% (0.02%)	0.87% (0.07%)
Peacock Grouper - Roi	476,556 (399,275-553,837)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	3 (0)	3 (0)	<0.01% (0.00%)	<0.01% (0.00%)	3 (0)	6 (0)	<0.01% (0.00%)	<0.01% (0.00%)
Pencil Wrasse	169,025 (79,513-258,536)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	165 (69)	424 (287)	0.10% (0.04%)	0.25% (0.17%)	165 (69)	589 (287)	0.10% (0.04%)	0.35% (0.17%)
Potter's Angelfish	1,087,709 (826,174-1,349,245)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	1,086 (451)	3,370 (1,379)	0.10% (0.04%)	0.31% (0.13%)	1,086 (451)	4,456 (1,379)	0.10% (0.04%)	0.41% (0.13%)
Psychedelic Wrasse	36,770 (10,627-62,913)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	274 (121)	599 (390)	0.75% (0.33%)	1.63% (1.06%)	274 (121)	873 (390)	0.75% (0.33%)	2.37% (1.06%)
Pyramid Butterflyfish	23,217 (559-45,874)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	133 (52)	714 (375)	0.57% (0.22%)	3.08% (1.62%)	133 (52)	847 (375)	0.57% (0.22%)	3.65% (1.62%)
Redbarred Hawkfish	231,580 (165,409-297,751)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	13 (4)	21 (8)	<0.01% (<0.01%)	<0.01% (<0.01%)	13 (4)	34 (8)	<0.01% (<0.01%)	0.01% (<0.01%)
Saddle Wrasse	6,396,052 (5,757,305-7,034,799)	9 (0)	9 (0)	<0.01% (0.00%)	<0.01% (0.00%)	602 (166)	982 (413)	<0.01% (<0.01%)	0.02% (<0.01%)	611 (166)	1,585 (413)	<0.01% (<0.01%)	0.02% (<0.01%)
Shortnose Wrasse	307,032 (157,058-457,006)	9 (0)	9 (0)	<0.01% (0.00%)	<0.01% (0.00%)	228 (134)	582 (390)	0.07% (0.04%)	0.19% (0.13%)	237 (134)	811 (390)	0.08% (0.04%)	0.26% (0.13%)
Spotted Boxfish	94,937 (55,775-134,099)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	170 (126)	454 (275)	0.18% (0.13%)	0.48% (0.29%)	170 (126)	624 (275)	0.18% (0.13%)	0.66% (0.29%)
Thompson's Surgeonfish	405,776 (205,636-605,916)	n.d. (0)	n.d. (0)	NA (0.00%)	NA (0.00%)	182 (50)	947 (238)	0.04% (0.01%)	0.23% (0.06%)	182 (50)	1,129 (238)	0.04% (0.01%)	0.28% (0.06%)

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Common Name	Island of Hawai'i Pop. Mean (lower-upper estimate limit) (CREP 2018)	East Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)				Island of Hawai'i (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year	Maximum Catch per Year ¹	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year ²	Maximum Catch per Year ²	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.
Tinker's Butterflyfish	18,475 (1,556-38,505)	36 (1)	38 (1)	0.20% (<0.01%)	0.21% (<0.01%)	309 (43)	586 (159)	1.67% (0.23%)	3.17% (0.86%)	345 (44)	909 (160)	1.87% (0.24%)	4.92% (0.87%)
Flame Wrasse	NA	n.d. (0)	n.d. (0)	NA	NA	75 (24)	168 (73)	NA	NA	75 (24)	243 (73)	NA	NA
Yellow Tang	8,262,144 (6,849,295-9,674,993)	11,996 (1,251)	33,809 (3,629)	0.15% (0.02%)	0.41% (0.04%)	271,430 (68,184)	386,767 (130,152)	3.29% (0.83%)	4.68% (1.58%)	283,426 (69,435)	668,194 (133,781)	3.43% (0.84%)	8.09% (1.62%)
Yellowtail Coris	391,507 (318,678-464,335)	17 (0)	18 (0)	<0.01% (0.00%)	<0.01% (0.00%)	575 (172)	851 (434)	0.15% (0.04%)	0.22% (0.11%)	592 (172)	1,428 (434)	0.15% (0.04%)	0.36% (0.11%)

¹In some instances, the maximum catch of the 10 fishers who disclosed their data is greater than the maximum catch previously reported. This is likely due to data that had previously not been disclosed (see Section 5.1).

²Based on the sums of the average or maximum from East Hawai'i and the average or maximum from West Hawai'i.

³The average and maximum catch for the Achilles Tang in the WHRFMA is limited to 2015-2017 data, after the implementation of the 2014 bag limit, to more accurately reflect future trends.

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spatial coverage and provide as accurate a depiction of population numbers as possible for the island of Hawai'i. The DAR (2018a) catch data provide collection numbers to allow for impact analysis. As noted throughout this FEIS, confidentiality regulations (HRS §189-3) and changes in the manner in which data were collected over the years did impact the analysis but was mitigated by the approach used during the analysis (i.e., using aggregate numbers). This method presents the most inclusive evaluation of the impact of the commercial aquarium fish collection on each of the 40 White List Species. Nevertheless, an analysis of the impact based on the WHAP Open Area population estimates is provided for comparison purposes in Appendix B.

While research into the reproductive biology and fecundity (i.e., ability to produce offspring) of specific species of reef fish is limited in availability, some generalities can be derived from available research, and most reef species are long-lived and highly productive. For reef fishes in general, the relationship between size and fecundity is well documented, with larger fish producing exponentially more eggs (Thresher 1984, Berkeley et al. 2004). Moreover, evidence from a diverse set of species indicates that older individuals produce larger, faster growing, and more starvation-resistant larvae (Thresher 1984, Bobko and Berkeley 2004). For these reasons, Birkeland and Dayton (2005) recommend protecting larger or older individuals to increase the sustainability of harvested populations.

Yellow Tang is a species which provides a good example of high fecundity, as well as the relationship between size and fecundity. Bushnell et al. (2010) studied Yellow Tang and found large individual variation in batch fecundity, with a range from 44 to >24,000 eggs per female produced on a single sampling date. Smaller females (3.1-4.75-inch standard length [LS]), produced limited numbers of eggs, while larger females (≥ 4.75 -inch LS) were capable of maximal egg production (>20,000 eggs per batch). Bushnell et al. (2010) estimated the annual fecundity of Yellow Tang to average 1,055,628 eggs per female (with a standard error of 120,596 eggs).

In addition to high levels of fecundity, many reef fish are long-lived. Choat and Axe (1996) studied four *Naso* species in the Great Barrier Reef, and found life spans of 35 to 40 years, with rapid growth during the first 3 to 4 years of life. Eble et al. (2009) found that the Hawaiian kala (*Naso unicornis*) is also long-lived, with rapid initial growth. Sampled kala ranged in age from 1 to 58 years with the majority of growth occurring within the first 15% of the life span. These two studies indicate that *Naso* species in general exhibit life-spans in excess of 40 years (Eble et al. 2009). While studying habitat- and sex-specific life history patterns of Yellow Tang, Claisse et al. (2009) found a 41-year old individual. In addition, they found median size and age at the transition between deeper coral-rich and shallow turf dominated habitat use were about 0.75 inch longer and about 2 years older for males than females and coincided with an increase in reproductive output. The sexual difference in size at habitat transition, combined with sexual size dimorphism results in differences in the size distributions of both sexes in the two habitats (Claisse et al. 2009).

Due to the combination of a high fecundity and long life-span, reef fish can likely sustain fairly high levels of continuous harvest. While specific research into sustainable levels of collection has not been conducted for the 40 White List Species, Ochavillo and Hodgson (2006) suggest collection of between 5% and 25% is sustainable for various reef species in the Philippines that are similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish). For 37 of the 40 White List Species, the average annual

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collection under the Pre-Aquarium Collection Ban Alternative would represent less than 1% of the estimated island-wide population, with the remaining three species averaging less than 5% (Table 5-11).

In addition to the low percentage of the populations which are harvested each year, commercial aquarium fishing has a distinct advantage over other types of fishing because it is targeted to specific species, and within those species, it primarily targets specific size-classes which minimizes the impact to the brood stock. Because commercial aquarium fishers target the smaller individuals in populations, the larger individuals with higher fecundity are left within the population.

Based on the low percentage of the overall populations collected annually by commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection under the Pre-Aquarium Collection Ban Alternative would have a **less than significant direct impact** on reef fish populations and the reefs in which they occur.

5.4.1.3 WHRFMA-only Programmatic Issuance of Permits Alternative

Under the WHRFMA-only Programmatic Issuance of Permits Alternative, an unlimited number of Aquarium Permits would be issued for the use of fine-mesh nets within the WHRFMA, but fine-mesh nets would not be allowed in East Hawai'i. The impact on biological resources, including reef habitat, within the WHRFMA would be similar to the Pre-Aquarium Collection Ban Alternative. In East Hawai'i, given that the WHRFMA would be open to fishing with the use of fine mesh nets, impacts to biological resources would be anticipated to be similar to the Pre-Aquarium Collection Ban Alternative or even potentially decrease since fishing in the WHRFMA may prove more favorable given the use of fine mesh nets. Therefore, impacts to fish populations are anticipated to be similar to the Pre-Aquarium Collection Ban Alternative for both the WHRFMA and East Hawai'i, with collection impacting less than 3.5% of any single species' population on average.

Based on the low percentage of the overall populations collected annually by commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection under the WHRFMA-only Programmatic Issuance of Permits Alternative would have a **less than significant direct impact** on reef fish populations and the reefs in which they occur, and **similar impacts** when compared to the Pre-Commercial Aquarium Ban Alternative.

5.4.1.4 Achilles Tang Conservation Alternative

Under the Achilles Tang Conservation (Preferred) Alternative, impacts would be the same as those described in Section 5.4.1.2 for the Pre-Aquarium Collection Ban Alternative for all fish, invertebrate species, and reef habitat, with the exception of the Achilles Tang, in both the WHRFMA and East Hawaii.

Based on WHAP data, the DAR has suggested decreasing population trends for the Achilles Tang in the WHRFMA. Commercial aquarium fishers worked with DLNR in 2012 to pass HAR 13-60.4, which beginning in 2014 limited commercial aquarium collection of Achilles Tang to 10 individual fish per day (recreational and non-aquarium commercial harvest is not subject to the bag limit). Under the Achilles Tang Conservation

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(Preferred) Alternative, the daily bag limit for Achilles Tang in the WHRFMA would be reduced from 10 per day to 5 per day.

Therefore, under this alternative, annual catch of Achilles Tang in the WHRFMA over the 5-year analysis period is estimated to be reduced by 50%¹⁵ from that under the Pre-Aquarium Collection Ban Alternative (5,600; the average amount collected since the 2014 bag limit was imposed) to 2,800, or 1.2% of the island-wide population that would be collected annually over the 5-year analysis period. In East Hawai'i, impacts to the Achilles Tang would be anticipated to be similar to those seen under the No Action Alternative (either remaining similar to historic catch, or potentially increasing slightly due to the bag limit in the WHRFMA), ranging from 0.21% - 0.93% of the island-wide population (Table 5-3), for a total impact of up to 2.13% of the population (WHRFMA and East Hawai'i combined). This level of collection is below the lower end of what is considered to be sustainable reef fish harvest based on available research (5% - 25%; Ochavillo and Hodgson 2006).

Therefore, the Achilles Tang Conservation Alternative would have **less than significant direct impacts** on reef fish populations and the reefs in which they occur and would have **a minor beneficial impact** for the Achilles Tang when compared to the Pre-Aquarium Collection Ban Alternative.

5.4.1.5 Limited Permit Issuance (Preferred) Alternative

Under the Limited Permit Issuance (Preferred) Alternative, Aquarium Permits would be issued to 10 fishers for the use of fine-mesh nets within the WHRFMA. No fine mesh nets would be allowed in East Hawai'i, though collection of aquarium fish would still be permitted using other legal means.

The 10 fishers who would receive Aquarium Permits collected up to a maximum of 160,832 fish in the WHRFMA in a single year during the period from 2000-2017 (see Table 5-2). Conservatively assuming collection in the first year of the 5-year analysis period started at this maximum, and then grew at 1.49% per year, a total of 828,484 fish would be collected over the 5-year analysis period, or an average of 165,697 per year.

Impacts to individual species in the WHRFMA are shown in Table 5-11, using both the average and maximum number of each of the White List Species collected in the WHRFMA by the 10 fishers annually between 2000 and 2017, and what percent of the CREP population estimates those values represent. The impacts on individual species' populations is less than 1% for all species when looking at average collection rates, and less than 2% when looking at maximum rates.

Additionally, the bag limit for Achilles Tang would be implemented, resulting in similar impacts to that species as seen under the Achilles Tang Alternative, though again, because of the limited number of Aquarium Permits that would be issued, it is anticipated that the impact may be even smaller. Therefore,

¹⁵ A 50% reduction is assumed, as collection decreased markedly from an average of 7,732 and a maximum of 13,615 per year prior to imposing the bag limit of 10. Since the bag limit of 10 was imposed, collection has stayed fairly constant, ranging from 5,473 to 5,757 per year (difference of 284 fish), suggesting that fishers may be collecting near the maximum allowed under the bag limit since there has been no growth in collection. Therefore, if fishers are currently collecting at or near the maximum allowed under the bag limit, it is reasonable to assume that reducing that bag limit by 50% would result in a 50% reduction in collection.

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under this alternative, annual catch of Achilles Tang in the WHRFMA over the 5-year analysis period is estimated to be reduced by 50% from that under the Pre-Aquarium Collection Ban Alternative (1,089; the average amount collected by the 10 fishers since the 2014 bag limit was imposed, or 2,157, the maximum collected by the 10 fishers since the bag limit was imposed) to 545 to 1,258, or 0.24% to 0.54% of the island-wide population that would be collected annually over the 5-year analysis period. An additional 1,372 Achilles Tang would be estimated to be collected from East Hawai'i (53% of the No Action Alternative, see discussion below, plus 52 to 142 from the 10 fishers in East Hawai'i, see Table 5-11). This results in a total of 1,969 to 2,772 Achilles Tang, or 0.85% to 1.20% of the island-wide population. This level of collection is below the lower end of what is considered to be sustainable reef fish harvest based on available research (5% - 25%; Ochavillo and Hodgson 2006).

In East Hawai'i, the impacts would be anticipated to be similar to the No Action Alternative, although lower given that 10 of the fishers would be able to collect aquarium fish in the WHRFMA using fine mesh nets and these fishers are anticipated to decrease their collection in East Hawai'i to levels seen under the Pre-Aquarium Collection Ban Alternative. Based upon data from 2018 (DAR 2019b), the 10 fishers collected approximately 47% of the fish in East Hawai'i. Under the Limited Permit Issuance Alternative, it is thus assumed that the collection in East Hawai'i would decrease 47% from the No Action Alternative collection of 57,503 fish per year, to 30,477 fish, plus an average of 294 fish per year from East Hawai'i collection (Pre-Aquarium Collection Ban) by the 10 fishers (see Table 5-2), for a total collection of 30,771 fish per year in East Hawai'i under the Limited Permit Issuance (Preferred) Alternative, or 153,855 fish total over the 5-year analysis period.

Impacts to individual species would be anticipated to follow the Pre-Aquarium Collection Ban Alternative trends for the 10 fishers for the island of Hawai'i (see Table 5-11), plus additional impacts from other fishers in East Hawai'i of 53% of the No Action Alternative. Even when combined with collection from the WHRFMA, the impact to a species' population would be less than 2% for the 38 White List Species with population estimates (see Section 5.5.1). The species with the highest collection as a percentage of the population, the Yellow Tang, would be at a maximum of 1.93% (see Section 5.5.1). Collection would need to increase by 2.6X to reach the lower end of the 5% to 25% sustainable threshold in Ochavillo and Hodgson (2006). Collection of other species would need to increase by even more than that.

Based on the low percentage of the overall populations anticipated to be collected annually by the 10 commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection under the Limited Permit Issuance (Preferred) Alternative would have a **less than significant** direct impact on reef fish populations and the reefs in which they occur, and a **minor beneficial impact** on reef fish populations compared to the Pre-Commercial Aquarium Collection Ban Alternative.

5.4.2 Indirect Effects

Under all alternatives, mortality of fish post-harvest will occur. As described in Munday et al. (2015), after a fish has been collected from the reef, they are brought to the surface, transported to an export facility, shipped to import facilities, and then transported to a retail store and eventually to a hobbyist aquarium.

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Mortality can occur at any point in this supply chain, though immediate mortality is less than 1% (Stevenson et al. 2011, as cited in Munday et al. 2015).

When bringing the fish to the surface, there are two methods commonly used in the Hawai'i fishery for avoiding barotrauma to collected fish (either ascent without decompression stops, or ascent with one decompression stop, followed by venting), and neither method resulted in any immediate or delayed mortality (Munday et al. 2015). Furthermore, the stress levels of vented fish versus fish brought to the surface using decompression (multiple stops along the way to the surface, with no venting) were not statistically different (Munday et al. 2015). While this study included limitations, including the lack of additional stressors, since fish were kept for 21 days for observations, and did not have to undergo additional shipment and handling, it does suggest that the collection methods used in Hawai'i minimize the post-collection mortality of fish compared to other methods (e.g., no decompression, or use of cyanide). Munday et al. (2015) stated that while venting has been controversial in this industry due to criticism from animal rights groups, other fishing groups are often encouraged to vent fish before returning them to the ocean.

Additional mortality may occur during transportation, shipping, or once the fish has reached its final destination. No post-collection data are available for fish collected in Hawai'i; however, cyanide-free net-caught fish in the Philippines have been found to have mortality rates of less than 10% through the chain from the reef to retailer (Rubec et al. 2001). This is compared to rates of 14.12% to 21.69% (depending on the experience of the final aquarist) found by Cartwright et al. (2012), which included fish collected using cyanide or other methods. While it is possible that higher post-collection mortality rates could result in the need to collect more fish from the reef, it is not expected that mortality rates will increase over what has previously occurred under historic collection rates. Therefore, because post-collection mortality is not expected to increase under any of the alternatives, it is not anticipated that collection rates will need to increase as a result of increased mortality.

5.4.2.1 No Action Alternative

Under the No Action Alternative issuance of Aquarium Permits would not occur and commercial aquarium fishing would stop in the WHRFMA. In East Hawai'i, aquarium collection using legal gear or methods other than fine-mesh nets would continue. Commercial aquarium fishers may no longer find it feasible to target aquarium fish and may begin to participate in other fisheries, but this is not possible to quantify at this time.

In the WHRFMA, where no fish would be collected, a minor, although unquantifiable, increase in number of White List Species, non-White List Species, and SGCN may occur over the 5-year analysis period, which may provide additional viewing opportunities for tourists, an increase in the prey base, additional individual herbivores to maintain the reef, and increased competition between species for available resources. However, data do not exist that would allow for a thorough analysis of such effects, and many species did not see differences in population trends between areas open and closed to commercial aquarium collection since establishment of the FRAs in 1999 (Table 5-4 and Table 5-8; DAR 2019a).

In East Hawai'i, collection may increase under the No Action Alternative (see Section 5.4.1.1), and without the use of fine mesh nets, the size class of fish collected may increase over that which is caught with fine mesh nets (i.e., the smaller fish would escape the larger mesh), but again this impact cannot be quantified

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at this time. With only a few exceptions for certain species where fishers classify fish as “small”, “medium” or “large”, the size of fish collected under CMLs is not required to be reported to the DAR, and thus these data are not available. If the size class of fish collected is larger, these larger fish may represent the brood stock.

Based on the analysis provided in Section 5.4.1.1, the impact to any population of White List Species of fish would be less than 1% of the island-wide population. Additionally, research conducted on herbivores showed that numbers did not decline in areas open to commercial aquarium collection in the WHRFMA between 2003 and 2017. Since collection rates are generally higher in the WHRFMA, even with the anticipated increase in collection under the No Action Alternative in East Hawai'i, no indirect impacts due to commercial aquarium collection on the biological function of herbivore populations are anticipated.

Therefore, it is anticipated that the No Action Alternative would have a ***less than significant indirect impact*** on tourists, as well as on collected fish populations and the reefs in which they occur in East Hawaii.

5.4.2.2 Pre-Aquarium Collection Ban Alternative

Under the Pre-Aquarium Collection Ban Alternative issuance of an unlimited number of Aquarium Permits would occur and commercial aquarium fish collection would take place. An estimated 1.7 million individual, primarily juvenile fish would be collected from the WHRFMA and an estimated 91,000 primarily juvenile fish and 67,229 invertebrates would be collected from East Hawai'i. Collection of these primarily juvenile fish and invertebrates would result in a decrease in the number of White List Species, non-White List Species, and SGCN over the 5-year analysis period, which may provide fewer viewing opportunities for tourists, a decrease in the prey base, and reduced competition between species for available resources. Given the low proportion of the island populations of the species that would be removed (Table 5-11, Section 5.4.1.2), and the geographic area over which the collection would occur (i.e., WHRFMA, island of Hawai'i), it is anticipated that indirect impacts on viewing opportunities, prey base, and competition would be minor or nonexistent. This conclusion is supported by the observation that population trends for many species did not differ between areas open and closed to commercial aquarium collection (Table 5-4 and Table 5-8). Additionally, between 2003 and 2017, total fish abundance significantly increased by 34.9% within Open Areas, where commercial aquarium collection was occurring (DAR 2019a, Gove et al. 2019). Total fish biomass also increased by 19.8%, though this change was not statistically significant (DAR 2019a, Gove et al. 2019). Species richness (the number of species observed per survey) remained constant for MPAs, FRAs and Open Areas (DAR 2019a, Gove et al. 2019).

As discussed in Section 5.4.1, herbivore numbers did not decline in the Open Areas between 2003 and 2017, and therefore, no indirect impacts due to commercial aquarium collection under the Pre-Aquarium Collection Ban Alternative on the biological function of herbivore populations are anticipated.

Based on the Tissot and Hallacher (2003) study and the 15 years of coral reef data collected and analyzed by the DAR (2018c), it is not anticipated that any significant indirect impacts to reef habitat would occur under the Pre-Aquarium Collection Ban Alternative. From 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was

not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time.

It is anticipated that implementation of the Pre-Aquarium Collection Ban Alternative would have a minor beneficial effect on invasive fish species over the 5-year analysis period. A total of 128 individual Bluestripe Snappers have been caught in the WHRFMA since 2000, based on disclosed data (DAR 2018a). The Peacock Grouper and Blacktail Snapper have not been reported as caught from the WHRFMA over the 18-year assessment period. Of the three invasive fish species, only the Peacock Grouper has been reported as caught (all *n.d.* data) in East Hawai'i.

Based on the analysis in this section, the Pre-Aquarium Collection Ban Alternative would have a ***less than significant indirect impact*** on tourists, as well as on collected fish populations and the reefs in which they occur.

5.4.2.3 WHRFMA-only Programmatic Issuance of Permits Alternative

Under the WHRFMA-only Programmatic Issuance of Permits Alternative, Aquarium Permits would be issued for the use of fine-mesh nets within the WHRFMA, but fine-mesh nets would not be allowed in East Hawai'i. The indirect effect on biological resources within the WHRFMA would be similar to the Pre-Aquarium Collection Ban Alternative. In East Hawai'i, indirect effects to biological resources would be anticipated to be similar to the No Action Alternative, though with the WHRFMA open to fishing with the use of fine mesh nets, indirect effects of aquarium fish collection in East Hawai'i may return to levels seen under the Pre-Aquarium Collection Ban Alternative or even decrease since fishing in the WHRFMA may prove more favorable given the use of fine mesh nets.

Based on the analysis in this section, the WHRFMA-only Programmatic Issuance of Permits Alternative would have ***less than significant indirect impact*** on tourists, as well as on collected fish populations and the reefs in which they occur.

5.4.2.4 Achilles Tang Conservation (Preferred) Alternative

Indirect impacts under the Achilles Tang Conservation Alternative would be similar to those of the Pre-Aquarium Collection Ban Alternative. The implementation of the 5 per day bag limit on Achilles Tang may provide a benefit to Achilles Tang populations, potentially leading to minor population growth as well as increased viewing opportunities for tourists, but this cannot be quantified at this time.

Based on the analysis in this section, the Achilles Tang Conservation Alternative would have ***less than significant indirect impact*** on tourists, as well as on collected fish populations and the reefs in which they occur.

5.4.2.5 Limited Permit Issuance (Preferred) Alternative

Under the Limited Permit Issuance (Preferred) Alternative, Aquarium Permits would be issued to 10 fishers for the use of fine-mesh nets within the WHRFMA. No fine mesh nets would be allowed in East Hawai'i, though collection of aquarium fish would still be permitted using other legal means.

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It is anticipated that collection of approximately 828,484 fish would occur in the WHRFMA, resulting in indirect impacts similar, though smaller in scale, to the Pre-Aquarium Collection Ban Alternative. In East Hawai'i, between 91,000 and 153,855 fish would be collected, and 67,229 invertebrates, resulting in indirect effects between the No Action and Pre-Aquarium Collection Ban alternatives.

Additionally, this alternative would implement a bag limit on Achilles Tang, leading to similar indirect impacts on that species as the Achilles Tang Conservation Alternative, though again, because of the limited number of Aquarium Permits that would be issued, it is anticipated that the indirect effects may be even smaller.

Based on the analysis in this section, the Limited Permit Issuance (Preferred) Alternative would have **less than significant indirect impact** on tourists, as well as on collected fish populations and the reefs in which they occur.

5.4.3 Cumulative Impacts

As stated in Section 4.4, Toonen et al. (2011) conclude that the Hawaiian Archipelago is not a single, well-mixed marine community, but rather there are at least four significant multi-species barriers to dispersal along the length of the island chain, and that species that appear capable of extensive dispersal, such as Yellow Tang and Kole, show significant population differentiation within the Hawaiian Archipelago. In addition, there are significant consensus genetic breaks that restrict gene flow between islands, including a barrier between the island of Hawai'i and the rest of the Main Hawaiian Islands (MHI). Therefore, the geographic boundary for analysis of cumulative effects is the island of Hawai'i.

5.4.3.1 Recreational Aquarium Fish Collection

As of April 2018, all recreational permits for collection of aquarium species with fine mesh nets were voided, and no collection with fine mesh nets is currently legally allowed, pending environmental review (DAR 2019a). Given the five-year analysis period, it cannot currently be predicted when or if these permits will be reinstated, therefore, the following discussion focuses on the cumulative impacts if the permits were to be reinstated, and pressure remained similar to historic trends.

Recreational aquarium fish collection is governed by state law and regulations. Under HRS 188-31, individuals may use fine mesh nets (< 2-inch mesh) to collect aquatic life for an aquarium. A permit is not required if:

- The net has large mesh (more than two-inch mesh);
- The net has small mesh but is less than three feet in length, height, or width, including the handle; or,
- Using a slurp gun.

A recreational aquarium permit is required if using a small mesh net other than a hand net, or a small mesh hand net larger than the dimensions indicated above. Small mesh throw nets are always prohibited. Regardless of whether a permit is required, regulations that impose bag limits, seasons, and limit the size of fish that can be collected apply to all recreational fish collection. The aquarium permit only exempts a

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person from the small mesh restriction. The recreational aquarium permit rules apply everywhere in the state, except for West Hawai'i, which has its own rules and permits specific to the WHRFMA (HAR §13-60.4).

Under a recreational aquarium permit, individuals are authorized to collect up to five aquatic animals per day (1,825 per year) (HAR 13-60.4). Since 2000, the number of recreational permits issued for the state (island-specific numbers not available) has averaged 159 annually (DAR 2018a). The DAR collected recreational aquarium fish catch information from 1975 until 1985, after which, data collection was discontinued, and currently no reporting of catch is required for recreational aquarium permit holders. Historic recreational catch data were not digitized or processed into a database, and therefore, are not available for analysis (DAR 2018a).

Because reporting of recreational aquarium catch is not required, the impact of recreational collection on White List Species cannot be quantified. It is likely that not all recreational permit holders collect the maximum allowable number (1,825); however, if each of the average 159 statewide permit holders were to collect 50% of the allowable catch (913), it would result in the collection of 145,088 aquatic animals per year statewide. If it is assumed that only 50% are White List Species, it would result in an estimated 72,544 White List Species collected by recreational aquarium permit holders annually. The same estimation would apply to non-White List Species. These estimates are likely high based on results from Harding (2017), which found that 57% of recreational aquarium permit holders surveyed had not utilized their permit in the previous 12-month period. Of the 43% who had used their permits, their average yearly catch was 45 fish per permit (Harding 2017), which is below the maximum allowable number of 1,825 fish or the 50% used to estimate impacts above.

Because reporting of recreational aquarium catch is not required, the impact of the collection on SGCN cannot be quantified. Nevertheless, it is likely that SGCN are occasionally collected by recreational aquarium permit holders. However, given the low number of SGCN individuals collected by commercial aquarium collectors (average 274 Psychedelic Wrasse/year; average 309 Tinker's Butterflyfish/year; average 96 Fisher's Angelfish/year) it is estimated that recreational collectors are collecting fewer individuals of these species.

Because reporting of interactions (e.g., damage from contact with collection equipment) with corals resulting from recreational aquarium collecting and recreational aquarium catch is not required, the impact of the interaction with reef habitat cannot be quantified. However, studies conducted by Tissot and Hallacher (2003) found that aquarium collecting had no significant impact (beneficial nor detrimental) on reef habitat. In addition, 15 years of coral reef data collected and analyzed by the DAR (2018b) found no significant difference in coral cover in areas open to commercial aquarium fish collection. It is assumed that recreational aquarium collect would likewise not have a significant impact.

Recreational aquarium collection impacts to biological resources cannot be fully quantified. However, data presented by DAR (2014a, 2019a) indicate that some species may be declining in various management areas (e.g., FRA, MPA, Open) due to factors other than commercial aquarium collecting which may include recreational aquarium collection.

5.4.3.2 Non-Aquarium Commercial and Non-Commercial Fishing (Non-Aquarium Fish)

Coral reef species are targeted by non-aquarium commercial fishers using numerous fishing gears including nets, traps, hook and line, spear, hand, and other methods. Commercial fish industry landings in Hawai'i have increased annually since 2006 and the NOAA reported total landings in 2013 were valued near \$108 million dollars (DLNR 2015). Akule (coastal pelagic scads) dominate nearshore commercial landings and are typically collected using surround or fence nets, gillnets or hook and line (Western Pacific Regional Fishery Management Council-WPRFMC 2017). Other top species by weight and value include soldierfishes, parrotfish, surgeonfishes and goatfishes, which may be targeted because they may bring a high price in some seasons (WPRFMC 2017).

Non-commercial fishing includes subsistence/consumptive, recreational, and cultural fishing and gathering activities that occur in ocean and coastal zones. The State of Hawai'i has the most developed recreational fishing infrastructure in the U.S. Pacific and is a substantial economic contributor to the State. The State of Hawai'i does not track non-commercial fish collection. However, creel surveys suggest that the total inshore non-commercial catch from reef areas could be as high as the reported commercial catch (WPRFMC 2017).

The most recent DAR summary report available on the West Hawai'i aquarium fishery (DAR 2019a) analyzed data collected since 2003 by the Hawai'i Marine Recreational Marine Fishing Survey (HMRFS) and subsequently since 2007 by NOAA's Marine Recreational Information Program (MRIP) to gain perspective on the generalized impact on reef fishes by aquarium collecting versus other types of reef fishing activities.

Statewide, looking at the period from 2008-2011, the number of reef fishes caught by the recreational and commercial sectors was found to be comparable, averaging 1,511,025 per year for recreational fishers and 1,554,010 per year for commercial (i.e., non-aquarium) fishers.

McCoy et al. (2018) found that 12.8% of households on Hawai'i participate in recreational (non-aquarium) fishing. Most of this fishing is conducted using lines from shore (65.6%), which catches an estimated 0.33 pounds of reef fish per hour fished (McCoy et al. 2018). The results of this study found that on Hawai'i, non-commercial annual catch was approximately 10.5 times commercial catch when comparing the average pounds per year between 2004 and 2013 (McCoy et al. 2018).

In West Hawai'i (i.e., the WHRFMA), on average the commercial aquarium fishery annually takes 1.8 times (343,729/year) the number of reef fishes taken annually by recreational and other commercial fishers combined (194,674/year) (DAR 2019a). However, if Yellow Tang, which is primarily collected at small sizes and generally not targeted by other fishers, is excluded, on average the recreational and commercial fisheries combine to take 3 times the number of reef fishes (194,674/year) caught annually by aquarium collectors (64,815/year) (DAR 2019a). In terms of reef fish biomass caught by the different fisheries in West Hawai'i (i.e., the WHRFMA), DAR (2019a) concluded that more biomass is taken by the combined recreational and commercial fisheries regardless of including Yellow Tang (2.8 times) or excluding Yellow Tang (8.6 times). In addition, unlike the aquarium fishery which targets mostly immature fish, the commercial and recreational fisheries selectively target the larger breeding portion of the population which has profound implications for the sustainable usage of the resource (DAR 2019a). Therefore, on the island of Hawai'i, commercial aquarium fish collection constitutes 25% of the total catch and 11% of the biomass

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(when excluding Yellow Tang, whose population has been increasing even with commercial aquarium collection).

The non-aquarium commercial fish industry targets some coral reef species; however, commercial non-aquarium fishers do not directly target most White List Species. Data for non-aquarium commercial fishing is lacking due to the DAR confidentiality regulations (HRS §189-3). Because most non-aquarium commercial fishers do not target aquarium species, there are usually less than three fishers reporting. Therefore, the data presented in Table 5-12 are underestimated.

Table 5-12. Available data on White List Species collected by commercial non-aquarium fishers in the State and on the island of Hawai'i from 2000-2017 (DAR 2018a). n.d. = Not Disclosed (see Section 5.1).

White List Species	WHRFMA Catch		East Hawai'i Catch		Island of Hawai'i Catch		State Catch Total	
	Total	Annual Average	Total	Annual Average	Total	Annual Average	Total	Annual Average
Achilles Tang	1,552	87	2,435	136	3,987	222	10,641	592
Yellow Tang	n.d.		n.d.		n.d.		n.d.	
Kole (=Goldring Surgeonfish, Yelloweye, Goldring)	4,773	266	28,496	1,584	33,269	1,849	103,391	5,744
Peacock Grouper (=Roi, Bluespot Peacock Grouper)	212	12	73	4	285	16	17,892	994
Eyestripe Surgeonfish (=Palani)	4,891	272	2,412	134	7,303	406	202,286	11,239
Orangeband (=Shoulder) Surgeonfish	396	22	604	34	1,000	56	95,380	5,299
Saddle Wrasse	4	1	62	4	66	4	1,150	64
Brown Surgeonfish (=Lavender, Forktail Tang)	n.d.		58	4	58	4	58	4
Bluestripe Snapper (=Taape)	15,499	861	64,660	3,593	80,159	4,454	715,913	39,773
Total Collected	27,327		98,800		126,127		1,146,711	

It is expected that the average number of White List individuals collected annually by non-aquarium commercial fishers would continue at these rates (at a minimum) over the 5-year analysis period.

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Because reporting of non-aquarium recreational, cultural and subsistence/consumptive catch is not required, the impact of recreational, cultural and subsistence/consumptive collection on White List Species, non-White List Species, and SGCN cannot be quantified. However, nearshore recreational and subsistence catch is likely at similar catch levels as that of non-aquarium commercial fishing (Friedlander 2017).

The impacts of non-aquarium commercial and non-commercial fishing on biological resources cannot be fully quantified. However, as discussed above data presented by DAR (2019a) indicate that some species are declining in various management areas (e.g., FRA, MPA, Open) due to factors other than commercial aquarium collecting, which include non-aquarium commercial and non-commercial fishing. However, there is no way to fully quantify the cumulative effects of past and ongoing non-aquarium commercial and non-commercial fishing on biological resources. Given the assumed past and present impacts of non-aquarium commercial and non-commercial fishing on biological resources, foreseeable future actions would likely result in some impacts to biological resources.

5.4.3.3 Commercial Aquarium Collection

As noted in Section 1.0, the commercial aquarium collection fishery has existed in Hawai'i since the late 1940s. Commercial aquarium collection pursuant to permits issued by DLNR was only recently halted after the Supreme Court of Hawai'i's determination that DLNR's issuance of the permits required compliance with HEPA. Cumulatively, since 1976, a total of 8.6 million White List Species individuals have been collected by commercial aquarium fishers in the WHRFMA area (DAR 2018a). Over 69% of that catch has occurred since 2000 and was included in the analysis of this FEIS. Regardless, this collection has already occurred, and is reflected in the current population estimates used to evaluate impacts on species (see Section 5.4.1.2).

Given the long history of commercial aquarium collection in Hawai'i, it is reasonably foreseeable that commercial aquarium collection will continue. Based on available data regarding species abundance and yearly commercial aquarium catch over the past 18 years, it is expected that in the reasonably foreseeable future, commercial aquarium collection will proceed generally at the same rate and have the same level of impact as in the past 18 years. To the extent new data regarding the impacts of commercial aquarium collection on biological resources becomes available in the future, DLNR may consider those data and, to the extent necessary, supplement this impacts analysis.

As noted in Section 5.4.1.2:

- Reef fish have high fecundity and are long lived, and as such produce a large number of young each year over many years;
- Commercial aquarium collection targets juvenile fish leaving behind the adult broodstock; and,
- A low percentage of the overall population of each of the targeted species would be collected annually by commercial aquarium fishers, and this collection would be spread throughout the year and across multiple areas.

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As such, Section 5.4.1.2 concludes that commercial aquarium collection would not have a significant impact on island of Hawai'i reef fish populations. Thus, it is not anticipated that losses would accumulate over time due to the low percentage collected each year and the high fecundity of reef fishes.

5.4.3.4 Tourism

Hawai'i is a major tourist destination and the tourism industry contributes the most to the state's economy. Over time this industry has grown and reshaped the native landscapes and sensitive ecosystems through major coastal development, increased energy consumption, and tourism based recreational activities. Major coastal development for tourism (i.e., hotels, resorts, restaurants, recreational outfitters) and associated point source pollution (e.g., petroleum hydrocarbons, pharmaceuticals, heavy metals, and sediment from agriculture and development) threaten the quality of coral reef ecosystems (State of Hawai'i 2010). When coral reefs are damaged, it could potentially expose reef dependent organisms and leave them vulnerable to other threats such as disease, predation, and climate change (State of Hawai'i 2010), including the reef fishes and other aquatic animals targeted by both commercial and recreational aquarium fishers.

Human interaction with native flora and fauna is also a growing concern. Damage to sensitive ecosystems (i.e., coral reefs, tide pools, shorelines) through tourism-based recreation overuse (e.g., SCUBA diving, snorkeling, etc.) has been attributed to killing many aquatic organisms that in turn may affect many more species that rely on such organisms as a food source. Damage to coral reef habitat in association with tourism (through coastal development, point source pollution, and recreational activities) threatens most White List Species that are dependent on reefs for habitat and foraging in the foreseeable future (State of Hawai'i 2010).

5.4.3.5 Climate Change

Warming of the planet and rising average temperatures may produce variations in precipitation and temperature patterns, sea levels, and storm severity. This process is commonly referred to as "climate change." Increased temperatures and acidity will reduce the health and resilience of coral reefs and other ocean resources (Hawai'i Climate Change Mitigation and Adaptation Commission 2017). Changes in sea surface temperatures have been documented, with temperatures warmer than normal in recent years (increase of 0.22 °F per decade), and even reaching record levels of thermal stress in September 2015 (Casey 2001; Gove et al. 2016). Warmer water temperatures can result in coral bleaching. When water is too warm, corals will expel the algae living in their tissues causing the coral to turn completely white. When coral bleaches, it is not dead; corals can survive a bleaching event, but they are under more stress and are subject to mortality. In 1998, global coral bleaching and die-off was unprecedented in geographic extent, depth, and severity. Researchers predict that coral bleaching events would occur when the average sea temperatures are 33.8 °F or more above average (DLNR 2015). In the fall of 2015, leeward reefs of Hawai'i Island suffered catastrophic coral mortality due to widespread and severe coral bleaching. Survey results indicated that overall coral bleaching prevalence averaged 53.3% and resulted in an average coral cover loss of 49.7%. Regional differences in bleaching prevalence and subsequent coral mortality were not detected. High post-bleaching mortality was detected for the coral species, *Pocillopora meandrina*, *Porites evermanni*, and *Porites lobata* (Kramer et al., 2016). Acidification can also damage corals and marine life

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that depend on minerals for shell/skeletal development. The acidity of the Pacific Ocean has increased by about 25% over the last 300 years and is predicted to increase 40-50% by 2100 (EPA 2016).

Based on studies in the Great Barrier Reef, fishing pressure had minimal effect on bleaching (Hughes et al. 2017). On the island of Hawai'i, the total cover of hard coral decreased between 2003 and 2017 in MPAs, FRAs and in Open Areas, with the smallest decline seen in Open Areas, though all areas saw significant declines ranging from 48.7% in Open Areas to 57.8% in FRAs (DAR 2019a, Gove et al. 2019). Given that Open Areas did not see a more severe decline than areas closed to commercial aquarium collection, it is anticipated that commercial aquarium collection has a less than significant impact on coral declines.

Currently, it is projected that with warming of approximately 5°F per decade, coral reefs will experience annual bleaching beginning by about 2040 in the Hawaiian Islands, though this may be delayed by approximately 11 years if the warming reductions in the 2015 Paris Agreement are met (U.S. Global Change Research Program [USGCRP] 2018). Bleaching and acidification will result in a loss of reef structure and lead to declines in fishery yields and loss of habitat (USGCRP 2018). Bleaching events in Hawai'i are tracked by NOAA, the DLNR, DAR, and other partners (found online at www.hawaiicoral.org). Changes in climate currently impact the physical resources of Hawai'i. Warming sea temperatures and acidification could result in damage, disease outbreaks, and ultimately death of coral reefs. The weakening or loss of coral reef ecosystems may threaten entire marine ecosystems in the region as many organisms, including numerous fish species, are not only dependent on these ecosystems for suitable habitat, but due to the isolation of the islands in the central pacific, are unable to move to new environments that provide suitable conditions for survival (EPA 2016).

Several White List and non-White List Species are endemic to the Hawaiian Archipelago (including Johnston Atoll) and therefore may be impacted when faced with changes in climate over time (e.g., warming temperatures, habitat loss due coral bleaching, etc.). The extent and severity of impacts to White List Species from climate change have been ongoing for decades and are expected to increase in the foreseeable future. If environmental fluctuations resulting from climate change (e.g., tropical storms, coral bleaching episodes, acidification, etc.), or other natural or human factors, change habitat conditions, fishing mortality may present a higher risk to some White List and non-White List Species and SGCN.

5.4.3.6 Poaching and Underreporting

It is acknowledged that poaching of aquarium fish could occur under any of the alternatives under consideration. For example, two fishers were cited in February 2020 for illegal harvesting of aquarium fish offshore of Kawaihae¹⁶. An inspection of the vessel allegedly turned up aquarium fishing gear, including a small mesh net, and the hold contained 550 live tropical fish of various species. The two fishers were cited by DOCARE officers for violation of HAR 13-60.4.4(3). The boat, trailer, and various fishing gear were seized as evidence. While poaching does occur, there are no available data on the number of aquarium

¹⁶ <https://www.hawaiitribune-herald.com/2020/02/22/hawaii-news/kona-men-cited-for-illegal-aquarium-fish-gear/>

fish, and specifically White List Species, taken by poachers in a given year. However, we assume the impact of poaching would be the same under all alternatives under consideration.

Analysis by the DAR (2014a) has shown that actual underreporting of catch is small, with a 3.5% difference between the number of animals reported caught and sold in 2010 and a 0.4% difference in 2014, which likely represent live releases and mortality. Therefore, it is anticipated that actual collection may be 0.4% to 3.5% higher than what had been reported prior to the October 2017 ban on fine-mesh nets, or 1,399 to 12,237 additional reef fish from the WHRFMA and East Hawai'i (based on 0.4% to 3.5% of the 349,620 average fish collected in a year). It is assumed that this rate of underreporting could occur under any of the alternatives under consideration (i.e., up to a 3.5% additional collection of any species). For example, under the Preferred Alternative, an additional 3.5% collection of the species with the highest collection of its population (Yellow Tang, at 1.93% of the population, see Table 5-14) would result in a collection of 2% of the population¹⁷. All other species would have even lower rates of collection. This 0.4% to 3.5% increase would also apply to the other alternatives under consideration.

5.4.3.7 Cumulative Impact Conclusion

The DAR (2019a) has noted significantly declining populations in one or more of the management areas for 12 of the White List Species, and cumulatively, all of the factors discussed above likely contribute to the declines. Therefore, cumulative impacts to these 12 White List Species would occur under any of the five alternatives under consideration and would be **significant** (including the No Action Alternative). Minor cumulative impacts to the remaining 28 White List Species are anticipated, given that populations have remained stable or increased for 24 of those species, and population trend data is not available for the other four species¹⁸.

However, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines. In addition, for the 12 species that have shown a significant decline in population size in one or more management area since establishment of the WHRFMA in 1999, commercial aquarium collection under any of the five alternatives would collect less than 1% of the island-wide population estimates for 10 of the species (Table 5-14). For the remaining two species, Achilles Tang and the Pyramid Butterflyfish, commercial aquarium collection would collect less than 4% of the island-wide

¹⁷ $0.0193 \times 1.035 = 0.020$

¹⁸ Species not adequately surveyed by WHAP include Tinker's Butterflyfish, Longfin Anthias, Flame Wrasse, and Eyestripe Surgeonfish. Tinker's Butterflyfish have a CREP (2018) population estimate of 18,475, and collection under any of the alternatives would be less than 5% of the island-wide population (though it should be noted that the vast majority of the population occurs well below the 98-foot depth surveyed by the CREP and thus the population estimate is likely low). Eyestripe Surgeonfish has a CREP (2018) population estimate of 578,835, and collection under any of the alternatives would be less than 0.3% of the island-wide population. Flame Wrasse do not have a CREP population estimate, but collection has been less than 175 individuals per year for the island of Hawai'i between 2000 and 2017. Longfin Anthias also do not have a CREP population estimate, but collection has been less than 150 individuals per year for the island of Hawai'i.

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population (Table 5-14). Based on this, while commercial aquarium collection does contribute to the cumulative impact, it is a **less than significant** factor in the observed declines.

Additionally, measures included in the Preferred Alternative (e.g., limited permit issuance, reduced Achilles Tang bag limit) may mitigate potential impacts by limiting the number of Aquarium Permits issued as well as the number of Achilles Tang that can be collected by commercial aquarium collectors each day. As described above, commercial aquarium collection is not the only stressor on this species, and therefore, it is anticipated that additional conservation measures designed to address the other stressors (e.g., commercial and recreational fisheries) will need to be implemented in order to sustain the population. The DAR (2019a) supports this conclusion, stating that conservative bag limits, as proposed in the Preferred Alternative for commercial aquarium collection, should be considered for other fisheries as well. There are currently no bag limits for Achilles Tang applied to any other fishery.

5.4.4 Mitigation

No significant adverse direct or indirect biological resource impacts are anticipated under any of the five alternatives under consideration. Significant cumulative impacts are anticipated; however, commercial aquarium collection is a less than significant factor in the cumulative impact. Therefore, no mitigation is required or proposed.

Nevertheless, the Preferred Alternative includes mitigative measures (see Section 5.0) such as a reduction in the number of Aquarium Permits that would be issued, limiting collection using fine mesh nets to the WHRFMA, and reducing the bag limit for the Achilles Tang, all of which would minimize impacts to biological resources.

5.5 SUMMARY OF IMPACTS

Table 5-13 summarizes the environmental consequences by alternative during the 5-year analysis period.

Table 5-13. Summary of direct and indirect impacts by alternative over the 5-year analysis period.

Alternative	Socioeconomics			Cultural Resources	Biological Resources	
	Direct	Indirect	Tourism	Direct and Indirect	Collection of Fish	Coral Reefs and Herbivores
No Action	\$2 million added to the economy (based on fishing in East Hawai'i), unknown number of jobs (<57)	\$10 million added to the economy, unknown number of indirect jobs (less than other alternatives)	No interactions between collectors and tourists in the WHRFMA, potential increase in East Hawai'i	No impact on culturally significant fish populations	No collection in WHRFMA Collection of 287,516 fish in East Hawai'i	No impact on coral. No impact on herbivore numbers.
Pre-Aquarium Collection Ban	\$8.3 million added to the economy and 57 jobs	\$41.7 million added to the economy, unknown number of indirect jobs	No known quantifiable impact on the tourism industry		Collection of 1.7 million White List Species fish from the WHRFMA Collection of 91,000 fish from East Hawai'i	
WHRFMA-only Programmatic	\$7.9 to \$8.2 million added to the economy and 57 jobs.	\$39.7 to \$41.7 million added to the economy,	No known quantifiable impact on the tourism industry		Collection of 1.7 million White List Species fish from the WHRFMA	

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Alternative	Socioeconomics			Cultural Resources	Biological Resources	
	Direct	Indirect	Tourism	Direct and Indirect	Collection of Fish	Coral Reefs and Herbivores
Issuance of Permits		unknown number of indirect jobs			Collection of less than 91,000 fish from East Hawai'i	
Achilles Tang Conservation	\$8 million added to the economy and 57 jobs	\$40 million added to the economy, unknown number of indirect jobs	No known quantifiable impact on the tourism industry, may increase viewing potential for Achilles Tang		Collection of 1.7 million White List Species fish from the WHRFMA, collection of Achilles reduced by 50% Collection of 91,000 fish from East Hawai'i	
Limited Permit Issuance (Preferred)	\$1.8 to \$3.7 million added to the economy and 10 jobs	\$9.1 to \$18.7 million added to the economy, unknown number of indirect jobs	No known impact on the tourism industry, may increase viewing potential for Achilles Tang		Collection of 828,484 White List Species fish from the WHRFMA, collection of Achilles Tang reduced by >50%, Collection of between 91,000 and 153,855 fish from East Hawai'i	

5.5.1 Summary of Impacts on White List Species Populations

Table 5-14 below summarizes the population impacts (based on the percent of the population collected) of the five alternatives on each of the 40 White List Species. The No Action Alternative looks at the 15 White List Species with historic collection data from East Hawai'i; the Pre-Aquarium Collection Ban Alternative and the WHRFMA-only Programmatic Issuance of Permits Alternative are based on average and maximum collection for the entire island of Hawai'i (see Table 5-11); the Achilles Tang Conservation Alternative is also based on the average and maximum collection for the island of Hawai'i, but with a decreased Achilles Tang collection in the WHRFMA; and, the Limited Permit Issuance Alternative is based on the average and maximum collection of the 10 fishers in the WHRFMA, with a decrease in the Achilles Tang collection, added to the impacts from East Hawai'i under this alternative (based on the No Action).

Table 5-14. Summary of the annual impact (percent collected by commercial aquarium collectors) on populations of the White List Species based on CREP (2018) population estimates and the projected annual collection under each alternative (see Table 5-1 and 5-11 for additional details). NA indicates the species does not have a population estimate.

Species	No Action Alternative	Pre-Aquarium Collection Ban Alternative	WHRFMA-Only	Achilles Tang Conservation	Limited Permit Issuance ¹
Achilles Tang	1.11%	2.72% to 3.15%		1.41% to 2.13%	0.85% to 1.20%
Bird Wrasse	n.d.		0.04% to 0.11%		<0.01% to 0.01%
Black Durgon	n.d.		<0.01% to 0.02%		<0.01%
Black Surgeonfish	0.03%		0.64% to 2.21%		0.13% to 0.35%
Blacklip Butterflyfish	n.d.		0.05% to 0.15%		0.02% to 0.05%
Blackside Hawkfish	n.d.		0.02% to 0.05%		<0.01% to 0.02%
Bluestripe Snapper - Taape	n.d.		<0.01%		<0.01%

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Species	No Action Alternative	Pre-Aquarium Collection Ban Alternative	WHRFMA-Only	Achilles Tang Conservation	Limited Permit Issuance ¹
Brown Surgeonfish	n.d.		0.01% to 0.02%		<0.01%
Eightline Wrasse	n.d.		0.02% to 0.07%		<0.01% to 0.01%
Eyestripe Surgeonfish	n.d.		0.07% to 0.27%		<0.01%
Fisher's Angelfish	n.d.		0.01% to 0.06%		<0.01% to 0.04%
Forcepsfish	n.d.		0.43% to 1.14%		0.11% to 0.20%
Fourline Wrasse	n.d.		0.01% to 0.02%		<0.01%
Fourspot Butterflyfish	n.d.		0.12% to 0.32%		0.03% to 0.05%
Gilded Triggerfish	n.d.		0.03% to 0.16%		<0.01% to 0.01%
Goldrim Tang	0.06%		0.59% to 1.93%		0.37% to 1.48%
Kole	<0.01%		0.27% to 0.63%		0.08% to 0.20%
Hawaiian Dascyllus	n.d.		0.06% to 0.16%		0.02% to 0.06%
Hawaiian Whitespotted Toby	n.d.		0.04% to 0.17%		0.01% to 0.08%
Lei Triggerfish	n.d.		0.01% to 0.04%		<0.01% to 0.02%
Longfin Anthias	n.d.		NA		NA
Milletseed Butterflyfish	n.d.		0.09% to 0.43%		0.06% to 0.33%
Multiband Butterflyfish	n.d.		0.07% to 0.23%		0.01% to 0.04%
Orangeband Surgeonfish	n.d.		0.06% to 0.24%		0.02% to 0.05%
Orangespine Unicornfish	0.01%		0.65% to 1.63%		0.16% to 0.37%
Ornate Wrasse	n.d.		0.10% to 0.87%		0.02% to 0.07%
Peacock Grouper - Roi	n.d.		<0.01%		0.00%
Pencil Wrasse	n.d.		0.10% to 0.35%		0.04% to 0.17%
Potter's Angelfish	n.d.		0.10% to 0.41%		0.04% to 0.13%
Psychedelic Wrasse	n.d.		0.75% to 2.37%		0.33% to 1.06%
Pyramid Butterflyfish	n.d.		0.57% to 3.65%		0.22% to 1.62%
Redbarred Hawkfish	n.d.		<0.01%		<0.01%
Saddle Wrasse	n.d.		<0.01% to 0.02%		<0.01%
Shortnose Wrasse	n.d.		0.08% to 0.26%		0.04% to 0.13%
Spotted Boxfish	n.d.		0.18% to 0.66%		0.13% to 0.29%
Thompson's Surgeonfish	n.d.		0.04% to 0.28%		0.01% to 0.06%
Tinker's Butterflyfish	0.94%		1.87% to 4.92%		1.04% to 1.36%
Flame Wrasse	n.d.		NA		NA
Yellow Tang	0.60%		3.43% to 8.09%		0.84% to 1.93%
Yellowtail Coris	n.d.		0.15% to 0.36%		0.04% to 0.11%

¹This is based on the island-wide impacts from the 10-fishers shown in Table 5-11, plus 53% of the No Action Alternative to account for other fishers who may continue to collect in East Hawai'i.

5.5.2 Identification of Preferred Alternative

Of the four action alternatives which meet the Applicant's purpose and need, the Limited Permit Issuance Alternative is the Preferred Alternative, as it results in the lowest collection of the 40 White List Species (less than 2% of any population, see Table 5-14), and includes a 50% reduction in the bag limit for the Achilles Tang (from 10 per day to 5 per day). In addition, the Preferred Alternative limits the geographic scope of Aquarium Permits to the WHRFMA, and it is the only Alternative under consideration which limits the number of permits that would be issued (10 permits).

5.6 EVALUATION OF HEPA SIGNIFICANCE CRITERIA

Below is a summary of the evaluation of the significance criteria described in Title II, Chapter 200, Hawai'i Administrative Rules, with the five criteria where the DLNR requested further analysis shown in bold.

- **Significance Criteria #1:** The Preferred Alternative (i.e., Limited Permit Issuance Alternative) does not involve an irrevocable commitment or loss or destruction of any natural or cultural resource.

Fish Populations: Collection of the 40 White List Species represents less than 2% of each species island-wide population when looking at average or maximum collection rates. Ochavillo and Hodgson (2006) suggest collection of between 5%-25% is sustainable for various reef species similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish). Under the Limited Permit Issuance Alternative, only six species have a maximum collection rate above 1% of the estimated island of Hawai'i population estimates (Table 5-14). Collection of these species would need to increase by 2.6 to 4.7 times the maximum levels seen between 2000 and 2017 to reach 5% of the estimated populations, and two of these species (Yellow Tang and Achilles Tang) currently have bag limits, with a reduced bag limit for the Achilles Tang proposed under the Preferred Alternative. Based on the low percentage of the overall populations collected annually by commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection likely has minimal impacts on populations in general. The DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was at a higher rate than what would occur under the Preferred Alternative, therefore, no impacts to these species are anticipated. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines. The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on fish populations as a result of the Preferred Alternative would occur.

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Reef Habitat: Tissot and Hallacher (2003) concluded that there were no significant differences in damaged coral between control and collected sites (i.e., sites where aquarium collection occurs) to indicate the presence of destructive fishing practices. In addition, they found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting. Additionally, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time. The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on reef habitat as a result of the Preferred Alternative would occur.

Cultural Resources: As concluded in the CIA, cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts. Table 4-3 lists the 40 White List Species, and Section 4.4 includes a brief summary of known cultural significance by species. While not all species have a known Hawaiian cultural significance, for this analysis, it was assumed that the 33 species on the White List identified as having a cultural use for food, medicinal, religious or ceremonial purposes could have a cultural impact if populations of those species were impacted. As detailed in Section 5.4, populations of the White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural resources would occur as a result of the Preferred Alternative.

Other Resources: Aside from reducing the number of Aquarium Permits issued and reducing the daily bag limit for Achilles Tang, the Preferred Alternative does not include any activities different from, or in addition to, those that have occurred in the past. There would be no construction of permanent or semi-permanent infrastructure, no discharges into coastal, surface or ground waters, and no dredging, and no significant use of hazardous materials that could be released into the environment. The Preferred Alternative would not result in significant beneficial or adverse impacts to water and air quality, geology and soil resources, aesthetics, noise, vegetation, terrestrial wildlife, and avian species, threatened and endangered species, land use, public health and safety, communications, transportation, utilities, or population and demographics from the current baseline condition.

- **Significance Criteria #2:** The Preferred Alternative does not curtail the range of beneficial uses of the environment. Act 306 has created a platform on which the public can learn about and participate in the management of the fishery. Since the Act's implementation, the DAR has created FRAs and

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conducts annual monitoring and research on the fish and coral, ensuring that the full range of beneficial uses of the environment remain now and into the future.

Aquatic Invasive Algae Control: Tissot and Hallacher (2003) found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting. Additionally, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time. The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on aquatic invasive algae control as a result of the Preferred Alternative would occur.

Tourism: Available data do not suggest that the commercial aquarium collection has impacted the tourism industry in Hawai'i. The Hawai'i's tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). When adjusted for inflation, total visitor spending was up 3.5% from 2016. A total of 9,404,346 visitors came by air or by cruise ship to the state, up 5.3% from the previous record of 8,934,277 visitors in 2016. Total visitor days rose 4.8% compared to 2016. The average spending per day by these visitors (\$198 per person) was also higher than 2016 (\$197 per person; HTA 2018). Additionally, as described in Section 5.4, populations of the White List Species are not anticipated to significantly decline, therefore not significantly impacting viewing opportunities. Consequently, continued commercial aquarium collection under the Preferred Alternative, which would limit the number of Aquarium Permits and decrease collection, is not anticipated to significantly impact tourism.

Integrity of Diverse Aquatic Ecosystems: As described in Section 5.4, populations of the White List Species are not anticipated to significantly decline. Additionally, Tissot and Hallacher (2003) concluded that there were no significant differences in damaged coral between control and collected sites (i.e., sites where aquarium collection occurs) to indicate the presence of destructive fishing practices. Tissot and Hallacher (2003) further found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting. Additionally, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial

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aquarium collection, which was occurring during this time. The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on the integrity of diverse aquatic ecosystems as a result of the Preferred Alternative would occur.

- **Significance Criteria #3:** The Preferred Alternative does not conflict with the State's long-term environmental policies, goals, or guidelines as expressed in chapter 344 HRS. As described in Section 5.4, populations of the White List Species are not anticipated to significantly decline under the Preferred Alternative and impacts to coral reefs or herbivores are not anticipated, therefore the Preferred Alternative is not in conflict with the conservation of natural resources or the flora and fauna. There would be a minor, beneficial impact to the economy under the Preferred Alternative. There would be no impact on human population, threatened and endangered species, parks, recreation, and open spaces, transportation, energy use, community life and housing, or education and culture. As described in Section 1.2.3.1, multiple opportunities have been provided throughout the history of the commercial aquarium fishery for citizen participation, including public comment periods during the DEA and FEA (see Section 1.1.2), and as part of this FEIS.
- **Significance Criteria #4:** The Preferred Alternative does not substantially affect the economic welfare, social welfare, and cultural practices of the community or State, but plays an important role as a nearshore fishery in the State. According to DAR (2019a), the marine aquarium fishery is the most economically valuable commercial inshore fishery in the State of Hawai'i, with 68% of the value coming from the Island of Hawai'i, mainly West Hawai'i. Under the Preferred Alternative, it is anticipated that \$1.8 to \$3.7 million would be added to the state's economy over the 5-year analysis period (average of \$365,311 to \$746,386 per year), and a minimum of 10 jobs would be created. Loss of the fishery would result in the loss of income, tax revenue, and jobs.

Cultural Practices: As concluded in the CIA, cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts. Table 4-3 lists the 40 White List Species, and Section 4.4 includes a brief summary of known cultural significance by species. While not all species have a known Hawaiian cultural significance, for this analysis, it was assumed that the 33 species on the White List identified as having a cultural use for food, medicinal, religious or ceremonial purposes could have a cultural impact if populations of those species were impacted. As detailed in Section 5.4, populations of the White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural practices would occur as a result of the Preferred Alternative.

- **Significance Criteria #5:** The Preferred Alternative would not affect public health.

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- **Significance Criteria #6:** The Preferred Alternative does not involve substantial secondary impacts, such as population changes or effects on public facilities. There is no expectation that populations or the public would be negatively impacted by continuing the fishery.
- **Significance Criteria #7:** The Preferred Alternative does not involve a substantial degradation of environmental quality. Two studies have concluded that the fishery has no significant impact on coral or the reef ecosystem (Tissot and Hallacher 2003; DAR 2019a).
- **Significance Criteria #8:** The Preferred Alternative does not involve a commitment for larger actions. When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species. However, the Preferred Alternative is not a significant contributor to the cumulative effect upon the environment. The DAR (2019a) has noted significantly declining populations in one or more of the management areas for 12 of the White List Species, and cumulatively, all of the factors discussed in Section 5.4.3 (including recreational aquarium fish collection, non-aquarium commercial and non-commercial fishing, tourism, and climate change) likely contribute to the declines. However, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines. In addition, for the 12 species that have shown a significant decline in population size in one or more management area since establishment of the WHRFMA in 1999, commercial aquarium collection under the Preferred Alternative would collect less than 1% of the island-wide population estimates for 10 of the species. For the remaining two species, Achilles Tang and the Pyramid Butterflyfish, commercial aquarium collection would collect less than 1.2% of the Achilles Tang population and less than 1.62% of the Pyramid Butterflyfish. Impacts to Kole, which are also commonly collected for consumption, would be less than 0.2% of the island-wide population. Additionally, this species has shown significant increases in population since establishment of the WHRFMA (DAR 2019a), despite cumulative pressures from both commercial aquarium collection and other fisheries. Based on this, while commercial aquarium collection does contribute to the cumulative impact, it is a less than significant factor in the observed declines. Minor cumulative impacts to the remaining 28 White List Species are anticipated, given that populations have remained stable or increased for 24 of those species, and population trend data is not available for the other four species¹⁹.

¹⁹ Species not adequately surveyed by WHAP include Tinker's Butterflyfish, Longfin Anthias, Flame Wrasse, and Eyestripe Surgeonfish. Tinker's Butterflyfish have a CREP (2018) population estimate of 18,475, and collection under any of the alternatives would be less than 5% of the island-wide population (though it should be noted that the vast majority of the population occurs well below the 98-foot depth surveyed by the CREP and thus the population estimate is likely low). Eyestripe Surgeonfish has a CREP (2018) population estimate of 578,835, and collection under any of the alternatives would be less than 0.3% of the island-wide population. Flame Wrasse do not have a CREP population estimate, but collection has been less than 175 individuals per year for the island of Hawai'i between 2000 and 2017. Longfin Anthias also do not have a CREP population estimate, but collection has been less than 150 individuals per year for the island of Hawai'i.

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- Significance Criteria #9: The Preferred Alternative does not affect threatened or endangered species or their habitats nor does it have a significant impact on rare species.
- Significance Criteria #10: The Preferred Alternative does not detrimentally affect air or water quality or ambient noise levels. At most, 10 boats would be involved in the island of Hawai'i aquarium fishery under the Preferred Alternative as compared to the thousands of other boats on the waters of Hawai'i.
- Significance Criteria #11: The Preferred Alternative would not significantly affect or suffer damage by being located in environmentally sensitive areas, geologically hazardous land, estuaries, freshwater, or coastal water. As noted earlier, the fishery has been active since the late 1940s. Regulations have been implemented restricting the fishery from sensitive areas.
- Significance Criteria #12: The Preferred Alternative does not substantially affect scenic vistas and view planes identified in county or state plans or studies.
- Significance Criteria #13: The Preferred Alternative does not require substantial energy consumption.

No significant adverse effects would occur as a result of the Preferred Alternative. Therefore, mitigation for impacts is not warranted and no mitigation measures would be implemented. Nevertheless, the Preferred Alternative includes mitigative measures (see Section 5.0) such as a reduction in the number of Aquarium Permits that would be issued, limiting collection using fine mesh nets to the WHRFMA, and reducing the bag limit for the Achilles Tang, all of which would minimize impacts to biological resources.

Under HRS 188-31, the DLNR may issue a commercial Aquarium Permit to a qualified party for a period of one year in duration, subject to renewal. Therefore, this FEIS analyzes the direct, indirect, and cumulative impacts of issuance of 10 Aquarium Permits on affected resources for a period of five years. Less than significant or slightly beneficial impacts are expected under the Preferred Alternative.

6.0 AGENCIES, ORGANIZATIONS, AND INDIVIDUALS CONSULTED

See the FEA²⁰ for a list of agencies, organizations, and individuals consulted during development of the FEA, which was used as the basis for development of the DEIS and FEIS.

6.1 CONSULTED PARTIES

The following individuals requested to be a Consulted Party during development of the DEIS:

- Keith Dane, Hawai'i Policy Advisor, The Humane Society of the United States

²⁰ http://oegc2.doh.hawaii.gov/EA_EIS_Library/2018-08-08-HA-FEA-EISPN-Hawaii-Island-Commercial-Aquarium-Permits.pdf

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- Rene Umberger, Executive Director, For the Fishes
- Laura Friend, Litigation Fellow, The Humane Society of the United States
- Miyoko Sakashita, Oceans Director, Center for Biological Diversity
- Mike Nakachi, President, Moana Ohana
- Teresa E. Kaneakua, 'Aho Hui Kia'i Kānāwai Lead Compliance Specialist, Office of Hawaiian Affairs
- Inga Gibson, Policy Director, Pono Advocacy, LLC
- Kealoha Pisciotta, Mauna Kea Anaina Hou and Kai Palaoa

Each of these individuals was contacted on August 2, 2019 via email and/or mail, seeking advice and input for DEIS development. The Applicant requested any information or advice concerning the fishery and other potentially impacted environmental, cultural, or other resources. Consulted Parties were asked to respond within 30 days. Comments received and responses to those comments are provided in Appendix B. The consultation process for cultural resources is described in depth in Section 4 of Appendix A. These consulted parties were sent links to the DEIS, and any comments received on the DEIS and the Applicant's responses are provided in Appendix C.

6.2 FEDERAL AGENCIES

The following federal agencies were consulted:

- National Marine Fisheries Service
- Coral Reef Ecosystem Program

6.3 STATE AGENCIES

The following state agencies were consulted:

- Hawai'i Department of Land and Natural Resources, Division of Aquatic Resources
- Hawai'i State Department of Health, Office of Environmental Quality Control

7.0 DISTRIBUTION OF THE FEIS

The distribution list for the FEIS is included in Appendix D.

8.0 LIST OF PREPARERS

Pet Industry Joint Advisory Council	Stantec Consulting Services Inc.
Bob Likins	Terry VanDeWalle Senior Ecologist
	Molly Stephenson Wildlife Biologist

9.0 LITERATURE CITED

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APPENDIX A—CULTURAL IMPACT ASSESSMENT

A Cultural Impact Assessment for the Proposed Issuance of Fourteen Commercial Aquarium Permits within the West Hawai'i Regional Fishery Management Area

Including the Near Shore Waters from 'Upolu Point to Ka Lae, Kohala, Kona, and Ka'ū Districts, Island of Hawai'i (except those areas already designated for no collection)



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‘Upolu Point to Ka Lae,
Kohala, Kona, and Ka‘ū Districts,
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1. INTRODUCTION

At the request of K & L Gates, LLP, on behalf of the Pet Industry Joint Advisory Council (PIJAC), ASM Affiliates (ASM) has prepared a Cultural Impact Assessment (CIA) for the proposed issuance of fourteen commercial aquarium permits within the West Hawai'i Regional Fishery Management Area (WHRFMA). The WHRFMA (the study area), established in 1998 by ACT 306 of the State Legislature of Hawai'i, includes the nearshore waters of the Kohala, Kona, and Ka'u Districts on the west side of Hawai'i Island, extending from 'Upolu Point to Ka Lae, and from the upper reaches of the wash of the waves onshore, seaward to the limit of the State's police power and management authority (Figure 1). This CIA is intended to inform an HRS Chapter 343 Environmental Impact Statement (EIS) being prepared on behalf of PIJAC (the applicant) that will allow for the issuance of fourteen annual commercial aquarium permits for the collection of forty fish species (referred to as 'white list' species) from within the WHRFMA, excluding those areas already designated for no collection. The no collection areas include all previously established Marine Life Conservation Districts (MLCDs), Fish Replenishment Areas (FRAs), Netting Restricted Areas (NRAs), and Fisheries Management Areas (FMAs) located within the WHRFMA (see Figure 1). Per the draft EIS for this project, the proposed action is as follows:

Under the Limited Permit Issuance Alternative, the DLNR would begin issuing new Aquarium Permits to 14 aquarium fishers in the WHRFMA, thereby allowing these 14 individuals to resume commercial aquarium fish collection in the WHRFMA. No additional permits would be issued. Permittees would abide by all rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Commercial Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List species only, and reporting requirements. In addition, daily bag limit for commercial aquarium collection of Achilles Tang within the WHRFMA would be reduced from 10 per day to 5 per day.

The following report, which has been prepared in accordance with the Office of Environmental Quality Control (OEQC) *Guidelines for Assessing Cultural Impacts*, adopted by the Environmental Council, State of Hawai'i, on November 19, 1997 (Office of Environmental Quality Control (OEQC) 1997), assesses the potential cultural impacts of aquarium collection by the proposed fourteen permit holders.

1. Introduction

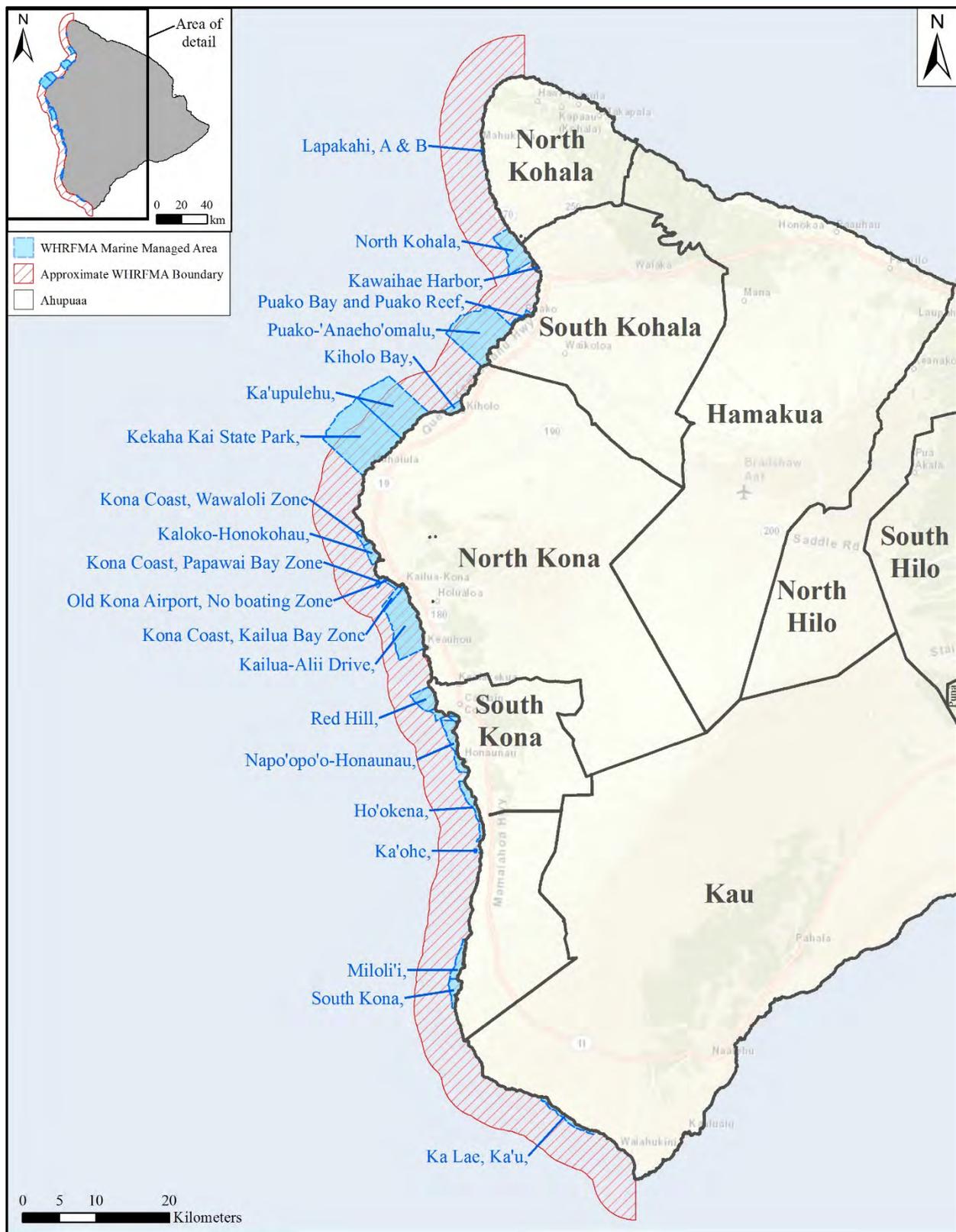


Figure 1. Map showing the extent of the West Hawai'i Regional Fishery Management Area, extending from the Kohala to the Ka'ū Districts of Hawai'i Island, with the no collection areas indicated.

REGULATORY BACKGROUND OF THE PROPOSED ACTION

The objective of the action proposed in the EIS is to create a program under the Department of Land and Natural Resources (DLNR) (the approving agency) that will help to facilitate a permitting process for the issuance of commercial aquarium permits within the WHRFMA (pursuant to Aquarium Fishing Permits issued under Hawai'i Revised Statute §188-31) so that fourteen commercial aquarium fishers' on the Island of Hawai'i can continue to operate their businesses in compliance with all applicable State of Hawai'i laws, rules, and regulations pertaining to the industry. Hawai'i Revised Statute (HRS) §188-31 (2013; Title 12 – Conservation and Resources; 188 – Fishing Rights and Regulations; 188-31 – Permits to take aquatic life for aquarium purposes) states that:

1. Except as prohibited by law, the department, upon receipt of a written application, may issue an aquarium fish permit, not longer than one year in duration, to use fine meshed traps, or fine meshed nets other than throw nets, for the taking of marine or freshwater nongame fish and other aquatic life for aquarium purposes.
2. Except as prohibited by law, the permits shall be issued only to persons who can satisfy the department that they possess facilities to and can maintain fish and other aquatic life alive and in reasonable health.
3. It shall be illegal to sell or offer for sale any fish and other aquatic life taken under an aquarium fish permit unless those fish and other aquatic life are sold alive for aquarium purposes. The department may adopt rules pursuant to HRS chapter 91 for the purpose of this section.

Additionally, aquarium permits issued for commercial aquarium collection within the WHRFMA are subject to the terms and conditions set forth in Hawai'i Administrative Rule (HAR) 13-60.4, which includes provisions for restrictions on equipment and access to various areas within the fishery, collection restrictions (40 White List species only), bag limits on certain fish species, and catch reporting requirements.

From 2000 to 2017, the DLNR issued between 24 and 60 commercial aquarium permits annually within the WHRFMA (Pet Industry Joint Advisory Council 2018). However, no commercial aquarium fishing permits have been issued or renewed by the DLNR under HRS §188-31—and no aquarium collection has occurred within the WHRFMA—since September of 2017, when the Supreme Court of Hawai'i ruled that the issuance of such permits (for aquarium collection using fine meshed traps or nets) constitutes a discretionary State action and is thus subject to the Hawai'i Environmental Policy Act (HEPA). HEPA requires that State agencies consider the impact of governmental actions on the environment by preparing an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) to document the potential impacts of the State action.

Accordingly, a Final Environmental Assessment (FEA) for the issuance of commercial aquarium permits for the entire Island of Hawai'i (Pet Industry Joint Advisory Council 2018) was prepared (by the current applicant) and submitted to the DLNR for review on June 7, 2018. The FEA, proposed a “finding of no significant impacts” (FONSI) for the action, but the DLNR disagreed with that finding and determined, based on the significance criteria outlined in Title 11, Chapter 200, Hawai'i Administrative Rules, that the project could have a significant impact on the environment, and therefore required the preparation of an Environmental Impact Statement (EIS).

As stated in Act 50, proposed and passed as Hawai'i State House of Representatives Bill No. 2895, and signed into law by the Governor on April 26, 2000, “environmental assessments or environmental impact statements should identify and address effects on Hawaii's culture, and traditional and customary rights,” as:

... native Hawaiian culture plays a vital role in preserving and advancing the unique quality of life and the “aloha spirit” in Hawai'i. Articles IX and XII of the state constitution, other state laws, and the courts of the State impose on governmental agencies a duty to promote and protect cultural beliefs, practices, and resources of native Hawaiians as well as other ethnic groups.

Moreover, the past failure to require native Hawaiian cultural impact assessments has resulted in the loss and destruction of many important cultural resources and has interfered with the exercise of native Hawaiian culture. The legislature further finds that due consideration of the effects of human activities on native Hawaiian culture and the exercise thereof is necessary to ensure the continued existence, development, and exercise of native Hawaiian culture.

It is the need to identify and address the effects of the proposed action (issuing fourteen commercial aquarium fishing permits within the WHRFMA) on Hawaii's culture, and traditional and customary rights, that has necessitated the preparation of this CIA.

ASSESSING THE POTENTIAL CULTURAL IMPACTS OF THE PROPOSED ACTION

In a letter reviewing the FEA for the issuance of commercial aquarium permits for the Island of Hawai‘i (dated July 26, 2018), Suzanne Case, Chair of the DLNR, specifically requested that further analysis occur in the EIS on several significance criteria under HAR § 11-200-12, including the take of aquarium fish as an irrevocable commitment to loss or destruction of natural or cultural resources, and the impact of the take of aquarium fish on cultural practices in the state. More specifically, with regards to assessing the cultural impacts, Case writes that:

Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action’s potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis.

While the action proposed in the current EIS differs somewhat from the action previously proposed in the FEA—limiting the geographic extent for the issuance of permits to the WHRFMA (rather than the entire Island of Hawai‘i) and capping the total number of annual commercial aquarium permits issued at 14—the additional analysis requested above by the DLNR has been used to guide the scope of work presented in this CIA, which was prepared following the OEQC *Guidelines for Assessing Cultural Impacts* (adopted by the Environmental Council, State of Hawai‘i, November 19, 1997). According to those guidelines:

In scoping the cultural portion of an environmental assessment, the geographical extent of the inquiry should, in most instances, be greater than the area over which the proposed action will take place. This is to ensure that cultural practices which may not occur within the boundaries of the project area, but which may nonetheless be affected, are included in the assessment. (State of Hawai‘i, Office of Environmental Quality Control 2012:11)

For this reason, for assessing the potential cultural impacts of the issuance of fourteen commercial aquarium permits within the WHRFMA, the entire fishery management area along the western coast of Hawai‘i Island is considered, not just those areas within which commercial aquarium fishing will be permitted. To Hawai‘i’s host culture, the ocean is viewed as an integrated whole, flowing unrestrained by politically imposed boundaries. While the proposed collection of fish to supply the aquarium industry will not be conducted in all existing marine managed areas, this study, in alignment with the OEQC guidelines seeks to understand the cultural beliefs, practices, and resources, even within those communities situated in or adjacent to previously established marine managed areas. This study therefore, utilizes a *moku* (district) level analysis and at times draws upon cultural-historical background for specific *ahupua‘a*.

The following CIA report is divided into five main sections, which includes: 1) and introduction of the proposed action; 2) a description of the general geographic context of the study area, which includes a discussion on the formalization of the WHRFMA and the establishment of the marine managed areas; 3) a culture-historical background for the nearshore waters of West Hawai‘i Island that includes a discussion of the traditional Hawaiian cultural significance of each type of aquarium fish taken; 4) a summary of the methods and results of consultation with traditional cultural practitioners and other knowledgeable informants regarding cultural resources and cultural practices of the study area, and the proposed action’s potential impacts; and 5) an analysis of potential cultural impacts that may result from the proposed action. At the conclusion of the CIA recommendations are offered regarding appropriate mitigation strategies that may be employed by the applicant and DLNR to help minimize the potential for cultural impacts that could result from the issuance of fourteen commercial aquarium permits within the WHRFMA.

2. STUDY AREA DESCRIPTION

The study area for the CIA consists of the entire West Hawai‘i Regional Fishery Management Area (WHRFMA), which extends for 147 miles along the west coast of Hawai‘i Island from its northernmost extent at ‘Upolu Point in the Kohala District to its southern most extent at Ka Lae in the Ka‘ū District (see Figure 1). The DLNR describes the geographical jurisdiction of the WHRFMA as extending from “the upper reaches of the wash of the waves on shore, seaward to the limit of the State’s police power and management authority” (DLNR 1999:3). The specific boundaries of the WHRFMA are described as follows in Hawai‘i Administrative Rules §13-60.4-2:

...The four points shall be identified as the landward northern point, the landward southern point, the seaward northern point, and the seaward southern point. The landward boundary for each of these areas shall be an imaginary line drawn along the highest wash of the waves between the landward northern point and the landward southern point. Should there be a stream or river flowing into the ocean, the landward boundary shall be an imaginary straight line drawn between the shoreline on either side of the stream or river, as if the stream or river was not there. Imaginary straight lines drawn through the landward and seaward northern points, and through the landward and seaward southern points, shall constitute the northern and southern boundary lines of each area. The seaward boundary of each area shall be determined by an imaginary line drawn along the one hundred fathom (six hundred feet) depth contour, between the intersection of the one hundred fathom depth contour and the northern and southern boundary lines. Seaward GPS reference points are for guidelines and the one hundred fathom depth contour otherwise controls the seaward boundary. Any area designated in this chapter shall include the submerged lands and overlying waters within these four boundaries. (DLNR 1999:5)

The WHRFMA spans the coastline of three traditional *moku* (districts) on the west side of Hawai'i Island—Kohala (North and South), Kona (North and South), and Ka'ū—and includes more than 170 distinct *ahupua'a* (Soehren 2004, 2005a, 2005b), whose boundaries encompass the shoreline resources and, in many cases, extend out into the nearshore waters of the fishery. Geologically, the jagged coastline is formed by four of the island's five volcanoes (Kohala, Mauna Kea, Hualālai, and Mauna Loa; Figure 2), and the underwater terrain typically follows the sloping profile of those volcanoes to the bottom of the Pacific Ocean (Sherrod et al. 2007). West Hawai'i Island also has the longest continuous coral reef in the main Hawaiian Islands, and is home to a highly productive and diverse marine ecosystem that supports an abundance of tropical corals, reef fishes, sea turtles, cetaceans, and manta rays. Boating access to the WHRFMA is limited to four small boat harbors (SBH) located at Kawaihae, Honokōhau, Kailua-Kona, and Keauhou, an anchorage at Mahukona, and launch ramps at Puakō, Honaunau, Kauhako (the beach at Ho'okena), Miloli'i, and Kaulana that are operated by the DLNR, Division of Boating and Ocean Recreation (DOBOR) and the County of Hawai'i (Figure 3).

The Kohala District (North and South) encompasses the northernmost region of the study area (Figure 4). Beginning at the northern tip of the Island at 'Upolu Point in the *ahupua'a* of Kahei, this district extends south to the *ahupua'a* of Waikoloa and the *'ili kūpono* of 'Anaeho'omalu—traditionally a politically independent land division within the Waikoloa Ahupua'a. Within the Kohala District are seven marine managed areas: Lapakahi MLCD-Subzones A and B; North Kohala FRA; Kawaihae Harbor FMA; Wailea Bay MLCD; Puakō Bay and Puakō Reef FMA; and the Puakō-'Anaeho'omalu FRA and NRA (see Figure 4 and Figure 5). The Kohala portion of the study area (Figure 6) is comprised of short expanses of reefs, sheltered bays, rocky shoreline that are interspersed with low lying cliffs, with a few white sand beaches near the Kawaihae area. Most of the North Kohala shoreline (from Kāhei-Hualua Ahupua'a at the north to Waikā Ahupua'a at the south) has remained undeveloped with the exception of a few homes situated *makai* (seaward) of the 'Akoni Pule Highway and the Kawaihae-Mahukona Road. This modern settlement pattern stands in contrast to the South Kohala shoreline (from Kawaihae 1 Ahupua'a at the north to Waikoloa Ahupua'a and 'Anaeho'omalu at the south) portion of the study area, which contains several large resort developments along the coast. Geologically speaking, this northernmost section of the study area is situated along the coast of Kohala Volcano, and contains the oldest lava substrates (see Figure 2).

Similar to North Kohala, the South Kohala coast (Figure 7) is comprised of low rocky shorelines interspersed with both large and small stretches of fine white sand beaches. The reef system in this portion of the study area is far more developed and in some places extends for some distance into the sea. It is at these white sand beaches fronting the well-developed reef areas that residential and large scale commercial developments (specifically resorts and condominiums) are concentrated. A distinguishing characteristic of this region are the many shallow bays, some of which were traditionally walled (both natural and artificial) and converted into *loko i'a* (fishponds), and the many naturally occurring *loko wai* (freshwater ponds). Both of these features were traditionally utilized for aquaculture and were strictly managed. Currently, within South Kohala, DOBOR maintains the Kawaihae small boat harbor and the Puakō launch ramp (see Figure 3). This section of the study area includes the coastal portions of three of the island's volcanoes, Kohala, Mauna Kea, Mauna Loa (see Figure 2).

2. Study Area Description

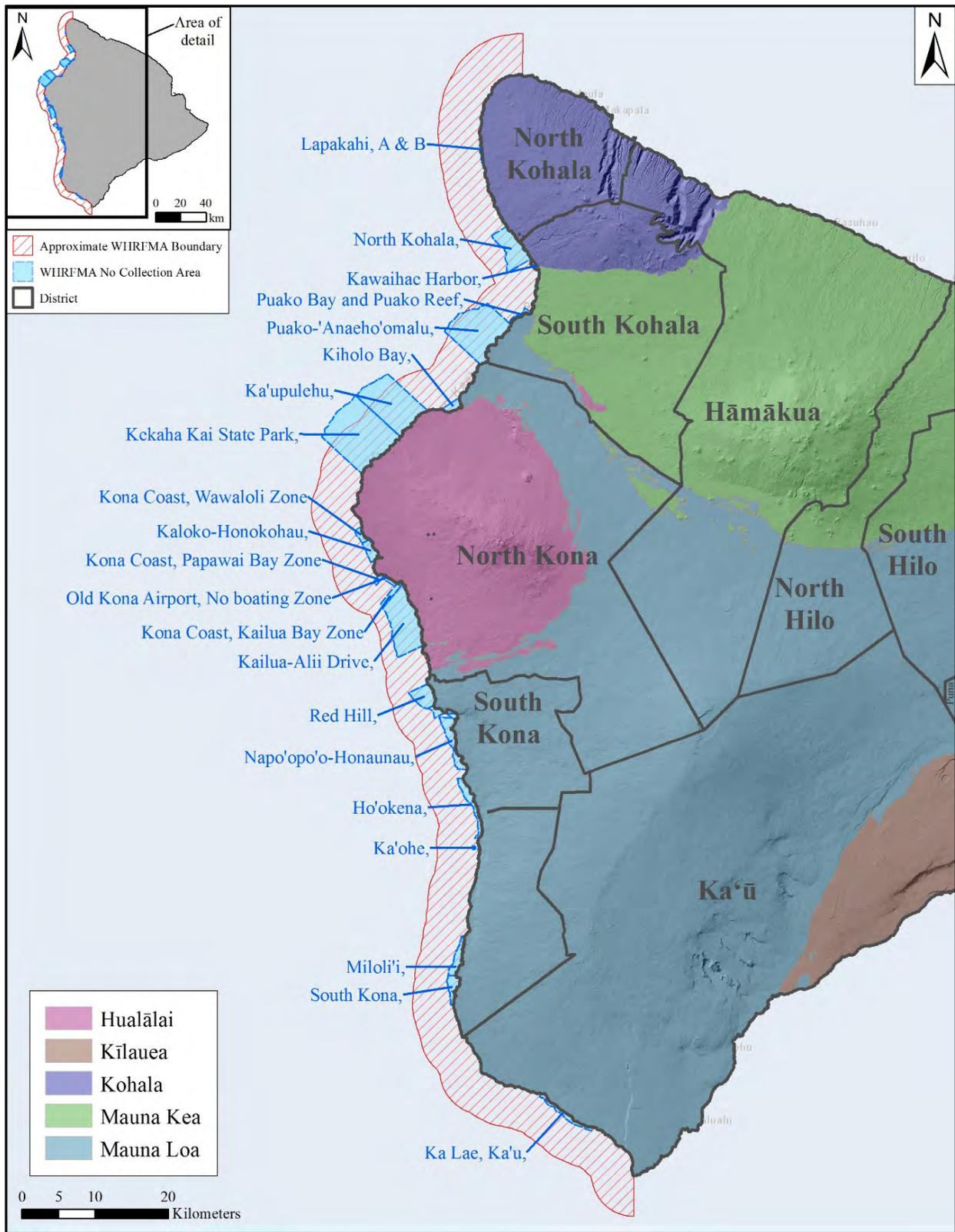


Figure 2. Geological map of the West Hawai'i Regional Fishery Management Area.

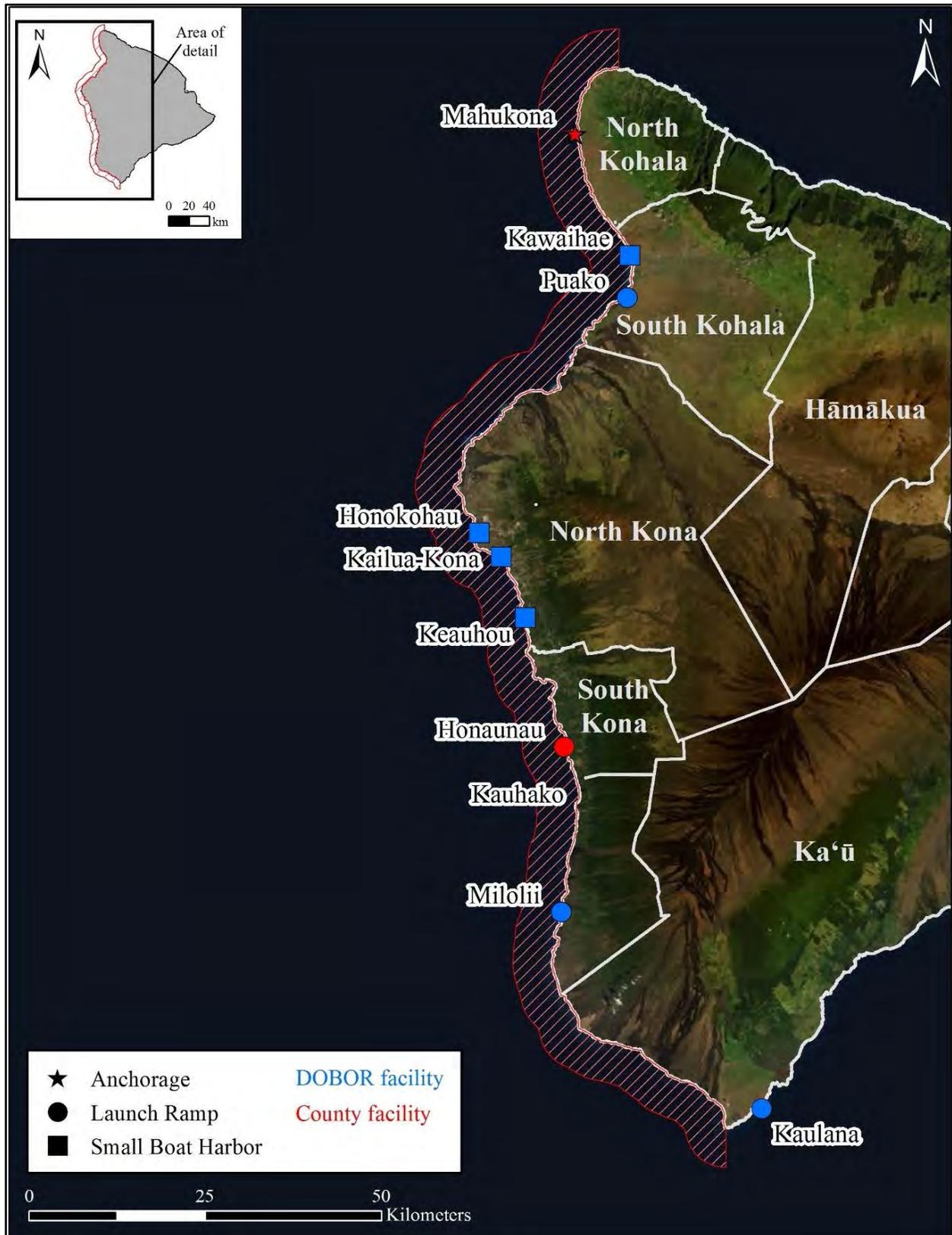


Figure 3. Map showing the location of harbors and launch ramps within (and nearby) the WHRFMA.

2. Study Area Description

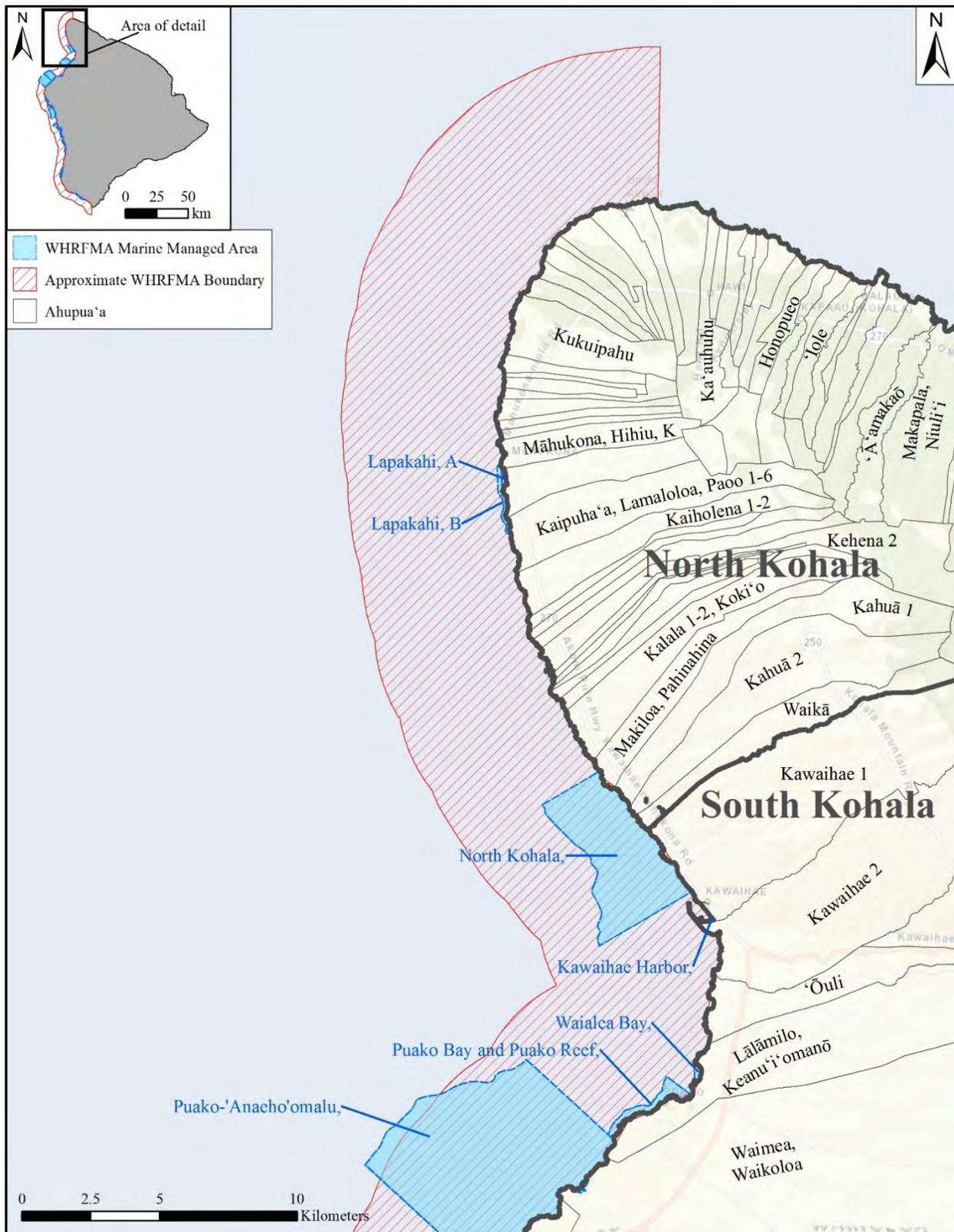


Figure 4. Detail of the North and South Kohala portion of the West Hawai'i Regional Fishery Management Area.



Figure 6. North Kohala coastline fronting Kaiholena Ahupua'a, view to the south.



Figure 7. South Kohala coastline fronting Puakō in Lālāmilo Ahupua'a, view to the north with Kohala Volcano visible in the background.

The Kona District, which makes up the greatest portion of the WHRFMA (see Figure 5 and Figure 8), commences at its northernmost *ahupua'a* of Pu'u Anahulu at the boundary of the South Kohala District, and extends south to Kaulanamauna Ahupua'a at the boundary of the Ka'u District. The Kona portion of the WHRFMA includes at least ninety-eight *ahupua'a* (Soehren 2004). Within the North Kona District (from Pu'u anahulu Ahupua'a at the north to Honalo-Mā'ihī 1 & 2 Ahupua'a at the south) are eleven marine managed areas: Kīholo Bay FMA; Ka'ūpūlehu Marine Reserve; Kikaua Point-Mākolē'ā NRA (labeled in Figure 5 as the "Kekaha Kai State Park"); the Kona Coast FMAs, which includes the Wāwālohi, Papawai Bay, and Kailua Bay; Kaloko-Honokōhau FRA; Old Kona Airport MLCD and no boating zone; Kailua Bay Zones A & B FMA, Kailua-Keauhou Bay FRA (labeled in Figure 8 as the "Kailua-Alii Drive" and "Keauhou Bay").

The coastline of the North Kona region is characterized by its rocky shoreline, low lying cliffs, many sheltered bays, speckled with both white and black sand beaches, as well as pebbled beaches (Figures 9 and 10). The latter two beach types were created as a result of more recent volcanic activity originating from the slopes of Hualālai Volcano, upon which most of this district is situated, although the northernmost section of this district includes coastal Mauna Loa flows as well (see Figure 2). The reefs in this area are well developed, and in some areas extend upwards of 0.5 miles into the ocean. Also, present within this region are *loko wai* and *loko i'a*. Similar to South Kohala, modern settlement in North Kona (inclusive of residential and large scale commercial development) is centered primarily around the sandy beaches and *loko wai*, although it does extend into the more desolate lava fields adjacent to those areas as well. Population density along the Kona coast increases significantly in the region extending south from the Kona Airport at Keāhole Point (the western tip of Hawai'i Island) to Keauhou Bay, within the town of Kailua-Kona. The area *makai* Ali'i Drive along the coast within Kailua-Kona is extensively developed and heavily populated. Within North Kona, DOBOR maintains the Honokōhau, Kailua-Kona, and Keauhou small boat harbors (see Figure 3).

The South Kona District (from Ke'eke'e-Kanakau Ahupua'a at its northern extent to Kaulanamauna Ahupua'a at its southern extent) includes eight marine managed areas (see Figure 8 and Figure 11): Red Hill FMA; Kealakekua Bay MLCD Zones A & B; Nāpo'opo'o-Hōnaunau FRA; Ho'okena FRA; Ka'ohe FRA; Miloli'i FRA, and the Hanamalo Point-Kanewa'a Point NRA (labeled as South Kona in Figure 11). The coastline in this area is predominately rocky, comprised of both high and low-lying cliffs interspersed with an occasional black sand beach. Many sheltered bays are also present along the South Kona coast. The reefs in this area are well developed, especially in the larger sheltered bays. Modern coastal development, now comprised of residential lots has, for the most part, followed traditional coastal settlement patterns which are concentrated in the vicinity of Kealakekua Bay, Kahauloa, Ke'ei, Hōnaunau, Keālia, Kauhakō, Ho'okena, Ka'ohe, Pāpā, and Miloli'i (Figure 12). DOBOR currently maintains the Miloli'i launch ramp, while the County of Hawai'i maintains the Hōnaunau launch ramp (see Figure 3). Although no longer considered an active boat ramp, historically, Ho'okena beach (Kauhakō) also served as a major landing point. Geologically this section of the study area is situated entirely along the coast of Mauna Loa, as is the adjacent section of the study area within the Ka'u District (see Figure 2).

The southernmost portion of the WHRFMA, within the Ka'u District, extends from Manukā Ahupua'a at its northern end to Ka Lae (the southernmost point of Hawai'i Island) and the *ahupua'a* of Pu'u'eo, at its southern end (see Figure 11). The only marine managed area in this portion of the WHRFMA is the Kanonohe-Kalipoa netting restricted area, which is labeled "Ka Lae, Ka'u" in Figure 11. This portion of Ka'u is characterized by its rocky coastline with both high and low-lying cliffs and the occasional white or black sand beach occurring within some of the many sheltered bays (Figure 13). The reefs in this area are mostly short, but highly developed. DOBOR currently maintains one (Kaulana launch ramp) of the two launch ramps in the Ka'u District. The Kaulana launch ramp is, however, located to the east beyond the WHRFMA boundaries (see Figure 3).

2. Study Area Description

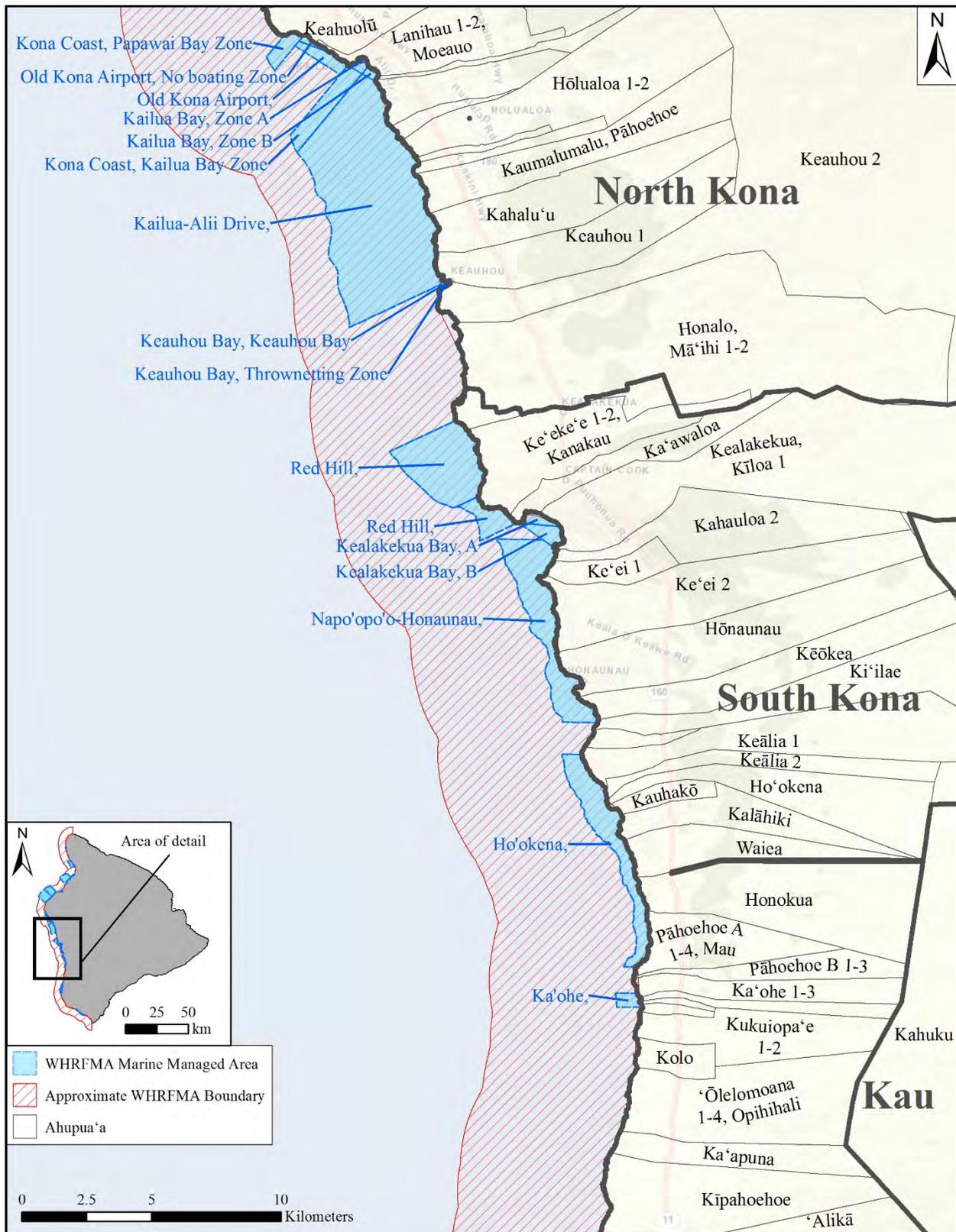


Figure 8. Detail of the South Kona portion of the West Hawai'i Regional Fishery Management Area.



Figure 9. Low, rocky coastline of North Kona fronting Keahuolū Ahupua‘a, view to the north.



Figure 10. La‘aloa Beach Park along the North Kona coastline, view to the north.

2. Study Area Description



Figure 11. Detail of the Ka'u portion of the West Hawai'i Regional Fishery Management Area.



Figure 12. South Kona coastline, view to the south across Pāpā Bay towards Miloli‘i.



Figure 13. Ka‘ū coastline, view to the northwest from Ka Lae.

AQUARIUM FISHING AND THE ESTABLISHMENT OF THE WHRFMA

The collection of aquarium fish in West Hawai‘i has a long and contentious history (Walsh 2000). While Division of Fish and Game received legislative authority to regulate the industry and issue Aquarium Fishing Permits as early as the 1950s, and division suspended those permits for a time in 1973 over public concern about aquarium collection, aquarium collection activities remained largely unregulated in West Hawai‘i until roughly twenty years ago, when the WHRFMA was established. The concept of the WHRFMA was introduced to the Hawai‘i legislature by Democratic Representative David Tarnas in 1997 as House Bill (HB) 3457. This bill was introduced following decades of conflict between various user groups within West Hawai‘i fishery (Walsh 2000). The discussions to improve marine management efforts within West Hawai‘i came primarily through the West Hawai‘i Reef Fish Working Group (WHRFWG), a group that formed in May of 1996 following the passage of House Concurrent Resolution (HCR) 184, which requested that the DLNR convene a task force to assist in developing a comprehensive management plan to regulate the take of aquarium fish within the area. In describing the purpose of HB 3457, Walsh writes:

This bill established a West Hawaii Regional Fishery Management Area along the entire West Hawaii coast (Upolu Pt. to Ka Lae) to provide for effective management of marine resources. Along several provisions of this bill was a requirement to set aside 50% of the FMA as Fish Replenishment Areas (FRAs) where aquarium collecting was prohibited....During committee hearings of HB3457, the 50% provision for FRAs was reduced to “a minimum of 30%”. (Walsh 2000:3)

With the support of aquarium collectors and other user groups, HB 3457 was approved by the Hawai‘i State Legislature on July 13, 1998, where it became Act 306 and subsequently codified as HRS 188F (Walsh 2014). This Act established the WHRFMA to: “(1) Effectively manage fishery activities to ensure sustainability; (2) Enhance nearshore resources; and (3) Minimize conflicts of use in this coastal area” (ibid.:3). With the passage of the act, the DLNR, Division of Aquatic Resources (DAR) was tasked with meeting four additional management goals for the fishery: “(1) Designate a minimum of 30% of coastal waters as Fish Replenishment Areas (FRAs) where aquarium collecting is prohibited. (2) Establish a day-use mooring buoy system and designate some high-use areas where no anchoring is allowed. (3) Establish a portion of the FRAs as fish reserved where no fishing of reef-dwelling fish is allowed. (4) Designate areas where the use of gill nets is prohibited” (ibid.:9).

Community Consultation and the Creation of the Fish Replenishment Areas within the WHRFMA

Additionally, Act 306 also mandated that the DLNR/DAR conduct close and substantial consultation with community members and resource users during the FRA designation process. To aid with the execution of Act 306, in 1998, Pete Hendricks of DAR, along with Sara Peck of the West Hawaii Sea Grant and Dr. William J. Walsh began to assemble a council that would have broad geographic representation and representation from various stakeholders, communities, and user groups in West Hawai‘i. On June 16, 1998, this council, originally dubbed the West Hawai‘i Fisheries Management Council (WHRFMC) convened with twenty-four voting members and representation from various state agencies, user groups, and community members. The council’s name was later changed to the West Hawai‘i Fisheries Council (WHFC). As the FRA designation process unfolded, the participating aquarium collectors, after seeing that the FRA site selection process included more than 30% of the WHRFMA, began to openly oppose the designation process. Despite the challenges faced by the council in maintaining attendance and reaching critical management decisions, nine separate areas (including previously protected areas) comprising a total of 35.2% of the WHRFMA were selected (Walsh 2000).

One of the major complications that arose during the selection process concerned the fishing communities in both Miloli‘i and Ho‘okena, who had worked previously with Dr. Kimberly Lowe of DAR in creating FMA proposal for their respective areas. According to Walsh (2000:5), the FMA proposals “specified a ban on aquarium collecting in a 33-mile zone in the vicinity of these communities” and that “of and by itself this zone exceeded 30% of the coastline.” Despite this prior plan, all parties including those representing these communities were able to reach a compromise, “which ultimately reduced these no collecting areas to slightly more than a third of what the communities had expected” (ibid.:5).” In order to enhance enforceability and stabilize the West Hawai‘i fishery, the council added several provisions to the draft FRA rule (Hawai‘i Revised Statutes (HAR) §13-60.3), which included:

Two boundary changes, establishment of seaward boundaries at 600 ft., inclusion of GPS boundary coordinates, prohibition of aquarium collecting gear or collected animals within FRAs, and aquarium vessel registration/identification system, and a control date for possible future use in a limited entry program. (Walsh 2000:5)

The proposed FRA rules were subsequently presented to the public on April 28, 1999 at a well-attended public hearing, where they received overwhelming support (93.5% of the 876) from a wide range of the community members present (Walsh 2014). The FRA rules were later voted on by the Board of Land and Natural Resources (BLNR), who unanimously approved them and their provisions, with the exception of the prohibition on aquarium collecting gear within the FRAs, which was ultimately omitted from the final rules package without explanation. After review by the Attorney General’s office, on December 17, 1999 the proposed rules were sent back to the BLNR for re-approval, and HAR §13-60.3 was signed by Governor Ben Cayetano on December 31, 1999 (Walsh 2000:1). The latter four management goals described above, which prohibit the collecting of aquarium fish anywhere within the FRA boundaries, were subsequently adopted as HAR §13-60.4 (following the repeal of HAR §13-60.3), and signed into law by Governor Neil Abercrombie on December 26, 2013 (Walsh 2014). The on shore boundaries of the FRAs created by Act 306—whose seaward boundaries extend to a depth of 100 fathoms—are marked with distinct yellow signs that indicate that the taking of aquarium fish is prohibited (Figure 14). There are currently ten established FRAs located within the WHRFMA, along with various other Marine Life Conservation Districts (MLCDs), Netting Restricted Areas (NRAs), and Fisheries Management Areas (FMAs) where aquarium fishing is not permitted (see Figure 1).



Figure 14. Example of a yellow FRA sign (located at Makahiki Point, Pāpā Bay, South Kona) indicating that aquarium collection is prohibited, view to the north.

Creation of the “White-List” Species

The rules adopted in 2013 (HAR §13-60.4) also called for the establishment of a list of fish species (a “white-list”) that could be taken by aquarium collectors within the WHRFMA (Walsh 2013). After an analysis of relative catch report data, population data, and habitat maps provided by DAR and NOAA, the DLNR established a list of forty distinct fish species (henceforth referred to as the “white-list”) that could be taken, while the capture of all other fish (not on the list) was prohibited. Subsection b of HAR §13-60.4-7 states that, “In addition to other regulations deemed necessary for the management of the West Hawai‘i regional fishery management area, an aquarium permit holder may only take or possess specimens of the following species of fish for aquarium purposes while within the West Hawai‘i regional fishery management area...” (DLNR 1999:15–16). Table 1, presented below, lists all forty fish white-list species sorted by scientific name and the common name as it appears in subsection b of HAR §13-60.4-7 (ibid).

Table 1. “White-List” Species

<i>Scientific Name</i>	<i>Common Name</i>	<i>Scientific Name</i>	<i>Common Name</i>
<i>Acanthurus achilles</i>	Achilles tang	<i>Ctenochaetus strigosus</i>	goldring surgeonfish
<i>Acanthurus dussumieri</i>	eyestripe surgeonfish	<i>Dascyllus albisella</i>	Hawaiian Dascyllus
<i>Acanthurus nigricans</i>	goldrim surgeonfish	<i>Forcipiger flavissimus</i>	forcepsfish
<i>Acanthurus nigrofuscus</i>	brown surgeonfish	<i>Gomphosus varius</i>	bird wrasse
<i>Acanthurus olivaceus</i>	orangeband surgeonfish	<i>Halichoeres ornatissimus</i>	ornate wrasse
<i>Acanthurus thompsoni</i>	Thompson’s surgeonfish	<i>Hemitaurichthys polylepis</i>	pyramid butterflyfish
<i>Anampses chrysocephalus</i>	psychedelic wrasse	<i>Lutjanus kasmira</i>	bluestripe snapper, taape
<i>Canthigaster jactator</i>	whitespotted Toby	<i>Macropharyngodon geoffroy</i>	shortnose wrasse
<i>Centropyge fisheri</i>	Fisher’s angelfish	<i>Melichthys niger</i>	black Durgon
<i>Centropyge potteri</i>	Potter’s angelfish	<i>Naso lituratus</i>	orangespine unicornfish
<i>Cephalopholis argus</i>	peacock grouper, roi	<i>Ostracion meleagris</i>	spotted boxfish
<i>Chaetodon kleinii</i>	blacklip butterflyfish	<i>Paracirrhites forsteri</i>	blackside hawkfish
<i>Chaetodon miliaris</i>	milletseed butterflyfish	<i>Pseudanthias hawaiiensis</i>	Hawaiian longfin Anthias
<i>Chaetodon multicinctus</i>	multiband butterflyfish	<i>Pseudocheilinus octotaenia</i>	eightline wrasse
<i>Chaetodon quadrimaculatus</i>	fourspot butterflyfish	<i>Pseudocheilinus tetrataenia</i>	fourlined wrasse
<i>Chaetodon tinkeri</i>	Tinker’s butterflyfish	<i>Pseudojuloides cerasinus</i>	smalltail wrasse
<i>Cirrhilabrus jordani</i>	flame wrasse	<i>Sufflamen bursa</i>	lei triggerfish
<i>Cirrhitops fasciatus</i>	redbarred hawkfish	<i>Thalassoma duperrey</i>	saddle wrasse
<i>Coris gaimard</i>	yellowtail coris	<i>Xanthichthys auromarginatus</i>	gilded triggerfish
<i>Ctenochaetus hawaiiensis</i>	chevron tang	<i>Zebrasoma flavescens</i>	yellow tang

3. CULTURE-HISTORICAL CONTEXT

To understand the vast landscape of the study area and the inherent cultural mores and traditions that developed as a direct result of interacting with this very landscape, it is imperative that the culture-historical research be conducted within the epistemological framework of the host culture. This is achieved by presenting indigenous narratives wherever possible. As such, this chapter presents a discussion of the culture-historical background for the study area. The information presented below is meant to provide a comprehensive understanding of the cultural significance of the area and the “white-list” species, and to establish an analytical basis for the assessment of any potential cultural impacts that the proposed issuance of fourteen commercial aquarium permits within the WHRFMA might have.

The chronological summary presented below begins with the settlement of the Hawaiian Islands followed by a discussion on the development of the *ahupua’a* system and its marine components. This is followed by a presentation of legendary accounts that focuses on the oceanic origins and cosmogony of the Hawaiian people, or Kānaka Maoli (lit. the true people), and a discussion on traditional marine resource management strategies and fishing practices, as well as traditional nearshore fishing techniques. To develop an understanding of the customary uses of the “white-list” species, a discussion on Hawaiian fish nomenclature is provided, which is followed by a detailed presentation on the cultural uses of all species listed on the “white-list.” This is followed by a summary of hallmark historic events specific to West Hawai‘i, which include the arrival of westerners in 1779 and the first company of missionaries in 1820, and the subsequent transformation of traditional marine resource management practices. A discussion of the 1848 *Māhele ‘Āina* and its effects on traditional marine resource procurement are then presented which is followed by a presentation on the boundary commission testimonies for the respective districts. The culture-historical background section concludes with a summary of the events during the second half of the 19th century, with emphasis on the gradual transformation of commercial fishing in Hawai‘i.

SETTLEMENT OF THE HAWAIIAN ISLANDS

While the question of the timing of the first settlement of Hawai‘i by Polynesians remains unanswered, several theories have been offered that derive from various sources of information (i.e., archaeological, genealogical, mythological, oral-historical, and radiometric). However, none of these theories is today universally accepted. What is more widely

accepted is the answer to the question of where Hawaiian populations came from and the transformations they went through on their way to establish a uniquely Hawaiian culture. More recently, with advances in palynology and radiocarbon dating techniques, Kirch (2011) and others (Athens et al. 2014; Wilmschurst et al. 2011) have convincingly argued that Polynesians arrived in the Hawaiian Islands, sometime between A.D. 1000 and A.D. 1200 and expanded rapidly thereafter (c.f., Kirch 2011). The initial migration to Hawai‘i is believed to have occurred from Kahiki (the ancestral homelands of Hawaiian gods and people) with long distance voyages occurring fairly regularly through at least the thirteenth century. It has been generally reported that the sources of the early Hawaiian populations originated from the southern Marquesas Islands (Emory in Tatar 1982). In these early times, Hawai‘i’s inhabitants were primarily engaged in subsistence-level agriculture and fishing (Handy and Handy 1991). This was a period of great exploitation and environmental modification when early Hawaiian fishers and farmers developed new subsistence strategies by adapting their familiar patterns and traditional tools to their new environment (Kirch 1985; Pogue 1978). According to Fornander (1969), the Hawaiians brought from their homeland certain Polynesian customs and belief: the major gods Kāne, Kū, Lono, and Kanaloa; the *kapu* system of law and order; the *pu‘uhonua* (places of refuge), their *‘aumakua* (family or personal gods), and the concept of *mana* (supernatural or divine power).

For generations following initial settlement, communities were clustered along the watered, *ko‘olau* (windward) shores of the Hawaiian Islands. Along the *ko‘olau* shores, streams flowed and rainfall was abundant, and agricultural production became established. The *ko‘olau* region also offered sheltered bays from which deep-sea fisheries could be easily accessed, and nearshore fisheries, enriched by nutrients carried in the freshwater, could be maintained in fishponds and coastal waters. It was around these bays that clusters of houses where families lived could be found (McEldowney 1979). In these early times, Hawai‘i’s inhabitants were primarily engaged in subsistence-level agriculture and fishing (Handy and Handy 1972).

Following the initial settlement period, areas with the richest natural resources became populated and perhaps crowded, and by about A.D. 1200, the population began expanding to the *kona* (leeward side) and more remote regions of the island (Cordy 2000). Along the *kona* coast of Hawai‘i Island, communities were initially established near sheltered bays with access to fresh water, where an abundance of marine resources were readily available. As indicated by the archaeological record, historic documentation, and legendary accounts, this shoreline zone was used primarily for habitation and related activities, such as recreation, ceremonial practices, canoe storage, fishing and associated rituals, and burial (Johnson and Wolforth 2006). Smaller temporary habitations associated with fishing activities were also common along the shore (Cordy 1995).

By the early 17th century, the Hawaiian royalty built chiefly centers within the shoreline zone of central Kona with royal compounds located at Kailua in the vicinity of Kamakahonu and Kaiakeakua, Kahalu‘u-Keauhou, Ka‘awaloa-Kealakekua, and Hōnaunau. Such royal centers included dwellings for chiefs, their court, and local *maka‘āinana* (common people) in addition to public structures, such as *heiau*, sporting grounds and places of refuge (Cordy 1995). As the population continued to expand so did social stratification, which was accompanied by major socioeconomic changes and intensive land modification. Most of the ecologically favorable zones of the windward and coastal regions of all major islands were settled and the more marginal leeward areas were being developed. During this expansion period, additional migrations to Hawai‘i occurred from Tahiti in the Society Islands (Kamakau 1976).

Rosendahl (1972) has proposed that settlement along the leeward coast of Hawai‘i Island at this time was seasonal and recurrent, and that coastal sites were primarily occupied during the drier summer to exploit marine resources, while the upland sites were primarily occupied during the wetter winter months to focus on agriculture. An increasing reliance on agricultural products may have eventually caused a shift in social networks, as Hommon (1976) argues kinship links between coastal settlements disintegrated as those links within the *mauka-makai* settlements expanded to accommodate the exchange of agricultural products for marine resources. This shift is believed to have resulted in the establishment of the *ahupua‘a* system sometime during the A.D. 1400s (Kirch 1985), which added another component to an already well-stratified society. The implications of this model include a shift in residential patterns from seasonal, temporary occupation, to the permanent dispersed occupation of both coastal and upland areas.

DEVELOPMENT OF THE AHUPUA‘A SYSTEM

For Hawai‘i Island, the formalization of the *ahupua‘a* land management system is attributed to ‘Umi a Līloa, a renowned *ali‘i* of the Pili line who rose to power during the early 16th century (Cordy 1994). ‘Umi a Līloa was also known for separating the various classes of chiefs, priests, and laborers (Beamer 2014; Cordy 2000; Kamakau 1992). An *ahupua‘a* is a traditional land division that typically incorporated all of the eco-zones from the mountains to the sea, and for several hundred yards beyond the shore, assuring a diverse subsistence resource base for its residents, and a source of taxation (tribute) for the chiefs (Hommon 1986). Although the *ahupua‘a* land division typically

incorporated all of the eco-zones, their size and shape varied greatly (Cannelora 1974; Kamakau 1976). *Ahupua'a* boundaries were generally defined by the natural topography (i.e. hills, ridgelines, gulches, craters, etc.) as well as the natural resources that occurred within a given area (Lyons 1875). In summarizing the types of ecozones that could be found in a given *ahupua'a*, Hawaiian scholar and historian, Samuel Kamakau writes:

Here are some names for [the zones of] the mountains—the *mauna* or *kuahiwi*. A mountain is called a *kuahiwi*, but *mauna* is the overall term for the whole mountain, and there are many names applied to one, according to its delineations ('*ano*). The part directly in back and in front of the summit proper is called the *kuamauna*, mountaintop; below the *kuamauna* is the *kuahea*, and makai of the *kuahea* is the *kuahiwi* proper. This is where small trees begin to grow; it is the *wao nahele*. Makai of this region the trees are tall, and this is the *wao lipo*. Makai of the *wao lipo* is the *wao 'eiwa*, and makai of that the *wao ma 'ukele*. Makai of the *wao ma 'ukele* is the *wao akua*, and makai of there is the *wao kanaka*, the area that people cultivate. Makai of the *wao kanaka* is the '*ama'u*, fern belt, and makai of the '*ama'u* the '*apa'a*, grasslands.

A solitary group of trees is a *moku la'au* (a "stand" of trees) or an *ulu la'au*, grove. Thickets that extend to the *kuahiwi* are *ulunahela*, wild growth. An area where *koa* trees suitable for canoes (*koa wa'a*) grow is a *wao koa* and mauka of there is a *wao la'au*, timber land. These are dry forest growths from the '*apa'a* up to the *kuahiwi*. The places that are "spongy" (*naele*) are found in the *wao ma 'ukele*, the wet forest.

Makai of the '*apa'a* are the *pahe'e* [*pili* grass] and '*ilima* growths and makai of them the *kula*, open country, and the '*apoho* hollows near to the habitations of men. Then comes the *kahakai*, coast, the *kahaone*, sandy beach, and the *kalawa*, the curve of the seashore—right down to the '*ae kai*, the water's edge.

That is the way *ka po'e kahiko* [the ancient people] named the land from mountain peak to sea. (Kamakau 1976:8–9)

The *ahupua'a* were also divided into smaller individual parcels of land (such as the '*ili*, *kō'ele*, *māla*, and *kīhāpai*, etc.), generally oriented in a *mauka-makai* direction, and often marked by stone alignments (*kuaiwi*). In these smaller land parcels the native tenants tended fields and cultivated crops necessary to sustain their families, and the chiefly communities with which they were associated. As long as sufficient tribute was offered and *kapu* (restrictions) were observed, the common people, who lived in a given *ahupua'a* had access to most of the resources from mountain slopes to the ocean. These access rights were almost uniformly tied to residency on a particular land, and earned as a result of taking responsibility for stewardship of the natural environment, and supplying the needs of the *ali'i* (see Kamakau 1961:372-377 and Malo 1951:63-67).

Entire *ahupua'a*, or portions of the land were generally under the jurisdiction of appointed *konohiki* or lesser chief-landlords, who answered to an *ali'i-'ai-ahupua'a* (chief who controlled the *ahupua'a* resources). The *ali'i-'ai-ahupua'a* in turn answered to an *ali'i 'ai moku* (chief who claimed the abundance of the entire district). Thus, *ahupua'a* resources supported not only the *maka'āinana* and '*ohana* who lived on the land, but also contributed to the support of the royal community of regional and/or island kingdoms. This form of district subdividing was integral to Hawaiian life and was the product of strictly adhered to resources management planning. In this system, the land provided fruits and vegetables and some meat in the diet, and the ocean provided a wealth of protein resources. Also, in communities with long-term royal residents, divisions of labor (with specialists in various occupations on land and in procurement of marine resources) came to be strictly adhered to. It is in this cultural setting that we find the present study area.

Nā Papakū O Ka Moana: Marine Extension of the Ahupua'a

The *ahupua'a* land management system and its traditional resource zones also served as a terrestrial extension of Hawai'i's oceanic ecosystem. Kānaka Maoli organized the *kai* into distinct ecological zones along both horizontal and vertical planes known as *nā papakū o ka moana* (marine zones). Each named zone was unique based on location, depth, color, geographical character, and procurable coastal and pelagic resources, as well as *wiliau* (ocean currents). These zones extended from where the waves gently dissolve over the sand to the distant *kahikimoe* (horizon). In his book *Hawaiian Antiquities*, Hawaiian scholar David Malo (1951:48–49) enumerated some of these *papakū o ka moana* as follows:

1. The ancients applied the name *kai* to the ocean and all its parts. That strip of the beach over which the waves ran after they had broken was called *ae-kai*.
2. A little further out where the waves break was called *poina-kai*. The name *pue-one* was likewise applied to this place. But the same expressions were not used of places where

shoal water extended to a great distance, and which were called *kai-kohola* (such as largely prevail for instance at Waikiki).

3. Outside of the *poina-kai* lay a belt called the *kai-hele-ku*, or *kai-papau*, that is, water in which one could stand, shoal water; another name given it was *kai-ohua*.
4. Beyond this lies a belt called *kua-au* where the shoal water ended; and outside of the *kua-au* was a belt called *kai-au*, *ho-au*, *kai-o-kilo-hee*, that is, swimming deep or sea for spearing squid, or *kai-hee-nalu*, that is, a surf swimming region. Another name still for this belt was *kai-kohola*.
5. Outside of this was a belt called *kai-uli*, blue sea, squid-fishing sea *kai-lu-hee*, or sea-of-the-flying-fish, *kai malolo*, or sea-of-the-*opelu*, *kai-opelu*.
6. Beyond this lies a belt called *kai-hi-aku*, sea for trolling the *aku*, and outside of this lay a belt called *kai-kohola*, where swim the whales, monsters of the sea; beyond this lay the deep ocean, *moana*, which was variously termed *waho-lilo* (far out to sea), or *lepo* (underground), or *lewa* (floating), or *lipo* (blue-black), which reach Kahiki-moe, the utmost bound of the ocean.
7. When the sea is tossed into billows they are termed *ale*. The breakers which roll in are termed *nalu*. The currents that move through the ocean are called *au* or *wili-au*.
8. Portions of the sea that enter into recesses of the land are *kai-hee-nalu*, that is a surf-swimming region. Another name still *kai-o-kilo-hee*, that is swimming deep, or sea for spearing squid, or called *kai-kuono*; that belt of shoal where the breakers curl is called *pu-ao*; another name for it is *ko-aka*.
9. A blow-hole where the ocean spouts up through a hole in the rocks is called a *puhi* (to blow). A place where the ocean is sucked with force down through a cavity in the rocks is called a *mimili*, whirlpool; it is also called *mimiki* or an *aaka*.
10. The rising of the ocean tide is called by such names as *kai-pii* (rising sea), *kai-nui* (big-sea), *kai-piha* (full sea), and *kai-apo* (surrounding sea).
11. When the tide remains stationary, neither rising nor falling, it is called *kai-ku*, standing sea; when it ebbs it is called *kai-moku* (the parted sea), or *kai-emi* (ebbing sea), or *kai-hoi* (retiring sea), or *kai-make* (defeated sea).
12. A violent, raging surf is called *kai-koo*. When the surf beats violently against a sharp point of land, that is a cape (*lae*), it is termed *kai-ma-ka-ka-lae*.
13. A calm in the ocean is termed a *lai* or a *malino* or a *pa-e-a-e-a* or a *pohu*.

As coastline geography is variable along the western shore of Hawai'i Island, ranging from nearly vertical sea cliffs to fine-sanded bays, not all oceanic zones exist in all locales. According to Kamakau (1979), there were names for sea ponds that were nearly entirely surrounded by land—*kai hāloko* or *kai puhi lala*; for bays—*kai kū'ono*; for lagoons—*loko kai*; for areas of the sea that were nearly landlocked—*hāloko kai*; and for places where seawater surged into a pond—*kai hī*. There were also specific names to indicate areas where waves multiplied—*kai ko'o*, and subsequently diverged from each other—*kai kulana*. Kamakau (1979) also mentions that in more rugged environments, such as at Ka Lae in Ka'ū, places where waves crashed against points of land were known as *kai maka lae*, and places where waves crashed into the bases of cliffsides were termed *kai kuehu*. Terms were also given to rocky places on the shoreline where waves broke within a crevice—*kai puhi*; where the sea ebbed up and down inside a crevice—*mimilo*, *mimiki*, or *'a'aka*; and for blowholes, which were known simply as *puhi* (ibid.). In locales such as Ka'ū and the southern part of South Kona, the rocky shoreline limited resource areas where reef-bound marine life dwelled, including “squid, mullet, goatfish, parrotfish and the like” (Handy and Pukui 1998:223).

Kānaka Maoli also distinguished the various moods and surface characteristics of the ocean by name. For instance, calm and peaceful seas were *kai malina*, *kai pohu*, or *kai paeaea*; and areas where the sea was glassy and appeared to puddle on the surface were *kai kāhekaheka*, *kai ki'o*, or *kai hāpuna* (Kamakau 1979). The famed proverbial sayings, “Ke kai malino o Kona” and “Kona, kai malino a Ehu” refers to the calm seas of the Kona District with the latter saying associating the calm seas with Kona's ruling chief 'Ehu (Pukui 1983:186,199). The calm sea of Kona, which produced “innumerable streaks of color” is described in the saying, “Kona i ke kai mā'oki'oki” which has been translated by Pukui (1983:199) to mean “Kona the sea that is cut up.”

There were also designations for contrasting parts of the *kai* based upon its color. Areas of the *kai* that were white were generally referred to as *kai kea*, with foamy, white seas being distinguished as *kai ke'oke'o*. Kānaka Maoli further distinguished striated, variegated seas for which the Kona District was famed, as *kai mā'oki'oki*, and sections that were richly red like 'alaea (ocherous earth) as *kai 'ula'ula* (red sea) and golden yellow like 'ōlena (turmeric) as *kai lenalena* (yellow sea). The ancient people also identified parts of the *kai* which were designated for certain activities. For instance, shallow parts of the sea where one could wade out into the shoal were known as the *kai hele kū*, and places where one could submerge and bathe were referred to as *kai 'au kohana*. There were also places designated for diving—*kai lu'u*, as well as surfing—*kai he'e nalu* or *kua'au* (Kamakau 1979).

Access to nearshore and offshore fisheries constituted an important component of the *ahupua'a* system. In detailing the nature of traditional fishers, Lyons writes:

While the smaller ahupuaas had to content themselves with the immediate shore fishery extending out not further than a man could touch bottom with his toes, the larger ones swept around outside of these, taking to themselves the main fisheries much in the same way as that in which the forests were appropriated. (Lyons 1875:111)

In describing the intimate connection between the 'ohana the *ahupua'a* system, Handy and Pukui (1998:18) relate, "the 'Ohana as a functioning social mechanism operates within the *milieu* of the sea, shore, coastal and inland slopes and uplands, subject to weather, sun and moon." Regarding marine resource management, Kānaka Maoli carefully regulated resource extraction within the different designated marine zones (discussed above) to ensure the preservation of the physical, biological, and ecological integrity of the *kai*, as well as the perpetuation of the ancient 'ohana (family) based socio-economic system (Jokieli et al. 2011). As related by Handy and Pukui:

. . . The fisherman needing *poi* or 'awa would take fish, squid or lobster upland to a household known to have taro, and would return with his *kalo* (taro) or *pa'i'ai* (hard poi, the steamed and pounded taro corm). A woman from seaward, wanting some medicinal plant, or sugar cane perhaps, growing on the land of a relative living inland would take with her a basket of shellfish or some edible seaweed and return with her stalks of sugar cane or her medicinal plants. In other words, it was the 'ohana that constituted the community within which the economic life moved. (Handy and Pukui 1998:6)

***Kuleana*: The Establishment of Native Access to Natural Resources**

The *hoa'āina* (native tenants) and 'ohana (families) who lived on the land had rights to the gather forest and marine resources for subsistence and for tribute (Jokieli et al. 2011; MacKenzie 1991). As part of these rights, the *ahupua'a* residents were also required to supply resources and labor that supported the royal community of regional and/or island kingdoms as well as provide offerings to appease their multitude of *akua* (Malo 1951). These services were a *kuleana* (privilege and responsibility) that came with the tenancy within a given *ahupua'a*. The *ahupua'a* thus became the equivalent of a local community, with its own social, economic, and political significance, and it also served as a taxable base for the *ali'i* during the *Makahiki* (festival beginning about the middle of October and lasting about four months, with sports and religious festivities and taboo on war) (Kelly 1956). During the annual *Makahiki* procession, the highest chief of the land sent select members of his retinue to collect *ho'okupu* (tribute and offerings) in the form of goods from each *ahupua'a*. The *hoa'āina* (native tenants) who resided in the *ahupua'a* brought their share of *ho'okupu* to an *ahu* (altar) that was symbolically marked with the image of a *pua'a* (pig). Kamakau describes some of the reasons for the annual *Makahiki* and notes the observance of *kapu* that restricted the consumption of certain vegetables and meats including fish:

The *Makahiki* festival was a time to rest, and a time to make great feasts of commemoration ('*aha'aina ho'omana'o*) for life and health of the body, and for the help received from the gods. All manual labor was prohibited and there were several days of resting and feasting. Chiefs and people made manu joyful *Makahiki* feasts at the end of each year. The custom (*malama*) of feasting came from very ancient times; and from the time that chiefs became rulers of the kingdoms...

They made *kapu* the last three months of the year. The *Makahiki* began (*e kauwelu ai*) in the month of Hilina, and at this time pork, coconut, and fish were placed under *kapu*; the eating of flesh foods (*i'o*) was *kapu* during these months. (Kamakau 1964:19)

Ahupua'a were ruled by *ali'i 'ai ahupua'a* or chiefs who controlled the *ahupua'a* resources; who, for the most part, had complete autonomy over this generally economically self-supporting piece of land (Malo 1951). *Ahupua'a* residents were not bound to the land, nor were they the property of the *ali'i*. If the living conditions under a particular *ahupua'a* chief were deemed unsuitable, the residents could move freely in pursuit of more favorable living conditions

(Lam 1985). This structure safeguarded the well-being of the people and the overall productivity of the land, lest the chief lose the support and loyalty of his, or her, principal supporters. *Ahupua'a* lands were in turn, managed by an appointed *konoiki* or lesser chief-landlord, who oversaw and coordinated stewardship of an area's natural resources (ibid.). In some places, the *po'o lawai'a* (head fisherman) held the same responsibilities as the *konoiki* (Jokieli et al. 2011). Under this system, the *konoiki* had the right "to regulate the taking of fish and other marine life from the reefs and fishing grounds abutting the *ahupua'a*" (MacKenzie 1991:173). *Hoa'āina* also had a right to gather fish, which was, however, "subject to the right of the *konoiki* to manage and conserve the fisheries" (ibid.). When necessary, the *konoiki* took the liberty of implementing *kapu* (restrictions and prohibitions) to protect the *mana* of the area's resources from physical and spiritual depletion.

Many *ahupua'a* were further divided into smaller land units termed '*ili* and '*ili kūpono* (often shortened to '*ili kū*) and cultivated patches known as *kō'ele*, *māla*, and *kīhāpai* (Beamer 2014; Lyons 1875). '*Ili* were created for the convenience of the *ahupua'a* chief, and they served as the basic land unit in which the *hoa'āina* made a living; these land units were often retained by specific '*ohana* for long periods of time (Jokieli et al. 2011; MacKenzie 2015). As the '*ili* themselves were typically passed down in families, so too were the *kuleana* (responsibilities, privileges) that were associated with them. The right to use and cultivate '*ili* was maintained within the '*ohana*, regardless of any change in title of the *ahupua'a* chief (Handy and Handy 1991). Malo (1951), recorded several types of '*ili*, including the '*ili pa'a*, a single intact parcel, and the '*ili lele*, a discontinuous parcel dispersed across an area. Whether dispersed or wholly intact, the '*ili* land division required a cross section of the available resources, and for the *hoa'āina*, this generally included access to agriculturally fertile lands, and the coastal fisheries. While much of these same resource principles applied to another type of '*ili*, the '*ili kūpono*, these land units were politically independent of the *ahupua'a* chief. This '*ili kūpono* designation was often applied to specific areas containing resources that were highly valued by the ruling chiefs, such as fishponds (Handy and Handy 1991).

The *ali'i* who presided over the *ahupua'a* (*ali'i-'ai-ahupua'a*), in turn, answered to an *ali'i 'ai moku* (chief who claimed the abundance of the entire *moku* or district) (Malo 1951). Although *moku* (districts) were comprised of multiple *ahupua'a*, they were considered geographical subdivisions with no explicit reference to rights in the land (Cannelora 1974). This form of district subdividing was integral to Hawaiian life and was strictly adhered to. Collectively, the *ali'i* regardless of their rank, held a vested responsibility, and were obligated to ensure, "the beneficial use of the land for all of the people" (MacKenzie 1991:173). It is vital to note that this complex and highly established system evolved well-before the Western concept (and practice) of private property and codified laws was introduced to the Hawaiian Islands. As knowledge of place developed over the centuries and was passed down intergenerationally through example, direct teaching, and experience, detailed information of an area's natural cycles and resources became ingrained and well-understood. Decisions pertaining to the use and management of natural resources were based on generations worth of highly informed knowledge, and were sustainably adapted to meet the needs of a growing population.

This highly-complex land management system set the foundation for traditional customary rights of the Kānaka Maoli, all while mirroring the Hawaiian thought process, and the unique culture that coevolved with these islands. Their relationship to the land and sea was fortified by their spiritual beliefs and origin stories that tied them to the greater cosmos. As evidenced in the subsequent section, the ancient Kānaka Maoli did not agree on a single creation story. Their pluralistic outlook on their origins reveal their profound connection to the ocean. The ocean was a living deity who they called Kanaloa. The ocean was the pathway of the gods and people who traveled by way of the *wa'a* (canoe) and the very element that connected them to their ancestral homeland, Kahiki. The ocean was the seat of life from which the islands were fished, and pulled up from its depth. The ocean and its creatures shared a kinship connection to the chiefs and the people, and were incorporated in an ancient genealogical chant known as the *Kumulipo*. As ancient as some of these stories may be, they remain an integral component for understanding the deep reverence and connection Kānaka Maoli have to their land and sea.

OCEANIC ORIGINS

The Kānaka Maoli were anchored through their ingrained philosophy of life to the '*āina* (land), *wai* (water), *lewa* (heavens), and the *kai* (ocean). These life-giving aspects of their natural environment were the foundation upon which they constructed their physical and spiritual world. Every natural element found within the Hawaiian world, whether on the land, in the sea, or in the heavens, was believed to be the physical embodiment of the *akua* (deities). The natural wonders of the universe were the source of life for the Kānaka Maoli, and were thus acknowledged, named, and deeply revered. Traditional legendary accounts describing the origins of the *Kanaka* (humans) are plentiful, and a review of these accounts reveals that the ancient people of these islands did not agree on a single creation story (Fornander 1916–1917). While Western scientists emphasize the geological formation of the Hawaiian Islands, traditional

accounts feature the ocean as the origin of the islands. The ocean is also described as the pathway of the gods, carrying them from their ancestral homeland of Kahiki to the shores of Hawai‘i. As the current study area includes the nearshore waters of West Hawai‘i, the most relevant of these accounts are summarized below.

The Great Fishermen, Kapūhe‘euanui

One such account concerns the genealogy of a Tahitian priest, ‘Ōpu‘ukahonua (lit. the budding earth), who established the “royal parents or ancestors of these islands,” as there were, “ninety-five generations from him to Kamehameha the Great” (Fornander 1916–1917:20). According to this genealogical account (as told by Fornander 1916–1917:20), the islands “were found or obtained by the fishing of Kapuheeuanui,” a great fisherman (*ka lawai‘a nui*), who fished them up one-by-one:

When Kapuheeuanui let down his fishing line into the sea from Kapaahu [Kohala] his line caught something that he thought was a fish and drew the line onto the canoe when, behold, it was a piece of coral. The priest Laulialamakua came along as Kapuheeuanui was disentangling his line from the coral and preparing to throw it away. Then the priest spoke to him, “Eh! Don’t throw away that piece of coral, for that is a chief, a foreteller of events. Go thou and look for a pig and appease the god, and after prayer call its name Hawaii’loa, then throw it back into the sea, and it will grow up into an island.” (ibid.)

Kapūhe‘euanui obeyed the commands of the priest and the next day, he went back out and again fished up another piece of coral. The priest Laulialamakua intervened and declared that this piece of coral be called Maui’loa. On the third day of fishing, Kapu’he‘euanui caught another piece of coral and showed it to the priest who named it O‘ahuni’ala‘a. Day after day, Kapu’he‘euanui continued to fish up coral fragments all of which were named by the priest “until all the islands now comprising the group were successfully raised as corals.” Fornander also narrates a chant describing the fishing up of the islands by the great fisherman Kapūhe‘euanui:

<i>E Lono, e Lono-e! E Lonokaeho!</i>	O Lono, O Lono, listen, O Lonokaeho!
<i>Lonokulani alii o Kauluonana.</i>	Lonokulani, chief of Kauluonana,
<i>Eia na waaa kau mai,</i>	Here are the canoes, get on board,
<i>E hoi e noho ia Hawaiiikuauili,</i>	Come along and dwell in Hawaii-with-the-green-back,
<i>He aina loa i ka moana,</i>	A land that was found in the ocean,
<i>I hōea mai loko o ka ale;</i>	That was thrown up from the sea,
<i>I ka halehale poi pu a Kanaloa;</i>	From the very depths of Kanaloa,
<i>He koakea i halelo i ka wai,</i>	The white coral in the watery caves
<i>I lou i ka makau a ka lawaia,</i>	That was caught on the hook of the fisherman;
<i>A ka lawaia nui o Kapaahu</i>	The great fisherman of Kapaahu,
<i>A ka lawaia nui o Kapuheeuanui</i>	The great fisherman Kapuheeuanui.
<i>A pae na waa, kau mai,</i>	The canoes touch the shore, come on board,
<i>E holo ai i Hawaii, he moku;</i>	Sail to Hawaii, an island,
<i>He moku Hawaii,</i>	An island is Hawaii;
<i>He moku Hawaii na Lonokaeho.</i>	An island is Hawaii for Lonokaeho to dwell on.

(Fornander 1916–1917:22-23)

Fornander reported that this chant was recited by the Tahitian chief Makuakaumana when he and the 12th century priest Pa‘ao went back to Tahiti in search of a new chief for Hawai‘i Island. When Makuakaumana and his company had reached the shores of Moa‘ulanui‘ākea in Tahiti, Makuakaumana called out to Lonokaeho to sail to Hawai‘ikuauili, (a poetic name given to Hawai‘i Island describing its verdant countryside) to become its principle chief. Lonokaeho declined the offer and instead arranged for the chief Pili to sail to Hawai‘i to become its chief. This chant also tells of the islands being fished up from the depth of the ocean, from the realm of the great oceanic deity, Kanaloa, who is mentioned in the chant excerpted above. Kanaloa is also the subject of many legends discussed below.

Kanaloa, Deity of the Ocean

Kanaloa is one of the four male gods that were worshipped by both *maka‘āinana* (lit. people that attend the land) and *ali‘i* (chiefs) in Hawai‘i and throughout Polynesia (Beckwith 1970; Malo 1951). The three other male gods—Kāne, Kū, and Lono, along with four female gods: La‘ila‘i, Haumea, Hina, and Pelehonuamea, make up the pantheon of Hawaiian gods (Kanakanole Kanahale et al. 2009). In the islands of the South Pacific, Kanaloa is known by other names (Taaroa in Tahiti; Tangaloa in Samoa; Tanaoa in Marquesas; Tangaroa in Aotearoa) and in some places he is considered the creator, and the god of the ocean (ibid.). In Hawai‘i, his domain extended over the ocean and many

native Hawaiians today maintain the understanding that the ocean itself is Kanaloa. Kanaloa (the ocean) was considered the roadway for the navigator and served as the connection between the various islands across the vast Pacific Ocean; navigators and paddlers, who traveled at the mercy of the Kanaloa often invoked prayers to him for favorable weather and ocean conditions (ibid.).

Kanaloa is embodied in several ocean species including the elusive and polychromatic *he'e* (octopus) and *mūhe'e* (squid) (Handy and Handy 1991). The *he'e* form of Kanaloa was also applied to the area of healing and was used by a *kahuna lapa'au* (healing practitioner) to perform a healing ceremony called *he'e mahola* (Malo 1951). Malo (ibid.:109) expounds upon this ceremony writing, “[t]he *hee mahola* ceremony was through to be the thing to disperse (*hehee*) disease and bring healing to the body.” Other important body forms of Kanaloa included the *koholā* (whale), specifically the *palaoa* (sperm whale), from which the *lei niho palaoa* (ivory tooth pendant) was carved and worn exclusively by Hawaiian *ali'i*. Although whales are typically considered deep sea creatures, recent studies have shown that whales contribute to important nutrient cycling for reef fish (Smith et al. 2013). Kanaloa is also embodied in other large marine mammals including the *nai'a* (dolphin), *niuhi* (tiger shark), *pololia* (jellyfish), and the *hāhālua* (manta ray) (Kanaka'ole Kanahale et al. 2009; Liliuokalani 1978).

Kānenui'ākea: The Creator of Heaven and Earth and the Arrival of Kāne, Kanaloa, and Haumea in Ke'ei, South Kona

A portion of the current study area, Ke'ei in South Kona is mentioned in a legendary account recorded by Kamakau (1968) that details the initial arrival of Kāne, Kanaloa, and Haumea to the Hawaiian Islands, where they were first glimpsed by two fishermen near Ke'ei. The arrival of these gods is described in both textual and chant form, with the latter comparing their arrival to swimming fish moving on the currents from Kahiki, their ancestral homeland. Kamakau (ibid.) also relates that Kānenui'ākea was considered the creator of the “heavens and earth.” In describing the arrival of Kāne, Kanaloa, and their *kaikua hine* (sister) Haumea, Kamakau writes:

...it is said, Kane, Kanaloa, and Haumea came from Kahiki and from the firmament (*mai ka lewa mai*). They were first seen by a couple of fishermen outside of Ke'ei, in South Kona. Kuheleimoana and Kuheleipo were the two fishermen who first saw these spirits (*po'e akua*) coming over the surface of the sea. When the two men saw these wonderful beings they knelt in profound respect, and they gave them white fish and pointed out the 'awa plants mauka of 'Alanapo in Ke'ei. Those of us who study and understand clearly the prophetic chants (*mele wanana*) know that the name of Haumea was given to the woman who came with Kane and his companion because she was a woman of mysterious and recurrent births (*no ka mea o Haumea ka wahine hanau kupanaha a hanau wawa*). Here is a *mele* of the *po'e kahiko* that makes this clear:

<i>Holo mai Kane mai Kahiki,</i>	Here comes Kane from Kahiki,
<i>Holo a i'a iloko o ke kai,</i>	Coming like a fish in the sea,
<i>Ke kekele 'au i ka moana;</i>	Gliding through the currents of the ocean;
<i>O Haumea ke kaikua hine</i>	Haumea the sister
<i>O Kanaloa ia me Kane</i>	And Kanaloa are with Kane.
<i>E ki'i e ka i'a kea i kai,</i>	We get the white fish from the sea,
<i>La'a i ku'emake o Kane,</i>	That is sacred to the eyebrows of Kane,
<i>La'ahia i ke kanawai,</i>	Consecrated to him by his edict,
<i>He mau lawai'a i ka moana,</i>	We two fishermen on the ocean,
<i>O Kuheleimoana O Kuheleipo,</i>	Kuheleimoana and Kuheleipo,
<i>E kaka ana i ka malie,</i>	Who are deep-sea fishing in the calm,
<i>I ka la'i ku pohu malino,</i>	In the windless calm,
<i>I na kai malino a 'Ehu.</i>	In the calm seas of 'Ehu.
<i>Hukia i ka 'upena luelue.</i>	The bag net is drawn up.
<i>E ho'i kakou i ka uka,</i>	We return to shore,
<i>E 'alana i ka pu 'awa hiwa;</i>	And offer the choice 'awa;
<i>Ha'awi i ke kaikua hine.</i>	It is given to the sister.
<i>Elua 'ohua ko Haumea i ke keiki.</i>	There are two of you, and Haumea conceives a child.
<i>I hanau i kana hiapo,</i>	She gives birth to her first-born,
<i>O Ka'ulawena Konohiki Wananakalana.</i>	Ka'ulawena Konohiki Wananakalana.

According to Kamakau, the child Ka'ulawena Konohiki Wananakalana (also known as Mapunaia'a'ala) was fathered by one of the Ke'ei fishermen, Kuheleipo. In the Hawaiian cosmogonic chant, *Kumulipo* (discussed in further detail below), Mapunaia'a'ala was an ancestor of Māui, another noted demi-god who is celebrated in traditional lore for fishing the islands up from the depths of the sea (Beckwith 1951).

Māui Uses Manaiakalani to Fish the Hawaiian Islands Out of the Sea

Another account describing the oceanic origins of the Hawaiian Islands features the Pan-Pacific *kupua* or demi-god known as Māui, who among many other monumental life feats is said to have fished the Hawaiian Islands out of the depths of the sea using his supernatural fishhook called Manaiakalani, which was later cast up into the heavens. Westervelt writes:

Maui went out from his home at Kauiki, fishing with his brothers. After they had caught some fine fish the brothers desired to return, but Maui persuaded them to go our farther. Then when they became tired and determined to go back, he made the seas stretch out and the shores recede until they could see no land. Then drawing the magic hook, he baited it with the Alae or sacred mud hen belonging to his Mother Hina...

Down in the deep sea sank the hook with its struggling bait, until it was seized by "the land under the water."

But Hina the mother saw the struggle of her sacred bird and hastened to the rescue. She caught a wing of the bird, but could not pull the Alae from the sacred hook. The wing was torn off. Then the fish gathered around the bait and tore it to pieces. If the bait could have been kept entire, then the land would have come up in a continent rather than as an island. Then the Hawaiian group would have been unbroken. But the bait broke—and the islands came up as fragments from the under world. (Westervelt 1910:26–28)

The *Kumulipo*

While the above accounts attribute the origin of the Hawaiian Islands to various *akua* (deities) and great fishermen who raised coral and islands from the depths of the ocean, the following account is a *mele ko'i honua*, or cosmogonic chant, known as the *Kumulipo*, which explains the origins of the Hawaiian universe in a different manner. This account describes the birth of various aquatic and terrestrial organisms found in the Hawaiian Islands. Containing over 2,000 lines, this chant was uttered by the high priest Puou in Kealakekua, Kona upon the birth of the 18th-century high chief Ka'ī'imamao, as a way to recognize and fortify the depth of his royal family's divine origin (Liliuokalani 1978). Various scholars and Hawaiian royalty including Queen Lili'uokalani and her brother King David Kalākaua have attempted to translate this epic chant, with each translator offering their own interpretation. The *Kumulipo* anchors the Hawaiian world and its people to the ocean by way of the primal substance known to the Hawaiian people as *walewale* (slime). According to the *Kumulipo*, all animate and inanimate objects were *hānau* (born), including the *'uku ko 'ako 'a* (coral polyp), which was recorded as the very first organism born in the ocean. The small and simple *'uku ko 'ako 'a* is of vital importance to life, as it is the basic building block for all life in the sea. It is from the *'uku ko 'ako 'a* that the *'āko 'ako 'a* (coral head) was born, thus forming the broader foundation for all other marine organisms that inhabit the nearshore reefs, where benthic species and other fish live, including the white list species that are the subject of the current study.

This lengthy chant is broken up into sixteen *wā* (eras). The recurring theme of duality appears in the first four *wā* in which each aquatic life form is paired with a terrestrial counterpart. The first *wā* describes a time of eternal darkness (*pō*) that passes progressively, through the union of male and female energies, ultimately giving birth to light (*ao*). It is in this first *wā* that organisms of the benthic zone are born. The second *wā* of the *Kumulipo* describes the birth of the fishes and their forest counterparts; the third *wā* describes the emergence of the winged creatures of both land and sea., and the fourth *wā* describes the birth of the amphibious creatures (Beckwith 1951). In her explanation of the pairs of aquatic and terrestrial counterparts, Martha Beckwith writes:

The names are not invented for mere rhyme value...The punning of names have in some cases a practical magical function. For example, in plant medicine the first food to be taken after dosing with a special medicinal herb is the sea-growing thing whose name matches with it...Such is the nature of the language that these lists may be extended indefinitely. (Beckwith 1951:50–51)

It is not until the eight *wā* of the *Kumulipo* that the Kanaka Maoli, or the people of the Hawaiian Islands, are born. This birth order informs us of the Hawaiian thought process, which suggests that Kanaka Maoli derive from the same source as all other living creatures, and are therefore an integral part of the vastly complicated and fragile system of

life. The idea that Kanaka Maoli were born so long after the ocean helps provide context for understanding the reverence that they hold for the *kai* and all of its life forms. The *Kumulipo* also serves as a reminder that the well-being of Kanaka Maoli is dependent upon maintaining the delicate balance between all life forms, and that a symbiotic relationship exists between the land and the ocean. Although this accounts is set in Hawai'i's distant past, the messages and nuanced meanings remain deeply embedded in the spirits and minds of Native Hawaiians today.

For the purposes of the current study, in an effort to provide a more complete understanding of the cosmogony of marine life in the Hawaiian Islands, the entirety of the second *wā* of the *Kumulipo* is provided in the original Hawaiian with an English translation next to it. The Hawaiian version of this chant comes from a text written by King David Kalākaua that was published by Beckwith (1951:190–194). The English translation is derived from a version of the *Kumulipo* published by King Kalākaua's sister, Queen Lili'uokalani (Liliuokalani 1978:6–11). Both the Hawaiian and English versions have been transcribed and are presented below in their entirety. All fish names are presented in bold print for emphasis; while the white-list species have been underlined for ease of identification:

- | | |
|--|---|
| 123. <i>Hanau kama a ka Powehiwehi</i> | The first child born of Powehiwehi (dusky night) |
| 124. <i>Ho'oleilei ka lana a ka Pouliuli</i> | Tossed up land for Pouliuli (darkest night), |
| 125. <i>O Mahiua, o Ma'apuia</i> | For Mahiua or Maapuia, |
| 126. <i>O noho i ka 'aina o Pohomiluaimea</i> | And lived in the land of Pohomiluaimea (shougy hill of Mea); |
| 127. <i>Kukala mai ka Haipu-aalamea</i> | Suppressed the noise of the growth of unripe fruit, |
| 128. <i>O naha wilu ke au o Uliuli</i> | For fear Uliuli would cause it burst, and the stench |
| 129. <i>O ho'ohewahewa a kumalamala</i> | To disagree and turn sour, |
| 130. <i>O pohouli a poho'ele'ele</i> | For pits of darkness and pits of night. |
| 131. <i>O na wai ehiku e lana wale</i> | Then the seven waters became calm. |
| 132. <i>Hanau kama a <u>hilu</u>, a holo</i> | Then was born a child (kama), 'twas a Hilu and swam. |
| 133. <i>O ka <u>hilu</u> ia pewa lala kau</i> | The Hilu is a fish with standing fins, |
| 134. <i>O kau[']ana a Pouliuli</i> | On which Pouliuli sat. |
| 135. <i>O kuemiemi a Powehiwehi</i> | So undecided seemed Powehiwehi, |
| 136. <i>O pouliuli ke kane</i> | For Pouliuli was husband |
| 137. <i>O Powehiwehi ka wahine</i> | And Powehiwehi his wife. |
| 138. <i>Hanau ka i'a, hanau ka <u>Nai'a</u> i ke kai la holo</i> | And fish was born, the Nai'a (porpoise) was born in the sea and swam. |
| 139. <i>Hanau ka <u>Mano</u>, hanau ka <u>Moana</u> i ke kai la holo</i> | The Mano (shark) was born, the Moana was born in the sea and swam. |
| 140. <i>Hanau ka <u>Mau</u>, hanau ka <u>Maumau</u> i ke kai la holo</i> | The Mau was born, the Maumau was born in the sea and swam. |
| 141. <i>Hanau ka <u>Nana</u>, hanau ka <u>Mana</u> i ke kai la holo</i> | The Nana was born, the Mana was born in the sea and swam. |
| 142. <i>Hanau ka <u>Nake</u>, hanau ka <u>Make</u> i ke kai la holo</i> | The Nake was born, the Make was born in the sea and swam. |
| 143. <i>Hanau ka <u>Napa</u>, hanau ka <u>Nala</u> i ke kai la holo</i> | The Napa was born, the Nala was born in the sea and swam. |
| 144. <i>Hanau ka <u>Pala</u>, hanau ke <u>Kala</u> i ke kai la holo</i> | The Pala was born, the Kala was born in the sea and swam. |
| 145. <i>Hanau ka <u>Paka</u>, hanau ka <u>Papa</u> i ke kai la holo</i> | The Paka (an eel) was born, the Papa (crab) was born in the sea and swam. |
| 146. <i>Hanau ke <u>Kalakala</u>, hanau ka <u>Huluhulu</u> i ke kai la holo</i> | The Kalahala was born, the Huluhulu was born in the sea and swam. |
| 147. <i>Hanau ka <u>Halahala</u>, hanau ka <u>Palapala</u> i ke kai la holo</i> | The Halahala was born, the Palapala was born in the sea and swam. |
| 148. <i>Hanau ka <u>Pe'a</u>, hanau ka <u>Lupe</u> i ke kai la holo</i> | The Pea (starfish) was born, the Lupe was born in the sea and swam. |
| 149. <i>Hanau ke <u>Ao</u>, hanau ke <u>Awa</u> i ke kai la holo</i> | The Ao was born, the Awa was born in the sea and swam. |
| 150. <i>Hanau ke <u>Aku</u>, hanau ke <u>Ahi</u> i ke kai la holo</i> | The Aku (bonito) was born, the Ahi (same kind) was born in the sea and swam. |
| 151. <i>Hanau ka <u>Opelu</u>, hanau ke <u>Akule</u> i ke kai la holo</i> | The Opelu (same as above) was born, the Akule was born in the sea and swam. |
| 152. <i>Hanau ka <u>Ama'ama</u>, hanau ka <u>Anae</u> i ke kai la holo</i> | The Amaama (mullet) was born, the Anae (large kind) was born in the sea and swam. |
| 153. <i>Hanau ka <u>Ehu</u>, hanau ka <u>Nehu</u> i ke kai la holo</i> | The Ehu was born, the Nehu was born in the sea and swam. |
| 154. <i>Hanau ka <u>Iao</u>, hanau ka <u>Ao'ao</u> i ke kai la holo</i> | The Iao (used for bait) was born, the Aoao was born in the sea and swam. |
| 155. <i>Hanau ka <u>'Ono</u>, hanau ke <u>Omo</u> i ke kai la holo</i> | The Ono (large fish) was born, the Omo was born in the sea and swam. |
| 156. <i>Hanau ka <u>Pahau</u>, hanau ka <u>Lauhau</u> i ke kai la holo</i> | The Pahau (striped flatfish) was born, the Lauhau was born in the sea and swam. |
| 157. <i>Hanau ka <u>Moi</u>, hanau ka <u>Lo'ilo'i</u> i ke kai la holo</i> | The Moi was born, the Loiloi was born in the sea and swam. |
| 158. <i>Hanau ka <u>Mao</u>, hanau ka <u>Maomao</u> i ke kai la holo</i> | The Mao was born, the Maomao was born in the sea and swam. |
| 159. <i>Hanau ke <u>Kaku</u>, hanau ke <u>A'ua'u</u> i ke kai la holo</i> | The Kaku was born, the A'ua'u was born in the sea and swam. |
| 160. <i>Hanau ke <u>Kupou</u> hanau ke <u>Kupoupou</u> i ke kai la holo</i> | The Kupou was born, the Kupoupou was born in the sea and swam. |
| 161. <i>Hanau ka <u>Weke</u>, hanau ka <u>Lele</u> i ke kai la holo</i> | The Weke was born, the Lele was born in the sea and swam. |
| 162. <i>Hanau ka <u>Palani</u>, hanau ka <u>Nukumomi</u> i ke kai la holo</i> | The Palani was born, the Nuku Moni was born in the sea and swam. |
| 163. <i>Hanau ka <u>Ulua</u>, hanau ka <u>Hahalua</u> i ke kai la holo</i> | The Ulua was born, the Hahalua was born in the sea and swam. |
| 164. <i>Hanau ka <u>'Ao'aonui</u>, hanau ka <u>Paku'iku'i</u> i ke kai la holo</i> | The Ao'aonui was born, the Paku'iku'i was born in the sea and swam. |
| 165. <i>Hanau ka <u>Ma'i'i'i</u>, hanau ka <u>Ala'ihl</u> i ke kai la holo</i> | The Maii was born, the Alaihi was born in the sea and swam. |
| 166. <i>Hanau ka <u>'O'o</u>, hanau ka <u>Akilolo</u> i ke kai la holo</i> | The Oo was born, the Akilolo was born in the sea and swam. |
| 167. <i>Hanau ka <u>Nenu</u>, noho i kai</i> | The Nenu was born and lived in the sea; |

3. Culture-Historical Context

168. *Kia'i ia e ka Lauhue noho i uka*
169. *He po uhe'e i ka wawa*
170. *He nuku, he kai ka 'ai a ka i'a*
171. *O ke Akua ke momo, 'a'oe komo kanaka*
172. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
173. *Hanau ka Pahaha no i kai*
174. *Kia'i ia e ka Puhala noho i uka*
175. *He po uhe'e i ka wawa*
176. *He nuku, he kai ka 'ai a ka i'a*
177. *O ke Akua ke momo, 'a'oe komo kanaka*
178. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
179. *Hanau ka Pahau noho i kai*
180. *Kia'i ia e ka Lauhau noho i uka*
181. *He po uhe'e i ka wawa*
182. *He nuku, he kai ka 'ai a ka i'a*
183. *O ke Akua ke momo, 'a'oe komo kanaka*
184. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
185. *Hanau ka He'e noho i kai*
186. *Kia'i ia e ka Walahe'e noho i uka*
187. *He po uhe'e i ka wawa*
188. *He nuku, he kai ka 'ai a ka i'a*
189. *O ke Akua ke momo, 'a'oe komo kanaka*
190. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
191. *Hanau ka O'opukai noho i kai*
192. *Kia'i ia e ka O'opuwai noho i uka*
193. *He po uhe'e i ka wawa*
194. *He nuku, he kai ka 'ai a ka i'a*
195. *O ke Akua ke momo, 'a'oe komo kanaka*
196. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
197. *Hanau ka puhī Kauwila noho i kai*
198. *Kia'i ia e ka Uwila noho i uka*
199. *He po uhe'e i ka wawa*
200. *He nuku, he kai ka 'ai a ka i'a*
201. *O ke Akua ke momo, 'a'oe komo kanaka*
202. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
203. *Hanau ka Umaumalei noho i kai*
204. *Kia'i ia e ka Ulei noho i uka*
205. *He po uhe'e i ka wawa*
206. *He nuku, he kai ka 'ai a ka i'a*
207. *O ke Akua ke momo, 'a'oe komo kanaka*
208. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
209. *Hanau ka Paku'iku'i noho i kai*
210. *Kia'i ia e ka la'au Kukui noho i uka*
211. *He po uhe'e i ka wawa*
212. *He nuku, he kai ka 'ai a ka i'a*
213. *O ke Akua ke momo, 'a'oe komo kanaka*
214. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
215. *Hanau ka Laumilo noho i kai*
216. *Kia'i ia e ka [la'au] Milo noho i uka*
217. *He po uhe'e i ka wawa*
218. *He nuku, he kai ka 'ai a ka i'a*
219. *O ke Akua ke momo, 'a'oe komo kanaka*
220. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
221. *Hanau ke Kupoupou noho i kai*
222. *Kia'i ia e ka Kou noho i uka*
223. *He po uhe'e i ka wawa*
224. *He nuku, he kai ka 'ai a ka i'a*
225. *O ke Akua ke momo, 'a'oe komo kanaka*
226. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
227. *Hanau ka Hauliuli noho i kai*
228. *Kia'i ia e ka Uhi noho i uka*
229. *He po uhe'e i ka wawa*
230. *He nuku, he kai ka 'ai a ka i'a*
231. *O ke Akua ke momo, 'a'oe komo kanaka*
232. *O kane ia Wai'ololi, o ka wahine ia Wai'olola*
233. *Hanau ka Weke noho i kai*
- Guarded by the Lauhue that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Haha** was born and lived in the sea;
Guarded by the Puhala that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Pahau** was born in the sea;
Guarded by the Lauhau that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Hee** was born and lived in the sea;
Guarded by the Walahee that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Oopukai** was born and lived in the sea;
Guarded by the Oopuwai that lived in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Puhi kauwila** was born and lived in the sea;
Guarded by the Uwila that lived in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Umaumalei** was born and lived in the sea;
Guarded by the Ulei that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Paku'iku'i** was born and lived in the sea;
Guarded by the Laukukui that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Laumilo** was born and lived in the sea;
Guarded by the Milo that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Kapouu** was born and lived in the sea;
Guarded by the Kou that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Hauliuli** was born and lived in the sea;
Guarded by the Uhi that grew in the forest.
A night of flight by noises
Through a channel; salt water is life to fish;
So the gods may enter, but not man.
Man by Waiololi, woman by Waiolola,
The **Weke** was born and lived in the sea;

234. <i>Kia'i ia e ka Wauke noho i uka</i>	Guarded by the Wauke that grew in the forest.
235. <i>He po uhe'e i ka wawa</i>	A night of flight by noises
236. <i>He nuku, he kai ka 'ai a ka i'a</i>	Through a channel; salt water is life to fish;
237. <i>O ke Akua ke momo, 'a 'oe komo kanaka</i>	So the gods may enter, but not man.
238. <i>O kane ia Wai'ololi, o ka wahine ia Wai'olola</i>	Man by Waiololi, woman by Waiolola,
239. <i>Hanau ka 'A'awa noho i kai</i>	The Aawa was born and lived in the sea;
240. <i>Kia'i ia e ka 'Awa noho i uka</i>	Guarded by the Awa that grew in the forest.
241. <i>He po uhe'e i ka wawa</i>	A night of flight by noises
242. <i>He nuku, he kai ka 'ai a ka i'a</i>	Through a channel; salt water is life to fish;
243. <i>O ke Akua ke momo, 'a 'oe komo kanaka</i>	So the gods may enter, but not man.
244. <i>O kane ia Wai'ololi, o ka wahine ia Wai'olola</i>	Man by Waiololi, woman by Waiolola,
245. <i>Hanau ka Ulae noho i kai</i>	The Ulae was born and lived in the sea;
246. <i>Kia'i ia e ka Mokae noho i uka</i>	Guarded by the Mokae that grew in the forest.
247. <i>He po uhe'e i ka wawa</i>	A night of flight by noises
248. <i>He nuku, he kai ka 'ai a ka i'a</i>	Through a channel; salt water is life to fish;
249. <i>O ke Akua ke momo, 'a 'oe komo kanaka</i>	So the gods may enter, but not man.
250. <i>O kane ia Wai'ololi, o ka wahine ia Wai'olola</i>	Man by Waiololi, woman by Waiolola,
251. <i>Hanau ka Palaoa noho i kai</i>	The Palaoa (sea-elephant) was born and lived in the sea;
252. <i>Kia'i ia e ka Aoa noho i uka</i>	Guarded by the Aoa that grew in the forest.
253. <i>He po uhe'e i ka wawa</i>	A night of flight by noises
254. <i>He nuku, he kai ka 'ai a ka i'a</i>	Through a channel; salt water is life to fish;
255. <i>O ke Akua ke momo, 'a 'oe komo kanaka</i>	So the gods may enter, but not man.
256. <i>O ke ka'ina a palaoa e ka'i nei</i>	The train of the Palaoa (walrus) that swim by,
257. <i>E kuwili o ha'aha'a i ka moana</i>	Embracing only the deep blue waters,
258. <i>O ka opule ka'i loloa</i>	Also the Opule that move in schools,
259. <i>Manoa wale ke kai ia lakou</i>	The deep is as nothing to them.
260. <i>O kumimi, o ka lohelohe a pa'a</i>	And the Kumimi (a crab) and Lohelohe (a locust) cling together
261. <i>O ka'a monimomi i ke ala</i>	To the rolling motion of their cradle
262. <i>O ke ala o Kolomio o miomio i hele ai</i>	On their path so narrow, so slim, to move,
263. <i>Loa'a Pimoe i ke polikua</i>	Till Pimoe (a mermaid) is found in the depth of her cave,
264. <i>O Hikawainui, o Hikawaina</i>	With Hikawainui, and Hikawaine
265. <i>O pulehulehu hako'ako'a</i>	Amongst piles of heated coral
266. <i>Ka mene 'a'ahu wa'awa'a</i>	That were thrown in piles unevenly,
267. <i>O holi ka poki'i i ke au ia uliuli</i>	So thin and scraggy in the blue tide.
268. <i>Po'ele wale ka moana powehiwehi</i>	Surely it must be dismal, that unknown deep;
269. <i>He kai ko'ako'a no ka uli o Paliuli</i>	'Tis a sea of coral from the depth of Paliuli,
270. <i>O he'e wale ka 'aina ia lakou</i>	And when the land recedes from them
271. <i>O kaha uliuli wale i ka po—la</i>	The east is still in darkness of night,
272. <i>Po—no</i>	'Tis night

As reflected in the origin stories previously described, the Kānaka Maoli ordered all living things in the world. The ocean and its creatures were living resources of divine origin capable to living and reproducing without the aid of man. Their dependency on thriving but finite resources of the Hawaiian Islands and the adjacent oceanscape, coupled with an ever growing population, required that the Kānaka Maoli, from the beginning, develop systems, practices, and cosmology that would maintain the ecological and spiritual integrity of the islands' finite resources. Over time, what developed was sophisticated and highly integrated set of stewardship practices that were codified in the socio-political system, and interwoven with their spiritual beliefs.

TRADITIONAL RESOURCE MANAGEMENT PRACTICES

The ancient and ingrained philosophy of life of the Native Hawaiian people, or Kānaka Maoli, was reinforced through cultural norms, beliefs, values, and practices that tied them to their environment in a very intimate and profound way. Evident in traditional resource stewardship practices are several underlying components: having a personal and reciprocal relationship with the resources; the belief that all things are interconnected; exercising self-control; having the staunch support of a socio-political system that valued the management and beneficial use of natural resources; and uncodified laws that imposed serious consequences for violators. This lifestyle helped maintain natural, spiritual, and social orders that were actualized as place-based cultural practices. In describing the intimate relationship that exists between the Hawaiian people and the *āina* (land) and the *kai* (ocean), Hawaiian historian and cultural specialist, Kepā Maly writes:

In the Hawaiian context, these values—the “sense of place”—have developed over hundreds of generations of evolving “cultural attachment” to the natural, physical, and spiritual environments. In any culturally sensitive discussion on land use in Hawai‘i, one must understand that Hawaiian

culture evolved in close partnership with its' natural environment. Thus, Hawaiian culture does not have a clear dividing line of where culture ends and nature begins.

In a traditional Hawaiian context, nature and culture are one in the same, there is no division between the two. The wealth and limitations of the land and ocean resources gave birth to, and shaped the Hawaiian world view. The *'āina* (land), *wai* (water), *kai* (ocean), and *lewa* (sky) were the foundation of life and the source of the spiritual relationship between people and their environs. (Maly 2001:1)

The *'ōlelo no 'eau* (proverbial saying) "*Hānau ka 'āina, hānau ke ali 'i, hānau ke kanaka*" (Born was the land, born were the chiefs, born were the commoners), conveys the belief that all things of the land, including *kanaka*, were literally born, and are thus connected through kinship links that extend beyond the immediate family (Pukui 1983:57). *'Āina*, or land, was perhaps most revered, as another *'ōlelo no 'eau* notes, "*He ali 'i ka 'āina; he kauwā ke kanaka*," which has been translated by Pukui (1983:62) as "[t]he land is a chief; man is its servant." The lifeways of early Kānaka Maoli, which depended upon the finite natural resources of these islands, necessitated the development of sustainable resource management practices. Over time, what developed was an adaptable management system that integrated the watershed, freshwater, nearshore fisheries, all of which are connected through the many unique ecosystems that extend from the mountains to the sea (Jokieli et al. 2011). As evidenced by their understandings and use of this island environment, Kānaka Maoli were masters of exploring, utilizing, and maximizing the wide array of island resources. However, included in any form of traditional land use was the practice of *mālama*, meaning as "to take care of, tend, attend, care for, preserve, protect, beware, save, maintain; to keep or observe, as a taboo..." (Pukui and Elbert 1986:232). The nuanced practice of *mālama* was a shared responsibility that was reinforced at a personal, familial, and social level throughout the society. In traditional Hawaiian society, all persons who exercised their right to utilize a resource were also expected to follow social and customary rules and rituals, one of which included the ritualistic gifting of *ho 'okupu* to the many *akua*, who in their elemental form imparted abundance and fertility to the land and sea.

Ho'okupu & Pule: Reciprocity as a Means to Maintaining Spiritual Balance and Abundance

While the people held the responsibility of tending to the land and sea, the *ali 'i* held the prerogative of caring for, and looking after, the solidarity of the land and people (Malo 1951). Maintaining a reciprocal relationship with the *kini akua* (the multitude of gods) and *'aumākua* (ancestral gods), however, was traditionally a task undertaken by all classes of people. This was accomplished through ritualistic processes, including *pule* (prayers), giving *ho 'okupu* in the form of physical offerings, and also maintaining *heiau* (temple) rituals (ibid.). While there were many *heiau* types, each dedicated for a specific purpose, those devoted specifically to the occupation of fishing included the *ko 'a* and *kū 'ula*, both of which are discussed in more detail in the ensuing paragraphs. Maintaining balance with the gods was a practice vital to the life of the Kānaka Maoli. Failure to provide an adequate tribute to the gods was believed to disrupt the solidarity of the land and people, thereby provoking the gods to unleash their elemental powers onto upon them. Early Missionary, William Ellis described how fish were used to appease *akua* associated with the volcanic activity of Hawai'i Island. Ellis writes:

The whole island was considered as bound to pay them tribute, or support their heiaus, and kahu (devotees;) and whenever the chiefs or people failed to send the proper offerings, or incurred their displeasure by insulting them or their priest, or breaking the tabu (sacred restrictions) of their domains in the vicinity of the craters, they filled Kirauea [Kīlauea] with lava, and spouted it out, or, taking a subterranean passage, marched to some one of their houses (craters) in the neighbourhood where the offending parties dwelt, and from thence came down upon the delinquents with all their dreadful scourges.

If a sufficient number of fish were not taken to them by the inhabitants of the sea-shore, they would go down, and with fire kill the fish, fill up with pahoehoe (lava) the shallow places, and destroy all the fishing grounds. (Ellis 1917:186)

In the Kekaha region of North Kona, historical accounts describe the destruction of great fishponds by Pelehonuamea, the fiery goddess of lava. Historical accounts describe Pelehonuamea, who after having been denied fish by the local fishermen, consumed the massive Pā'aiea fishpond that belonged to Kamehameha. This fishpond was said to have extended for some three miles along the Kona coast from Ka'elehuluhulu to Wāwālohi, at the boundary of 'O'oma Ahupua'a (Maguire 1926).

***Kilo*: Astute Observation of the Natural World**

Kilo or perceptive observation of the natural world was perhaps one of the most fundamental stewardship tools used by the Kānaka Maoli. The vast knowledge acquired through the practice of *kilo* enabled them to observe and record the subtlest changes, distinctions, and correlations in their natural world. Examples of their keen observations are evident in Hawaiian nomenclature, where numerous types of rains, clouds, winds, stones, terrestrial and oceanic environments, flora, and fauna—many of which are geographically unique and distinct—have been named. These names are recorded in centuries-old traditions such as *oli* (chants), *mele* (songs), *pule* (prayers), *inoa 'āina* (place names), and *'ōlelo no'eau*, which were transmitted orally from one generation to the next. The Kānaka Maoli knowledge of the natural environment was further reinforced through other traditional practices and arts including, but not limited to, *lawai'a* (fishing) and *mahi'ai* (farming), both primary occupations, *hula* (traditional dance), and *lapa'au* (traditional healing).

***Kapu* and *Noa*: Harvest Restrictions**

As discussed above, the dependency on a thriving, but finite, set of natural resources led the Kānaka Maoli to develop a sophisticated and comprehensive system of land stewardship in the Hawaiian Islands that was reinforced culturally through a strict adherence to terrestrial and marine management practices that were governed, and enhanced, by the dual concepts of *kapu* and *mana*. Kānaka Maoli believed that all things natural, places, and even people, especially those of high rank, possessed a certain degree of *mana* or “divine power” (Pukui et al. 1972; Pukui and Elbert 1986:235). The concept of *mana* is believed to be derived from the *kini akua*, or the multitude of Hawaiian gods, who were embodied in elemental forces, including the *kai* (ocean), the land and its natural resources, and certain material objects and persons as well (Crabbe et al. 2017). Buck (1993) expands upon this concept, noting that *mana* was associated with “the well-being of a community, in human knowledge and skills (canoe building, harvesting) and in nature (crop fertility, weather etc.)”

To ensure the *mana* of the resources, certain places, and people remained protected from over-exploitation and defilement, *kapu* of various kinds were implemented and strictly enforced. According to Elbert and Pukui (1986:132) *kapu* are defined as “taboo, prohibitions; special privilege or exemption...” Kepelino (1932) notes that *kapu* associated with the gods applied to all social classes, while the *kapu* associated with the chiefs were applied to the people. As the laws of *kapu* dictated social relationships, they also provided “environmental rules and controls that were essential for a subsistence economy” (Else 2004:246). Standing in juxtaposition to the concept of *kapu* is the concept of *noa*, translated as “freed of taboo, released from restrictions, profane, freedom” (Pukui and Elbert 1986:268). Some *kapu*—particularly those associated with maintaining social hierarchy and gender differentiation—were unremitting, while other *kapu*, such as those placed on natural resources were applied and enforced according to seasonal changes.

The application of *kapu* to natural resources ensured that such were resources remained unspoiled and available for future use. When the *ali'i* or the lesser chiefs (including *konohiki* and *po'o lawai'a*) determined that a particular resource was to be made available to the native residents, a decree was proclaimed indicating that *kapu* had been lifted, thereby making it *noa*. Although transitioning a resource from a state of *kapu* to *noa* allowed for its use, native residents were still expected to practice sustainable harvesting methods and pay tribute to the ruling chief and the gods and goddesses associated with that resource. *Kapu* were strictly enforced and violators faced serious consequences including death (Jokiel et al. 2011). Details about the *kapu* system and its use as a marine resource management strategy were described by early visitors and missionaries to the islands, including Scottish surgeon and naturalist Archibald Menzies, and British Missionary, William Ellis. Menzies was a surgeon and naturalist on board the *H.M.S. Discovery*. He visited Hawai'i Island on three separate occasions in 1792, 1793, and 1794 and recorded many observations of Hawaiian cultural in his journals, which were published in 1920. Ellis on the other hand, arrived first to Honolulu in 1822, and then returned to Hawai'i Island later in 1823, where he and other missionaries toured the island to identify potential locations for future mission stations.

Menzies, in his journal entry for February 24th, 1793, provides some insights into the traditional *kapu* system as it related to fishing practices, recording that a man had been put to death in South Kona, near Nāpo'opo'o Beach, for breaking a fish-related *kapu*. In the entry he writes:

Close to the foot of the marae [heiau], some of the natives pointed out to us the grave of a man that had been put to death about a fortnight before on account of breaking the kapu, which was simply this: The bay had been tabooed some days on account of a large shoal of fish that appeared on the coast, at which time this unfortunate man was seen going across the entrance of it in a small canoe. He was immediately pursued, and when brought on shore, they first broke the bones of his arms and

legs, and afterwards put an end to his miserable existence by stabbing his body with their pahoas [daggers]. (Menzies 1920:72)

Ellis too, recorded details about the traditional repercussions of breaking a *kapu*, which he referred to as “*tabu*,” writing in the 1820s that,

The flesh of hogs, fowls, turtle, and several other kinds of fish, cocoa-nuts, and almost every thing offered in sacrifice were *tabu* to the use of the gods and the men; hence the women were, except in cases of particular indulgence, restricted from using them. . . Particular fruits, animals, and the fish of certain places, were occasionally *tabu* for several months from both men and women (Ellis 1831:387).

Ellis continues that, “when the fish of a certain part are tabued, a small pole is fixed in the rocks on the coast, in the centre of the place, to which is tied a bunch of bamboo leaves, or a piece of white cloth” (ibid.:389). In relating some of the consequences of breaking a *kapu*, Ellis tells of the wife of Alapai, an *ali'i* of Waimanu, “who was afflicted with an affection of the spine, which prevented her walking without support,” who told them, “she had incurred the displeasure of the gods by eating a fish that was *tabu*, or sacred, and that the disease which rendered her a cripple was her punishment” (ibid:375).

Violators of *kapu* who managed to escape death, either sought refuge at a *pu'uhonua* (a designated place of refuge), or were sometimes freed by the word of certain chiefs (Kamakau 1992). At the *pu'uhonua*, after completing the proper rituals, the violator was absolved of his, or her, crime and allowed to reintegrate back into society. One such *pu'uhonua* was located at Hōnaunau in Kona, and was described by Ellis during the 1820s as follows:

Adjoining the Hare of Keave [Hale o Keawe] to the southward, we found a Pahu *tabu* (sacred enclosure) of considerable extent, and were informed by our guide that it was one of the *pohonuas* [*sic*] of Hawaii, of which we had so often heard the chiefs and others speak. There are only two on the island; the one which we were then examining, and another at Waipio, on the north-east part of the island, in the district of Kohala.

These Puhonuas were the Hawaiian cities of refuge, and afforded an inviolable sanctuary to the guilty fugitive, who, when flying from the avenging spear, was so favoured as to enter their precincts.

This had several wide entrances, some on the side next the sea, the others facing the mountains. Hither the manslayer, the man who had broken a *tabu*, or failed in the observance of its rigid requirements, the thief, and even the murderer, fled from his incensed pursuers, and was secure.

To whomsoever he belonged, and from whatever part he came, he was equally certain of admittance, though liable to be pursued even to the gates of the enclosure.

Happily for him, those gates were perpetually open; and as soon as the fugitive had entered, he repaired to the presence of the idol, and made a short ejaculatory address, expressive of his obligations to him in reaching the place with security. (Ellis 1917:126–127)

The importance of fishing related *kapu* in traditional Hawaiian society, and the necessity for them, has been described by Manuia Maunupau, a native of O‘ahu and practitioner of traditional Hawaiian fishing methods, who was born in 1872 and spent his formative years fishing with his father, Maihui, in North Kona. Advocating for all those who fish the waters of Hawai‘i to maintain their *kuleana* and have respect for the resources, he states:

The ancient Hawaiian did everything he could to preserve the fishing ground. No fishing ground can be preserved unless precautions such as the Hawaiians observed are taken. This is true not only of *aku* and *ahi* fishing but of every other kind of fishing. The Hawaiians had a *kapu* on alongshore fishing in certain places when deep sea fishing was open. The *kapu* places were marked with coconut leaves. In the case of inshore fishing, one place was *kapu* for a month; then this area was opened and the next was *kapu*. At certain times of the year, certain seaweeds were *kapu*, because when fish food was preserved by this means, the shore fishing was saved for the people. There used to be plenty of fish in Hawaiian waters, but these have to a great extent disappeared because constant fishing has wiped them out. The fish are gone for good unless we have closed and open seasons for different kinds of fishing. The government is trying to place certain restrictions on fishing. If the ancient form of *kapu* used by the old-time Hawaiians could be revived in these new governmental restrictions, we should again have plenty of fish, provided the restrictions were observed as were the *kapus* in the old days.

The old Hawaiian fisherman was a skilled and selected person. He had knowledge of, and respect for, the traditions and customs of fishing. He was careful to observe these customs, because through them, fishing was preserved for the coming generations, and his children were trained in the skill they would need as they became fishermen. Fishing in those days was not a matter of getting all the fish and moving on to another fishing ground. The Hawaiian fisherman was much too clever to do this, and he respected the traditions of his people too much to do it. Laws today cannot help to preserve the fish in Hawaiian waters, unless in addition to the laws, we have a feeling of respect for them and observe them because we see that they are beneficial. (Maunupau in Handy et al. 1981)

Maunupau's sentiments are still echoed today amongst native fishing practitioners and should serve as a valued reminder of the importance of maintaining Hawai'i's precious fishing grounds. Another component of the traditional Hawaiian approach to marine resource management was maintaining designated fishing grounds, known as *ko'a*, where non-current swimming *i'a* (fish) congregated, fed, and slept.

Ko'a

Ko'a fishing has a long standing history in West Hawai'i as a valued cultural practice. Even since the introduction of modern fishing technologies, fishing for *'ōpelu* using *ko'a* remains a living cultural expression deeply anchored in familiar cultural mores. Accounts describing *'ōpelu* fishing utilizing *ko'a* are well recorded in historical literature. Designated fishing grounds known as *ko'a*, often identified as either a depression or a mound on the floor of deep parts of the ocean, were places guaranteed to yield a great quantity of fish for *po'e lawai'a* who fished there. However, in order to preserve the long-term integrity of the *ko'a*, *po'e lawai'a* would only fish them selectively, ensuring that they did not overharvest them, lest they would be spoiled forever (Handy et al. 1981). Some *ko'a* were species-specific and bore the corresponding names of the species found at them, such as *'ahi* (*ko'a hī 'ahi*), *'ōpelu* (*ko'a 'ōpelu*), and *kāhala* (*ko'a hī kāhala*) (Kamakau 1976). Maunupau, the old Kona fisherman quoted above (in Handy et al. 1981:105), characterized *ko'a* as “an area in which fish were always found.” He related that regarding *aku ko'a* in particular:

It was a depression in the bottom of the ocean and was particularly deep. The Hawaiians knew just where to go to find fish. They did not fish just anywhere over the ocean, but only in those places where fish were always found. They found good fishing grounds, located them by certain marks, and never missed the place. The *koa* is not so important in *aku* fishing because *aku* swim with the current, but it is very important in deep sea fishing. However, the fisherman who knows where the *koa* is can always go there and get his fish. Today a person can watch from shore and see schools of *aku* going in a certain direction and disappearing at a certain spot. This is a *koa*. The fish either go to that hole and sleep or they simply remain there. At any rate, they may be found there the next day. The experienced Hawaiian fisherman of the present does not fish outside the *koa*. (ibid.)

As expressed by Ka'elemakule, within Kekaha in North Kona, fishing for *aku*, *'ahi*, and *'ōpelu* was commonly practiced at the famed *ko'a* of Hale'ōhi'u:

... Among the important fishing practices of Kekaha, that I was taught in my youth were *aku* fishing, *ahi* fishing, and fishing for *opelu* with nets. These were the important fishing customs that I was taught...

Fishing for these fish was done at the *ko'a 'ōpelu* (*'ōpelu* fishing station or grounds), that was not too far out. And beyond that, was the *ko'a* for *aku* and *'ahi* fishing. The *ko'a* for these fish (the *'ahi* and *aku*), was the famous *ko'a lawai'a* (fishing ground) of Kekaha, known by the name, “Hale'ōhiu.” (Ka'elemakule in Handy et al. 1981:223)

Similarly, Issac W. H. Kihe also wrote about the famed fishing *ko'a* between Keāhole Point in North Kona and 'Upolu Point in Kohala. Kihe, who often used the pen name Ka Ohu Haaheo i na Kuahiwi Ekolu, authored a series of articles that were published in the Hawaiian language newspaper, *Ka Hōkū O Hawai'i* between September 13th, 1923 and August 28th, 1924. An excerpt is taken from his October 11th, 1923, article in which Kihe described the location and names of these fishing *ko'a*:

Aia i mua o keia lae ma ka aoao maloko he ale hohonu a ma ia wahi e kahe mai ai ka wiliau me ka Ikaika a pii maluna o ua pohaku nei a kahi aku la me he waikahe ala no kekahi muliwai a loa a aku la na ko'a hi-aku, hi-ahi, kahala, opakapaka, a pela wale aku.

O kekahi oia mau ko'a lawaia, o Paoo, o Opaē, o Kahakai, o Kahakina, o Kahawai, o Kapapu, o Kanahahe, o Kaluahine, o Kanukuhale, o Kahoowaha, o Honu, o Muliwai, kiei i ka lepo o Haena i Kohala... (Kihe 1923:1)

Located in front of this point, on the inner side of the deep billows, where the current flows with force, ascending up over this rock and flowing out like a flood from a river mouth until reaching the fishing grounds for *aku*, *ahi*, *kahala*, *‘ōpakapaka*, and other such fish.

Some of these fishing grounds were named Pāo‘o, ‘Ōpae, Kahakai, Kahakina, Kahawai, Kapapu, Kanahahe, Kaluahine, Kanukuhale, Kaho‘owaha, Honu, Muliwai peering towards the land of Hā‘ena in Kohala...

Although *‘ōpelu* fishing could be conducted in shallow waters, they were perhaps, more prevalent at offshore *ko‘a* where they could be found in great abundance. In this manner, *‘ōpelu* were traditionally caught by net or by line using various types of bait including *‘ōpae ‘ula* (a tiny endemic red shrimp). Within Kona, *‘ōpelu* were caught by the hundreds along the coastline of Kalaemanō (National Park Service Ala Kahakai National Historic Trail 2007). John Ka‘elemakule, Sr., who wrote a series of articles that were published in the Hawaiian language newspaper *Ka Hoku o Hawaii* between 1928 and 1930 describing life along the North Kona coast, related that fishing for *‘ōpelu* was of great importance to the Hawaiians, particularly within Kona, where this type of fish served as one of the primary sources of sustenance. Ka‘elemakule describes the practice and nuances of *‘ōpelu* fishing in the Kekaha region of Kona at a *ko‘a ‘ōpelu* called Kaloahale in Awalua during the calm season:

‘Ōpelu fishing was another one of the important practices of these islands in ancient times; it was perhaps the foremost of the practices in the streaked sea (*kai mā‘ok‘ioki*) of Kona. It became the type of fishing that contributed to the livelihood of the fishermen and their families... For *‘ōpelu* fishing, two men are adequate in going on the canoe to the place of the *ko‘a ‘ōpelu* which has been known since the days of the ancient people. It is at a place where one can look below and see the fish, that he prepares to feed the *‘ōpelu*. The man at the front of the canoe is the fisherman, the one who is prepared for this manner of fishing, he leads in all things for this kind of fishing.

There in front of the fisherman was set out the bait of the *‘ōpelu*, that is the *‘ōpae ‘ula* (red shrimp) and sometimes other baits as well. He’d give the man at the back of the canoe the bait, this man would do whatever the fisherman told him to. The man in the back had a stone weight, the black dirt, and the coconut sheath in which the *‘ōpae ‘ula* or other bait would be placed and folded in. This would be wrapped with cordage and let down into the water about 2 or three fathoms deep, then the man would jerk the cord and the bait would be released. The water would be blackened by the dirt, and this would help the fisherman see the *‘ōpelu* eating in the water. . . When many *‘ōpelu* were seen, he would have the man feed the fish again and lower the net into the water. While the *‘ōpelu* were eating, the net was drawn up, and as the fish tried to swim down, they were caught in the net... While I was a youth living at my beloved land of Mahai‘ula, I fished for *‘ōpelu*. I went with my foster father, Ka‘aikaula, to fish for *‘ōpelu* at the *ko‘a ‘ōpelu* (*‘ōpelu* fishing ground) called “Kaloahale,” it was directly seaward of the black sand shore of Awalua. . .

...When the calm weather returned to the land of Kekaha, that was the time that one saw the *lehua* blossoms return to the sea [a poetical description of the people from the uplands who dwelt in the area of growth of the *lehua* trees, and who returned to the shore for fishing in good weather]. It was then, that I would also see the fleets of canoes traveling from one extremity to the other upon the sea of my beloved land. At those times, people were also seen looking for *aku*, the fruit of the sea. It was at this time that I entered into the business of trading the fine dried fish of the land, taking them to Kawaihae and sending them to Honolulu. I continued this work for some time, moving forward without any problems befalling me. As a result, I accumulated quite a bit of money, which I kept hidden in one of the caves of the land. . .

When my new house was completed, Poke, my foster mother, named the house “Kalāhikiola.” We spoke about this and I desired to have a song for our house on the day of the feast for moving into the house. . .As we prepared for the feast to enter the house, there were not many things that would be set out, but they were things which we Hawaiians were accustomed to. It was *poi*; *kālua* (roast pig); *poi palau* (taro pudding); and things of the ocean, like the *‘ōpihi* (limpets), *limu* (seaweeds), *wana* (urchins); and the fat *awa* (milkfish) that came from the fishpond of Makalawena (*awa momona o ka loko i‘a o Makalawena*). . . (Ka‘elemakule in Maly and Maly 2003:224)

Theodore Kelsey, who spent his entire life recording Hawaiian traditions, further elaborated on the significance of the *‘ōpelu* to the *kanaka*, who regarded the fish as sacred (ibid.). This belief appears to have originated during the arrival of the 12th century Tahitian priest, Pā‘ao, who while on his journey to Hawai‘i encountered dreadful weather. Hapai (1920) relates that in an effort to placate the *akua* and calm the ocean, Pā‘ao tossed his *aku* and *‘ōpelu* overboard,

which almost immediately cleared the weather, making for a safe journey. Pā‘ao then called the fish back to his boat and upon his arrival to Hawaii Island, he liberated the *aku* and the ‘*opelu* in nearshore waters (ibid.). Titcomb (1972) relates that “at Kalae in Ka‘u, there was a special *heiau* called Kalalea for the ‘*opelu*.” Kelsey also describes a sacred feeding ceremony conducted by *po‘e lawai‘a* during a span of four months in Kona, when the ‘*opelu* were offered as tribute:

By far the most important of the fishes thus fed was the sacred ‘*opelu*, which in turn with the *aku*-fish was tabued in ancient times for six months of the year. Next to the ‘*opelu* came the *nenu*, which congregated close inshore. For a few days it might be fed previous to catching it with net, fish-trap, or hook. The bait, cooked in an underground oven for the purpose, was a sea-moss known as *limu-‘aki‘aki*. The *kala*-fish, found in the same locations as the *nenu*, was also fed at times. It was caught in basket-traps, using *limu-kala* sea-weed for bait. To a very limited extent eels were fattened on crushed *manini* or other fish. Fed on crabs, at times, were such charming pets as devil-fish. Sharks (*mano*), regarded as ancestral guardians known as ‘aumakuas, were sometimes reared from infancy. Like faithful dogs they would follow their masters while in or upon the ocean. Many a tale is told of how faithful sharks saved the lives of their keepers by bearing them ashore on their backs. A most interesting case of feeding, is such it may be called, was the insertion of pebbles into the mother-of-pearl bivalves known as *papaua* (pah-pah-oo‘-wuh), which when matured were known as *pas*. The pebbles caused the shells to increase in size and strength for use as trolling-spoons, also known as *pas*, for catching *aku*-fish. The land of Kona, Hawaii, was particularly renowned for its excellent *pas*.

Opelus, after the abrogation of the old tabu-system, were not fed and caught at any time. No indeed, there were special periods for these purposes. In Puna, Hawaii, the season of feeding and catching combined lasted from October through December. In Kona, where ‘*opelu* fishing assumed considerable proportions, the fish were fed from May to August. From August to December they repaid the hospitality of their hosts.

At the opening of the ‘*opelu*-feeding season in Kona an interesting ancient ceremony, probably performed in the same manner in other localities, took place just before sunset on the night previous to setting forth. This was to secure the favor of the fish-god. To this deity, accompanied by weird chanting and prayer, were offered a cup of the divine ‘*awa*, a small sacred black pig cooked in an *imu*, and consecrated red fish, red *tapa*, and a red *malo* or loin-cloth.

Imagine a fleet of graceful outrigger canoes paddled by stalwart brown fishermen, gliding swiftly, just before sunrise, over the tranquil sea, the beautiful variegated sea of Kona (Kona *kai malino*, *kai ma‘oki‘oki*). With them, in gourd calabashes (*ipu pohue*), or open-mouthed food-containers of *lauhala* (*poho lauhala*) they bear a tempting repast for the ‘*opelus*. Rap! Rap! Rap! They strike the outsides of their canoes with their paddles, chanting impressively, perchance, the while. In this interesting manner fish were called to meals in olden days. A man in each canoe would rap a few handfuls of food, together with a flat stone for a sinker, in a piece of brown coconut-fibre cloth that grows at the base of the long crowning leaves. The parcels were then lowered into the sea to a depth of say two fathoms, to which the fish were to become accustomed, and released by a jerk of the line so that they showered downward in tasty morsels. Cloth and stone were then hauled in for another load. ‘*Opelu* breakfast was served. Toward sunset many of these fish-stewards provided supper for the ‘*opelus*. In most localities a few days of such stewardship were deemed sufficient. (Kelsey in Maly and Maly 2003:224)

While *ko‘a* themselves were established as underwater fish habitats, they also had a connection to the land, for the locations of fishing *ko‘a* were identified using markers on the shore. In some cases, these markers were geological features, such as *pu‘u* (hills), but the markers could also be single stones or piles of rocks intentionally placed along the shore to coincide with the underwater location of the *ko‘a*:

Perhaps the most important stones in ancient times were the *ku‘ula* and *koa* stones of the fishermen. *Koa* stones—either natural stone outcrops or stone piles used for marking and finding fishing grounds—could be located near fishing grounds or simply used to triangulate their location. Some *koa* were nothing more than piles of stones built up in the ocean by members of a fishing family. Such *koa* might be markers for a natural fishing ground or serve to attract a fish colony. (Gutmanis 1991:26)

Some of these markers also served as fishing shrines where Kānaka Maoli made offerings and recited prayers either hoping to secure a good catch, or expressing gratitude for the sea's bounty. Elbert and Pukui (1986) explain that these types of structural *ko'a* were utilized in ceremonies that would cause the fish to multiply. Malo relates the following details regarding how *kanaka* used two points on the land to triangulate the location of deep sea *ko'a*:

These koa-lawaia were so deep under water that the eye failed to perceive them, nor could the fish be seen when swimming over them, nor when they seized the hook. In order to find them, it was necessary to take one's bearings from the land. Two bearings were required; and where these were found to intersect, there was the koa, and there the fisherman let down his hook or his net. (1951:211)

In the late 19th century publication *Hawaiian Fisheries and Methods of Fishing*, Beckley elaborates on how *kanaka* used their deep understanding of the Islands' terrain, both beneath the sea and on land, for fishing:

... Every rocky protuberance from the bottom of the sea for miles out, in the waters surrounding the islands, was well known to the ancient fishermen, and so were the different kinds of rock fish likely to be met with on each separate rock. The ordinary habitat of every known species of Hawaiian fishes was also well known to them. They often went fishing so far out from land as to be entirely out of sight of the low lands and mountain slopes and took their bearing for the purpose of ascertaining the rock which was the habitat of the particular fish they were after, from the positions of the different mountain peaks. (1883:10)

Locating underwater *ko'a* was only one part of a successful catch. In order to ensure that they would return with food, *po'e lawai'a* had to combine their knowledge of each particular *i'a* sought with their understanding of the most practical materials, methods, and *palu* (bait) for catching them. They also had to observe very specific *kapu* that were dependent upon their particular *akua*, and spiritually express their intent and thankfulness through rituals conducted both prior to, and after, fishing. A *po'e lawai'a*'s success could be enhanced through the spiritual guidance provided by an *akua* that dwelled within a *ko'a* stone, which was sometimes associated with a *kū'ula* (discussed in the following section).

Kū'ula

A *kū'ula*, meaning “red Kū,” is “any stone god used to attract fish, whether tiny or enormous, carved or natural, named for the god of fishermen,” (Figure 15) it is also a “heiau near the sea for worship of fish gods;” and a “hut where fish gear was kept with *kū'ula* images so that gear might be impregnated with *kū'ula* mana, usually inland and very taboo” (Pukui and Elbert 1986:187). Maunupau, who was intimately familiar with the various *ko'a* and their respective *kū'ula* situated along the Kona coastline, particularly those associated with Hale'ōhi'u, relates that “the fishermen of old Hawaii believed that they needed some supernatural power to aid them in their undertaking, and hence religion and fishing were closely connected by ceremonies and customs” (in Handy et al. 1981:106). Maunupau provides the following details about *kū'ula*:

... In the olden days, every heiau or temple had in it a fish god or kuula. Each fisherman had his own kuula. Perhaps it might be a stone or image he had pulled up in the ocean, and which he regarded from then on as his kuula, or it might be the family god or aumakua. The kuula was supposed to bring luck and success in fishing. (ibid:105.)

In describing the purpose of the *kū'ula*, Kihe (1924:4) relates that “...*aia maia wahi he kuula, oia hoi, he wahi hooulu i'a a maia wahi e hanaia ai na hana hoomana hooulu i'a, a hoolaupa'i a hoomomona hoi i ka i'a...*[located at this place was a *kū'ula*, that is, a place to increase the fish and at the place is where ritual occurred to increase the fish, and multiply and fatten the fish...].” Large *kū'ula* were often “set up on promontories along the sea shores, or near streams and ponds...small *kū'ula* were carried to sea in the fishing canoes to attract fish” (2001:151). Some *kū'ula* were contained within *heiau* and “set in circular enclosures, nearly always built of limestone or coral,” (ibid.). An altar (*ko'a*) consisting of a platform of stone placed before the *kū'ula*, was where the offerings were placed, and:

Within the enclosure of the large shrine, sometimes called a heiau *ko'a*, an *imu* was kept. Here pigs were cooked and eaten, along with other feast foods, as part of the ceremony of dedicating a new fishnet. Also within the area was a *lele* altar where bananas were offered. These may be a tribute to Kanaloa who is associated with bananas. (These fruits were never carried to sea by fishermen.)

The customs seem to have differed among the fishermen as to the number of fish that would be left on the fishing shrine when they returned from a successful catch. This is understandable since the fishermen prayed to and respected their own family *'aumakua* as well as *Kū'ula*.

Upon returning from the sea some fishermen went to the *ko‘a* with two fish in their right hand for the male *‘aumākua* and two in their left hand for the female *‘aumākua*. They addressed the gods and placed the fish on the altar. After the gods had received the “essence” (*aka*) of the offering the fishermen were free to take the fish away and add them to the catch for distribution and use.

Maunupau wrote that the first fish caught was marked by cutting off its tail. It was placed in the bow of the canoe and was *kapu*. When ashore the fishermen placed this fish on the *kū‘ula* for his *‘aumakua*. (ibid.151–152)

The cycle of giving back to the *akua* was accomplished through regulatory tribute associated with the *kū‘ula*. There are contrasting accounts as to how this was accomplished, but Maunupau relates that “the first fish caught was marked with a tail or fin mark and saved as an offering to the *kuula*” (Honolulu Star-Bulletin 1931). Similarly, Keli‘ipio and Nakuina (1900:111), writing during the late 19th century, expanded upon this practice:

The first fish caught by fishermen, or any one else, was marked and dedicated to *Kuula*. After this offering was made, *Kuula*’s right therein being thus recognized, they were free from further oblations so far as that particular variety of fish offered was concerned. All fishermen, from Hawaii to Niihau, observed this custom religiously. When the fishermen caught a large supply, whether by the net, hook or shell, but one of a kind, as just stated, was reserved as an offering to *Kuula*; the remainder was then free to the people.

Offerings at the *kū‘ula* were made immediately upon the return of the canoe to the shore:

As soon as the fishing fleet reached the shore, the head fisherman stepped ashore holding an *aku* fish in each hand and went to the *heiau* of *Ku‘ula* where he offered prayer; and when he had finished this worship of the god, he threw down the fishes for the male *aumakua* on one side and those for the female on the other. (Kamakau in Titcomb 1972:44)

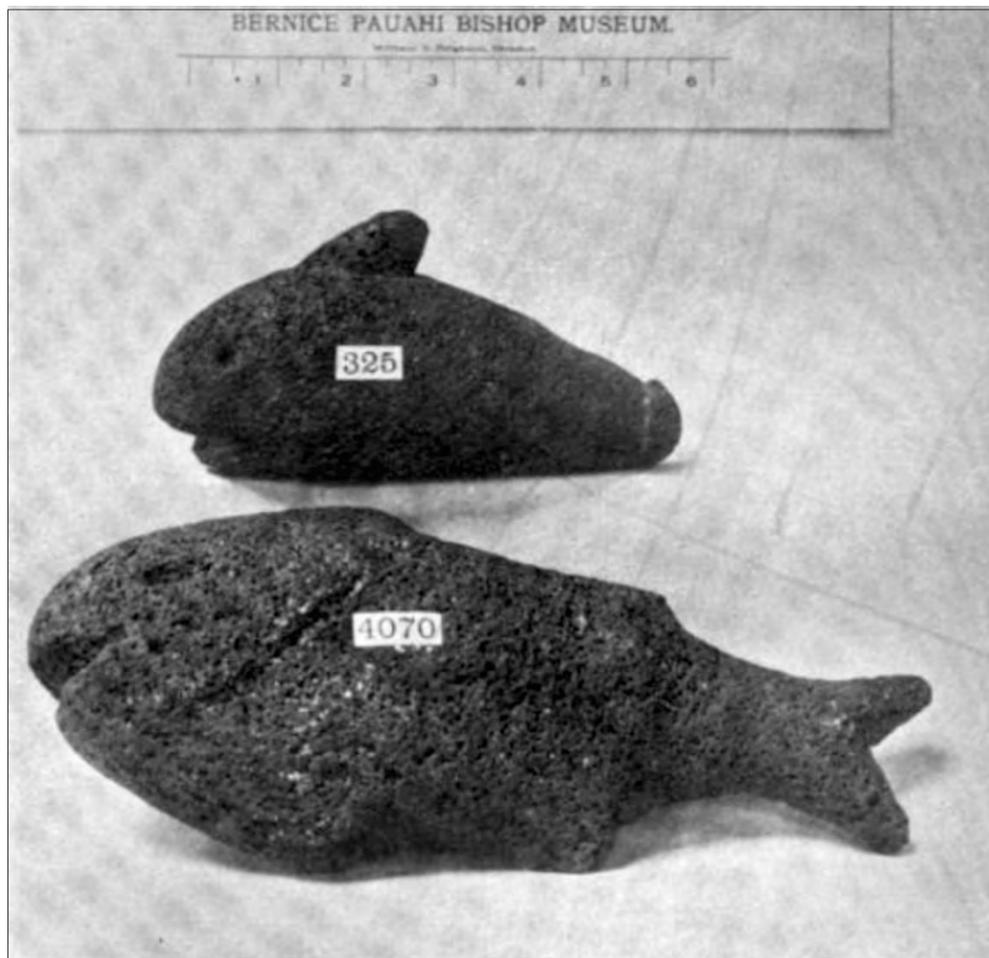


Figure 15. *Kū‘ula* stones (Brigham 1902:94)

Kū'ula (lit. red Kū) bear the name of Kūka'ilimoku, an *akua* traditionally associated with war. Fishermen often prayed, and still pray, to Kūka'ilimoku and his wife Hina (Beckwith 1970:11). Kūka'ilimoku, as the ruler over all of the male gods, had dominion over Kū'ulakai, an *ali'i* and *akua* of Hānā, Maui, who himself controlled "all the gods of the sea" (ibid.:19). Valeri (1985:76) relates that Kū'ulakai married Hinapukui'a ("Hina gathering seafood"), whose dominion was over the shoreline, and to them was born their son 'Ai'ai ("eats food"). Fishing stones dedicated to Hina and 'Ai'ai were once utilized by the ancient fishers of Hawai'i. The *mana* of Hina was said to control certain fish, namely the *aku*, *akule*, 'ō'io, *mōi*, *a'u*, and the *manini* (Fornander 1919–1920). Fornander relates that things that were reddish in color were considered sacred to Kū. Therefore, in addition to *'aumākua*, *kū'ula* stones were imbued with the spirit of their namesake Kū'ulakai as well as Kūka'ilimoku. The following account, compiled by June Gutmanis (from George Ai, Louis Aila, Ned Burgess, Arthur K. Cathcart, Ah Sam Cheong, Thomas Maunupau, Kalahikiola Naluelua, Henry Young, and Maryknoll Kalahikiola Sotkaeff), details how *kū'ula* stones acquired the spirits within them. This account explains the mutually beneficial relationship between *kū'ula* and their *po'e lawai'a* caretakers:

Ku'ula stones were believed to contain a spirit that attracted fish and helped fishermen. They could be either naturally shaped stones or slightly worked. According to tradition, the naturally shaped stones contained a spirit, either placed there by the gods or there of its own choice. A man-made *ku'ula* was believed to receive its spirit only after appropriate prayers and offerings had been made. The *ku'ula* could be either of black- or light-colored stone; some said that the dark stones were male and the light ones female.

A naturally formed *ku'ula* might be found by a fisherman realizing that the stone contained a spirit. Other times, it was believed, a stone chose a fisherman for its *kahu* (caretaker). It might come to him in a dream, saying, "I am cold, come and get me." The fisherman would ask, "What do you say? Where are you?" The stone would then describe just where it was and how to find it, what to bring as an offering, and when to come for it. Sometimes the stone would not reveal what it wanted the first time it appeared in a dream. It might take days, weeks, or even months before the stone revealed its whereabouts. If the stone was female and the dreamer a man, the stone might even flirt with him.

The dreamer would search for the stone, carefully following all the directions given by the *ku'ula*. When found, the stone would have the mouth of a fish. It when then be taken home and put in a *kapu* (taboo) place where nothing could disturb it. Only the guardian chosen by the stone could handle it. It was believed that if others handled it and the stone did not wish them to, it would become hot like fire.

Those who had *ku'ula* stones believed that caring for them was as serious as caring for a baby. The guardian would ask the *pohaku* (stone) what it wanted. The answer would come in a dream or vision. The *ku'ula* had to be fed three meals a day. If even one meal were missed, the guardian could be in for trouble. It also needed clothing—a *malo* (loincloth) that could be wrapped around the stone or used as a blanket. The *malo* had to be kept very clean.

According to tradition, if the stone was well cared for and all of the requirements met, its guardian would profit richly. It was said that the more you gave the stone, the more fish you would catch. Lights, laughter, and activity would bless the home of the caretaker.

Sometimes the *ku'ula* would vanish. Like a little child it would go out to play and disappear. But apparently it always knew when it was time to come home and would then reappear.

A person in need of help would traditionally make offerings to the stone and wait. It might take days or even months, but when the stone was ready, it would give the location of a school of fish. It would also tell what time of day the fish would appear and what line or net and bait to use. When caught, the fish were to be shared with everyone. Pregnant women customarily received double the share of others. (Gutmanis 1991:26–28)

As Gutmanis goes on to relate, an important aspect of the keeping of *kū'ula* was that they were transferred from one generation to the next:

A *ku'ula* could be used for generations. When the guardian had grown old, the stone would tell him who the next caretaker should be. It would know which child in the family should carry on the tradition. It was believed that the stone could "fall in love" with anyone.

Sometimes the *ku'ula* would be given to a member of the family, but the guardian would not tell the chosen person the purpose of the stone. One night the stone would come to its new caretaker and reveal its name, its work, and how to care for it. It could be within a few days or it might take years.

Belief in the *ku'ula* and *koa* stones continues. The traditions surrounding them are still practiced by some, and the recipient of such a stone must care for it. Its powers are unknown and untapped. The stone may be a source of power for good, and, if treated with respect, one that will reward its guardian richly. (Gutmanis 1991:26–28)

Thus, the continued care and worship of *kū'ula* by Hawaiian *po'e lawai'a* was a quintessential spiritual practice and heritable custom that endures as a tangible connection to the past. Drawing upon the knowledge of the ancient *po'e lawai'a*, whose spirits remain tied to the depths of the *kai* and the treasured *kai lawai'a* (fishing grounds), it is clear that the Kānaka Maoli revered all marine life and holistically managed the marine resources. Since becoming a *po'e lawai'a* was a privilege, each fisher felt a deep respect for the ocean's cosmic connection with the heavens and the earth, and while it was their job to provide food for their *'ohana* and *ali'i* on land, they made it their *kuleana* to protect and perpetuate the ancient fishing grounds. Although the *'ike* (knowledge) of Kānaka Maoli extended from the mountain tops to the depths of the ocean, for the purposes of the current study, the remaining discussion will focus on the traditional fishing methods, beliefs, and cultural practices associated with the nearshore fisheries that are within the study area vicinity.

***Loko I 'a*: Fishponds**

Another method by which the Kānaka Maoli were able to sustainably support the population of these islands was through the creation of a distinctly Hawaiian aquaculture system, known as *loko i'a* (fishponds). *Loko* is the general term used to refer to any pond, lake or pool of water and *i'a* referring to the fish that were raised therein (Pukui and Elbert 1986). With respect to the study area, such features are concentrated primarily within the Kona and South Kohala portion of the WHRFMA. While the initial origins of *loko i'a* remain largely unknown, traditional lore associates this engineering feat with Kū'ulakai (Fornander 1919–1920; Valeri 1985). Kū'ulakai is said to have built a large fishpond next to his home that was filled with fish (ibid.). These fish were considered the bodies of Kū'ulakai, his wife Hinapukui'a, and their son 'Ai'ai, all of whom were important fishing gods (Fornander 1919–1920).

In their 1975 study, Apple and Kikuchi identified five primary types: 1) *loko kuapā*, characterized by its seawall (*kuapā*) in which at least one *makahā* (sluice gate) was built; 2) *loko pu'uone* (or *loko hakuone*), identifiable by its natural elongated sand barrier that enclosed a body of water; 3) *loko wai*, a body of fresh water typically found inland from the shoreline; 4) *loko i'a kalo* (or *loko lo'i kalo*), a fishpond that utilized an irrigated taro plot; and 5) the *loko 'ume'iki*, a fish trap recognizable by its numerous stone-flanked lanes that allowed fish to move into or out of the trap with the ebb and flow of the tide. With the exception of *loko wai* and *loko i'a kalo*, which were inland freshwater ponds, all remaining fishponds were constructed within the littoral zone and were nourished from a mixture of freshwater (*wai*) and seawater (*kai*) (Keala et al. 2007).

Although *loko i'a* varied in shape and size, they were a component of the total food production system in Precontact times and their primary purpose, as purported by Apple and Kikuchi (1975:6), was to make “fresh food, available in quantity at call...” Keala et al. (2007) elaborate on this, noting that fishponds “...were used to provide a reliable, convenient, and every-ready supply of fresh seafood for the ruling *ali'i* (chief) and the royal court.” During Precontact times, and even into the early Historic period, all *loko i'a* and their products were strictly controlled by the ruling class. In relating the importance of *loko i'a* to Hawaiian nobility and the indirect benefits to the general populace, Apple and Kikuchi write:

Access to these ponds and their products was limited to the elite minority of the native population - the chiefs and priest. Prehistoric ponds and pond products appear to have been taboo to the vast majority of Hawaiians and to have yielded them no direct benefit. However, indirect public benefit came from ownership by the chiefs of exclusive food sources. Royal fishponds and their terrestrial equivalents, the royal gardens (*Kō'ele*), insured less demand on the commoners' food production resources. Every fish taken from a royal fishpond left its counterpart in natural habitat available to lesser chiefs and commoners. Ownership of one or more fishponds was one of the ultimate, high-status symbols in the status-conscious Hawaiian culture. (Apple and Kikuchi 1975:2)

Traditionally, herbivores, specifically the *'ama'ama* (mullet; *Mugil cephalus*) and *awa* (milkfish; *Chanos chanos*) were the primary species raised with *loko i'a*. While grown primarily for food, these two species were part of a grouping of fish that were traditionally known as *pua'a kai*, literally translated as “sea pig,” which were used as a substitute for pig offerings (Pukui and Elbert 1986:345). Other species of fish that were considered *pua'a kai* included

the *āhole* (*Kuhlia sandvicensis*), *humuhumunukunukuapuaa* (*Rhinecanthus* sp.), *kūmū* (*Parupeneus porphyreus*), and *pualu* (*Acanthurus* sp.). Tribute to the respective gods was an important component of maintaining a fishpond and detailed in the account concerning the great fishpond of Pā'aiea which was consumed by Pele after being denied fish from the head fisherman (Maguire 1926).

Although fishponds and its products were closely guarded by the ruling *ali'i*, and practically off-limits to the common people, they provided for a sustainable and ever-ready supply of fish for the massive royal courts that were established along the coast of the current study area. While constructing a fishpond was an enormous undertaking, requiring the labor of many individuals, maintaining it did not require as much labor, unless the fishpond was impacted by severe weather or war (Apple and Kikuchi 1975). The use of fishponds was another component of the traditional marine management strategies employed by the Kānaka Maoli that helped reduce pressure on the nearshore resources, while at the same time providing a sustainable source of food.

TRADITIONAL HAWAIIAN NEARSHORE FISHING TECHNIQUES

Kānaka Maoli were tremendously adept *po'e lawai'a* (fishers) who were intimately connected to the *kai* and its underwater environment. They were innately adapted to its dynamic moods and were sensitive to the ocean's ever-changing conditions and, as a result, they developed a plethora of methods which they used to harvest its bounty wherever they lived. Fishing methods varied greatly within *nā papakū o ka moana* (the strata of the ocean), with "a different method in shallow water, and in deep water, and a different method again in the fishing grounds midocean" (Fornander 1920:174). While smaller reef fish, *limu*, shellfish, echinoids, and crabs could be gathered from shallow nearshore waters and along the rocky shoreline of the study area, to access the *kai lawai'a* within the open ocean, *kanaka* used *wa'a* (canoes) and specific fishing techniques designed to reach deep-sea fish. The larger deep-water fish species that were "treasured most for subsistence" included *'ahi*, *aku*, *a'u*, *mahimahi*, *nai'a*, *kumu*, *'ōpelu*, *pānuhunuhu*, *hala hala*, *uhu*, and *ulua* (Handy and Pukui 1998:223). Typically, deep-sea fishing was conducted during the summer months when particular types of *i'a* were more plentiful. Handy and Pukui (ibid.:176) also describe gender base division of labor associated with harvest zones of the ocean, noting that "offshore, reef and along-shore fishing was the function of men, while the collecting of shellfish, sea urchins, crabs and the like, and seaweed was done by women and children."

Traditional shallow water and intertidal marine zones identified by Malo (1951) and elaborated on by Fornander (1920) and Kamakau (1979) included the *'ae kai*, also referred to as *lihi kai* (water's edge), the *pāhola*, also known as the *hohola* or *pālaha* (where the water spread about), the *pu'eone*, (sand dunes), also the *po'ina nalu*, *po'ina a kai*, or *po'ina kai* (where the waves break). There were also places specifically designated for the catching of small black crabs known as the *kai 'elemihi* and *kai haha pāpa'i*, and for the gathering of cowry, or *leho* (*kai 'o leho*). Similarly, *uhu* (parrotfish) were gathered in the shallow waters known as *kai kākā uhu* with dip nets such as the *'upena pōuouo*, *'upena kākā uhu*, or *'upena kākā 'ōpule* often lured by another *pākali* (decoy) *uhu* (Kahā'ulelio 2006). Pole fishing (*kā mākoi*) was conducted in shallower waters when the *kai paeaea* (calm seas) occurred (Kamakau 1979).

Fishing required careful preparation of not only the fishing tools, but also deliberate composure of the mind, body, and spirit to properly attune with nature (Handy et al. 1981). Careful protocol was observed in each step of the preparation for fishing from the shaping and lashing of *makau* (hooks) or *pā* (lures), to the sewing and weaving of *'upena* (nets) and *hīna'i* (baskets), to the shaping of *'ō* (spears), to the storing of the different fishing apparatuses, to the observation of *kapu* by members of the *'ohana* and the required silence prior to an expedition (ibid.). While the harvesting of nearshore marine resources was a year-round endeavor, offshore fishing was typically done when the sea was calm (Handy and Pukui 1998).

The methods used for fishing were dependent upon the type of fish, or intertidal species, that was sought. Some methods required nothing more than a gentle, but swift hand and a watchful eye, while other methods required specialized fishing apparatuses that were crafted from a blend of natural materials including, but not limited to, processed plant fibers, shell, bone, wood, stone, and yellowed foliage. Some fishing methods was done on an individual basis, but as demonstrated below, the traditional practice of near-shore fishing at times involved all able-bodied persons regardless of age or gender. Some of these methods are described by the honorable Daniel Kahā'ulelio, who recognized the immeasurable value of preserving, sustaining, and sharing generational knowledge of ancient Hawaiian fishing practices passed down from his *mākua* and *kūpuna*. After being approached by the editor of *Ka Nūpepa Kū'oko'a*, Kahā'ulelio consented to pen a series of columns detailing Hawaiian fishing methodology, the first of which was published on February 24th, 1902. Subsequent to his passing, Kahā'ulelio's articles, originally written in Hawaiian, were translated into the English language by Mary Kawena Pukui. Kahā'ulelio's comprehensive narratives offer precious insight into traditional methods of marine resource procurement, many of which are filled with personal recollections.

Twentieth-century scholar and *limu* expert, Isabella Abbott, in drawing from an assortment of manuscripts from early works of J. F. G. Stokes, W. T. Bringham, and native scholars like Kamakau, also compiled a great deal of information on traditional fishing methods that is summarized here. Her work focused more on the ethnobotanical uses of plants in Hawaiian culture, and was published in her book, *Lā'au Hawai'i Traditional Hawaiian Uses of Plants*. The descriptions of near shore fishing methods recorded by Abbott are presented below.

In the late 1960s, Thomas S. Newman (1970) compiled information about nearshore fishing methods, which he published in his dissertation titled *Makai—Mauka: Fishing and Farming on the Island of Hawaii in A.D. 1778*. Newman (ibid.:49), who attempted to “reconstruct sea exploitation practices for specific time periods” compiled information from late 18th and 19th-century accounts. Newman relied almost exclusively on the works of Emma Metcalf Beckley (1883) and John Cobb (1902). Accordingly, 20th-century sources were omitted from his synopsis as, according to Newman (1970:49), these sources failed to provide “(1) demonstratable authority on the subject and (2) a careful delineation of the time period reflected in their descriptions.” Cobb (1902), who worked for the United States Fish Commission, spent three months in 1901 gathering data on commercial fisheries in Hawai‘i, which included observational research, interviews with local fisherman, and analysis of government documents newspapers and other pertinent records. Emma Metcalf Beckley Nakuina was an early Hawaiian female judge who presided over water rights cases. She also wrote extensively about Hawaiian culture and folklore (Hopkins 2012). Newman, in his work, provides a graphic (Figure 16) that shows the maritime econiches in Hawai‘i during the 19th century. The nearshore fishing methods compiled by Newman are elaborated on in the ensuing paragraphs.

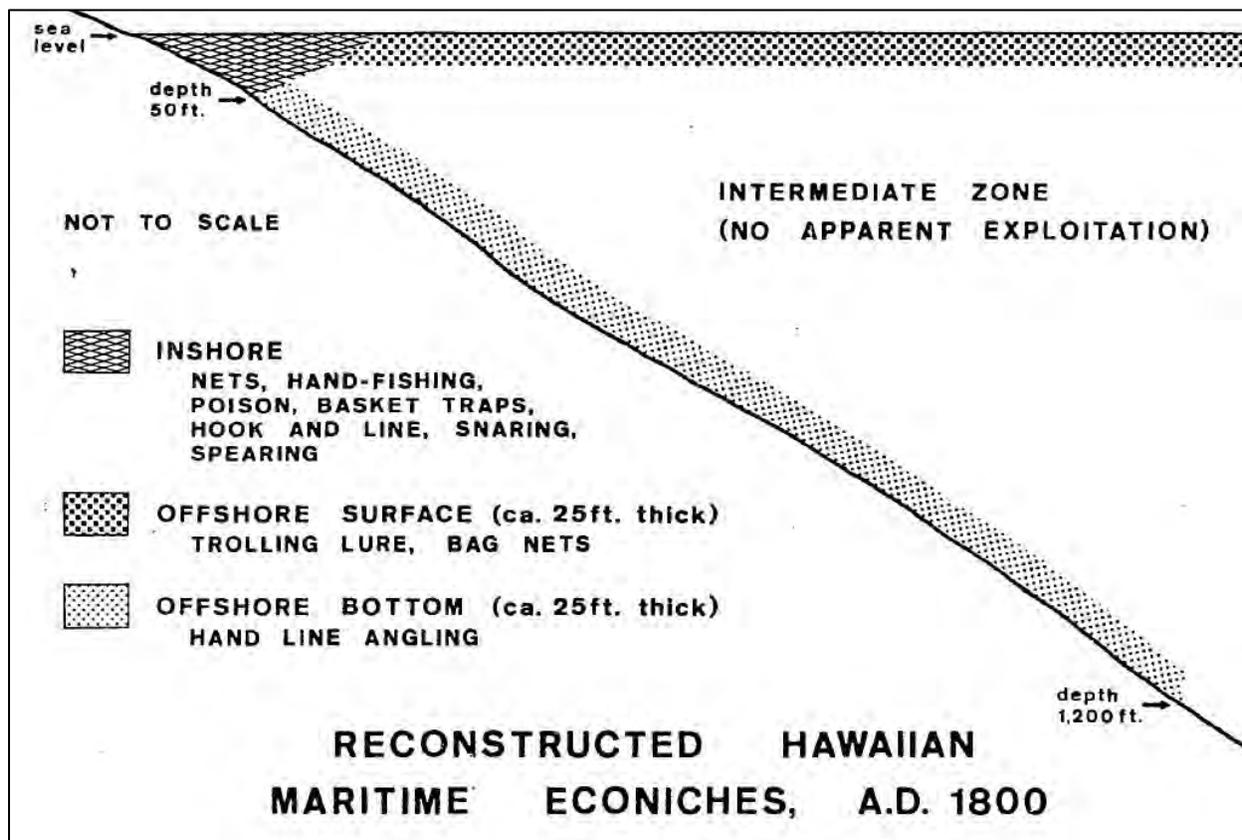


Figure 16. Diagram showing Hawaiian maritime econiches during A.D. 1800 (Newman 1970:92).

Basket Traps

Broadly known as *hīna* ʻī, basket traps (Figure 17) were created from the roots of climbing *ʻieʻie* (*Freycinetia arborea*) plant and crude versions of *hīna* ʻī were sometimes made from the vines of the *ʻāwikiwiki* (*Canavalia galeata*) (Abbott 1992). Abbott (ibid.:84) also relates that both “men and women alike laid traps in the reef shallows for small-to medium-sized fish such as *hīnālea*.” *Hīna* ʻi were of various shapes and sizes and some were baited and weighted down with a sinker (see Figure 17). *Hīna* ʻi were also employed when catching freshwater stream fish including *ʻōpae* (shrimp) and *ʻoʻopu*, which was a practice done almost exclusively by women. Relating to basket traps, Newman (1970:52–53) related the following:

Relatively few basket traps were made and most were used by women to catch *ʻopae*, *hinalēa*, *kala*, and *ʻuiʻui*. The traps were woven from fresh vines or flexible branches into box-shaped designs. In one common technique, a simple basket was lowered to the bottom in shallow water, often with a bait of pounded shrimp inside and when fish entered the trap, the woman watching nearby would dive to bring the trap to the surface. A more sophisticated version had a conical woven entry protruding into the interior where it terminated in an opening only large enough for a fish to squeeze through. The trap, baited with seaweed, ripe bread-fruit or papayas, cooked pumpkins or sweet potatoes, was lowered to the bottom, and when the fish entered by the conical entry they were unable to find their way back again.



Figure 17. Example of *hīna* ʻi (Kahāʻuelio 2006:192).

Hand Collecting

Hand collecting, which often required nothing more than a swift hand and watchful eye and a storage vessel, was utilized to catch a variety of nearshore species. In describing the method of hand collecting, a practice that was done by scouring and or diving the nearshore areas, Newman writes:

Collecting by hand was practiced in shallow water, both on the surface and by diving. Some types of fish were caught by hand in shallow pools as well as by divers in underwater caves while other food items collected by hand included crabs, lobsters, eels, sea urchins, sea cucumbers, shellfish,

octopi, shrimp, and seaweed. Much of this type of exploitation was practiced at night, particularly for mobile fauna. No items of material culture were used except for fiber containers in which the organisms were placed, and perhaps the torches used at night to mesmerize fish (Newman 1970:51).

Hook and Line

Although the hook and line method of fishing was conducted in offshore waters, it was also employed in the nearshore waters, sometimes being attached to a long wood pole. Abbott (1992:83) notes that “hooks were mainly fabricated from non-plant materials—pearl shell, turtle shell, ivory, and bone—but hardwoods like *‘alahe‘e* and *koai‘e* (*Acacia koaia*) also played a minor part.” Abbott (ibid.) notes that “. . . wood served only for the shaft of the two-part hook, the second part being a sharp tip made of bone or another substance that would hold a fine edge.” The fibers from the hardy *olonā* (*Touchardia latifolia*) were the choice material for fishing lines. To camouflage the white fibers, fishing lines as well as nets were often dyed a reddish brown by immersing it in a dye bath made of pounded *kukui* (*Aleurites mollucana*) bark (Langlas 2003). Along the high cliffs of the Puna District of Hawai‘i Island, native residents employed a methods known as *kau lā‘au* to catch large *ulua* (jacks). This method required a relatively long and straight *‘ōhi‘a* (*Metrosideros polymorpha*) pole, which was extended off the cliff with its base fastened into a crevice. The baited hook and line was then hung from the *‘āmana* (Y-shaped cross piece) that was located at the tip of the pole down where it was suspended just above the water (ibid.). In some cases the fisher, using just a baited hook and line, simply cast the rig into the ocean from the shore. In describing the use of a hook and line attached to a pole, Newman (1970:62) explains:

Sub-surface angling was done with a pole and line in shallow water and with hand lines for deep-water bottom fishing. . . Some were attached directly to the hook, while the palu [chum] bait was merely rubbed on the hook; often a bag of bait was lowered near the baited hooks and released underwater.

Newman also describes a slightly more complex hook and line contraption called *kākā*. In describing how this technique was carried out, he writes:

Kākā Technique:-- Deep-water bottom fishing used a rig of multiple hooks attached by short leaders to the main 3/8th incl (1.7 cm.) fish line at intervals close to the bottom. Each short line with the hook attached was supported by a section of coconut midrib lashed perpendicular to the main fish line which served to keep the multiple hooks separated from one another and from the main line. (ibid.)

Lures

Fishing lures crafted from a combination of stone, shell, wood, and plant fibers were a popular method utilized in offshore trolling, as well as in the nearshore waters. While mother-of-pearl shell was the primary material used for trolling lures, which were attached to a line a dragged behind a canoe and used to catch offshore pelagic species, near shore lures were far more specialized, and often used to capture octopus. Octopus lures were known as *lūhe‘e* (Figure 18) and in describing their composition, Abbott (1992:86) notes:

In the pre-contact era, octopus was a very highly regarded food, and besides spearing these animals in their holes, Hawaiian fishermen caught them from canoes using two kinds of lures. The simple of the pair consisted of a hood of wood or bone lashed to a stick, a stone attached as a sinker, and a tuft of *tī* leaves to camouflage the hook. The second lure included all these elements but also incorporated the colorful, shiny shell of a Mauritius or tiger cowry (*leho*), bound back to back with the sinker. Since an octopus puts up a good fight, these lures were ruggedly built, tied with *olonā* cordage and perhaps secured with *kēpau* as well.

Similar lures have been made and used throughout Polynesia since time immemorial and, in the hands of a skilled fisherman, are very effective. The octopus (today commonly referred to in Hawai‘i as “squid”) is a keen-eyed animal generally curious about objects introduced into its environment, and it feeds on cowries, so a *leho* lure presented it a double temptation as the fisherman slowly dragged it, cowrie side up, along the bottom.

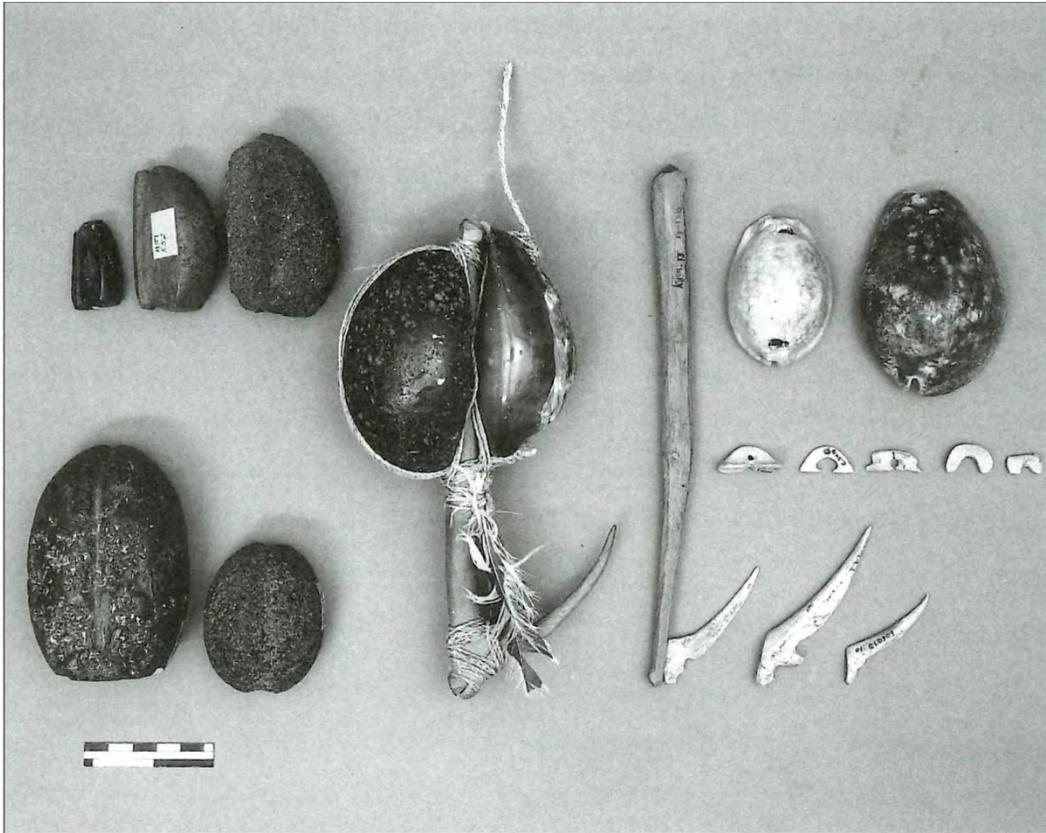


Figure 18. Complete *lūhe'e* (center) and associated components (Kahā'uelio 2006:70).

Netting

'Upena (nets) of various shapes, mesh width, and sizes were widely used for traditional nearshore and offshore fishing. The fibers of *olonā* (*Touchardia latifolia*) were the primary material from which nets and fishing lines were made. *Olonā* required careful cultivation and could only be grown in the wetter upland areas. For the fishers who relied on these valued fibers, procuring such material necessitated exchange with those of the uplands—a hallmark activity of the *ahupua'a* system (Abbott 1992). Traveling along the coastal areas, it is common to see fishers perched low on the rocky reef with long cone shaped nets dangling around their bodies and hands. This type of cast net, although known in Hawaiian as *'upena ho'olei*, was introduced by Asian migrants during the 19th century (Mitchell 2001). Elbert and Pukui (1986) list some thirty or so names that were used to distinguish net types. Abbott (1992), however, states that the myriad of nets that were traditionally employed can be categorized into four primary types: *'upena ku'u* (gill nets); *'upena paloa* (seine nets); *hukilau* (long seine nets), and scoop nets. The amount of culture-historical information available regarding traditional net fishing suggests that these methods were perhaps one of the most popular fishing methods utilized by Kānaka Maoli for the capture of both near and offshore fish species. The different types of nets and netting strategies traditionally used for fishing are described in further detail below.

'Upena ku'u (gill nets)

In describing the *'upena ku'u* (Figure 19) Abbott writes:

'Upena Ku'u (gill nets): These larger nets, with mesh up to three centimeters (one inch) in diameter, were set upright in the water to carch schools of fish such as *'ōpelu*, and *'akule*, species related to the mackerel. They worked by entangling the fills of the swimming fish and ranged from as short as seven meters (twenty-three feet) to ten times that length. (Abbott 1992:83)

Newman (1970:53-54) also provided a late 19th century description of gill nets, noting:

Gill nets were designed to entangle the fish in a net with a fairly large mesh instead of merely trapping them within an encircling small mesh net wall as was done with seines and bag nets. Gill nets were manufactured in different sizes according to the type of fish to be caught and the habitat

to be exploited, ranging in length from about 55 feet (17 meters) to over 1,200 feet (366 meters), in depth from seven feet (2 meters) to 25 feet (8 meters), with mesh size from one-half to seven inches (1.2 to 17.7 cm.). Three basic techniques were used in gill netting:

1. letting the net remain stationary and allowing the fish to entangle themselves in the mesh;
2. driving the fish into a stationary net; or
3. moving the gill net to encircle the fish and then scaring them into the entangling mesh.

Stationary gill nets were often placed at high tide across shallow openings in the coral reef at night to entangle any fish navigating the fish run. Nets used in this fashion usually had a mesh of two to two and one-half inches (5 to 6 cm.).

Drawn gill nets were used to either completely encircle fish or to arc a half-circle around them before the fish were scared into the net by fishermen beating and splashing the water from within the circle or across the open end of the semi-circle. Sometimes, the nets were drawn up on the shore after the fish were meshed but at other times, the fish were taken out of the nets and put into canoes.

Lobsters were caught in a special gill net, with a seven-inch (18 cm.) mesh, by placing the net completely around a rock cluster and leaving it in place all night to entangle the lobsters as they came out of the rock cairn.

Gill nets used for specific fish included:

1. a net measuring some 1,200 feet (366 meters) in length, 25 feet (8 meters) in depth, with a mesh of four inches (10 cm.) used to encircle a school of akule, and
2. a gill net some 540 to 900 feet (165 to 275 meters) long, 12 to 18 feet (4 to 5 meters) deep with a three to four inch (8 to 10 cm.) mesh used just outside the reef or breakers to encircle larger fish such as the 'o'io.)



Figure 19. Girl with gill net, pre-1900s (Hawai'i State Archives Call No. PP-34-8-008).

‘Upena pāloa (seine nets)

In describing the *‘upena paloa* Abbott writes:

‘Upena Paloa (seine nets) were similar nets, but usually longer, with a large midportion or “bag.” Rather than capturing fish by entangling them in the mesh itself, seines encircled the prey. Like gill nets, they were held upright in the water, their upper edged suspended from floats made of *hau* wood, the lower portions weighted with stone sinkers. Using large gill nets and seines was a community operation, involving a large number of people, numerous small canoes, and a lot of cooperation. (Abbott 1992:83-84)

Adding to Abbott’s discussion about the *‘upena ku‘u*, Newman (1970:55) relates the following:

A Hawaiian seine was a net deployed in the water and moved horizontally, trapping fish by impounding them within a complete circle formed by the net, or between the net and the shoreline. The fish were not normally entangled in the mesh as with a gill net, but rather were kept within a small circle by the net wall where they could be scooped out with small bag nets or dragged bodily onshore, net and all. A bag net was often used in conjunction with a seine and this combination will be discussed later. Seines varied in length from about six to over 350 feet (2 to 107 meters) in length, with the common large net measuring some 150 to 350 feet (46 to 107 meters) in length, about 10 feet (3 meters) in depth, with a mesh width of several inches. The net size and mesh type seem to have been dependent upon the particular types of fish to be caught and the habitats to be exploited.

Hukilau/Lau (long seine nets)

In detailing the use of long seine nets, which she referred to as *hukilau*, Abbott explains:

Hukilau nets were used to capture smaller fish in shallow waters, usually in sandy-bottomed bays. The *hukilau* nets were shorter versions of the seine, with *tī* leaves tied along the top to alarm the fish and drive them into the center of the net. Setting a *hukilau* net, too, was a large, cooperative endeavor but with much of the work done by waders rather than from canoes. (Abbott 1992:84)

While Abbott refers to the large seine nets as *hukilau*, Kahā‘ulelio (2006) uses the term *lau* to describe large seine nets, and notes that *hukilau* was a specific cooperative fishing method that involved the use of a *lau* net. Kahā‘ulelio (ibid.) describes several cooperative fishing methods, which was done under the direct supervision of a *po‘o lawai‘a* (head fishermen) and employed the effort of men, women, and children (Figure 20). Kahā‘ulelio (2006:3) notes that “these people became the owners and shareholders in this kind of fishing.” Although a great deal of labor and knowledge was involved in the preparation and execution of this method, it provided an abundance of reef fish such as *‘ōpule*, *moi li‘i*, *palapala*, *kūmū*, *weke*, *kala*, *manini*, *moano*, *uhu*, *‘ō‘io*, *hilu*, *‘a‘awa* and others that were divided to feed multiple *‘ohana* (families). The type of fish caught, however, was dependent upon the nature of the area in which this type of fishing was performed. This method, known broadly as *lau*, is described by Kahā‘ulelio as having two distinguishing types. The primary types, which included the methods known as *lau nui*, *lau lele*, *lau kapalili*, and *lau ‘apo‘apo*, utilized large draglines and were “done outside of the surf line, or where there was no surfline” (ibid.:3). The lesser types, which included the methods known as *lauahi*, *lau ‘ōhua*, *lau ‘ōhia liko*, *lau kō ‘upena pahu*, and the *lau kō pua li‘ili‘i*, utilized drag nets and were “done within the reef” (ibid.).

Kahā‘ulelio (ibid.) describes the *lau* nets as being sewn together from at least three distinct nets that contained a different mesh width. These nets were traditionally crafted from the fibers harvested from *wauke* (*Broussonetia papyrifera*) and *olonā*. Once the net was crafted, men, women, and children were ordered to the uplands to gather yellowed foliage of plants such as *tī* or *mai‘a* (banana), along with dried *wiliwili* (*Erythrina sandwicensis*) wood, or dried gourds, for use as floats that were attached to the dragline and knotted with *tī* leaves.

In detailing the general nature of how the *lau* method was conducted, Kahā‘ulelio (ibid.) explains that with the *lau nui* method the net, which was attached to the dragline was loaded onto a canoe along with divers who took the net out to a depth of about fifteen fathoms. At the command of the *po‘o lawai‘a* (head fisherman), and with the aid of several other canoes, the divers carefully placed and arranged the net in the ocean and watched as the men in the canoe slowly paddled the canoes and net closer to shore. Explaining how the *lau* net was moved into shore, Kahā‘ulelio writes:

At that place, fifteen fathoms in depth, which I had mentioned before, the *lau* is let down to about half of the depth and is moved evenly up to a depth of four or five fathoms or less. The drag line goes almost to the sea floor but it doesn’t completely touch, lest it snag on the corals or catch in hollows. When the stone anchors of the *lau* canoes are set, the men begin to pull the *lau* lines, six

or seven men per canoe. When the sun shines directly down on the line, the shadows of the *lau* drive the fish shoreward to the place where the lines are being drawn. (2006:5)

As the net was drawn closer to shore, the *po'o lawai'a* and divers continued to monitor and adjust the net. The *po'o lawai'a* then determined where to lay the *papa* net, which measured roughly six to seven fathoms in length. While the *lau* net was used to usher the fish closer to shore, the *papa* net was used to catch the fish that were brought in. As the fish came closer to shore, the *papa* net was placed at the opening end of the *lau* net. The divers continued to watch as the fish entered into the *papa* net, and when it was time the *po'o lawai'a* called for the lifting of the net into the canoe. Kahā'ulelio (ibid.:7) writes that "at this excited time, like a garden laden with flowers, such are the colors of the fish then as they surge excitedly to and fro, eager to find a way out." Kahā'ulelio (ibid.:7, 9) adds that "the canoe to hold the fish draws near and the man the head fisherman placed on that canoe is hard-hearted, cross and stingy so that people don't crowd about and their hands plow in, bringing misfortune to the group."

Kahā'ulelio (ibid.) goes on to describe the lesser types of *lau* fishing, one of which was *lau kapalili* (see Figure 20). Executed in a manner similar to the *lau nui* method, the *lau kapalili* technique utilized a much smaller net and was carried out in sandy areas and lagoons. The net was dragged shoreward and the people dragged the net from the shore to the beach, where the fish flapped (*kapalili*) on the sand.



Figure 20. *Lau kapalili* method of net fishing ca. 1930 (Kahā'ulelio 2006:18).

The *lau ahi* fishing method was carried out during dark nights with no wave action. The net was drawn shoreward within the surf break into a sheltered bay. Kahā'ulelio (ibid.) describes the *lau 'ōhua* method as being carried out primarily by children and women, noting that the men aided only in drawing the *lau* net to shore. The fish caught using this method included juvenile wrasses such as the *'ōhua pa'awela* and *'akilolo*.

The *lau 'ōhua liko* method utilized a fine mesh net that measured roughly a fathom in length. The small mesh size allowed for the capturing of small shrimp and other small fish that lived around a heaped up cairn of rocks known as an *imu* or an *ahu*. The name used, however, varied from place to place. This method was typically employed in the early morning during low tides. Kahā'ulelio (ibid.) notes that when mosquito netting became available during the Historic Period it was also used in the *lau 'ōhua liko* method. The fine mesh net was placed around the stone cairn and people removed the stones one by one until none remained. The fleeing fish and shrimp were caught in the net then placed into a small pail and later consumed.

The *lau kō pua* method was done by children and adults during the wettest time of the rainy months when the streams were swollen, and the ponds near the beach would break open to the sea. This influx of freshwater attracted schools of tiny fish that were ushered into the sandy shore by children using yellowed banana leaves. The children

and adults then picked up the small fish either by hand, or during the Historic Period by using mosquito netting. The captured fish were placed into a calabash and eaten later. In reflecting upon more recent fishing regulations of the 20th century, Kahā‘ulelio (ibid.:13) laments that “because laws have been made about catching such small fish, this type of fishing is no longer seen.”

The final of the lesser type of *lau* fishing detailed by Kahā‘ulelio (ibid.:13) is the *lau kō pahu ‘anae*, which he describes as the “easiest kinds of fishing.” This method was used to catch ‘anae and required the labor of four men, two of which kept control of the bag net while the other two controlled the *lau* dragline. The men worked in unison to bring the dragline and net together to draw in a school of ‘anae. This method was sometimes repeated four or five times, and as many as eighty or more fish could be caught.

Scoop Nets

The final net types recorded by Abbott (1992) are hand held scoop nets (Figure 21), which she describes as follows:

...scoop nets with handles and sometimes with closure mechanisms served a variety of purposes, including catching fish attempting to leap out of seine or *hukilau* nets. These small, one-person nets were also employed to catch crabs and freshwater shrimp (*‘ōpae*), the latter being a speciality of women. Scoop net handles and closure were frequently made from the endemic shrub *‘ūlei* (*Osteomeles anthyllidifolia*), whose spreading branches can be easily bent into loops. The ends of the piece were lashed together with corn to form the handles of the net. (ibid.:84)

Newman (1970) also details the use of scoop nets, but he instead refers to them as “bag nets” with two specific types: hand held ones, and those that were manipulated by attached ropes. Newman’s description of these nets reads thusly:

Bag nets were made into an enclosed purse with only one open end; or alternately were flat pieces of netting that were closed into a self-contained bag by manipulating attached flexible sticks in a particular manner to seal it. Although bag nets were extensively used in conjunction with seines, there was a great diversity of bag nets used alone, and these seem to have been quite specialized by type of fish to be caught. An initial ordering of these different types may be made on the basis of use technique: (1) hand held, and (2) manipulated by attached ropes.

Hand Held Bag Nets:--The hand-held bag nets were fine meshed small nets fitted on a flexible wooden hoop which held the mouth open, used for dipping out fish trapped by an encircling sein net; for scooping up fish at night in very shallow water areas, usually by torchlight which mesmerized the fish; or by being held across the opening of an underwater hole by a diver while the fish hiding inside were herded into the net with a stick.

Rope Manipulated Bag Nets and Baits:--Bag nets manipulated by attached ropes were often used with some form of bait to draw the fish into the net. Common baits were cooked pumpkin, squash, sweet potatoes, kukui and coconut meat; raw mashed bananas, papaya, breadfruit or taro; pounded up fish, sea urchins, shrimp or eels; whole small fish such as nehu, ‘iao, and akule; or a special mixture called palu which was based on the cooked ink bag of the octopus pounded into a paste with ingredients added such as the juices of various plants, salt, spices, kerosene, tobacco juice, liquor, or Perry Davis Pain Killer. These different baits were often mixed with sand, to make the bait sink, and then placed in the water near as well as inside the bag net to attract fish. Some of these baits are obviously the result of European diffusion. When the fish, usually ‘opelu, were inside the bag, it was lifted to the surface by the attached ropes. (Newman 1970:56-57)



Figure 21. *Kanaka* with scoop net ca. 1925 (Cobb 1905:716).

Poisoning

The use of plant-based poisons for fishing in Hawai'i involved the use of two primary agents, the *'auhuhu* (*Tephrosia purpurea*) and *'ākia* (*Wikstroemia* sp.). These agents, which can still be found within the study area today, “were crushed, either with a mortar and pestle or with rocks found by the shore,” and then scattered in tide pools, “and in a few minutes the small fish that were present would float to the surface and could be picked up.” (Abbott 1992:86). Abbott emphasizes that:

This effect did not last more than twenty or so minutes, depending on the size of the tide pool and the speed with which fresh seawater entered in and diluted the toxin. Any fish that were washed out of the pools or overlooked in the gathering would recover and swim away, since the toxins merely stupefied the fish rather than killing them outright. In this sense, these old “poisons” more closely resembled modern fish anesthetics than the chemical rotenone, another plant derivative used to catch fish, from which fish do not recover. No data suggest that *'auhuhu* or *'ākia* toxins are transferred to humans through consumption of fish caught in this way. (Abbott 1992:86)

In relating his knowledge of plant-based poisons, which also describes the use of *'auhuhu* (written by Newman as *ahuhu*) and *'ākia*, Newman writes:

Although fish poisoning was made a misdemeanor by legislation in 1850 (Jordan and Evermann 1902:365), it was still reported by Cobb in 1902. Poisons used were of plant origin and made of pounded *ahuhu* (*Tephrosia purpurea*) and *'ākia* (*Diplomorpha sandwicensis*) to be inserted into underwater caves; the fish were not affected as a human food by it [*sic*]. For obvious reasons there are no data available on poisoned fish in the 1900 commercial market. (Newman 1970:51)

Newman also cites Campbell (1967), who described fish poisoning in the same manner as Cobb for the late nineteenth century, but notes that he stated that the fish were instantly gutted after being poisoned to keep the poison from affecting the quality of the flesh. Cobb (1902), on the otherhand, states that the poison did not affect the flesh.

Snaring

The use of snares is described by Newman as a nearshore fishing method employed only on Hawai'i Island. In referencing the writing of Cobb (1902), Newman relates:

Cobb notes that he only saw snares being used on Hawaii Island and not on any of the other major islands. He says that eels and lobsters were the primary objects of snaring. A noose on a pole was placed in front of an eel hole, bait placed outside and when the eel stuck its head outside the hole to get the bait, the noose was drawn tight and the eel brought to the surface with the pole. A noose attached to a long pole with a forked end was also lowered near bait and the line slipped under the tail of a lobster. (Newman 1970:51–52)

Abbott also describes snares being used to catch sharks using the *kūpalupalu manō* (shark chumming) method. Abbott notes that this method

...was practiced only by *ali'i* and only as a form of sport. The game sought—*niuhi*, “man-eating” sharks—were not eaten, although some other sharks were used as food. The snare was made of *hau* rope and baited with human flesh or decomposed pig. To successfully snare a shark and bring it to shore was considered to increase one's *mana* (spiritual force). (Abbott 1992:86)

Spearing

Traditional *ō i'a* or *pōluhi* (fish spears; Figures 22 and 23) used for catching fish were crafted from several types of hardwood species such as *kauila* (*Alphitonia ponderosa*), *uhiuhi* (*Caesalpinia kavaiensis*), and sometimes *koai'e* (*Acacia sp.*), while spears used to catch the elusive *he'e* (octopus) were made from *alaha'e* (*Psydrax odorata*), *ūlei* (*Osteomeles anthyllidifolia*), *'a'ali'i* (*Dodonaea viscosa*), and *uhiuhi* (Abbott 1992). Fish spears typically ranged in length from one to two meters; those used to catch *he'e* were much longer, ranging anywhere from two to four meters in length (*ibid.*). Kahā'ulelio (2006) reports that spear fishing was done either by swimming, or from canoes. Abbott (1992:86) relates that spears “saw heavy service in night-time torch fishing as well as during daylight hours... and were especially useful for picking up sea urchins with venomous spines (*wana*)...” Newman (1970:52) provides the following description of Hawaiian spear fishing, which during the Historic period also included the use of iron tipped spears:

Fish spears were about six feet long (2 meters), made of a very hard wood tipped with an iron point, and used underwater by a diver who positioned himself on the bottom and impaled fish on the spear as they came close. It was possible to spear more than one fish per dive by allowing them to slip down the spear after they were pierced. Above surface use of spears was restricted to spearing turtles, octopi, 'o'opu-hue, and fish mesmerized by torchlight at night in shallow water. No mention was made of spears propelled by slings or elastic bands, such as the “Hawaiian sling,” and these are undoubtedly of twentieth century origin.

While the above-described traditional cultural fishing practices of trapping, hand-collecting, using hook and line, trolling with lures or using octopus lures, netting, poisoning, snaring, and spearing reflect the tangible methods used by *po'e lawai'a* to harvest marine resources, the following section will explore Hawaiian fish nomenclature, which then leads into a discussion of cultural uses of the “white-list” species. The Kānaka Maoli connection to the sea, and all its lifeforms, is further reinforced by ways in which fish were categorized, named, and used.



Figure 22. Spear fishing ca. 1890 (Kahā'uelio 2006).



Figure 23. *Kanaka* diving into ocean with spear (Grosvenor 1909:11).

HAWAIIAN FISH NOMENCLATURE

Keen awareness of the natural world, coupled with their high degree of dependency upon marine resources, culminated over time in a complex naming system for Hawaiian marine resources that conveyed not just descriptive information, but other important cultural information as well. Hawaiian fish nomenclature mirrors other aspects of traditional Hawaiian society, where detailed naming practices helped to categorize the seemingly endless varieties of small reef fishes. Hawaiian fish nomenclature has endured to this day through its constant use—a practice that speaks to both the cultural value of fish, and the importance of intergenerational transmission of knowledge. Titcomb (1972:51) relates that “some names of fishes show the relationship of Hawaiians to other Polynesians, and are therefore very old,” but that “many names are peculiar to Hawaii.” Fish names were maintained through direct use, as well as through the creation of chants that served as a memory aid (ibid.).

According to Malo (1951) all products of the ocean and in freshwater streams and rivers, whether mobile or not, were considered *i'a* (fish). For instance, the various species of *limu* (seaweed) were included in the category of *i'a* (ibid.). Likewise, Titcomb (1972) conveys that the term *i'a* was applied to vertebrates and invertebrates alike, even “those that were utterly useless as food and of no importance in any other way.” Titcomb further relates that Hawaiians gave two names to most fish, one designating the kind (or species), the other designating a group characteristic. The names usually chosen for fish were descriptive of the colour, structure or habitat, such as “(1) colour: *lelo* (reddish), *mele* (yellow), *uli* or *uliuli* (blue, also means green, dark-coloured, that is, the colour of the deep blue sea), *kahauli* (dark-striped), *kea* (white); (2) form: *po'onui* (large-headed), *waha nui* (large mouthed); (3) a special characteristic: *makaonaona* (bright-eyed); *moe* (sleeping), *holo* (travelling), *ka'aka'a lā'au* (stick rolling), *pili ko'a* (coral clinging) (ibid.:50-51). This traditional system of nomenclature is exemplified in the naming of wrasses, which were known broadly as *hīnālea*, and triggerfish known as *humuhumu* (Pukui and Elbert 1986).

Qualifiers describing prominent traits were sometimes added after the general name to identify specific species. This rule was, however, not universally applied as indicated by other examples, which include surgeonfishes (inclusive of tangs and unicorn fish, identified by their sharp protuberances). In this case, individual species were known by specific names such as *manini* (*Acanthurus triostegus*; convict tang), *kala* (*Naso unicornis*; unicorn fish), *kole* (*Ctenochaetus strigosus*), *mā'i'i'i* (*Acanthurus nigrofuscus*), and *palani* (*Acanthurus dussumieri*) (ibid.).

Similarly, names were given to distinguish the growth stages of fish, with the terms *ōhua* or *āhua* being used to refer to the schooling of juvenile fish, especially the young of reef fish such as *hīnālea*, *humuhumu*, *kala*, *kūpou*, *manini*, *pualu*, and *uhu* (Pukui and Elbert 1986). Fish that were cultivated in fishponds, including the *'ama'ama* or mullet, were the subject of close observation, and the names given to these fish were based on size, with *pua* being used to refer to fish that were a finger length, and *kahaha* being used to refer to fish that had reached hand length (Titcomb 1972).

While *i'a* was broadest term used to refer to all sorts of marine species, fish that dwelled on the coral reefs were termed *i'a o ke ko'a* (lit. fish of the reef), while those that lived in deeper waters were referred to as *i'a o ke kai uli* (lit. fish of the deep sea) (ibid.). Kānaka Maoli also distinguished and named the anatomical features of fish, both the exterior features as well as the principal internal organs. Titcomb (1972:54) provides a list of the anatomical terms that were given to the various parts of the fish, which is reproduced below in Table 2. While some fish names were widely used across all marine territories, Titcomb states that:

In spite of conscious effort to hand down knowledge, names for some fish names did vary from island to island, and even from one part of an island to another. This may be due in part to faults of memory, though memories were trained to astonishing capacity, and in part to a conscious wish to call a fish by what seemed a more appropriate name. (ibid.:49)

Understanding how Kānaka Maoli categorized and named the various marine species provides insight into understanding the cultural value and uses were ascribed to them. The following section discusses the specific cultural uses of the forty fish species on the white-list for the WHFRMA.

Table 2. List of Hawaiian anatomical terms given various parts of the fish (from Titcomb 1972:54).

<i>Hawaiian Term</i>	<i>English Equivalent</i>	<i>Hawaiian Term</i>	<i>English Equivalent</i>
<i>nuku</i> , or <i>nukunuku</i>	nose	<i>kualā</i>	dorsal fin (same for soft dorsal)
<i>lae</i>	frontal region over eye	<i>unahi</i>	scales
<i>alo</i>	chest	<i>unahi kalakala</i>	the rough scales from mid-body to tail of certain fishes-scutes
<i>alo piko</i>	belly	<i>kakala</i>	knife-like cartilage near the tail (as in the surgeon fishes)
<i>mahamaha</i>	gill plate	<i>hi'u</i>	tail
<i>api</i>	gill opening	<i>pewa</i>	tail fin
<i>pihapiha</i>	gills	<i>umiumi</i>	barbels (same term as is used for beard of a man)
<i>halo</i>	gill fin	<i>kiwi</i>	the “unicorn” of the <i>kala</i> fish

CULTURAL USES OF THE “WHITE LIST” SPECIES

In an effort to identify any traditional cultural uses, practices, and beliefs associated with the forty fish species on the “white-list,” the authors of this report began by identifying and compiling the Hawaiian name(s) associated with each of them (Table 3). To verify the accuracy, and to address any discrepancies in traditional naming practices, the Hawaiian names were cross-referenced using various primary and secondary sources, which are cited in the ensuing paragraphs. Once all known Hawaiian names were identified and correlated, additional cultural information was gathered for each of the forty species from various primary and secondary sources written in both the Hawaiian and English languages. The information compiled from these sources summarizes the continued cultural uses of these fish throughout the Precontact and Historic periods. Compiling the Hawaiian names for reef fish was approached with much caution and careful consideration, as the Hawaiian names for the fish in the written literature include many inconsistencies, as well as conflicting naming information. Many fish, especially wrasses and butterflyfishes were traditionally known by multiple names, some of which were qualifiers for specific characteristics. Additionally, Kānaka Maoli gave names to the different growth stages of certain fish, which further adds to the difficulty of understanding the conflicting nomenclature. Where known, the growth stage names are discussed below under the relevant fish subheading, but are not included in Table 3. The Hawaiian fish names presented in Table 3 should not be considered an exhaustive list, as it may not capture regional names, or names used locally by certain families or individuals.

Despite the challenges mentioned above, a significant amount of information was found with respect to traditional subsistence practices, beliefs, customs, and general cultural uses of the white-list species. Additionally, the origin status of each fish species—whether they are indigenous, endemic, or invasive—was categorized (see Table 3). This information from collected from Hoover (2007) and the Marine Life Photography database compiled by Keoki and Yuko Stander (www.marinelifephotography.com). Obviously, more culture-historical information is available for the indigenous and endemic fish species, than for invasive species, which arrived to these islands more recently.

***Acanthurus achilles* (pākukui, pākuikui, pāku'iku'i)**

The Achilles tang (*Acanthurus achilles*), or *pāku'iku'i*, is a feisty surgeonfish that measures from six to eight inches long (Titcomb 1972). This fish is described by Hoover (2007:141) “as blueish black with an orange-red teardrop-shaped patch over the scalpel and a white-edged orange-red bar on the tail fin.” Its fins are trimmed with white and white stripes are also observed near the mouth and under the eye (ibid.). The spelling and pronunciation of the Hawaiian names for this fish, which include *pākukui*, *pākuikui*, and *pāku'iku'i*, vary. Pukui and Elbert (1986:306) note that this fish was considered “good eating” and Titcomb (1972) adds that this fish was “always cooked” and was “excellent when broiled.” An excerpt from a riddle published in the Hawaiian language newspaper *Ka Nūpepa Kū'oko'a* reads “...Pakuikui, he wahi i'a ono i'o ano kupono keia kalele leo ana Halale ke kai i ka lehelehe,” which translates to “pakuikui, a truly delicious fish and is just right with a lip smacking sauce” (Kuhelemai Jr. 1907).

Table 3. “White-list” species with known Hawaiian name(s) and status.

<i>Scientific Name</i>	<i>Hawaiian Names</i>	<i>Common Name</i>	
<i>Acanthurus achilles</i>	<i>pākukui, pākuikui, pāku‘iku‘i</i>	Achilles tang	Indigenous
<i>Acanthurus dussumieri</i>	<i>palani</i>	eyestripe surgeonfish	Indigenous
<i>Acanthurus nigricans</i>	unknown	goldrim surgeonfish	Indigenous
<i>Acanthurus nigrofuscus</i>	<i>mā‘i‘i‘i, mā‘i‘i</i>	brown surgeonfish, lavender tang	Indigenous
<i>Acanthurus olivaceus</i>	<i>na‘ena‘e</i>	orangeband surgeonfish	Indigenous
<i>Acanthurus thompsoni</i>	species of <i>kala</i>	Thompson’s surgeonfish	Indigenous
<i>Anampses chrysocephalus</i>	species of <i>hīnālea</i>	psychedelic wrasse	Endemic
<i>Canthigaster jactator</i>	unknown	whitespotted Toby	Endemic
<i>Centropyge fisheri</i>	unknown	Fisher’s angelfish	Indigenous
<i>Centropyge potteri</i>	unknown	Potter’s angelfish	Endemic
<i>Cephalopholis argus</i>	unknown	peacock grouper, <i>roi</i>	Invasive
<i>Chaetodon kleinii</i>	<i>kīkākapu, kapuhili, lauhau, lauwiwili</i>	blacklip butterflyfish	Indigenous
<i>Chaetodon miliaris</i>	<i>kīkākapu</i>	milletseed butterflyfish	Endemic
<i>Chaetodon multicinctus</i>	<i>kīkākapu</i>	multiband butterflyfish	Endemic
<i>Chaetodon quadrimaculatus</i>	<i>lauhau</i>	fourspot butterflyfish	Indigenous
<i>Chaetodon tinkeri</i>	<i>kīkākapu, kapuhili, lauhau, lauwiwili</i>	Tinker’s butterflyfish	Indigenous
<i>Cirrhilabrus jordani</i>	species of <i>hīnālea</i>	flame wrasse	Endemic
<i>Cirrhitops fasciatus</i>	<i>piliko‘a</i>	redbarred hawkfish	Endemic
<i>Coris gaimard</i>	<i>hīnālea ‘akilolo</i>	yellowtail Coris	Indigenous
<i>Ctenochaetus hawaiiensis</i>	species of <i>kole</i>	chevron tang	Indigenous
<i>Ctenochaetus strigosus</i>	<i>kole, kole makaonaona</i>	goldring surgeonfish	Endemic
<i>Dascyllus albisella</i>	<i>‘ālo‘ilo‘i</i>	Hawaiian Dascyllus	Endemic
<i>Forcipiger flavissimus</i>	<i>lauwiwili nukunuku ‘oi‘oi</i>	forcepsfish	Indigenous
<i>Gomphosus varius</i>	<i>hīnālea ‘i‘iwi</i>	bird wrasse	Indigenous
<i>Halichoeres ornatissimus</i>	<i>lā‘ō</i>	ornate wrasse	Endemic
<i>Hemitaurichthys polylepis</i>	<i>kapuhili</i>	pyramid butterflyfish	Indigenous
<i>Lutjanus kasmira</i>	unknown	bluestripe snapper, <i>ta‘ape</i>	Invasive
<i>Macropharyngodon geoffroy</i>	species of <i>hīnālea</i>	shortnose wrasse	Endemic
<i>Melichthys niger</i>	<i>humuhumu ‘ele‘ele</i>	black Durgon	Indigenous
<i>Naso lituratus</i>	<i>umaumalei, kala umaumalei</i>	orangespine unicornfish	Indigenous
<i>Ostracion meleagris</i>	<i>pahu, moa</i>	spotted boxfish	Indigenous
<i>Paracirrhites forsteri</i>	<i>hilu, hilu piliko‘a</i>	blackside hawkfish	Indigenous
<i>Pseudanthias hawaiiensis</i>	unknown	Hawaiian longfin Anthias	Endemic
<i>Pseudocheilinus octotaenia</i>	species of <i>hīnālea</i>	eightline wrasse	Indigenous
<i>Pseudocheilinus tetrataenia</i>	species of <i>hīnālea</i>	fourlined wrasse	Indigenous
<i>Pseudojuloides cerasinus</i>	species of <i>hīnālea</i>	smalltail wrasse	Indigenous
<i>Sufflamen bursa</i>	<i>humuhumu lei, humuhumu umaumalei</i>	lei triggerfish	Indigenous
<i>Thalassoma duperrey</i>	<i>hīnālea lauwiwili</i>	saddle wrasse	Endemic
<i>Xanthichthys auromarginatus</i>	species of <i>humuhumu</i>	gilded triggerfish	Indigenous
<i>Zebbrasoma flavescens</i>	<i>lā‘ī pala, lau‘ī pala</i>	yellow tang	Indigenous

The *pāku'iku'i* is also noted in a chant that appears in the epic saga of Hi'iakaikapoliopole. The chant associates this fish with Hawai'i Island—an island celebrated for its black sands, black pigs, black garments, and the black *pākuikui*. The chant also draws a correlation between the *pākukui* and the *kukui* tree (*Aleurites moluccana*) that grows on land. The portion of the chant that describes the celebrated features of Hawai'i Island reads:

<i>Kū i Hawai'i ke one</i>	The sand is there at Hawai'i
<i>He one 'ele'ele ke one</i>	The sand is black volcanic sand
<i>He 'a'ahu 'ele'ele ka 'a'ahu</i>	Black garments are the attire
<i>He pua'a hiwa ka pua'a</i>	The pig is a black one
<i>He 'eho ka ma'i, he kukui ka lā'au.</i>	The sickness is a tumor, the kukui is the remedy.
<i>Hoeha'a ka uku na Haumea</i>	Haumea's reward is uncertain
<i>Hānau kukui ali'i, ho'opumehana i ka poli o Papa</i>	Born is the chiefly kukui, warming Papa's bosom
<i>Hānau ka i'a, 'o ka pākuikui</i>	Born is the fish, a pākuikui , a nibbling fish
<i>Lilo i kai, kia'i 'ia e ke kukui noho i uka</i>	Swept to sea, guarded by the kukui of the uplands
<i>Hānau ka i'a, o leho hua kukui</i>	Born is the kukui-shell cowry
<i>Lilo i kai, kia'i ke kukui i ka uka</i>	Swept to sea, the kukui guards in the uplands
<i>Hānau ka i'a o ka uka, huahua kukui</i>	Born is the fish of the uplands, fruitful kukui
<i>Lilo i kai, ho'okanaka kākou i uka nei.</i>	Swept to sea, we populate these lands.
(Ho'oulumāhiehie 2006a:67)	(Ho'oulumāhiehie 2006b:64–65)

The *pāku'iku'i* is also noted in the second *wā* of the *Kumulipo*, which describes this fish as being the offspring of the 'ao'aonui (Beckwith 1951; Liliuokalani 1978). The 'ao'aonui, according to Elbert and Pukui (1986:27), is a juvenile *kūpīpī* (another tyoe of reef fish; *Abudefduf sordidus*). The *Kumulipo* chant also relates that the land counterpart of the *pāku'iku'i* is the *laukukui* or *kukui* tree (*Aleurites moluccana*) (Beckwith 1951; Liliuokalani 1978).

Acanthurus dussumieri (*palani*)

The eyestripe surgeonfish (*Acanthurus dussumieri*), commonly known as *palani*, is a popular reef fish that ranges from six to twelve inches in length (Titcomb 1972). *Palani* is characterized by its bright blue tail and underbody, with distinct yellow markings on the dorsal fin, tail, and a yellow band over the eye (Hoover 2007). Its caudal spine is bright white (ibid.). Titcomb (1972:138) reports that “some say that *maiko*, or *maikoiko* is the name of the young; other [*sic*] say *maiko* is a distinct fish.” The *palani* is also noted in the *Kumulipo* as being the fish that bore the *nuku momi*, which is described by Elbert and Pukui (1986:272) as “a variety of jackfish (*Caranx melampugus*).” Titcomb (1972:139) further details the color and markings of the *palani* as having “... a dull bluish olive color, with brassy and bluish markings and shades, a blue line along base of dorsal fin; caudal fin bluish with blackish olive spots.”

Palani, meaning “to stink, smell sour or rancid” (Pukui and Elbert 1986:309), is a well-recognized trait of this fish that is documented in *mo'olelo* and *'ōlelo no'eau*. One such *'ōlelo no'eau* reads, “Hauna ke kai o ka palani,” translated as “The *palani* makes a strong smelling soup.” (Pukui 1983:59). Pukui (ibid.:59) indicates that this saying was used in reference to “a person of unsavory reputation [who] imparts it to all he does.” Titcomb notes that despite its strong odor, the *palani* was a popular fish to eat and was most delightful when broiled (the best method to remove the odor) or cooked in a calabash. If the *palani* was eaten raw, the skin was always removed. In describing a traditional custom for removing the pungent smell, Titcomb referenced a practice that was reported by Lily Akuna, an informant from the Puna District. Akuna notes:

To remove the odor from such fish as the *palani*, *kala*, or *puwalu*, which are good to eat but have a rank odour, lay the fish across the palms of both hands with the head resting in the left hand and the tail in the right. Inhale over the fish from left to right, and expel the breath violently. Turn the fish over and repeat. (Titcomb 1972:30)

The mythical origin of this fish's foul smell is detailed in the *mo'olelo* of Ke'emalu (also referenced as Keamalu), published in the January 3, 1917 version of the Hawaiian language newspaper, *Ka Hōkū O Hawai'i* and retold by Titcomb (1972). In relating this story, Titcomb writes:

As she floated around in the ocean she recalled what her grandmother, Hina, had told her, that she had an ancestor among the fishes of the sea, named Palani-nui-mahao'o. She called to him in a short time she found herself on her ancestor's back, being borne shoreward. As she was taken back to shore, she was seized with such a desire to urinate that she was unable to control herself and so she urinated on her ancestor. Her ancestor became very angry and left her out at sea. It is said that

was how the *palani* got its strong odour. When she found herself deserted she chanted a chant of derision to this ancestor... (Titcomb 1972:139)

Handy and Handy (1972:262) named several types of fish, including *palani*, which were commonly raised in fishponds. These fish were raised particularly for ceremonial use, or were reserved for *ali'i*, and “were kept in the pond to breed,” while the offspring were raised tame so that they could be removed easily from the pond by hand. During spawning seasons certain fish, one of which included the *palani* were prohibited from being caught or consumed. Additionally, *palani* were considered *kapu* to men (Titcomb 1972). In the March 8, 1923 issue of *Ka Nūpepa Ku'oko'a*, an article titled “*Ka Ho'opakele Ana I Nā I'a*,” (Unknown 1923) offered insight into the traditional beliefs and Kānaka Maoli practices regarding the *palani* and other similar fish. Presented is a portion of this article concerning *palani* that was translated by Titcomb:

Fish such as the manini, the kole, the uhu, the kumu and the **palani** and the kala and many others went into sea pools to live until the tiny fish were grown. No kapus were imposed on them at the spawning season. The mullet, squid, aku, opelu and other fish bore their young in a place that was not sheltered... They were made kapu when the spawning season was near until the months for this duty were over. (Titcomb 1972:14)

Acanthurus nigrican

Dwelling within the surge zone to about thirty feet, the goldrim tang is noted for its black body that bears small white markings below the eyes and behind the mouth (Hoover 2007). Bright yellow stripes are observed on the fin, caudal spine, as well as its dorsal and anal fins (ibid.). The review of historical literature conducted for this study did not reveal any specific Hawaiian name or any specific cultural information related to this species.

Acanthurus nigrofuscus (mā'i'i'i, mā'i'i)

Mā'i'i, shortened from *mā'i'i'i*, is a small reef fish commonly referred to as the brown surgeonfish or lavender tang (*Acanthurus nigrofuscus*). The name *mā'i'i'i* is also applied to a taro variety (Pukui and Elbert 1986). Its color varies from dark brown to light grayish brown with a lavender-colored tinge (Hoover 2007). Dull orange spots are also present below the eyes (ibid.). In the *Kumulipo*, the *mā'i'i* is noted as the parent fish of the *'ala'ihī*, which according to Elbert and Pukui (1986:17) is the name given to “various species of squirrelfishes of the family Holocentridae.” According to Titcomb (1972), some accounts state that the *mā'i'i* is the name given to the juvenile *pualu* (sometimes spelled as *puwalu*) (Pukui and Elbert 1986:347), another species of surgeonfish (*Acanthurus xanthopterus* and *A. Mata*), but others argue that *mā'i'i* is its own variety of surgeonfish. Traditionally, the *mā'i'i* was considered a good eating fish that could be eaten both raw and cooked, but was best when broiled (Titcomb 1972).

Acanthurus olivaceus (na'ena'e)

The orangeband Surgeonfish (*Acanthurus olivaceus*), also referred to as *na'ena'e* meaning “quick, alert” (Pukui and Elbert 1986:258), is grayish-brown in color with an orange band trimmed with a purple streak that extends along its body. Kent (1986) reports that *na'ena'e* resides on the outer ends of the reef where waves and a sandy beach are present. The name *na'ena'e* is also applied to a native daisy known for its small yellow, orange, purple, or white flower (Pukui and Elbert 1986).

Anampses chrysocephalus, Cirrhitilabrus jordani, Macropharyngodon Geoffroy, Pseudocheilinus octotaenia, Pseudocheilinus tetrataenia, Pseudojuloides cerasinus (hīnālea); Coris gaimardi (hīnālea 'akilolo); Gomphosus varius (hīnālea 'i 'iwi); Thalassoma duperrey (hīnālea lauwilī);

Hīnālea, occasionally shortened to *ālea*, is a name broadly applied to various species known commonly as wrasses. These fish, distinguished by their elongated bodies, can range in size from three to ten inches long (Hoover 2007; Titcomb 1972). Its colors and attributes vary according to species. Hoover (2007:158) relates that “the general Hawaiian name *hīnālea* is applied to most, but not all; many of the smaller wrasses have no known Hawaiian names.” Elbert and Pukui (1986:71) explain that “*hīnālea* may be qualified by the terms *'ele'ele, līpoa, lolo, nī'au, nuku 'i'iwi, nuku 'i'iwi 'ula, nuku 'i'iwi uli, nuku loa, [and] nuku loa 'ele'ele.*” The *hīnālea* are found primarily in shallow waters, but are also known to live in waters that are as deep as seven to eight fathoms (Titcomb 1972). Their behavior, and the areas in which they dwell, are described in the *'ōlelo no'eau*, “*naeue ka hi'u o ka i'a lewa i ke kai,*” literally translated as “the tails of the fish that move in the sea tremble” (Pukui 1983:250). Pukui (ibid.) goes on to explain that this expression was said of fish, such as the *hīnālea*, whose tails can be seen bending as they seek hollows in the corals

for hiding during the cold month of Welehu (approximately November). *Hīnālea* are also described in ethnographic literature as having sharp protuberances (Malo 1951).

Specific traditional fishing methods are associated with these fish, including one described by Kahā‘ulelio (2006) as *melomelo*, which involved the use of a carefully curated stick used to attract fish (Figure 24). This method, described below, was effective in catching various fish including the *palani*, *mahamea*, *‘ōpelu*, *mā‘i‘i‘i*, *humuhumu*, and *hīnālea*:

It was a smooth, black stick, as long as from the knuckles to the armpit. It was made black. It had a small knob at the top, around which the line was tied. The stick was constantly toasted over the fire and rubbed with the oil of dried coconuts. The rubbing was done with a piece of *kapa* made of *mamaki* until it shone; then it was wrapped and laid away in the trunk. If we were to smell it, it was heavily fragrant. The canoe went out before sunrise, just outside of the breakers. There were two of us who used to go, my father and I, with a net having meshes two fingers in width, ten fathoms long, and three wide. As soon as the stick was let down, these fishes gathered to the spot: the *palani*, *mahamea*, *‘ōpelu*, *mā‘i‘i‘i* (*palapala*), *humuhumu*, *hīnālea* and so on. The net was lowered from the back of the canoe, then with a cord of the net held fast in the hand, my father leaped overboard and swam. I, in turn, held the *melomelo* stick. He swam around the canoe, where he came to the sticks that held the nets open. He tied them together and went on board the canoe, where he watched the fish circling around the stick. He jumped back into the water and pulled the support sticks until they met. All the fish were caught and we turned shoreward. My father called this kind of fishing a “morning meal,” a “cure for hunger,” and when the chiefs wanted fish, it was no trouble to get them. (Kahā‘ulelio 2006:111)



Figure 24. Assortment of *melomelo* sticks (Kahā‘ulelio 2006:114).

Other traditional fishing methods used to catch *hīnālea* included the use of *hīna‘i*, or basket traps woven from plant-based fibers. One such basket trap was called *hīna‘i ho‘olu‘ulu‘u* (a diving basket), which was made from the vines of the ‘āwikiwiki (*Canvalia galeata*). The method of using the *hīna‘i ho‘olu‘ulu‘u* is described in the book *Hawaiian Fishing Traditions* as follows:

The *hīna‘i ho‘olu‘ulu‘u* [diving basket], used in catching *hīnālea* (a small species of *Julis*), is a small basket made from the vines of the ‘āwikiwiki (a convolvulus) and is made anew from day to day as wanted. A light framework of twigs is first tied together and then the ‘āwikiwiki vines, leaves and all, are wound in and out round and round till the baskets is of the requisite size, three or four feet around and about one and a half feet deep. Shrimp pounded and enclosed in coconut fibre [*sic*] is occasionally placed at the bottom of the basket for bait, but usually the scent of the bruised and withering ‘āwikiwiki leaves seems to be sufficient to attract the *hīnālea*. Women attend to this kind of fishing. They wade out to suitable places, generally small, sandy openings in coral ground or reef, and let the baskets down suitably weighted to keep them in position. The weights are attached in such a way as to be easily detached. Each woman then moves some distance away from her basket, from where she can watch the fish enter it.

When all the fish in sight have entered, the woman takes the basket up, transfers the fish to a large, small-mouthed gourd, and moves the basket to a fresh place. This kind of fishing can only be done on calm, sunny days at low tide. Since the introduction of the weeping willow, the *hīna‘i ho‘olu‘ulu‘u* are sometimes made from willow twigs. Such baskets can be used over and over again. Men sometimes take such *hīna‘i* and using wana (sea urchin) for bait, with the top of the shell broken to expose the meat, place them in comparatively deep water, piling stones around them to keep them in place. The men leave them for a day or two, and if the place is a good fishing ground, the baskets will be full by the time the men return. (Manu et al. 2006:95)

Manu et al. (2006) also describe the use of *kūkulu ‘upena* (standing nets) and *ke kāmākoi*—a fishing pole made of bamboo or *hau* (*Hibiscus tiliaceus*) measuring about eighteen feet long—for catching *hīnālea*. The *ke kāmākoi* method was used from the nearshore reefs where the fisher could cast a hook and line attached to the fishing pole into the sea from the shore. Another method employed traditionally for catching *hīnālea* was poisoning. ‘*Upena holahola*’ was the name given to a net that was used in conjunction with certain piscicidal plants that were crushed and placed around a *hīnālea* fish hole. The toxins released from the crushed plants diffused throughout the water thereby paralyzing the trapped fish and causing the *hīnālea* to float to the surface into the *holahola* net (ibid).

Considered a popular fish of the Hawaiian diet, *hīnālea* are referenced in many *mo‘olelo*. One origin story of this fish is associated with a female ‘*e‘epa*, or mystical being, who after being angered by two other supernatural beings for helping her unfaithful husband, tore her enemies to pieces and transformed the torn pieces into the *hīnālea* (Kamakau in Titcomb 1972). In the February 8, 1911, issue of *Ke Au Hou*, a Hawaiian language newspaper, John H. Wise published a *mo‘olelo* that describes the importance of the *hīnālea* for the conception of a child. In these instances *hīnālea* were used as offerings to the *akua*, or gods, responsible for conceiving a child, namely Kū and Hina. The ceremony involved two *hīnālea* fish that were wrapped in *ti* leaves and cooked on coals. The first fish belonged to Kū, and a chant would be uttered to grant the woman an offspring. If a son was desired the chanter would mention the duties of a man. For a daughter, the duties of a woman would be mentioned. The second *hīnālea* was for Hina, Kū’s wife, who was associated with the moon. Chants and prayers were to Hina were given in the same manner as the first fish (Wise 1911).

Hīnālea are also noted in the account of ‘*Ai‘ai*, who was the son of Kū‘ulakai and Hinapukui‘a, both of whom were key fishing deities worshiped by the ancient fishers of Hawai‘i Nei (Fornander 1919–1920; Valeri 1985). Fornander (1919–1920) relates that in ‘*Ai‘ai*’s attempt to replenish the fish that were taken from the sea by his parents—after being threatened by Kahoalii, a chief of Hāna, Maui—he seeks the help of his friend Pilihawawa. To restore the fish in the sea, ‘*Ai‘ai* orders his friend to weave a basket for catching *hīnālea*. After the basket was woven, it was taken to the rocky shore at which point ‘*Ai‘ai* summoned the help of his parents by chanting a song that called forth the young *hīnālea* and ‘*ōpule* fish. After hearing the calls of her son, Hina ordered her husband Kū to send fish to their son, and as a result droves of fish came onshore, some of which were collected by Pilihawawa. Kū‘ulakai then sent in the surf which carried the fish back into the sea.

Manu et al. (2006) also relate another story of the *hīnālea* that appears in the account of Kalamainu‘u, a *mo‘o* (lizard) goddess. While on O‘ahu, Kalamainu‘u enticed a young *ali‘i*, Puna‘aikoa‘e, and lured him to her cave on the island of Moloka‘i. Drawn by the beauty of Kalamainu‘u, Puna‘aikoa‘e became her obedient captive and remained in the cave until one day he longed for freedom and to be amongst other people again. Puna‘aikoa‘e overheard the cheers

of people down below and became intrigued asking Kalamainu‘u about what he heard. She explained that it was the sounds of people celebrating their victories in the *Makahiki* games. He then asked if he could leave the cave to see the festivities for himself, to which she consented. While mingling with the people, Puna‘aikoa‘e met a man by the name of Hinale, who was the brother of Kalamainu‘u. As they conversed, Hinale discovered that Puna‘aikoa‘e was Kalaimainu‘u’s lover and immediately began plotting to free Puna‘aikoa‘e from his sister. As Puna‘aikoa‘e began to carry out his escape from Kalamainu‘u, the *mo‘o* goddess learned that the plan had been initiated by her brother, Hinale, and she sought revenge. When Hinale discovered that his sister was after him, he fled to the ocean where he transformed into a *hīnālea*. Kalamainu‘u followed after him, but eventually lost Hinale. She then learned from a hermit crab how to entrap her brother, so she followed his instructions and constructed a basket trap made from the *‘inalua* (*Cardiospermum halicacabum*) vine. After several attempts, Kalamainu‘u eventually captured her brother in the trap, which “has been the method of catching *hīnālea* ever since” (Manu et al. 2006:53).

The story titled *The Wind Gourd of La‘amaomao* (Nakuina 2005) also makes reference to *hīnālea* and notes that it was the preferred fish to cut through the bitterness of the drink known as ‘awa (kava). This account relates how *hīnālea* were kept in small sea pools, and collected at the request of a chief. In the preamble to this story, Pāka‘a who was the beloved servant of Keawenuia‘umi, a chief of Hawai‘i Island, was unjustly cast out of the king’s court and replaced by two new, but inept, servants named Ho‘okeleipuna and Ho‘okeleihilo. These two servants knew very little about the chief’s likings, and overtime Keawenuia‘umi became aware of their incompetence. Longing for his beloved servant, Keawenuia‘umi and his entourage set out in search of Pāka‘a, who by this time had relocated to Moloka‘i with his wife and son, Kūapāka‘a. After the king’s arrival on Moloka‘i, Kūapāka‘a invoked a mystical storm through the use of the sacred wind gourd of La‘amaomao, which thwarted the king’s plan to return to Hawai‘i Island. To win the compassion of Keawenuia‘umi, and to gain back his role in the king’s court, Pāka‘a taught his son everything he knew about the chief, including his fondness for consuming *hīnālea* after downing a cup of ‘awa, his favorite beverage. The portion of the story describing the use of *hīnālea* is presented below (all mentions of *hīnālea* are presented in bold text for emphasis):

When night fell and everyone was at ease, Keawenuia‘umi reminisced: “My love for Pāka‘a wells up in me. On evenings like this, my kauwā would bring me my cup of ‘awa and live **hīnālea**, and the intoxication would take effect; I would sit enjoying the intoxication of the ‘awa until I fell asleep; then I would sleep soundly all night long. How I miss Pāka‘a!”

Kūapāka‘a heard these words of the ali‘i and reported to his father: “Kā! My haku desires some ‘awa. He spoke of his love for you; when you were his kahu, you brought him his ‘awa. He misses it.”

Pāka‘a took out an ‘awa preparation bowl and a cup, some grass for straining the ‘awa, a piece of dried ‘awa root, and portions of ‘awa root already chewed, which he tied into bundles. He put everything into a piece of trimmed kapa, which he took out of the wind gourd of La‘amaomao, and told his keiki, “Take this dried ‘awa to your ali‘i and show it to him. If he tells you to chew it, look for a dark place and hide the dried ‘awa there, then strain this portion of already chewed ‘awa into the bowl. He’ll be impressed with how quickly you’ve prepared the ‘awa for him. That’s they way I did it when I was with him. After pouring the ‘awa into the cup, serve the ‘awa to him, then run quickly to the beach to get the live **hīnālea** we put into the small pond, and give them to your haku as pūpū to cut the bitterness of the ‘awa.”

When the ali‘i saw the large dried ‘awa root, he told the keiki, “You must chew my ‘awa.” The keiki turned away to a corner of the room and dropped the dried ‘awa root there, then poured water into the preparation bowl and put into it the ‘awa Pāka‘a had already chewed. He strained the juice out of the chewed ‘awa with the grass, then poured the juice into the cup and gave the cup to the ali‘i. Then he ran to the beach and returned with two **hīnālea** wriggling about in his hands. He put them on a dish and placed the live **hīnālea** before the ali‘i. (Nakuina 2005:68–69)

Hīnālea ‘akilolo

The *hīnālea ‘akilolo* commonly known as yellowtail Coris (*Coris gaimardi*), ranges in size from five to twelve inches long and varies in color. This name is also applied to the shortnose wrasse (*Macropharyngodon geoffroyi*), and sometimes the bird wrasse (*Gomphosus varius*), which is also known more properly as *hīnālea ‘i‘iwi*, or *hīnālea nuku ‘i‘iwi*. There are, however, visible differences between these varieties, as *hīnālea ‘akilolo* are predominantly green in color with a blue underbody, brownish tints towards the tail, and greenish-blue fins, while the *hīnālea ‘i‘iwi* is predominantly blue (Titcomb 1972). *Hīnālea ‘akilolo* are also gray in color with white spots on their back and underbody. The *hīnālea ‘akilolo* is noted in the *Kumulipo* as being the offspring of the ‘ō‘ō, a fish whose specific type

is unspecified, but may be a name of a “type of swordfish” (Beckwith 1951; Liliuokalani 1978; Pukui and Elbert 1986:290). The word *‘akilolo*, literally translated as “brain biting,” (Pukui and Elbert 1986:14) was used by *kahuna* (priests) as a *pani*, or closing medicine, for someone suffering from a head sickness or disease. This variety was also a highly favored delicacy for eating because of its sweet taste. It was traditionally “eaten with salt, dried, broiled over coals or wrapped in *ti* leaves and then baked or broiled” (Titcomb 1972:78).

Hīnālea lauwili

The *lauwili* variety of *hīnālea* (*Thalassoma duperrey*) is said to have been named in reference to the famed dryland tree termed *wiliwili* (*Erythrina sandwicensis*)—a tree whose flowers are of a bright orange hue. Often mentioned in *mo‘olelo* and referenced in traditional fishing practices as “the proper fish to eat as an aftertaste to ‘awa [a mildly narcotic drink made from the chewed *Piper methysticum* plant]” (Titcomb 1972:77). This variety is said to be the most commonly observed of the *hīnālea* species. *Hīnālea lauwili* are small coral reef fish that are very abundant in Hawaiian waters. The scales of the fish were hard to remove so it was usually skinned, before or after cooking, or broiling, but was mostly favored when eaten raw. This type of fish was also good for *i‘a ho‘omelumelu*, which is the practice of removing the entrails, head, tail, and spine, followed by scraping off the scaly skin, then dressing it with condiments (ibid.).

Canthigaster jactator

Hoover (2007) reports that there are twelve known species of pufferfish that inhabit Hawai‘i’s waters of which three are endemic, including the Hawaiian whitespotted Toby (*Canthigaster jactator*). The common name, Toby, originated from Australia is commonly used to identify these diminutive puffers that measure less than four inches long and have a slightly elongated snout. The *C. jactator* is the most common Toby in Hawai‘i and is frequently seen in pairs. It is brown with white spots with a light green fluorescent color on the head and snout. These fish can be found in active reef areas or in “dead silty places where little else seems to live” (ibid.:109).

Tobys do not have any known specific Hawaiian names, but are sometimes referred to generally as *makimaki*, “a term apparently not used in ancient times,” and possibly a variation of the word *make*, meaning death (Hoover 2007:107). Other names traditionally used for pufferfish were *‘o‘opu hue*, possibly an alteration of *ōpūhue* (calabash, gourd) or *kēkē* (potbelly). However, the review of historical literature conducted for this study did not reveal any Hawaiian name or cultural information specifically related to *C. jactator*.

Centropyge fisheri; Centropyge potteri

Species of the genus *Centropyge*, popularly known as angelfish, typically have a large backward-pointing spine on the gill cover. Of the five species in Hawai‘i, three are endemic, however, there are no known Hawaiian names for any of these species. The Fisher’s angelfish (*Centropyge fisheri*), is a small orange-brown fish trimmed in iridescent blue with a translucent tail. These fish are typically found in finger coral (*Porites compressa*) at depths of 80 feet. Known to be quick moving, they tend to stay close to cover and are not frequently seen, but are found along the West coast of Hawai‘i Island (Hoover 2007).

The well-known endemic Potter’s angelfish (*Centropyge potteri*) is the most frequently spotted angelfish in Hawai‘i. This species has a rusty orange color on its head and back, which transitions to a bluish black on the rest of the body. The body is “covered with irregular vertical gray-blue lines” with blue and black horizontal stripes on the rear fins (ibid:3). The males tend have more of a blue color than that of its female counterpart. These fish live in pairs or in small groups, and dwell in the clear water under ledges and on reef slopes with hollow spaces. The review of historical literature conducted for this study did not reveal any specific Hawaiian name or any specific cultural information related to this species.

Cephalopholis argus

More commonly known as the *roi*, or peacock grouper, this fish was introduced to Hawai‘i from French Polynesia in 1956 to enhance local fisheries. *Roi* are known to contain a ciguatoxin which can be dangerous to human health when consumed. Because of this, these fish are a non-targeted species for local fishermen, which as a consequence has led to a significant population increase in the years since they were first introduced (Hoover 2007). It has become a dominant predator species in the main Hawaiian Islands, and is known to have negative ecological impacts on other endemic and culturally valued species (Dierking 2007). In recent years, efforts to minimize *roi* populations have led to statewide events often dubbed “*roi* round-ups,” where local spear fishers are encouraged to catch and remove as many *roi* from the reefs as possible. Hoover (2007) notes that this fish is identifiable by its bright blue spots and dark blue spotted fins, the primary base color of this fish changes as it matures from dark brown to a lighter tan color with

distinct light colored bands that extend vertically along the back half of the body. Because this species was so recently introduced to Hawaiian waters, the review of historical literature conducted for this study did not reveal any specific Hawaiian name or any specific cultural information related to it.

***Chaetodon kleinii* and *Chaetodon tinkeri*, (kīkākāpu, kapuhili, lauhau, lauwiwili); *Chaetodon miliaris* and *Chaetodon multicinctus* (kīkākāpu); *Chaetodon quadrimaculatus* (lauhau); *Forcipiger flavissimus* (lauwiwili nuku ‘oi ‘ō); *Hemitaurichthys polylepis* (kapuhili)**

Members of the genus *Chaetodon*, are broadly referred to as butterflyfish and are usually yellow or white in color with distinct markings (Kent 1986; Titcomb 1972). They grow to about six inches in length, and are distinguished by their compressed bodies (ideal for navigating narrow reef spaces) and small pointed mouths. Butterflyfish are known by a number of Hawaiian names including *kapuhili*, *kihikihi*, *kīkākāpu*, *lauhau*, *lauwiwili*, *lauhau wiliwili*, and *nukunuku* (Titcomb 1972). While sometimes eaten, butterflyfish appear to have been more commonly caught and used for certain rituals and ceremonies. Specific information related to four types of butterflyfish found in the culture-historical literature, *kapuhili*, *kīkākāpu*, *lauhau* and *lauhau wiliwili*, is presented below.

Kapuhili

The term *kapuhili* has been translated by Elbert and Pukui (1986:133) as “...many taboos inherited from chiefly ancestors or from the gods; person with many taboos.” Titcomb reports on an account written by S. K. Kamakau in 1845 while he served at the Lahainaluna seminary on Maui that describes how these fish received their distinct marks. In this account, *kapuhili* is the name of the person, or perhaps the deity, who marked each fish with their distinct colors. Kamakau notes:

These islands of Hawaii were created by Kumuhonua (whose wife was Haloiho). He slept and when he awoke, the earth turned and this was called an earthquake.

At that time the duty of each creature had not been apportioned, nor were names given to each... So all things were gathered together—animals, birds, crawling things, winged things that fly through the air, and man. The work of each was assigned... It was as Molea in Hamakua that all the fishes gathered, the big fish and the little fish. It was there that all the fishes were marked, and streaked ones, the red ones, the white ones, the yellow ones and all the kinds found in the ocean. **Kapuhili** was the overseer who marked them. The unmarked fish were spotted simply by having ashes sprinkled over them. Then the proper names were given to each variety of all the fishes in the ocean. (Titcomb 1972:48)

Kīkākāpu

The name *kīkākāpu* is used to describe “various species of butterfly fishes of the genera *Chaetodon* and *Cheilodactylus*” and may be further qualified by terms such as “*alo lua* and *ko ‘a*” (ibid.:148). Titcomb (1972) relates that *kīkākāpu* were also considered sacred, and makes reference to a chant presented in the account of Kihāapi‘ilani, a 16th century chief of Maui (Fornander 1880). The portion of the chant referencing the *kīkākāpu* (name bolded for emphasis) reads thusly:

<i>He kakau kiko onio i ka lae,</i>	With striped marks on the forehead,
<i>Ke kiko o ke ki-kakapu,</i>	Marks of the kikakapu ,
<i>O ka ia kapu hilia au awahia.</i>	The sacred fish with the bitter gall.
(Fornander 1916–1917:241)	(Fornander 1916–1917:240)

Kīkākāpu are also noted in a name chant composed for Kauhikeaouli (Kamehameha III) that is duly titled *Mele no Kauhikeaouli*. The portion of the *mele* that references both the *kīkākāpu* and *kapuhili* (names bolded for reference) is presented below:

<i>Ke kakau kiokii onio i ka lae</i>	The forehead was marked with variegated stripes,
<i>He kikoi kapu,</i>	Indicating high kapu;
<i>O ke kikakapu o ku ia kapuhili</i>	The kikakapu was substituted for kapuhili ,
<i>Au wahiawahi ia lani.</i>	The time that chief ended.
(Fornander 1919–1920:485)	(ibid.)

The use of *kīkākāpu* to signify one’s intent to challenge a group of people is described in an account titled, *Ka ‘ao no Kaipalaoa, ke Keiki Ho‘opapa* (Legend of Kaipalaoa, the Ho‘opapa Youngster) (Fornander 1916–1917). As a preamble to this story, Fornander writes that Kaipalaoa was from Waiākea in Hilo and that his father, Halepaki, was

killed by Kalaniali'iloa, the *kapu* chief of that island who was also very skilled in *ho'opāpā*—a traditional art of riddling and debate—after traveling to Kaua'i. Kalaniali'iloa was so accomplished at *ho'opāpā* that the fence that surrounded his house was made entirely of the bones of those who he had defeated. To avenge his father's death, Kaipalaoa sought to master the art of *ho'opāpā* and compete against Kalaniali'iloa. To develop his skills, Kaipalaoa traveled first to the home of his aunt in Kohala, where she taught the young boy everything she knew about this art. Kaipalaoa continued to refine his skills, and eventually made his way to Kaua'i where he landed his canoe in Hanalei. While at Hanalei, the boy came across two of the king's canoes that were filled with fish. The boy inquired of the king if he could have some fish, to which the king consented. The boy then grabbed two fish, an *oililepa* and a *kikākapu*, and after an exchange of words with the king, Kaipalaoa continued on his way towards Wailua, where the *kapu* chief Kalaniali'iloa lived. In writing about the portion of the story that describing the use of the *kikākapu* (name bolded for emphasis), Fornander relates that:

From this place he continued on to Anahola; thence on to Kealia and then on to Wailua where Kalaniali'iloa resided, where was his bone fence, almost completed, built from human bones. When he arrived at the place he looked and saw the bones of Halepaki his father; they were still fresh, the bones not yet being bleached. At sight of this the boy bowed in sorrow and wept. After his weeping he approached the flagstaff and pushed it down and put up the *oililepa*, one of the fish brought along by him. He then next took the *kapu* stick and pushed it down and put up in its place the other fish, the **kikākapu**. By this action of the boy, it was meant as a challenge to the people that he saw come to meet them in a wrangling contest. When Kalaniali'iloa and his instructor saw the action of the boy, they knew at once that he was challenging them to a contest of wits, so a messenger was dispatched to meet the boy showing the challenge was accepted. (Fornander 1916–1917:576)

Lauhau and Lauhau wiliwili

The term *lauhau* has been translated as “brightly colored butterfly fish (*Chaetodon quadrimaculatus* and *C. umimaculatus*)” and may also be “qualified by the terms *kapuhili*, *kikākapu*, *maha uli*, *nuku 'i'iwi* or *nuku 'iwi*, and *wiliwili*” (Elbert and Pukui 1986:195). The milletseed butterflyfish (*C. miliaris*) ranges in length from one to six inches and is pale yellow in color with a black band on the forehead and near the tail (Titcomb 1972). Black to blueish colored blotches also string downward on the body of the fish (ibid.). This variety of fish is known as *lau wiliwili* or *lauhau wiliwili*, meaning “*wiliwili* leaf,” because its shape is believed to resemble the endemic *wiliwili* tree. The fourspot butterflyfish (*C. quadrimaculatus*) is termed *lauhau*. A characteristic of the *lauhau* is described in the “*ōlelo no 'eau*, “*he lauhau, he i'a hōkake kāheka*,” which has been translated as “it is a *lauhau*, the fish that creates disturbances in sea pools” (Pukui 1983:80). Pukui (ibid.) goes on to elaborate on this saying, noting that it was in reference to “...a boisterous person.” Manu et al. (2006) describe how *lauhau* were caught using the *kūkulu 'upena* method, or a standing net, which was cast from the shore. They indicate that the types of fish commonly caught in the *kūkulu* nets were ‘*ālo'ilo'i* (*Dascyllus albisella*), *hīnālea*, and *lauhau*.

With respect to its value as a food fish, Titcomb (1972:97) reports that there was some disagreement as some informants reported that this fish was “bony, not worth eating” while others contend “sweet flesh, broiled on charcoal immediately, without scaling or cleaning.” Titcomb adds that the *lauhau* was used in the *ho'omelumelu* style of preparation. Elbert and Pukui (1986:246) define *melu* as “...slightly decomposed, then salted and seasoned with kukui-nut relish, chili peppers, etc.” This *ho'omelumelu* preparation of fish was also applied to *hīnālea* (ibid.).

Cirrhitops fasciatus (piliko 'a)

The redbarred hawkfish (*Cirrhitops fasciatus*) is also known as *piliko 'a* (lit. clinging to coral) (Titcomb 1972). It is marked with five grayish red to brick red bands of color, separated by white stripes that extend along the width of the body (Hoover 2007). White spots are also observed near the face, which diffuse down the length of the body (ibid.). Titcomb (1972:124) notes that *piliko 'a* were sometimes grouped with ‘*o'opu kai* (sea gobies), but that they were “not true ‘*o'opu*.”

Ctenochaetus hawaiiensis (kole) and Ctenochaetus strigosus (kole, kole makaonaona)

The black surgeonfish (*Ctenochaetus hawaiiensis*), or Chevron tang is a species of the *kole* family. *Kole* (meaning “raw” or “red”) are also called *ukole* or *pākole*. They range in size from four to six inches and are reddish-black in color (Pukui and Elbert 1986:162; Titcomb 1972). The *kole makaonaona* (*Ctenochaetus strigosus*), characterized by its yellow-ringed eyes, are the more popular eating variety. The eyes of this variety were described as beautiful and the name *kole maka onaona*, bright-eyed *kole*, was often applied to them (Pukui and Elbert 1986). *Kole* are often found traveling in schools, sometimes associating with the *pāku 'iku 'i*, or Achilles Tang (*Acanthurus achilles*), and are

very abundant in Kona on Hawai'i Island. This fish has very small scales, but is known to have tough, thick skin. This trait has been poetically described in the *'ōlelo no'eau*, "*he nanea no ka lawai'a kole*," meaning "it is interesting to fish for *kole*" (Pukui 1983:91). Pukui (ibid.) further explains that the English word "story" was Hawaiianized to "*kole*," and that this proverbial saying uses *kole* as a metaphor for describing the excitement of getting together to share stories. This fish is also noted in the *mo'olelo* of Hi'iakaikapoliopole, during the description of Hi'iaka's journey from Kohala to Puna, when she was accompanied by Lohi'au and Wahine'ōma'o, and the people they encountered fed them ocean delicacies that included the "sweet-eyed *kole* fish" (Ho'oulumāhiehie 2006b:331).

Although the *kole* is known as being tough-skinned, it is considered a favorite fish to eat raw. *Kole* was also important for traditional practices and customs relating to the home, as it was believed to *hole*, or strip, the house of unwanted spiritual energy (Titcomb 1972). As documented by Titcomb, if a home that was under construction needed to be rid of "evil influences," *kole* or '*āholehole* (*Kuhlia xenura*; Hawaiian flagtail) were placed under the east-facing house post prior to it being set (ibid.:60).

In the March 8, 1923 issue of *Ka Nūpepa Ku'oko'a*, an article titled *Ka Ho'opakele Ana I Nā I'a*, offers insights into the traditional beliefs and practices related to catching *kole* and other similar fish. Presented below is a portion of this article concerning *kole* (bolded for emphasis), translated by Titcomb:

Fish such as the Manini, the **kole**, the uhu, the kumu and the palani and the kala and many others went into sea pools to live until the tiny fish were grown. No kapus were imposed on them at the spawning season. The mullet, squid, aku, opelu and other fish bore their young in a place that was not sheltered... They were made kapu when the spawning season was near until the months for this duty were over. (Titcomb 1972:14).

***Dascyllus abisella* ('ālo'ilo'i)**

The common name for the '*ālo'ilo'i* is the Hawaiian Dascyllus (*Dascyllus Abisella*). Titcomb (1972) describes the '*ālo'ilo'i* as a "bright and sparkling" demoiselle fish that is brown in color with large white scales extending along the width of the body. Titcomb (1972:64) presents a brief narrative from Kepelino, a Native Hawaiian cultural historian, who described the colors of the '*ālo'ilo'i* as being of "two colours, like mixed paint over the entire body, reddish-brown and black in equal degree." The middle dorsal area of the body is lighter in color with whitish scales on the dorsal fin, while the rest of the fins are darker in color (ibid.). '*Ālo'ilo'i* typically range from five to eight inches long and have a flat body (Malo 1951; Titcomb 1972). The young stages of the fish are called '*a*, or '*a'a* and are also referred to as '*a'akimakau* (bait nibbling), which "is a term for a variety or perhaps an alternative name" (ibid:63). The '*ālo'ilo'i* is referenced in the *'ōlelo no'eau*, "*he 'ālo'ilo'i, ka i'a waha iki o ke kai*," literally translated as "an '*ālo'ilo'i*, a fish of the sea that has a small mouth" (Pukui 1983:63). Pukui (ibid.) relates that this was "said of one who always has little to say." '*Ālo'ilo'i* were considered "a tasty fish," and were preferred "eaten raw or cooked on hot ashes" (Titcomb 1972:63–64). A method of collecting '*ālo'ilo'i* for consumption was done by using the *kūkulu 'upena*, or a standing net, which was cast from shore. The types of fish commonly caught in these nets were, '*ālo'ilo'i*, *hīnālea* (wrasses), and *lauhau* (butterflyfish) (Manu et al. 2006).

***Halichoeres ornatissimus* (lā'ō)**

The Ornate Wrasse (Pinkface), referred to in Hawaiian as *lā'ō*, is a small slender fish that ranges from five to six inches in length. Bright in color, *lā'ō* are distinguished by their salmon hue and iridescent green stripes that extend across the face (Hoover 2007). The dorsal, anal, and tail fins are blueish with green spots and stripes. Juvenile *lā'ō* are dark reddish brown with light green stripes and brown spots. The review of culture-historical literature conducted for this study did not reveal any specific cultural information related to this species.

Lutjanus kasmira

Introduced initially from the Marquesas to the Hawaiian Islands in 1958 for commercial fishing purposes, *Lutjanus kasmira*, more commonly known as *ta'ape*, or bluestriped snapper, has not fared well in Hawai'i's fish consumer market. These fish, which tend to school in great numbers, are often regarded by local fishermen as pest. The name *ta'ape* is a Tahitian name that is commonly used in Hawai'i (Hoover 2007). *Ta'ape* are easily identified by their predominately yellow body and four blue stripes that extend along the length of the body (ibid.). Given that it arrived in Hawaiian waters so recently, there are currently no known Hawaiian names for this fish nor any traditional cultural uses, other than it being eaten at times.

***Melichthys niger* (humuhumu ‘ele ‘ele) and *Sufflamen bursa* (humuhumu lei, humuhumu umaumalei)**

The *humuhumu*, meaning “to sew, stitch,” is a general name used to refer to many different varieties of trigger fish, including (but are not limited to) the *humuhumu ‘ele ‘ele*, or the Black Surgeon (*Melichthys niger*), and the *humuhumu lei* or *humuhumu umaumalei*, or the Lei Triggerfish (*Sufflamen bursa*) (Titcomb 1972:79). The *humuhumu ‘ele ‘ele*, is recognizable by its predominately black colored body with blue iridescent stripes on the head and white stripes at the base of its dorsal and anal fins (Hoover 2007). The *humuhumu lei*, on the other hand, is grayish-brown and white, but washed with a yellow color on its back (ibid.). The *humuhumu lei* is said “to have a bad odour” (Titcomb 1972:79).

In providing information on the preparation of *humuhumu*, Titcomb (1972) notes that the skin is tough and hard. She adds that when being prepared, the skin was removed and the flesh salted, and that it was sometimes eaten with *limu manaua*. The skin is described as having a rank odor which necessitated its removal prior to eating. Traditionally, the *humuhumu* was broiled in *ti* leaves, but it is now more typically fried (ibid.). In conveying sentiments about the tastiness of this fish, Titcomb (ibid.:81) states, “Kepelino (52) says the flesh is good, better than *manini*; another says it is too bony to be considered a good food fish. Japanese in Hawaii are fond of it, and it therefore brings a good price in the market.” Additionally, if the *humuhumu* were caught in large numbers, then the remains, particularly the head, would be tossed into the fire to help keep the fire burning because of its oils.

Titcomb (1972) documents a gathering method for these fish that involved lowering a basket with cooked pumpkins or sweet potatoes as bait onto a school of fish. While the fish attacked the bait in a frenzy the basket would be hoisted up and the fish caught.

***Naso lituratus* (umaumalei, kala umaumalei) and *Acanthurus thompsoni* (kala)**

A member of the surgeonfish family (*Acenthuridae*), the Orangespine Unicornfish (*Naso lituratus*), known in Hawai‘i as *umaumalei*, is common in shallow waters where it feeds upon algae, sometimes in schools. In describing the most prominent features of this fish, Hoover (2007:148) writes that it has “bright orange lips, a graceful curve of yellow from eye to mouth (somewhat like a lei), and orange caudal spine identifies this attractive hornless unicorn fish.” The orange markings tend to brighten in color when hunting. The colors are dull when these fish are in their juvenile stage, while large males are distinguished by thin tail streamers (ibid.). This species ranges in size from fourteen to eighteen inches long, but they have yellow tails when they are four to five inches long, and a spike near the caudal fin used as a defense mechanism (Titcomb 1972). A chant submitted by S. Z. Kalaakumuole (1866) to the November 24, 1866 edition of *Ka Nūpepa Kū‘oko‘a* states, “*O ka Umaumalei ke līi*,” which translates as “the *umaumalei* is chief.” The *umaumalei* is also referenced in the *Kumulipo* (Beckwith 1951; Liliuokalani 1978), where it is paired with its land counterpart the *‘ūlei* (*Osteomeles anthyllidifolia*). While the *umaumalei* is a specific species within the family *Acenthuridae*, some traditional accounts classify them under the name *kala* or *kala umaumalei* (Ka Nupepa Kuokoa 1867; Titcomb 1972). *Kala*, although distinguished more by their protruding horn, also have a caudal spine. One such *‘ōlelo no ‘eau* describing this unique trait states, “*mālama i ke kala ka i‘a hi‘u ‘oi*,” translated as “watch out for the *kala*, the fish with a sharp tail,” which is said as “a warning to beware of a person who is well equipped to defend himself” (Pukui 1983:230).

Kala in all of its forms was a popular Hawaiian delicacy, containing white meat and usually eaten broiled over coals and rarely eaten raw. The soft parts of the fish are described as good *palu* (fish bait). This fish is sometimes dried with the tough skin stripped whole, the flesh then cut off in strips and dried, or the meat cut away from the spine and dried with the skin. If the skin is left on, the flesh is cut down to the skin, after the bones are removed, so that the salt will absorb well into the flesh. According to Titcomb (1972), an informant described this fish as best when broiled or baked, after it was about three-quarters dried, and not too stiff or hard. *Kala* is very abundant and easy to catch which is why it is eaten often (ibid.).

The skin of the *kala* is tough and has no scales which made it ideal for the covering on the *pūniu*, a small drum that was lashed onto the thigh of a *hula* dancer. The skin also produces a pungent odor, but its strong smell varied depending on the region it was from, which is a result of their diet. A traditional custom to rid the pungent smell, was done in the same manner as for the *palani*, which was to lay the fish across both hands with the head on the left palm and the tail on the right palm, then breathe in over the fish, while turning the head from left to right, and then breathe out violently. This process was repeated on the other side of the fish (Titcomb 1972).

During the spawning seasons, certain fish were prohibited from being caught and consumed, which included *kala* (ibid.). In the March 8, 1923 issue of *Ka Nūpepa Kū‘oko‘a*, an article titled “*Ka Ho‘opakele Ana I Nā I‘a*,” offered

insight into the traditional beliefs and sustainable practices of *kala* and other similar fish. Presented is a portion of this article concerning *kala*, translated by Titcomb:

Fish such as the Manini, the kole, the uhu, the kumu and the palani and the **kala** and many others went into sea pools to live until the tiny fish were grown. No kapus were imposed on them at the spawning season. The mullet, squid, aku, opelu and other fish bore their young in a place that was not sheltered... They were made kapu when the spawning season was near until the months for this duty were over. (Titcomb 1972:14).

Manu et al. (2006) described the '*ie kala* (lit. *kala* basket) as the largest type of *hina* 'i (basket fish trap). These baskets were round and flat, and about four to five feet long and two and a half to three feet deep with a one and a half foot opening. Near the large end of the opening, a small wicker cylinder or cone is attached and turned inwards towards the bottom of the basket with the free end of the cone small enough for the *kala* to fit through. Use of the '*ie kala* is described as follows:

Immediately below the end of this cone, on the bottom of this basket, is placed the bait, properly secured, which in the case of the **kala** is *limu kala* (a coarse brownish-yellow algae on which this fish feeds and from which it takes its name), ripe breadfruit, cooked pumpkins, half-roasted sweet potatoes, and papayas. This basket is called '*ie lawe* (taking basket). The fishermen generally feed the fish at a given place for a week or more before taking any, using large feeding baskets, similar to the '*ie lawe*, but without the inverted cylinder and wider at the mouth to allow the fish free entry and exit. After a week or two of feeding, the fish become very fat and fine-flavored, and also very tame, so that baskets full of fish can be drawn up in the '*ie lawe* without in the least disturbing the fish which are still greedily feeding in the feeding baskets. The '*ie kala* are occasionally used to catch other kinds of fish, substituting bait known to attract particular kinds, but the technique is never as successful as with **kala**. (Manu et al. 2006:96)

Additional methods for catching *kala* included the use of a *holoholo*, a net tied to a twelve-foot-long piece of *alaha* 'e (*Canthium odoratum*) wood. The net was lowered down in an area with swift-ebbing tides with one person holding the net and the other corralling fish into it (Manu et al. 2006). *Hina* 'i *pai kala*, was a method of using a plaited basket as a net. The basket was filled with *limu kala* (seaweed), *kalo* (taro) and pumpkin and then let down for the fish to feed. This process was continued until the fish became plump and accustomed to feeding in the basket, then a "catching net" was lowered down to collect *kala*.

***Ostracion meleagris* (pahu, moa)**

The Spotted Boxfish (*Ostracion Meleagris*) or trunkfish, is a commonly known as *pahu*, meaning "box," a name likely applied because of puffy triangular shaped body (Pukui and Elbert 1986:300). This fish is also known as *moa*, which is noted as a Proto Polynesian word (ibid.). The *pahu*, identifiable by its brownish colored body with white spots, can grow up to nine inches long and prefers living in quiet waters along the shoreline (Hoover 2007). If it is disturbed it emits a poison from the skin. Traditionally, these fish were *kapu* (forbidden) to women. (Kent 1986). Titcomb (1972) adds that there was little flesh on this fish and that they were not eaten.

***Paracirrhites forsetri* (hilu, hilu piliko 'a)**

The blackside hawkfish (*Paracirrhites forsetri*) is known by many names, including *hilu*, '*ele*'*ele*, *lauwili*, *melemele*, *moelola*, *pano*, *pāni* 'o, *piliko* 'a, '*ula* and *uli*, but is most commonly referred to as *hilu* (Pukui and Elbert 1986). The *hilu* is a brightly colored fish with prominent white and black stripes running horizontally across its body and a speckled face (Hoover 2007). It ranges in size from twelve to eighteen inches long (Titcomb 1972). Juvenile *hilu* are often tricolored, with bands of yellow, black, and white (Hoover 2007). Malo (1951) describes *hilu* as having eminences, or *kino* '*oe*'*oe* (sharp protuberances). Titcomb (1972:75) relates that "they are found in crevices of the reef, under large projecting *limu*-covered rocks, or asleep in the sandy bottom, completely hidden." This species prefers to keep out of sight but they are sometimes seen associating with other species of the wrasse family such as the '*a*'*awa* (ibid.). Considered an "excellent eating" fish, *hilu* was traditionally either eaten raw, dried or salted and baked or broiled (Malo 1951:46). It is said that an expectant mother that craved *hilu*, "a small bright fish that feeds busily about coral heads, foretold a quiet, industrious child" (Handy and Pukui 1998:77). Titcomb (1972:75) adds that, "all Hawaiian informants remark upon the "quiet, ladylike" demeanor of the *hilu*. A child that is quiet from childhood, is called a *hilu*, a pregnant woman who eats *hilu* will have a quiet, dignified child." Likewise, Pukui related several '*ōlelo no* '*eau* that liken the demeanor of the *hilu* to that of a quiet child:

He hilu na ke ali'i.

A *hilu* belonging to a chief

When a pregnant woman longed for a *hilu* fish, the child born to her would be a very quiet, well-behaved person. Because chiefs liked reserved, well-mannered people, such persons were often found in the royal courts and were referred to as the chief's *hilu* fish. (Pukui 1983:67)

Hilu ka i'a, he i'a no'eno'e.

The fish is the *hilu*, an attractive one.

A quiet, well-behaved person. When a pregnant woman longed for *hilu* fish, the child born to her would be well-mannered, quiet, and unobtrusive. (ibid.:108)

Another *'ōlelo no'eau* that mentions *hilu* is given in references to a story known as "*Ka hilu pani wai o Hau'ula*," literally translated as "The water-damming *hilu* fish of Hau'ula." (Pukui 1983:143). The version of the story related by Titcomb (1972) is taken from an article titled, "*Ka Huaka'i Pokole i Ko'olauloa*" (The short trip to Ko'olauloa), which appeared in the September 25, 1896 issue of the Hawaiian language newspaper, *Ka Nūpepa Kū'oko'a*. The story relates that the *hilu* was a *kinolau* (physical embodiment) of two supernatural brothers, Kaululena and Ma'i'o, and an event that resulted in fish acquiring its distinct stripes. Kaululena and Ma'i'o were able to assume various forms but they traveled frequently in their *hilu* form. Kaululena had the ability to become either a *hilu*, *manō* (shark) or *kanaka* (human) while Ma'i'o could transform into a *hilu* or *kanaka*. The two brothers traveled to O'ahu as *hilu* and as they neared Kawaihoa, O'ahu they separated. Ma'i'o headed towards the Ko'olau (windward) region and Kaululena, towards the Kona (leeward) region. While traveling through the Ko'olau region, Ma'i'o came upon an area named Hau'ula where a fisherman and the chief of Hau'ula, Makali'i, caught a glimpse of Ma'i'o swimming along the shore. Enthralled by his size, the men quickly cast their nets and ensnared him. As they pulled Ma'i'o on shore the people of the village watched in amazement, excited to reap their share of the day's catch. The fisherman and the Hau'ula chief quickly collected their catch and cut Ma'i'o into pieces to divide him amongst the people. While they relentlessly worked to divvy the cut pieces, the blood of Ma'i'o spilled slowly into the ocean. It spread so far that the sky reflected its redness.

Meanwhile, Kaululena reached Ka'ena when he saw the red sky. He immediately knew his brother had been killed. Woeful for his brother's unfortunate fate, Kaululena took his human form and walked to Hau'ula to confirm his brother's death. As Kaululena arrived at Hau'ula, he came upon a house that was broiling a piece of *hilu* and very discreetly, picked it up and threw it back into the sea. He continued to do this at every home that he encountered until he came upon the house of an elderly man. There Kaululena witnessed the elder performing a ceremony for him and his brother before drinking his *'awa*. When the elderly man finished his prayer, Kaululena was certain this man was their *kahu*, or mortal guardian. Kaululena then approached the man and asked him if he knew of Kaululena and Ma'i'o to whom he prayed, to which the man replied that he had never seen Kaululena and Ma'i'o, but that he was raised by his parents and grandparents to place a *kapu* (sacred oath) on himself pertaining to the matter of eating *hilu*. He continued to explain that he performed the ceremony because when the chief, Makali'i and his fishermen caught a large fish he did not accept the bounties of the catch, for *hilu* was sacred and forbidden to him. After explaining his customs, Kaululena revealed himself to the man and provided him with strict orders. He advised him to place *lepa* (sacred flags) around his home and when he was done he was to gather his family and keep them safe within those boundaries. Kaululena counseled the man to ensure his survival, for the land and its people who ate the flesh of the *hilu* would be severely punished by a great flood. Kaululena left these instructions with the man and continued on his quest to find the remaining pieces of his brother's body.

After locating all the remains of Ma'i'o, Kaululena then traveled upland to Kipapa'u stream, where he prayed for the rains to pour down onto the homes of those who had his brother's remains. The heavens responded to Kaululena's prayer and the water continued to rise in a hollow area surrounded by the hills. He then transformed into his *hilu* form and as the rain and water hit his body, he grew bigger and bigger until he created a barrier that prevented the water from flowing out. When the water finally filled up to the top of the basin, Kaululena quickly leaped out of the way of the gushing water and sought shelter in a cave within one of the surrounding hills. The waters raged down the stream bed and destroyed everyone and everything in its path except where the *lepa* were placed. Following the advice of Kaululena, the elderly man and his family were spared. It is said that Ma'i'o regained his life and did so in the form of a striped *hilu* fish. The stripes, a dominant trait seen on the majority of *hilu* today, symbolize the parts of Ma'i'o's body that were seared by fire or sliced for salting (Titcomb 1972).

Pseudanthias hawaiiensis

The brightly colored Hawaiian longfin Anthias is distinguished by its hues of pink, yellow, and orange. Males are characterized by their yellow heads and reddish-orange bodies, lavender-hued tails, and long wispy pectoral fins. Females are mostly yellow on the head and back with a pinkish body (Hoover 2007). Although endemic to the islands, the review of culture-historical literature conducted for this study did not identify any Hawaiian name or traditional cultural uses.

***Zebrasoma flavescens* (*lā 'īpala, lau'īpala*)**

The fish commonly known as yellow tang (*Zebrasoma flavescens*) is known in Hawaiian as *lau'īpala* or *lā'īpala*. It is an inshore fish that grows up to approximately seven inches. A bright-colored yellow, the *lā'īpala* has no scales with a combination of rough and soft skin. This fish although small was a delicacy and was preferred to be broiled. The skin was edible when cooked but was removed if eaten raw. This reef fish is known to school and are beautiful in numbers (Titcomb 1972). They are common in most coastal regions, particularly in Kealahou Bay (ibid.). In *The Epic Tale of Hi'ikaikapoliopole*, Hi'ika spoke of a healing ritual that includes the consumption of the *lau'īpala* (bolded for emphasis):

Listen to me, this grandchild of ours will be troubled no more. When we depart, you fetch the blossoms of the ma'o in abundance, then mash them soft, make a ball of it, and affix it to the soft spot on the head of our grandchild. Before high noon, he will awaken, and will be healed. And if he hungers for food, then feed him warm potato, along with ***lau'īpala***, the fish called the yellow tang. That fish will make for abundance of food, like the bounty of Maka'ukiu. This grandchild of ours is no longer ill. (Ho'oumāhie 2006b:131–132)

It is evident from the information presented above that a large majority of these species were utilized throughout the Precontact and Historic era as they are mentioned in traditional legendary narratives and a variety of historical accounts. Collectively, these narratives provide at the very least, a baseline understanding of the ways in which these fish have been utilized in Hawaiian culture.

THE ARRIVAL OF WESTERNERS AND THE TRANSFORMATION OF MARINE RESOURCE MANAGEMENT PRACTICES IN HAWAI'I

By the mid-18th century, the young and determined Kamehameha had directed his efforts towards consolidating Hawai'i Island under his rule. To accomplish this feat, Kamehameha continued to train under his more experienced kin, namely Kalani'ōpu'u, who held the title of *ali'i nui* of Hawai'i Island ('Ī'i 1959). During Kalani'ōpu'u's reign, the first foreign vessels captained by the British explorer, James Cook arrived in Hawaiian waters. Cook first landed at Waimea, Kaua'i in 1778 and on January 17, 1779, he anchored in Ka'awaloa Bay, Kona within the study area (Kamakau 1992). Aboard these foreign ships were innovative technologies and diseases unknown to the original inhabitants of the Hawaiian Islands. Items such as metal, nails, guns, canons, and the large foreign vessels themselves, stirred the interest of the Kānaka Maoli. Acquisition of these technological advancements came through barter. This ultimately resulted in the *ali'i* gaining possession of foreign items that ultimately set traditional Hawaiian warfare in new trajectory, one forged by Kamehameha himself. By the late 18th century, wars were occurring regularly between intra-island and inter-island polities, and by 1810, Kamehameha had unified all of the Hawaiian Islands under his rule. Following this unification, Kamakahonu in Kailua, Kona became his seat of government until his death in 1819 (Kamakau 1992).

The year 1778 marks the end of what is often referred to as Hawai'i's Precontact Period and the beginning of the Historic Period. While 1778 signifies an important date in Hawaiian history, it is vital to note that throughout the Early Historic Period, even with Western influences, the Hawaiian chiefs still held outright rule over the land and its resources, and that they maintained strict adherence to the *kapu* system—the very system from which their power was derived. At the outset of the Historic Period, there was a continued trend toward craft and status specialization, intensification of agriculture, *ali'i* controlled aquaculture, the establishment of upland residential sites, and the enhancement of traditional oral history. The veneration of traditional gods and the strict observation of the *kapu* system were also at their peaks (Kent 1983; Kirch 1985).

The abrogation of the *kapu* system in 1819, under the rule of Kamehameha's son, 'Iolani Liholiho (Kamehameha II) also marks significant date of socio-religious change in the Hawaiian Islands. Some researchers have argued that the abolishment of the *kapu* system undermined the very foundation upon which traditional Hawaiian society was built, thereby altering the relationship between the chiefs and the people, as well as their relationship to the land (Else

2004; Kame'elehiwa 1992). Such cultural changes were further endorsed by early Missionaries who arrived in March of 1820 off the coast of Kawaihae, and anchored in Kailua Bay a month later. These early missionaries introduced monotheistic Christian beliefs, established Hawaiian orthography, and generally promoted a Euro-American lifestyle and political system of governance. During this same time period, the first commercial fishing ventures were underway in the islands as British and American whaling fleets began to arrive in Hawaiian waters. These early whalers established Hawai'i as the provisioning and trading headquarters (Schug 2001). The whaling industry lasted for several decades, and by the 1850s had reached its peak, with some five hundred whaling vessels operating out of the various island ports. Many Kānaka Maoli men, who were skillful on the ocean, had become employed in this industry.

With the influx of foreigners, many of whom were quick to introduce the idea of trade for profit and later fee simple ownership of land, Hawai'i's traditional culture, and the sociopolitical economy began to shift to meet the growing demands of the foreign populations. As early as 1832, fish markets had become formally established, which were supplied with various marine products caught by Kānaka Maoli (Schug 2001). As Schug (ibid.:17) explains, "commercial fishing provided Hawaiians an early opportunity to participate in the new island economy with a relatively small capital outlay and without abandoning their own customs and skills." In describing their adaptation to newly introduced Western materials, Schug (2001:17) writes:

As new goods and materials became available, Hawaiian fishermen modified their fishing accoutrements. Steel hooks, for example, replaced those carved from pearl-shell, and wooden spears were tipped with iron. But the Hawaiian retained many of the long-established fishing techniques that were so well adapted to Hawai'i's marine environment. Also retained were various ancient rituals to ensure safety at sea and a bountiful catch. Fishermen continued to pray to the traditional deities for success and appease them with offerings of fish.

In 1839, under the administration of Kamehameha III (Kauikeaouli) a set of laws were drafted that were known as *Ke Kumukānāwai, a me Nā Kānāwai O Ko Hawai'i Pae 'Āina* (The Constitution and Laws of the Hawaiian Islands). These laws proclaimed the rights of the people, and ensured equitable protection for the people and chiefs (Achiu 2002). By October 8th, 1840, Kamehameha III and Kekāuluohi, the *Kuhina Nui* (Premier), had enacted the 1840 constitution that "...organized the parts and the functions of government at that time," and included the creation of the *'Aha 'ōlelo* (House of Representatives) as part of the legislative body, thereby allowing the voice of the people to be heard in governmental matters (ibid.:35).

Fishing Rights Codified in the Hawaiian Kingdom Government Constitutional Laws of 1839 and 1840

Traditionally, Hawaiian land stewardship practices and philosophies were centered around the natural resources that extended from the mountain tops to the deep ocean, which were held in "trust" by the *mō'ī* (King) and his *ali'i* (Maly and Maly 2003). Under the ancient system, land use rights included access to fisheries and natural resources that were within the lands, which were then given to the *hoa 'āina* (native tenants). Kamehameha III officially defined the ancient fishing rights and practices of the people in the Constitution and Laws of 1839 and reconfirmed them in 1840 (ibid.:26). With respect to the fisheries, these laws permitted Kamehameha III to distribute the fishing grounds and resources between the *ali'i* and the people of the land. Maly and Maly (2003:243), further emphasizes that "fisheries on coral reefs fronting various lands were for the landlords (*konohiki*) and the people who lived on their given lands (*ahupua'a*) under the *konohiki*." The laws were established to identify traditional fishing values and practices, while acknowledging the influences of western property rights. Maly and Maly (ibid.) have compiled the Hawaiian laws enacted between the years of 1833-1842 from archival records located at the Hawai'i State Archives. Extracted from Maly and Maly (ibid.:244-246), those laws pertaining to fishing rights are detailed below:

No na Kai noa, a me na Kai kapu.

(Of free and prohibited fishing grounds) (1839-1841)

I. —Of free fishing grounds. (No ka noa ana o ke kai)

His majesty the King hereby takes the fishing grounds from those who now possess them, from Hawaii to Kauai, and gives one portion of them to the common people, another portion to the landlords, and a portion he reserves to himself. These are the fishing grounds which his Majesty the King takes and gives to the people; the fishing grounds without the coral reef. viz. the Kilohee grounds, the Luhee ground, the Malolo ground, together with the ocean beyond.

But the fishing grounds from the coral reefs to the sea beach are for the landlords, and for the tenants of their several lands, but not for others. But if that species of fish which the landlord selects as his own personal portion, should go onto the grounds which are given to the common people, then that

species of fish and that only is taboo. If the squid, then the squid only; or if some other species of fish, that only and [1842:36] not the squid. And thus it shall be in all places all over the islands; if the squid, that only; and if in some other place it be another fish, then that only and not the squid.

If any of the people take the fish which the landlord taboos for himself, this is the penalty, for two years he shall not fish at all on any fishing ground. And the several landlords shall give immediate notice respecting said fisherman, that the landlords may protect their fishing grounds, lest he go and take fish on other grounds.

If there be a variety of fish on the ground where the landlord taboos his particular fish, then the tenants of his own land may take them, but not the tenants of other lands, lest they take also the fish tabooed by the landlord. The people shall give to the landlord one third of the fish thus taken. Furthermore, there shall no duty whatever be laid on the fish taken by the people on grounds given to them, nor shall any canoe be taxed or taboo'd.

If a landlord having fishing grounds lay any duty on the fish taken by the people on their own fishing grounds, the penalty shall be as follows: for one full year his own fish shall be taboo'd for the tenants of his own particular land, and notice shall be given of the same, so that a landlord who lays a duty on the fish of the people may be known.

If any of the landlords lay a protective taboo on their fish, when the proper fishing season arrives all the people may take fish, and when the fish are collected, they shall be divided—one third to the fishermen, and two thirds to the landlord. If there is a canoe full, one third part shall belong to the fishermen, and two [1842:37] thirds to the landlord. If the landlord seize all the fish and leave none for the fishermen, the punishment is the same as that of the landlords who lay a duty on the fish of the people.

If, however, there is any plantation having fishing grounds belonging to it, but no reef, the sea being deep, it shall be proper for the landlord to lay a taboo on one species of fish for himself, but one species only. If the parrot fish, then the parrot fish only; but if some other fish, then that only and not the parrot fish. These are the enactments respecting the free fishing grounds, and respecting the taking of fish.

2.—Respecting the taboo'd fishing grounds. (No na kai kapu)

Those fishing grounds which are known by the people to have shoals of fish remaining upon them, shall at the proper season for fishing be placed under the protective taboo of *the tax officers, for the King*. The fishing grounds on Oahu thus protected, are 1, Kalia; 2, Keehi; 3, Kapapa; 4, Malaekuli; 5, Pahihi. On Molokai, as follows: 1, Punalau; 2, Ooia; 3, Kawai; 4, Koholanui; 5, Kaonini; 6, Aikoolua; 7, Waiokama; 8, Heleiki. On Lanai the Bonito and the Parrot fish. On Maui, the Kuleku of Honuaula and other places.

On Hawaii, the Albicore.

On Kauai, the Mullet of Huleia, Anehola [Anahola], Kahili and Hanalei, and the squid and fresh water fish of Mana, the permanent shoal fish of Niihau, and all the transient shoal fish from Hawaii to Niihau, if in sufficient quantity to fill two or more canoes, but not so small a quantity as to fill one canoe only. But if the fishermen go and borrow a large canoe, that all the fish may be put into one, then there shall be a duty upon them. [1842:38]

On the above conditions there shall be a government duty on all the transient shoal fish of the islands. The tax officer shall lay a protective taboo on these fish for his Majesty the King, and when the proper time for taking the fish arrives, then the fish shall be divided in the same manner as those which are under the protective taboo of the landlords.

If the tax officer seize all the fish of the fisherman, and leave none for those who take them, then he shall pay a fine of ten dollars, and shall have nothing more to say respecting the royal taxes. But if the order for seizing all the fish of the fishermen was from the Governor, then he shall no longer be Governor, though he may hold his own lands, and the tax officer shall not be turned out of office. At the proper time the tax officer may lay a protective taboo on all the King's fish, and the landlords' all around the island. But it is not proper that the officer should lay the taboo for a long time. The

best course is for the officer to give previous notice to the fishermen, and then the common people and the landlords to fish on the same day. Thus the rights of all will be protected.

But no restrictions whatever shall by any means be laid on the sea without the reef even to the deepest ocean. Though the particular fish which the general tax officer prohibits, and those of the landlords which swim into those seas, are taboo. The fine of those who take prohibited fish is specified above. [1842:39]

Maly and Maly (2003) also report that on May 31st, 1841, several changes were made and signed into the law on fisheries by the King and *ali'i*. One such section revised the punishment of a fisherman to state, “for two years he shall not fish at all on any fishing ground” and “if he take one fish criminally he shall pay five, and always at that rate. And if a canoe full be taken then five canoes full shall [1842:85] be paid, according to the amount taken, even to the farthest extent [1842:86]” (ibid.:245-246). In 1846, Article V of the “Statute Laws of His Majesty Kamehameha III” was published. These laws identified the responsibilities and rights of the *konohiki* and the people pertaining to various types of fishing grounds and resources. As can be seen below, the laws also acknowledged the practice of *kapu*, or restrictions, with respect to fishing customs and specific fisheries:

ARTICLE V.—OF THE PUBLIC AND PRIVATE RIGHTS OF PISCARY (1846)

SECTION I. The entire marine space, without and seaward of the reefs, upon the coasts of the several islands, comprising the several fishing grounds commonly known as the *Kilohee grounds*—the *Luhee grounds*—the *Malolo ground*, and the fishery of the ocean, from said reefs to the limit of the marine jurisdiction in the first article of this chapter defined, shall be free to the people of these islands. The people shall not be molested in the enjoyment thereof except as hereinafter provided.

SECTION II. The fishing grounds from the reefs, and where there happen to be no reefs from the distance of one geographical mile seaward to the beach at low water mark, shall in law be considered the private property of the landlords whose lands, by ancient regulation, belong to the same; in the possession of which private fisheries, the said landholders shall not be molested except to the extent of the reservations and prohibitions hereinafter set forth.

SECTION III. The landholders shall be considered in law to hold said private fisheries for the equal use of themselves and the [1846:90] tenants on their respective lands; and the tenants shall be at liberty to use the fisheries of their landlords, subject to the restrictions in this article imposed.

SECTION IV. The landlords shall have power, each year, to set apart for themselves one given species or variety of fish natural to their respective fisheries, giving public notice by *viva voce* proclamation to their tenants and others residing on their lands, and signifying to the minister of the interior, in writing, through his agents in their districts, the kind and description of fish which they have chosen to set apart for themselves. The landlords shall respectively pay for such notification, the fees prescribed by the third part of this act; and it shall be the duty of the minister of the interior yearly to furnish the director of the government press with a list of said landlords, the districts and island of their residence, and the kind of fish specially set apart by each, in the form of a catalogue; which catalogue the said director shall cause to be once inserted in Hawaiian and English languages, in the Polynesian newspaper, for public information, at the expense of said minister to be included by him, according to a fixed rate, in the fees to be received at his department from the respective landlords.

SECTION V. The specific fish so set apart shall be exclusively for use of the landlords, if caught within the bounds of his fishery, and neither his tenants nor others shall be at liberty to appropriate such reserved fish to their private use; but when caught, such reserved fish shall be the property of the landlord, for which he shall be at liberty to sue and recover the value from any fisherman appropriating the same; and more over, if he take one fish criminally he shall pay five, and in the proportion shall he pay to the full amount of what he may have taken wrongfully. Whoever may have taken fish in violation of this law, without paying as about, shall be fined fifty dollars for each offence.

SECTION VI. The landlords shall not have power to lay any tax or impose any other restriction upon their tenants regarding the private fisheries that is in the preceding section prescribed, neither shall such further restrictions be valid. [1846:91]

SECTION VII. It shall be competent to the landlords, on consultation with the tenants of their lands, in lieu of setting apart some peculiar fish to their exclusive use, as hereinbefore allowed, to prohibit during certain indicated months of the year, all fishing of every description upon their fisheries; and, during the fishing season to exact of each fisherman among their tenants, one thirds part of all the fish taken upon their private fishing grounds. In every such case it shall be incumbent on the landlords to comply in like manner with the requirements of the fourth section of this article.

SECTION VIII. The royal fish shall appertain to the Hawaiian government, and shall be the following, viz:

1st. The bonito when off any part of the coast of Lanai.

2nd. The albacore of Hawaii.

3rd. The mullet of Huleia, Anehola [Anahola], and Hanalei; the squid and freshwater fish of Mana on Kauai.

4th. The shoal fish taken at the following places, noted for the abundance of fish frequenting them; off Oahu: 1, Kalia; 2, Keehi; 3, Kapapa; 4, Malaeakuli, and 5, Pahihi.

5th. Off Molokai: 1, Punalau; 2, Ooia; 3, Kawai; 4, Koholanui; 5, Kaonini; 6, Aikoolua; 7, Waiokama, and 8, Heleiki.

6th. And off Maui; the *kuleku* of Honuaula; and the same whenever found off said island.

7th. All the following transient fish, viz:—1, the *kule*; 2, the *anaeholo*; 3, the *alalauwa*; 4, the *uhukai*; 5, the *kawelea*; 6, the *kawakawa*; 7, the *kalaku*.

These shall be divided equally between the king and fishermen. But on all the prohibited fishing grounds the landlords shall be entitled to one species of fish, and those who have walled fish ponds shall be allowed to scoop up small fish to replenish their ponds. If the prohibited fish of the landlord be mingled with the royal fish, then the landlord shall be entitled to one third of the whole of the fish taken, though this applies only to Molokai, Oahu and the rivers of Kauai.

All which shall be yearly protected by the king's taboo, to be imposed by the minister of the interior, by means of circular from his department, as prescribed in the act to organize the executive ministry; and during the specified season of taboo they shall not be subject to be taken by the people. [1846:92]

SECTION IX. At the expiration of the taboo seasons, all persons inhabiting these islands shall be at liberty to take the protected fish, accounting to the fishery agents of the respective districts off which the same shall have been caught, for the half or portion, so taken; and the minister of the interior shall make known through his agents by *viva voce* proclamation, the respective months or seasons of the year during which the said royal fisheries may be used and the said protected fish taken.

SECTION X. The minister of the interior shall appoint suitable and proper fishing agents in the several coast districts of the respective islands, to superintend the fisheries aforesaid, to whom he shall from time to time give directions through the respective governors, in regard to the sale or other disposition of the share of fish accruing to the government.

SECTION XI. It shall be the duty of the agents appointed, to exact and receive of all fishermen, for the use of the royal exchequer, during the legalized fishing seasons the one half part, or portion of all protected fish taken without the reefs, whether at the respective places in the eighth section of this article indicated, or in the channels and enclosed seas dividing these islands, or upon the high seas within the marine jurisdiction of this country. And if any officer or agent of this government shall exact more fish of the people than is in and by this section expressly allowed, he shall on conviction, forfeit his office, and be liable to pecuniary fine, in the discretion of the court, before which he shall have been convicted.

SECTION XII. It shall be competent for His Majesty, by an order in council, from time to time, to set apart any given portion, or any definite kind of the said protected fish, or any proportional part of the avails therefrom arising, for the use of the royal palace, to be delivered or paid over to the chamberlain of his household, created by the third part of this act.

SECTION XIII. It shall be incumbent on the minister of the interior to provide, by instructions to the respective governors, for the sale and disposal of all fish received by the said fishing agents, and to pay the avails thereof to the minister of finance. [1846:93]

SECTION XIV. If any person shall, in violation of this article, take out of season the fish protected by the king's taboo, or if any person shall, within the free fishing seasons, take any of the protected fish, without delivering to the agent appointed for that purpose the proportion accruing to the royal exchequer, he shall, on conviction, forfeit all fish found in his possession, and shall, in addition, pay fivefold for all fish thus taken, or he may be put in confinement, at the discretion of the court condemning him. [1846:94; HSA collection KFH 25 .A24 1825/46] (Maly and Maly 2003:246-248)

THE LEGACY OF THE *MĀHELE 'ĀINA* OF 1848

By the mid-19th century, the ever-growing population of Westerners in the Hawaiian Islands forced socioeconomic and demographic changes that promoted the establishment of a Euro-American style of land ownership. By 1840 the first Hawaiian constitution had been drafted and the Hawaiian Kingdom shifted from an absolute monarchy into a constitutional government. Convinced that the feudal system of land tenure previously practiced was not compatible with a constitutional government, the King (Kamehameha III/Kauikeaouli) and his high-ranking chiefs decided to separate and define the ownership of all lands in the Kingdom (King n.d.). This period of land tenure transformation is known as the *Māhele 'Āina*. The change in land tenure was further promoted by missionaries and Western businessmen in the islands who were generally hesitant to enter business deals on leasehold lands that could be taken from them at any time. After much consideration, it was decided that three classes of people each had one-third vested rights to the lands of Hawai'i: the King, the chiefs and *konoiki*, and their tenants (the *maka 'āinana* or common people) (Chinen 1958). Prior to the 1848 *Māhele 'Āina*, in 1845 the legislature created the Board of Commissioners to Quiet Land Titles (more commonly known as the Land Commission), first to adopt guiding principles and procedures for dividing the lands and granting land titles, and then to act as a court of record to investigate and ultimately award or reject all claims of private individuals brought before them (Cannelora 1974). All land claims, whether by chiefs for entire *ahupua'a* or by tenants for their house lots and gardens, had to be filed with the Land Commission within two years of the effective date of the Act (February 14, 1846) to be considered. All of the land claimants were required to provide proof of land use and occupation, which took the form of volumes of native registry and testimony. The work of hearing, adjudicating, and surveying the claims required more time than was prescribed by the two-year term, and the deadline was extended several times, not for new claims, but for the Land Commission to finish its work (Alexander 1920). This deadline was also extended several times for chiefs and *konoiki*, but not for commoners (Soehren 2004).

The *Mō'ī* (King) and some 245 *ali'i* (Kuykendall 1938) spent nearly two years trying unsuccessfully to divide all the lands of Hawai'i amongst themselves before the whole matter was referred to the Privy Council on December 18, 1847 (King n.d.). Once the *Mō'ī* and his *ali'i* accepted the principles of the Privy Council, the *Māhele 'Āina* was completed in just forty days (on March 7, 1848), and the names of all of the *ahupua'a* and *'ili kūpono* (nearly independent *'ili* land division within an *ahupua'a*) of the Hawaiian Islands and the *ali'i* who claimed them, were recorded in the *Buke Māhele* (1848) (also known as the *Māhele* Book) (Soehren 2005b). As this process unfolded the *Mō'ī*, Kamehameha III, who received roughly one-third of the lands of Hawai'i, realized the importance of setting aside public lands that could be sold to raise money for the government and also purchased by his subjects to live on. Accordingly, the day after the division when the name the last chief was recorded in the *Buke Māhele*, the *Mō'ī*, Kamehameha III commuted about two-thirds of the lands awarded to him to the Hawaiian Kingdom Government (King n.d.). Unlike the *Mō'ī*, the *ali'i* and *konoiki* were required to present their claims to the Land Commission to receive their land awards (known as Land Commission Awards or LCAw). The chiefs who participated in the *Māhele* were also required to provide to the government commutations of a portion of their lands in order to receive a Royal Patent giving them title to their remaining lands. The lands surrendered to the government by the *Mō'ī* and *ali'i* became known as "Government Land," while the lands retained by Kamehameha III became known as "Crown Land," and the lands received by the chiefs became known as "Konoiki Land" (Chinen 1958:vii, 1961:13). To expedite the work of the Land Commission, all lands awarded during the *Māhele* were identified by name only, with the understanding that the ancient boundaries would prevail until the land could be formally surveyed.

During the *Māhele*, native tenants residing on the lands that were divided up among the Crown, *Konoiki*, and Government could claim, and acquire title to, *kuleana* parcels that they actively lived on or farmed. The Board of Commissioners oversaw the program and administered the *kuleana* as Land Commission Awards (LCAw.). Claims for *kuleana* had to be submitted during a two-year period that expired on February 14, 1848 to be considered. All of the land claimants were required to provide proof of land use and occupation, which took the form of volumes of native registry and testimony. The claims and awards were numbered, and the LCAw. numbers, in conjunction with

the volumes of documentation, remain in use today to identify the original owners and their use of the *kuleana* lands. The work of hearing, adjudicating, and surveying the claims required more than the two-year term, and the deadline was extended several times for the Land Commission to finish its work. In the meantime, as the new owners of the lands on which the *kuleana* were located began selling parcels to foreigners, questions arose concerning the rights of the native tenants and their ability to access and collect the resources necessary for sustaining life. The “Enabling” or “*Kuleana Act*,” passed by the King and Privy Council on December 21, 1849, clarified the native tenants’ rights to the land and resources, and the process by which they could apply for fee-simple interest in their *kuleana*.

Early in this process, questions concerning the rights of the *konohiki* and their imposing of restrictions upon the *hoa’āina* in the matters of fisheries arose. Maly and Maly (2003:250) relate that “a number of communications clarifying the Laws cited above, were published.” Among the communications was an Interior Department document (detailed below), which sought to resolve the issue:

FISHING RIGHTS, RESTRICTIONS AND LIBERATION

Interior Department Document Number 148

That, to whomsoever it may concern, the catching with hands of fishes and shrimps, etc., from the specified seas call, “Fishing grounds”, for human consumption only are hereby liberated.

That, is the King or the *Konohiki* are lack in having the catch of a certain fish and wish to prohibit some of these fishes (unspecified fish: but freely given to citizens), it is well in doing so.

That, the *Konohiki* is hereby ordered to take only one fish; and that the main coral fishing grounds, or other coral fishing grounds are under the jurisdiction of the government. That, the *Konohiki* is hereby allowed to take only one fish from these coral fishing grounds; and that he is not to take two or three; not that much.

If the overseer or the *Konohiki* who is in charge of a fishing right knows that he is out of fish, and wishes to have some by sending his brother out to fish, it is at his discretion in doing so; but, not to accuse him after the fish is caught. (Maly and Maly 2003:250–251)

As a result of the *Māhele ‘Āina*, all lands (specifically *ahupua‘a* and *‘ili kūpono*) within Hawai‘i were placed into one of three categories: Crown lands, Government lands, and *Ali‘i-Konohiki* lands. With respect to those lands within the current study area, Kamehameha III retained for himself (Crown lands) eight lands, three of which are within Kohala District (Kawaihae Komohana, Pu‘ukapu, and Waimea), and the remaining five are within the Kona District (Hale‘ōhiu, Honomalino, Onouli 2, Pua‘a 2, and Pu‘u Wa‘awa‘a). A total of 185 lands eventually became a part of the Government land holdings with 105 of those located in the Kona District, 69 lands in the Kohala District, and the remaining 11 situated in the Ka‘ū District. A total of 111 lands were claimed by the *ali‘i-konohiki*, with 71 located in the Kona District, 37 in the Kohala District, and the remaining 3 in the Ka‘ū District. In all, some 302 lands located within the study area were claimed during the *Māhele ‘Āina* of 1848 (Soehren 2004, 2005b, 2005a).

Fisheries and Fishing Rights Recorded During the *Māhele ‘Āina*

The plethora of documents that were generated as a result of the *Māhele ‘Āina* contain vital information pertaining not only to land use and practices, but fisheries and fishing rights that extended out to sea as well. In gathering information on fishery rights, Maly and Maly (2003) summarized the claims made by the *ali‘i-konohiki*, and *hoa‘āina*. While they compiled the fishery rights information for all of the major Hawaiian Islands, only those specific to the current study area are presented below. Given that many of the *ali‘i-konohiki* land claims encompassed lands on multiple islands, it is difficult to ascertain those claims specific to the current study area. Many of these claims make broad references to fisheries and do not give specific details regarding fishery types. Nonetheless, the information presented below provides an overview of claims made by the *ali‘i-konohiki*, and demonstrates the abundance and importance applied by Kānaka Maoli to maintaining traditional fishing rights following the *Māhele ‘Āina* of 1848. With respect to the *ali‘i-konohiki* claims, Maly and Maly (2003:253-254) write:

<i>Helu</i> [LCAw.]	Claimant; Location; and Resource Claimed
4452	H. Kalama (wife of Kamehameha III). <u>Fourteen lands and fisheries</u> on Hawaii, Maui, and Oahu.
5368	Akahi (w.) Land and fisheries of: Kealia, Makalawena and Keei iki, Kona, Hawaii; and Puuepa and Ulupaalua, Kohala, Hawaii; and Kaaipu, Waikiki, Oahu.

3. Culture-Historical Context

- 5525 L. Konia (w). Ten lands and fisheries at: Keei, Kona, Hawaii; Lumahai, Kauai; Napili, Honokeana, Alaeloa, and Mailepai, Kaanapali, Maui; and Kalauao, Oahu.
- 7712 M. Kekuaanoa. Six lands and fisheries on Hawaii, Kauai, and Oahu.
- 7713 Victoria Kamamalu. Fifty-three lands and fisheries on Hawaii, Kauai, Lanai, Maui, Molokai, and Oahu.
- 7714 B Moses Kekuaiwa. Twelve lands and fisheries on Hawaii, Kauai, Lanai, Maui, and Oahu.
- 7715 Lot Kapuaiwa Kamehameha. Sixteen lands and fisheries on Hawaii, Maui, and Oahu.
- 7716 R. Keelikolani (w.). Twelve lands and fisheries on Hawaii, Kauai, Maui and Oahu.
- 8452 A. Keohokalole (w.). Thirty-seven lands and fisheries on Hawaii, Maui, and Oahu.
- 8515 Keoni Ana. Lands and fisheries of: Kawaihae, Kohala, Hawaii; Kukuau, Hilo, Hawaii; and Halehaku, Maui.
- 8516 B Kamaikui (w.). Lands and fisheries at: Waiaka 1st, Kohala Hawaii; Kalama, Kona, Hawaii; Kahului, Kona, Hawaii; Halawa, Ewa, Oahu.
- 8518 B James Young Kanehoa. Lands and fisheries at: Ouli, Kohala, Hawaii; Ulaino, Maui; and Lawai, Kauai.
- 8519 B Fanny Young (w.) Kiiokalani, Kohala; and Pahoehoe, Kona, Hawaii; Maunalei, Lanai; and Haleu, Lahaina, Maui.
- 8520 Iosua Kaeo. Five lands and fisheries on Hawai'i; Kealia, Lanai; Maui, and Oahu.
- 8520 B Gini Lahilahi (w.) Lands and fisheries at: Waiaka 2nd and Waika, Kohala, Hawaii; Pahoehoe, Hawai'i; Waikahekahe, Hawaii; and Puunoa, Lahaina, Maui.
- 8521 B G. Davis Hueu. Lands and fisheries of: Kukuau 2, Hilo, Hawaii; and Kiilae, Kona, Hawaii.
- 8522 B Kale Davis (w.). Lands and fisheries at: Honokahua, Maui; Kapaa, Kohala, Hawaii; and Waikahekahe, Puna, Hawaii.
- 8559 C. Kanaina. Thirteen lands and fisheries on Hawaii, Maui and Oahu.
- 8559 B Wm. Lunalilo. Sixty-three lands and fisheries on Hawaii, Kauai, Maui, Molokai, and Oahu.
- 9971 Wm. P. Leleiohoku. Thirty-five lands and fisheries on Hawaii, Lanai, Maui, Molokai and Oahu.
- 10474 N. Namauu for M. Kekuaanoa. Twelve lands and fisheries on Hawaii, Maui, and Oahu.
- 10613 A. Paki. Six lands and fisheries on Hawaii, Kauai, Maui, and Oahu.
- 10806 Iona Piikoi for Kauikeaouli, Kamehameha III; and unnumbered lands described in Buke Mahele (1848). At least 159 Crown Lands covering Hawaii, Maui, Molokai, Oahu, and Kauai, with fisheries rights on all island.
- 11215 Kealiahonui. Three lands and fisheries on Hawaii, Kauai, and Oahu.
- 11216 M. Kekauonohi (w). Fifty-seven lands and fisheries on Hawaii, Kauai, Lanai, Maui, Molokai, and Oahu

In summarizing the land claims made by the *hoa 'āina* (native tenants), Maly and Maly (2003) clarify that there were some seventy-six claims that made explicit reference to fishery-related activities for the entirety of Hawai'i Island, of which twenty-three are specific to the current study area. Unlike the claims made by the *ali 'i-konohiki*, which are far more vague (described in the previous section), the claims made by the *hoa 'āina* provide a little more detail on the fisheries within the current study area during the mid-19th century. These claims include references to fishponds, anchialine ponds, salt production areas, *umu 'ōhua* (stone mound fry fisheries), anchialine shrimp ponds, as well as general references to coastal fisheries. Several land claims make explicit reference to the fish that were reserved for the *konohiki* of specific lands. While the claims presented below do not reflect all possible fishery-related activities that were occurring during the mid-19th century, they do provide a glimpse into nature and location in which such activities occurred. Those fishing rights claimed by the native tenants along the coast of Hawaii Island during the *Māhele 'Āina* of 1848 have been extracted from Maly and Maly (2003:254-256) and are presented below:

<i>Helu</i> [LCAw.]	Claimant; Location; and Resource Claimed
817	Heirs of George Beckley at Kealahewa, Kohala, Hawaii. <u>A farm and fishing grounds, given by Kamehameha I about 1811.</u>
3480	Kauwe at Kauhako, Kapalilua, Kona, Hawaii. <i>A kupo</i> ocean fishery, like a pond.
4012	Thomas Hopu (Hooper) at Kailua, Kona, Hawaii. <u>“Seashore <i>kihapai</i>, it is a salt pond, 17 fathoms by 27 fathoms.”</u>
4099	Keawekulua at Puako, Waimea, Hawaii. <u>Five <i>kaheka loko</i> (anchialine fishponds).</u>
4140	Kamanawa at Kaloko, Kona, Hawaii. A lot bounded on side by <u>Kaloko pond.</u>
4452	Hazaleleponi Kalama at Kalahuipuaa and Anaehoomalu, <i>ili</i> of Waimea, Kohala, Hawaii. Lands including <u>approximately twelve fish ponds.</u>
5317	Kaawa at Lanihau, Hawaii. A lot in the <i>ili</i> of Kaluaolike, bounded on Kau side by <u>pond of Alanaio.</u>
5759	Kapule at Pahoehoe, North Kona. <u><i>Kala</i> is the fish to be taken by <i>konohiki</i>.</u>
5759	Kapule at Pahoehoe, North Kona, Hawaii. “...Here is a second thought, about the fish of the <i>konohiki</i> , it is the <i>kala</i> in the fishery; and the <i>ulu</i> is the tree on the land...”
5778	Kaai at Pakini, Kau. <u>A protected fish.</u>
5874	Keohokalole at Kaawaloa, Kona, Hawaii. <u>Fisheries and ponds at Hanapahoehoe, Awili, Kalaemamo, and Haliilua.</u>
5874	Keohokalole at Kealakekua, Kona, Hawaii. <u>Fish pond of Wailokoalii.</u>
6230	J. A. Kuakini at Puuanahulu, Hawaii. <u>Fifteen salt ponds and three fish ponds.</u>
6235	Kapaakea at Kaapuna, Kona, Hawaii. <u>Some protected fish.</u>
7277	Kaieie at Keei, Hawaii. <u>One pond at Kalaeohia.</u>
7702	Kooka at Kealia, Kona, Hawaii. An <i>umu ohua</i> (stone mound fry fishery).
8773 B	Haumea at Kahuku, Kau, Hawaii. <u>The protected fish of the <i>Konohiki</i> is the <i>opelu</i>, the tree is the <i>mamaki</i>.</u>
9251	Kaea at Lanihau, Kona, Hawaii. Seven <i>wai opae</i> (anchialine shrimp ponds) at shore.

10000	Lukehiwa at Honomalino, Hawaii. "...An <i>ahupuaa</i> , received from Unualoha, from the sea to the upland <i>koa</i> forest. <u>The <i>opelu</i> is its fish which is taken</u> , and the <i>koko</i> is its wood which is taken..."
10264	Mahi at Hoopuloa, Hawaii. The ocean <u>fishery of Kipehu</u> .
10340	Namalo at Kamaoa, Kau, Hawaii. "...A fishing right is at the sea in Kawela, Puueo and Waiopua..."
10527	Namaielua at Kapua, Hawaii. <u>A fish pond in the <i>ili</i> of Kailiohia</u> .
10913	Uahine at Kamaoa, Kau, Hawaii. <u>A salt land; and fishing rights in Kawela, Waiopua and Mohoae</u> .

PROCEEDINGS OF THE BOUNDARY COMMISSION: AHUPUA‘A BOUNDARIES AND FISHING RIGHTS ALONG THE WESTERN COAST OF HAWAI‘I ISLAND

Although the entwined relationship of terrestrial and oceanic resources within the *ahupua‘a* system were traditionally recognized by Kānaka Maoli, who considered the sea an extension of land, differing perceptions and realities of the ocean as it pertained to the *ahupua‘a* unit began to arise during the mid-nineteenth century. With the establishment of the Commission of Boundaries (Boundary Commission) in the Kingdom of Hawai‘i in 1862, boundaries of all *ahupua‘a* that were awarded as part of the *Māhele ‘Āina* were legally set. The boundaries of the lands were subsequently certified by the Commissioners of Boundaries in 1874. The primary informants for the boundary descriptions were old native residents of the lands, many of whom had also been claimants for *kuleana* during the *Māhele*. This information was collected primarily between 1873 and 1885 and was usually given in Hawaiian and transcribed into English as it occurred. Hearings for most *ahupua‘a* boundaries were brought before the Boundary Commission and later surveyed by Government employed surveyors, many of whom were accompanied and guided by Kānaka who related the boundaries as passed down to them through their *kupuna*. Conversely, in some instances, *ahupua‘a* boundaries were established through a combination of other methods such as conducting surveys on adjacent *ahupua‘a*. Or in cases where the entire *ahupua‘a* was divided and awarded as Land Claim Awards (LCAw.), and or Government issued Land Grants (both which required formal surveys), the Boundary Commission relied on those surveys to establish the boundaries for that *ahupua‘a*.

Surveying land boundaries was a tough and methodical task, centered primarily around the accurate location, recordation, and triangulation of prominent geographic and cultural features, however it "was not merely a matter of measuring angles and lines, it involved listening to people about their use of land and making judgements that would affect the quality of their lives" (Moffat and Fitzpatrick 1995:60). Therefore, in order to accurately ascertain the boundaries of the *ahupua‘a*, it was crucial to combine scientific concepts and procedures with generational knowledge held by the Kānaka Maoli. Some of the Kānaka Maoli who accompanied foreign surveyors even took up the practice of surveying themselves. Although these surveys aided in establishing the *ahupua‘a* boundaries, the maps produced present only a basic outline of the land divisions, and they lack the cultural knowledge of the landscape presented during the Boundary Commission hearings. Generally, there was great emphasis placed on the identification of terrestrial features along, and adjacent to, *ahupua‘a* boundaries that demarcated them from the next. However, many *ahupua‘a* boundaries traditionally extended offshore into the *kai*. The tightly woven interconnection between *mauka* and *makai* resources, spanning from the uplands to the sea, was largely overlooked by the surveyors who sought primarily to record the boundaries of *ahupua‘a* based upon physical features of the land. These differing perceptions of *ahupua‘a* boundaries and resource procurement areas, whether marine or terrestrial-based, are evident in the Boundary Commission testimonies, most notably in those provided by land surveyors, rather than *kama‘āina* informants, where intangible oceanic boundaries are disregarded.

While rare, testimonies presented by surveyors in lieu of *kama‘āina* informants (e.g. ‘Upolu Ahupua‘a in North Kohala) were markedly fixated on discerning boundaries based on earthly attributes, and were non-inclusive of information pertaining to intangible *ahupua‘a* boundaries that extended past the shoreline and into the sea. Alternatively, Boundary Commission testimonies provided by natives were infused with meticulous recollections of not only tangible earthly features, but also those which were imperceptible except to those who had intimate knowledge of the land, sea, and customary practices that occurred in these places. Native testimonies often preserve crucial culture-historical information related whether or not *ahupua‘a* boundaries extended out to the sea, the distance to which they extended, and the fishing rights of the people therein.

The analysis of 107 *ahupua'a*—extending from Kahei in North Kohala to Kamā'oa in Ka'ū—that were surveyed and testified about as part of the Boundary Commission process, reveals that seventy-four of these land divisions had boundaries extending out into sea, sixty-seven of which claimed fishing rights to those waters. The disparity between the amount of surveyed *ahupua'a* and those that claimed fishing rights (roughly 63%) is not necessarily an accurate representation of the general scope of traditional *ahupua'a* boundaries or access to fishing rights along the western coast of Hawai'i Island, nor is it indicative of patterns island-wide. In some cases (thirty-one total *ahupua'a*, roughly 29%), the extent of an *ahupua'a* boundary into the sea was simply not specified or discussed. It is also imperative to note that Boundary Commission testimony was not presented for every *ahupua'a* that claimed traditional fishing rights, and that ambiguity regarding the details of the rights of an *ahupua'a* often arose from the fact that the boundaries could not be clarified, either because of a total lack of testimony or because of the omission of crucial detail within existing testimonies. The Boundary Commission information for the study area *ahupua'a* within North Kohala, South Kohala, North Kona, South Kona, and Ka'ū presented below provides a glimpse into how the traditional *ahupua'a* system operated with respect to intangible seaward boundaries and access to the fishing access rights therein.

North Kohala District

Twenty *ahupua'a* in North Kohala stretching southward from Kahei to Waikā, the southernmost limit of the district, were surveyed for their boundaries (Table 4 and Figure 25). Of these, fourteen had boundaries that extended out to sea, and eleven were identified as having ancient fishing rights. The particulars of the extent of the fishing grounds of five of the *ahupua'a* (Kaiholena 1st and 2nd, Kamano, Pua'a 1st, and Pu'uepa 1st) were elaborated upon by those who provided Boundary Commission testimony, and testimony provided for two additional *ahupua'a* (Ki'ioakalani and Kehena 2nd) related that fishing rights and resources were reserved for the *konohiki* or that the *konohiki* had right to collect monetary taxes for the aquatic resources obtained.

The testimonies given for *ahupua'a* in North Kohala with more detailed explanations of fishing rights varied in extent. In one case, fishing privileges were only permitted to as far as the bottom of the ocean that could be seen, or to indeterminable depths that were not elaborated upon, while other *ahupua'a* retained a broader expanse from which to gather resources, extending from near shore out into deep water. For some *ahupua'a* the boundaries were delineated by traditional fishing grounds, like in the case of Pua'a 1st whose fishing rights terminated at the place where squid could be caught. In another case, the fishing rights were limited to roughly 5/8 of a mile offshore in the deep sea. Excerpts of Boundary Commission testimonies for the *ahupua'a* of North Kohala that discuss ancient fishing rights and boundaries are presented below (underlining and italicization added for emphasis and clarity).

Kaiholena 1st and 2nd

Kama, sworn: . . . My parents now dead, were *kamaaina* of Kohala, and pointed out the boundaries of the lands to me. The sea bounds these two lands on the *makai* side. These lands had ancient fishing rights extending out to the deep sea. The land Makeanehu 1st bounds Kaiholena 2nd on the south side. The lands Kaiholena 1st and 2nd lay side and side from the shore to the end of both lands. The boundary between Kaiholena 2nd and Makeanehu 1st at the sea shore is a long rocky point, narrow near the main land and growing wider a little way from the shore called Honoaumi. . . (Volume A No. 1:80)

Hauli, sworn: . . . The sea bounds Kaiholena 1st and 2nd on the *makai* side. The fisheries belonging to these lands used to extend out to sea as far as from here to Kama's house (about 5/8 of a mile). A point at the sea shore on south side of land is the boundary between Kaiholena 2d and Makeanehu 1. There is a *pali* called Nohonaumi just *mauka* of this point. . . (Volume A No. 1:81)

Kamano

Palua, sworn: . . . Thence *makai* to Puopahoakahi, a resting place. From thence to Kaaka, a place where the natives tied their ropes when they were fishing. Bounded *makai* by the sea. Ancient fishing rights extending out as far as you can see bottom. (Volume B:143)

Kehena 2nd

Kikalaeaka, sworn: . . . Hauli, now present in Court, showed me the *makai* boundaries of Kehena 2nd. I went with Wiltse several years ago when he was surveying on the sea shore. I do not know the boundaries. Do not know whether Kehena 2nd had any fishing rights or not. . . [Volume A No. 1:75]

Hauli, sworn: . . . A water spring named Maue on the north side of Keawanui is the boundary at the shore between Kehena 1st and Kehena 2d. The sea bounds Kehena 2d on the *makai* side. I have

always heard that Kehena 2d had ancient fishing rights extending out a good way into the sea. Nakapauluhua, father of Pohakuuli, was Konohiki of Kehena, and always charged people for fishing on the sea belonging to Kehena and collected the pay. . . (Volume A No. 1:75)

Ki'iokalani

Kekuaaea, sworn. . . thence to Ahuliilii, a resting place. The compass was put here to sight to Puulepo; thence *makai* to Pukoae, a resting place; thence to Malae, a point at the shore; Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:276)

Pohakuauli, sworn. . . Bounded *makai* by the sea, where we went fishing; we had to give fish to the Konohiki. . . (Volume B:277)

Kukuipahu

Ku, sworn. . . From the shore to Kepioholowai is as far as I know the boundaries. Ancient fishing rights extending out to sea. . . (Volume B:135)

Kaneihalau, sworn. . . I have heard that Kaauhuhu and Kukuipahu join. Bounded on the *makai* side by the sea. Ancient fishing rights extending out to sea. This is all I know of the boundaries of Kukuipahu. . . (Volume B:137)

Māhukona 2nd

Palua, sworn: . . . Poupou is the point at shore between Mahukona 1st and Mahukona 2nd. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. Kaheana's *kuleana* joins Mahukona 1st at the sea shore. (Volume B:141)

Pua'a 1st

Kauua, sworn. . . I was born at Puaa, North Kona Hawaii, at the time of Keoua, and have always lived there, and am acquainted with the boundaries of the land. . . Puaa is bounded *makai* by the sea and the land has ancient fishing rights near the shore but not extending out to sea. . . Puaa has ancient fishing rights extending to the squid grounds. (Volume A No 1:376)

Puanui

Kanaha, sworn: . . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:130)

Paahao, sworn: . . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:130)

Pu'uepa 1st

Pahiha, sworn: . . . Hukiaa 3d bounds Puuepa 1st on the east side; Kukuipahu *mauka* and Puuepa 2d on the north side and *makai* by the sea. Puuepa 1st always had a fishing right, extending out into deep water. A long rock in the sea called Pohakuloa is the boundary at shore between Puuepa 1st, Hukiaa 3d there is a large rock on shore marked P & H; thence the boundary runs up *iwi aina* (a ridge of small stones which the natives formed in clearing their potato and *kalo* patches) to stones set in the ground and marked P. . . (Volume A No. 1:163-164)

Waikā

Puhi, sworn: . . . A rocky point, named Oneloa, is the boundary of Waika where Kawaihae joins it. I do not know about fishing rights. . . (Volume A No. 1:171)

Kaohia, sworn: . . . The sea is the *makai* boundary, and the land had an ancient fishing right extending out to sea. Oneloa is the boundary between Kawaihae and Waika; thence up a small *awaawa* to a point *makai* of Maaukaa. . . (Volume A No. 1:172)

Table 4. Oceanic boundaries and fishing rights in the North Kohala District.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Awalua	No	-	-	-
Hā'ena	No	-	-	-
Honoipu	No	-	-	-
Kāhei, Hualua	No	-	-	-
Kahuā Li'ili'i (1 st)	Yes	Not specified	Not specified	-
Kahuā Nui (2 nd)	Yes	Not specified	Not specified	-
Kaiholena 1 st and 2 nd	Yes	Yes	Yes	Roughly 5/8 of a mile into the deep sea
Kaiho'onā	No	-	-	-
Kaipuha'a, Lamaloloa	No	-	-	-
Kalala 1 st and 2 nd , Koki'o	No	-	-	-
Kamano	Yes	Yes	Yes	As far as can see bottom
Kapa'a	No	-	-	-
Kapa'a Iki	No	-	-	-
Kapa'a Nui	Yes	Yes	Not specified	No testimony given
Kapunapuna	No	-	-	-
Kaupalaoa	No	-	-	-
Kealahewa 1 st	Yes	Not specified	Not specified	-
Kealahewa 3 rd	Yes	Yes	Not specified	-
Kehena, Kipi	No	-	-	-
Kehena 2 nd	Yes	Yes	Yes	Extended out to undetermined depth, <i>Konohiki</i> collected money from those who fished there
Ki'ioakalani	Yes	Yes	Yes	<i>Konohiki</i> fishing rights
Kokoiki	No	-	-	-
Kou	No	-	-	-
Kukuipahu	Yes	Yes	Yes	-
Māhukona 1 st	Yes	Not specified	Not specified	No testimony given
Māhukona 2 nd	Yes	Yes	Yes	-
Makeanehu	No	-	-	-
Makiloa, Pahinahina	No	-	-	-
Opihipau, Hukia'a	No	-	-	-
Pōhakulua, Ahulua	No	-	-	-
Pua'a 1 st	Yes	Yes	Yes	Near shore fishing only extending to squid grounds
Puaiki	No	-	-	-
Puakea	No	-	-	-
Puanui	Yes	Yes	Yes	-
Pu'uepa 1 st	Yes	Yes	Yes	To deep water
Pu'uepa 2 nd	Yes	Yes	Not specified	-
Pu'ukole, Koea, Lapakahi	No	-	-	-
'Upolu 1 st and 2 nd	Yes	Not specified	Not specified	Testimony given by surveyors only
Waikā	Yes	Yes	Yes	-

South Kohala District

Ten *ahupua'a* of south Kohala were surveyed for their boundaries, seven of which had boundaries that extended out to sea and claimed ancient fishing rights (Table 5 and Figure 26). Of these, details are presented for only two of the *ahupua'a* (Kawaihae Akau [1st] and Hikina [2nd]). Fishing grounds for Kawaihae Akau extended from Pōki'i'āhua to Kawaihae Hikina, and the grounds for Kawaihae Hikina extended from the shore to the Kona side of Kauhuhu and Pokiiahua, although the testimony reveals that part of the catch from Kawaihae Hikina was to be given to John Young and the *konohiki* for Kawaihae Akau. Both *ahupua'a* also had rights to *poho pa'akai* (salt collection areas), particularly Kawaihae Akau, which according to the testimony had the rights to the majority of the salt. While fishing rights were also claimed by Lālāmilo, the testimony for that *ahupua'a* does not elaborate on specifics. Information presented for Puakō, however, relates that Lālāmilo had rights over Puakō's waters. The excerpts of Boundary Commission testimonies for the *ahupua'a* of South Kohala that discussed ancient fishing rights and boundaries are presented below (underlining and italicization added for emphasis and clarity).

'Anaeho'omalu

George Kaukuna, sworn: . . . Know the land of Anaehoomalu in South Kohala. Puanahulu, a land in North Kona bounds it on the Southwest side; this land used to bound it on the *mauka* side also, but I am told that Waikoloa now bounds it from the South corner, bounded on the North side by Kalahuipuaa; and by the sea on the *makai* side. The land has ancient fishing rights extending out to sea. . . . (Volume A No. 1:386)

Naauhau, sworn: . . . Waikoloa is said to bound Anaehoomalu *mauka* to Kepani; just before you can see the trees at the shore, on Kalahuipuaa, coming towards Kawaihae. There turn *makai* along Kalahuipuaa to Iliilenehe at Pohakuloa, on the sea shore. Ancient fishing rights extending out to sea. . . . (Volume A No. 1:387)

Kalāhuipua'a

George Kaukuna, sworn: . . . a place called Milokukahi; a grove of Milo trees, where the boundary turns *makai*, along Waimea to seashore. Between the seashore and Milokukahi there is a place on the boundary called Keahaaha on *aa*. Pohakupuka, a rock in the sea, is the boundary at shore. Ancient fishing rights extending out to sea. . . . (Volume A No. 1:384)

Naauhau, sworn: . . . thence to Pohakupuka, a large rock in the sea with holes through it. Ancient fishing rights extending out to sea. . . . (Volume A No. 1:385)

Kawaihae Akau (1st)

Kalua, sworn: . . . The boundary runs down Keawewai gulch to Keanakawaha; thence down the gulch to Pohakuloa and thence follows the gulch to the sea. Kawaihae 1st is bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . . (Volume B:148)

Kawaihae Hikina (2nd)

Kahiahikela, sworn: . . . Kawaihae is bounded *makai* by the sea, and has ancient fishing rights extending out to sea; bounded on the Kona side by the *Ahupuaa* of Waimea. In Kamehameha I time, I heard from my parents that he gave the land adjoining Kawaihae at the sea shore to Ouli; thereby making that land extend to the sea, before that time, Ouli stopped at Puuiki. Davis and John Young were great favorites of Kamehameha I and he gave them the land, thereby making Ouli (*ili* of Waimea) bound Kawaihae at the sea shore... [Volume B:74]

Kaneahiku, sworn: . . . I have been away from here 40 or 50 years, and have forgotten the boundaries. John Young was alive when I moved away. The beach and sea on the Kona side of Kauhuhu belonged to Kawaihae Hikina [Kawaihae 2]. When we came from the other Kawaihae on to this place to fish, we had to give part of our fish to Olohana [John Young]. . . . (Volume B:390)

Kamoehau, sworn: . . . The sea from Pokiiahua to Kauhuhu belonged to Kawaihae Akau [Kawaihae 1], and the sea on the Kona side of Pokiiahua to Kawaihae Hikina. Mahi lived on the tract of land between Pokiiahua and Kauhuhu, but was *Konohiki* under Kalaimoku, and not under Olohana. He used to divide the fish and give part to Olohana. Olohana and Kalaimoku were *noho like* [lived under same privileges], so they used to give him part of the fish. . .

Part of the *poho paakai* [salt pans] belong to Kawaihae Hikina, but most of them belong to Kawaihae 1st. The boundary between the two lands is where I stated before. The folks living *mauka* on Kawaihae 2d used to go after salt at the shore to the salt works near Kauhuhu. The *poho paakai* Pohakuloa, Kaholei, Piipepii, Nupaa belong to Kawaihae Hikina, the other *poho paakai* to Kawaihae 1st. They are *lele* of Kawaihae Hikina. Kaneloa is on Kawaihae Hikina, and I know of *poho paakai* called Kaneloa. Know of place of Kawaihae Hikina called Makela, but do not know of salt piece of that name.

Malahuehue is an *ili* of Kawaihae Hikina, and I know of salt place at shore by that name, and it belongs to Kawaihae Hikina. Kukui is an *ili aina* of Kawaihae Hikina; I do not know of any salt place of that name. Kapahukapu is an *ili* of Kawaihae Hikina, I do not know of any *poho paakai* of that name. The places I have mentioned are *ili aina* of Kawaihae Hikina, and the *poho paakai* of the same names belong to it also. . . (Volume B:391-392)

J.P. Parker, Jr., sworn: . . . I know the lands of Kawaihae 1st and Kawaihae 2d, and have heard where the boundary is between them from Hueu, Kini Keoke and Kauwe. They told me that the fishing rights belong to the King's Kawaihae and that the gulch between my house at the shore and John Young's old house was the boundary. The gulch is on the Kona side of my house. . . (Volume B:392)

S.P. Wahinenui, sworn: . . . When we used to catch fish Olohana's man used to take part, and the *Konohiki* of Kawaihae 1st a part. I do not know why. I have always heard from Hueu (George Davis) that the fishing rights belonged to Kawaihae 1st. I have heard that the places for making salt belonged to both lands. The *poho paakai* have the same names as the *ili aina* to which they belong on both Kawaihae. The *makaha* of the fish pond is called Kukui and belonged to Kawaihae 2nd. I never heard any dispute about the *poho paakai*, but the dispute was about the land on the Kona side of them to Pokiahua gulch. (Volume B:393)

Lālāmilo

Kauuewahine, sworn. . . C. Kanaina only claims the beach and fishing rights. Lalamilo had ancient fishing rights, extending out to sea. . .

‘Ouli

Pupuka, sworn: . . . I was born on Ouli, and was quite large at the building of Kiholo [ca. 1812], but do not know the date of my birth. I have lived on Ouli and adjoining lands. I know all the boundaries of said land, used to *mahiai* on the *makai* portion of it. Ouli is bounded *makai* by the sea, and has ancient fishing rights; it is bounded on the Kona side by Waimea.

The boundary at seashore is at Kaihumoku, a point of stones in the sea, or the middle of the sand beach; thence direct to Ahuahaloo, the boundary following an old trail to this place. . . (Volume B:64)

Kalua, sworn. . . I was born in Waimea, South Kohala Hawaii at the time of the plague (1804), and have lived in Waimea and Kapia, a land near Ouli. I am a *kamaaina* and know the boundaries of Ouli. Kauhine^k a *konohiki* (now dead) showed them to me. The sea bounds it *makai* and the land has ancient fishing rights. . . (Volume 1:120)

Puakō

Kauuewahine, sworn: . . . Lalamilo bounds Puako on the Kawaihae side (or North side) a wall at the dam of a fishing pond at a place called Makaha is the boundary. Thence along the stream from the pond to a place called Kaekuakapuaa, a wall at the shore; Thence along shore towards Kona to a large rock on the sand beach called Kapelekaaha. The sea belongs to Lalamilo. Thence *mauka* along Lalamilo to Puapuaa passing from the Kona side to the *mauka* side of the pond. Thence towards Kohala hills to Piikoele, an old pond now filled with sand, on the *mauka* side of the present pond; thence to the *Makaha*. These are the boundaries of Puako as told me by my parents. . . (Volume B:296)

Table 5. Oceanic boundaries and fishing rights in the South Kohala District.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Ala'ōhi'a	No	-	-	-
Ānaeho'omalū	Yes	Yes	Yes	-
Hale'aha	No	-	-	-
Hale'aha	No	-	-	-
Kalāhuipua'a	Yes	Yes	Yes	-
Kanakanaka	No	-	-	-
Kapia	No	-	-	-
Kauniho	No	-	-	-
Kaupo	No	-	-	-
Kawaihae Akau	Yes	Yes	Yes	From Pokiiahua to Kawaihae Hikina or to Kauhuhu. Had <i>poho pa'akai</i> rights
Kawaihae Hikina	Yes	Yes	Yes	Beach and Kona side of Kauhuhu/Pokiiahua. Had <i>poho pa'akai</i> rights in 'ili of Pohakuloa, Kaholei, Kaneloa, Malahuehue, Pi'ipepi'i, Nupa'a. Part of fish catch went to John Young and to <i>konohiki</i> of Kawaihae Akau
Keoniki	No	-	-	-
Lālāmilo	Yes	Yes	Yes	-
Lanikepu	No	-	-	-
Momoualua	No	-	-	-
Ōuli	Yes	Yes	Yes	-
Pahipa	No	-	-	-
Panoluukia	No	-	-	-
Pauahi	No	-	-	-
Paulama	No	-	-	-
Puakō	Yes	No	No	Sea belonged to Lālāmilo
Pu'ukalani (Pukalani)	No	-	-	-
Pu'ukapu	No	-	-	-
Puu Kawaiwai	No	-	-	-
Pu'u Ki	No	-	-	-
Waawaa	No	-	-	-
Wai'aka	Yes	Not specified	Not specified	-
Waikōloa	Yes	No	No	-
Waima'a	Yes	Yes	Yes	-
Waiuia	No	-	-	-
Waiuia	No	-	-	-

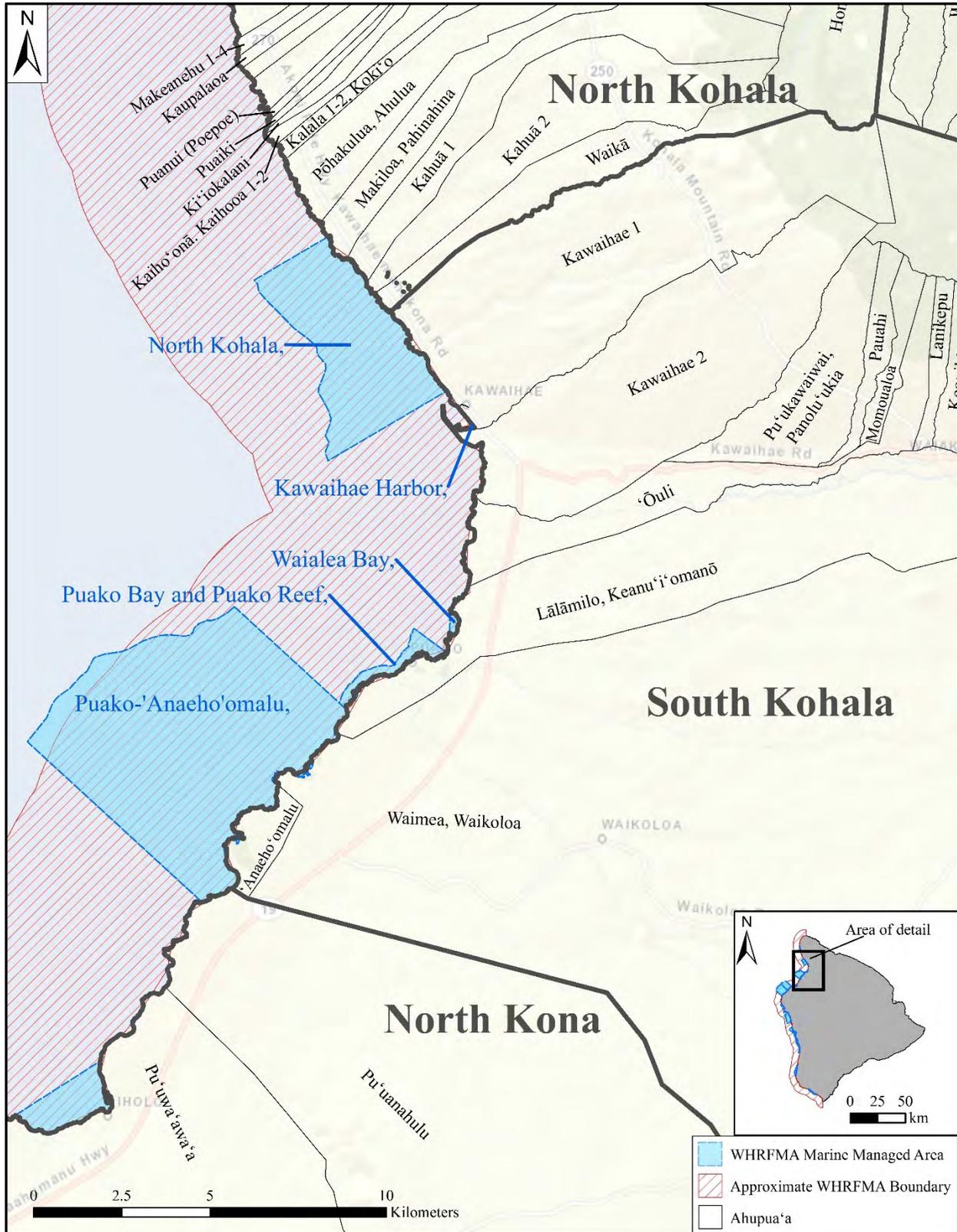


Figure 26. Ahupua'a of the South Kohala District.

Waikōloa

Mi, sworn: . . . Waimea is a Kalana. – which is the same as an island divided in to districts. – there are eight Okana in Waimea. In those Okana are those lands said to extend out (*hele mawaho*). These lands came in to the possession of Kamehameha I who said to Kupapaulu, go and look out to of the large lands running to the sea, for John Young and Isaac Davis. Kupapaulu went to Keawekuloa, the *haku aina*, who said if we give Waikoloa to the foreigners they will get Kalahuipua [Kalāhuipua‘a] and Anaionalu [Anaehoomalu] (two lands at the beach) then your master will have no fish. So they kept the sea lands and gave Waikoloa to Isaac Davis. John Young asked my parents if it was a large land they said, the black *aa* was Napuu, and the good land Waimea. . . (Volume A No. 1:7)

Moolau, sworn: . . . all the plain was given to Waikoloa, and Keanakaloa secured the fish lands at the shore. All the *pili* from Ouli to the *aa* of Kona belonged to Waikoloa. . . (Volume A No. 1:8)

Waima‘a

Kaahumoku, sworn. . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. (Volume B:298)

North Kona District

In North Kona, forth-five *ahupua‘a* were surveyed for their boundaries as a result of the Boundary Commission proceedings (Table 6 and Figure 27). Of these, twenty-seven had boundaries that extended out to sea, and all of those were identified in the testimony as retaining ancient fishing rights. There were twelve total *ahupua‘a* whose specific fishing rights were described in detail as part of the testimony including Hale‘ōhi‘u, Hāmanamana, Hōlualoa 4th, Honokōhau Iki (1st), Honokōhau Nui (2nd), Kaloko, Ka‘ūpūlehu, Keahuolū, Keauhou 1st, Keauhou 2nd, Keōpū 3rd, and Pua‘a 1st. Within North Kona there were several *ahupua‘a* that either had fishing rights to waters in a neighboring *ahupua‘a*, or shared fishing rights with another *ahupua‘a*.

With respect to the fishing rights of Honokōhau Nui and Keauhou 2nd, testimonies did not specify whether the boundaries of the former extended out to sea nor whether there were any ancient fishing rights belonging to its inhabitants. However, testimony relates that residents of Honokōhau Nui did have permission to fish within the waters of Honokōhau Iki, and that the fishing rights within Honokōhau Iki were small, extending only from Maliu to Kananaka, where they were truncated by the seas belonging to Kealakehe and Honokōhau. While Honokōhau Iki held these shared fishing rights with Honokōhau Nui, there was some controversy over a *ko‘a ‘ōpelu* which was claimed and fished by the people belonging to Kaloko Ahupua‘a. Also of note in the testimony are the chronological limitations of *akule* fishing rights as they pertain to Keauhou 1st and 2nd, as the latter possessed fishing rights to *akule* during the reign of Ke‘eaumoku, but following the end of his reign (and the marital union of chiefs belonging to both Keauhou *ahupua‘a*), rights to the *akule* (and *‘ahi*) transferred to Keauhou 1st, and Keauhou 2nd only retained rights to bird hunting in the *mauka* lands. In the case of Hale‘ōhi‘u Ahupua‘a, fishing encompassed the waters of neighboring Hāmanamana Ahupua‘a, where residents were restricted to shoreline fishing only.

Table 6. Oceanic boundaries and fishing rights in the North Kona District.

<i>Ahupua‘a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
‘Auhaukea‘ē 1 st	Yes	Yes	Yes	-
Awake‘e	No	-	-	-
Awalua	No	-	-	-
Elepaio	No	-	-	-
Haleki‘i	Yes	Not specified	Not specified	No testimony given
Hale‘ōhi‘u	Yes	Yes	Yes	Also held fishing rights to Hāmanamana

Table 6 continued on next page.

Table 6.continued.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Hāmanamana	Yes	Yes	Yes	Rights belonged to Hale'ōhi'u, fishing confined to rocks on shore
Haukalua 2 nd	Yes	Yes	Yes	-
Hienaloli 1 st	Yes	Not specified	Not specified	No testimony given
Hienaloli 2 nd	Yes	Not specified	Not specified	-
Hienaloli 3 rd	No	-	-	-
Hienaloli 4 th	Yes	Yes	Yes	-
Hōlualoa 1 st	Yes	Yes	Yes	-
Hōlualoa 2 nd	Yes	Not specified	Not specified	-
Hōlualoa 3 rd	Yes	Not located	-	-
Hōlualoa 4 th	Yes	Yes	Yes	Only out until one couldn't see the sea floor
Honalo	No	-	-	-
Hōnauau	Yes	Yes	Yes	-
Honokōhau Iki	Yes	Yes	Yes	Small fishing rights extending from Maliu to Kananaka limited by the sea belonging to Kealakehe and Honokohau. May have jurisdiction over a <i>ko'a 'ōpelu</i> which was also fished and claimed by natives of Kaloko. Fishing also allowed here by natives of Honokōhau Nui.
Honokōhau Nui	Yes	Not specified	Not specified	Testimony for Honokōhau Iki relates Honokōhau Nui had fishing rights there
Honua'ino 1 st	Yes	Not specified	Not specified	-
Honua'ula	No	-	-	-
Hokukano, Kalukalu	Yes	Not specified	Not specified	No testimony given
Kahalu'u	Yes	Yes	Yes	-
Kahului 1 st	Yes	Not specified	Not specified	No testimony given
Kahului 2 nd	Yes	Yes	Yes	-
Kalaoa 1 st - 5 th	No	-	-	-
Kaloko	Yes	Yes	Yes	Claimed fishing rights to the <i>ko'a 'ōpelu</i> in Honokōhau Iki
Kanaeue	No	-	-	-
Kapalaaea 1 st	Yes	Not specified	Not specified	No testimony given
Kau	No	-	-	-

Table 6 continued on next page.

Table 6. continued.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Kaulana, Awalua, 'Ōhiki	No	-	-	-
Kaulehua	No	-	-	-
Kawanui Iki	Yes	Not specified	Not specified	No testimony given
Keahuolū	Yes	Yes	Yes	Keahuolū claimed the 'ōpelu
Kealakehe	No	-	-	-
Keauhou 1 st	Yes	Yes	Yes	<i>Akule</i> and ' <i>ahi</i> belonged to Keauhou 1 st after Ke'eumoku's reign
Keauhou 2 nd	Yes	Not specified	Yes	<i>Akule</i> belonged to Keauhou 2 nd during Ke'eumoku's reign. No fishing rights after his reign following the marriage of two chiefs of Keauhou 1 st and 2 nd
Keōpū 1 st	Yes	Not specified	Not specified	No testimony given
Keōpū 2 nd	No	-	-	-
Keōpū 3 rd	Yes	Yes	Yes	Small fishing rights cut off by Honua'ula, limited to Okolepohopohu
Kohanaiki	No	-	-	-
Kuamo'o	No	-	-	-
Kūki'o, Manini'ōwali	No	-	-	-
La'aloa 1 st	Yes	Yes	Yes	-
Lanihau Iki (1 st)	No	-	-	-
Lanihau Nui (2 nd)	Yes	Yes	Yes	-
Laula	No	-	-	-
Lehuula Iki	Yes	Not specified	Not specified	No testimony given
Lehuula Nui	Yes	Yes	Yes	-
Mahai'ula	No	-	-	-
Mā'ihī 1 st	Yes	Yes	Yes	-
Makalawena	Yes	Yes	Yes	-
Maka'ula	No	-	-	-
Maniniowali	No	-	-	-
Moeauoa 2 nd	Yes	Not specified	Not specified	-
Ohiki	No	-	-	-
'O'oma 1 st and 2 nd	No	-	-	-
Onouli Iki (1 st)	Yes	Not specified	Not specified	No testimony given

Table 6 continued on next page.

Table 6. continued.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Onouli Nui (2 nd)	Yes	Not specified	Not specified	-
Pāhoehoe 2 nd	Yes	Not specified	Not specified	No testimony given
Pua'a 1 st	Yes	Yes	Yes	Near shore and possibly to squid grounds
Pua'a 2 nd and 3 rd	No	-	-	-
Puapua'a 2 nd	No	-	-	-
Puapua'a Nui	Yes	Yes	Yes	-
Pu'u Anahulu	No	-	-	-
Pu'u Kala	No	-	-	-
Pu'u Wa'awa'a	Yes	Yes	Yes	-
Wai'aha 1 st	No	-	-	-
Wai'aha 2 nd	Yes	Yes	Yes	-

End of Table 6.

Collectively, the testimonies provided for the remaining *ahupua'a* of North Kona relay little detail, particularly with regard to distance offshore. The fishing rights of Ka'ūpūlehu were spatially restricted between Keawaiki and Popo'omino. Similarly, the fishing rights of Keōpū 3rd were cut off by the waters of Honua'ula, seemingly limited to the a stone on the shoreline called Okolepohopohu. The fishing grounds for Pua'a 1st expanded out a bit further to encompass the near shore fishery and the squid fishing grounds, while the rights of Hōlualoa 4th extended out as far as the ocean floor was visible from land. Excerpts of Boundary Commission testimonies for the *ahupua'a* of North Kona that discussed ancient fishing rights and boundaries are presented below (underlining and italicization added for emphasis and clarity).

'Auhaukea'e 1st

Kekoanui, sworn: . . . Kailianu w. was the *kamaaina* at the shore; she lived near the land; she pointed out the boundaries on both sides of the land at the shore; I marked the corner of the land on the South side, cut into a large rock X; on the North side is a ridge of rock in the sea by a sand beach; did not mark that. That land always had undisputed fishing right in the sea. . . (Volume B:450)

Hale'ōhi'u

Kanehailua, sworn: [near the southern boundary, *makai*] . . . thence to Kuula [a near shore hill], a *puu pohaku*, where we used to worship. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:266)

Hāmanamana

Kaukaliinea, sworn: . . . thence to Kahua, a *lae* at the seashore. Bounded *makai* by the sea. I have heard that the Ancient fishing rights belonged to Haleohiu. The people from Hamanamana had their fishing confined to the rocks. . . (Volume B:264)

Kanehailua, sworn: thence *makai* to Kahua at the seashore. Bounded *makai* by the sea. The ancient fishing rights was limited to the rocks at shore. The sea belonging to Haleohiu. . . (Volume B:264)

Haukalua 2nd

Hoolau, sworn: . . . Bounded on the *makai* side by the sea. Ancient fishing rights extending out to sea. . . (Volume B:214)

Hienaloli 4th

Haleokane, sworn: I was born at Hianaloli, North Kona, Hawaii and have lived here ever since. I was quite large when Mr. Thurston arrived [1820], know the boundaries of the land, my *makua* (now dead) pointed them out to me. The sea is the *makai* boundary and the land has ancient fishing rights extending out to sea. . . (Volume A No. 1:346)

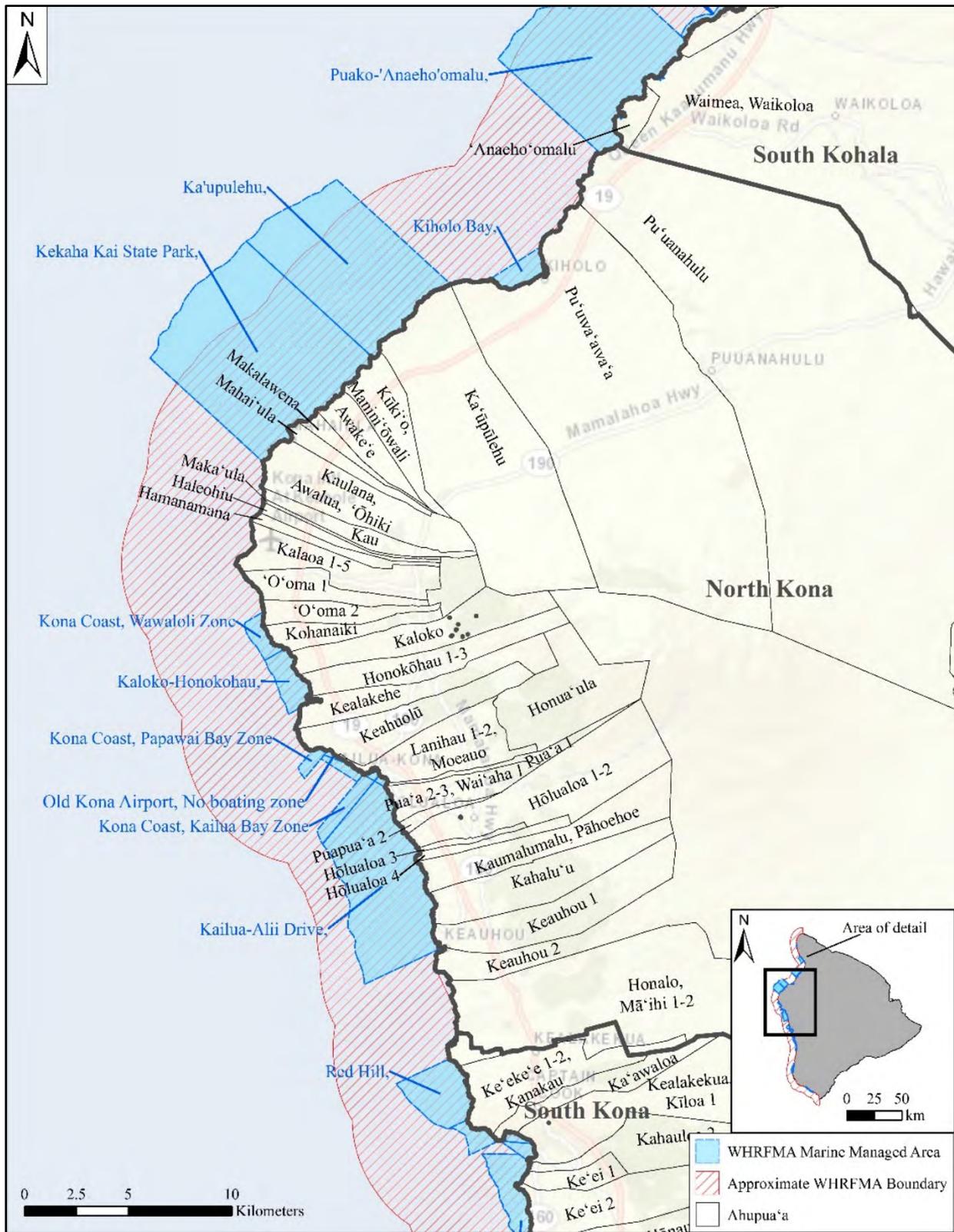


Figure 27. Ahupua'a of the North Kona District.

Hōlualoa 1st

Keliikanakaole, sworn: . . . thence *makai* following an *iwi aina* to a place at shore called Kuapae, a rocky point in the sea, with sand each side of it. The boundary at shore between Puapua and Hōlualoa 1st. Ancient fishing rights extending out to sea. . . (Volume A No. 1:337)

Ihihi, sworn: . . . thence *makai* to Puuopelu, an *oioina kukui* [trail side resting place, shade by *kukui* trees]; thence *makai* along the *iwi aina* to Kuapae, a *puu pahoehoe* with sand on Kailua side and sea on the *makai* side. Ancient fishing rights extending out to sea. . . (Volume A No. 1:338)

Hōlualoa 4th

Kea, sworn: ...My parents (now dead) who were also *kamaainas*, pointed out the boundaries to me. At that time all lands had different *Konohiki*. Kaumalumalu bounds Hōlualoa 4th on the South side; the sea on the *makai* side. Ancient fishing rights extending out to where it is hard to see bottom. . . (Volume A No. 1: 343)

Haleokane, sworn: . . . The sea is the *makai* boundary and the land has ancient fishing rights extending out to sea. Hienaloli 5th is on the South side, the boundary at shore between Hianaloli 4th and Hianaloli 5th is Okikau, a water hole and bathing place. . . (Volume A No. 1: 346)

Hōnaunau

Kila, sworn: . . . Ancient fishing rights extending out to sea. . . (Volume A No. 1:282)

Kuiline, sworn: . . . Know a place called Anapuka; it is way on Honaunau. The boundary as it was told to me runs from Anapukalua to Puulehu, and then to Mahana. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:223)

Honokōhau Iki (1st)

Hoohio, sworn: . . . Thence *makai* to Maliu a lae, the sea bounds the land *makai*; and there is a very small fishing right cut off by the sea of Kealakehe and Honokohau. . . (Volume A No. 1:364)

Kamohai, sworn: . . . Thence to a *heiau* named Halekuo thence to Maliu a lae in the sea; on the North side of the point. Ancient fishing rights extend from Maliu to Kananaka: a ledge of rocks in the sea, which looks red from the water is next to Honokohau. . . (Volume A No. 1:365)

Kekoanui, sworn: I am a *kamaaina* of Honokohau, and live there. I went with Mr. Hitchcock to survey the land. We commenced at the corner marked by Brown, at the seashore. Kaloko, said to be Keelikolani's land, is on the North side of the land. Kaohi w. and Kailioha kane were our *kamaainas* in the surveying; they pointed out the boundaries, a large rock in the sea, over which the waves break; it is quite a little distance off from the shore. There is a "Koa Opelu" in the sea, the *kamaainas* say it belongs to this land. Kaohi is a very old woman and is feeble, as is the man; they said that the people of Kaloko fish in the *Koa Opelu*, as formerly the *Konohiki* of Honokohau was a woman, who married a man who was the *Konohiki* of Kaloko, and allowed him to fish on her grounds. . . . Honokohau nui has fishing right in the sea. . . (Volume B:452-453)

D.H. Hitchcock, sworn: I marked the North *mauka* corner by the aa, as near as I could tell from what the natives told me of the boundary. . . According to the boundaries of Honokohau the "Koa Opelu" is entirely within the land, as the old woman said it belonged. . . From the beach up the North side of the land, the boundary line strikes up onto the aa to an *Ahu*, and on to a stone wall, said to be the boundary. The South side was surveyed by J.F. Brown, as far up as Honokohau iki extends, and we found his corner. . . The only disputed point was about the "Koa Opelu," which the Kaloko people claim. . . (Volume B:453)

Kahalu'u

Papa, sworn: . . . The sea bounds it *makai*, and it has ancient fishing rights extending out to sea. Keauhou bounds Kahaluu on the Southern side; at the sea shore the boundary between these two places is at Ohiki, a point on the South side of Paaniau, and near to it. . . (Volume A No. 1:321)

Kaahuna, sworn: . . . Keauhou bounds Kahaluu on the South side; sea *makai*; and the land has fishing rights. The boundary at shore is Ohiki, a pile of stones on the South side of Paaniau. . . (Volume A No. 1:322)

Kahului 2nd

Niniha, sworn: . . . I pointed out the boundaries of Kahului 1st when it was surveyed; thence along the land sold, to Kalalii, a *pulu lepo* at seashore. Ancient fishing rights extending out to sea. . . (Volume A No. 1:328)

Makuakane, sworn: . . . Thence the boundary runs along land sold, to the sea, and the land has ancient fishing rights extending out to sea. . . (Volume A No. 1:329)

Kaloko

Nahuina, sworn: . . . thence *makai* to Keawewai, an *awaawa*, with water near the shore road thence to Okuhi, an *awaawa* in the sea with a point on each side of it. On the *makai* side Kaloko is bounded by the sea; and the land had ancient fishing rights extending out to sea. The *koa* is on Kaloko and the *olona* on Honokohaunui. . . (Volume A No. 1:371)

Kaumalumu, Pāhoehoe

Kamakahoohia, sworn: . . . Kaleiahana (now dead) pointed out the boundaries to me; they used to go into the mountain after *uwau*. I went with them after sandalwood. The sea bounds this land *makai* and it has ancient fishing rights extending out to sea. Pahoehoe 1st is on the South side; the boundary at shore between these two lands is Manawai, a water hole on the North side of the landing. . . thence to Kui, a *pali* in the woods where canoe makers used to worship; here the boundary strikes the Judd road. . . (Volume A No. 1:324-325)

Palauolelo, sworn: . . . (The boundary at seashore between Holualoa and Kaumalumu is at Kuula opelu, a *heiau* [an '*ōpelu* fisherman's temple] The *Kaheka* [near shore pond—anchialine pond] is on Kaumalumu . . . (Volume A No. 1:325)

Ka'ūpūlehu

Keliihanapule, sworn: . . . Bounded on the South side by Kukio owned by Pupule, the boundary at shore is in the middle of a place called Keawaiki. The land had ancient fishing rights extending out to sea from Keawaiki to Popoomino, a pile of stones at the corner of Pupule's land. . . The place where they make salt at the seashore is on the Puna side of the lava flow. . . (Volume B:247-248)

Kahueai, sworn: . . . The boundary on Kohala side at shore is a spot of sand called Kolomuo on the south side of Kalaemano. . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:249-250)

Keahuolū

J.Z. Waiau, sworn: . . . thence to Puunahaha, a large red hill on the *mauka* side of the *makai* Government road, thence to Puuokaloa, an *oioina* or small hill; thence to Kaiwi, a *lae pohaku* on the middle of point. Ancient fishing rights extending out to sea. . . (Volume A No. 1:354-355)

Kealakai, sworn: . . . thence to Puunahaha; the boundary passing on the North side; from thence to Puuokaloa; thence *makai* to Kaiwi, the *kula* in middle of point and *lae pohaku* on the point at sea shore. Ancient fishing rights extending out to sea and claiming the *opelu*. . . (Volume A No. 1:356)

Keauhou 1st

Lono, sworn: . . . The boundary at the shore between Keauhou 1st and Keauhou 2nd is at Kamauae, a *heiau* for fishermen situated above the beach, on the hill where the houses stand; thence *mauka* to a breadfruit tree; thence to the head of Holua. . . Keauhou is bounded by the sea and the land has ancient fishing rights extending out to sea. . . (Volume A No. 1:319)

Keauhou 2nd

Kakio, sworn: . . . The boundary at shore between the two Keauhous is at a place called Kamauae at the beach; Thence it runs *mauka* to the head of *Holua* (an old sliding place). . . They say in the days of Keeaumoku the *Akule* used to belong to Keauhou 2^d and the birds to Keauhou 1st, but the Chief of Keauhou 2 married a chief of Keauhou 1st and after that all the fish were given to Keauhou 1st and the birds and land *mauka* to Keauhou 2nd. . . (Volume A No. 1:267)

Keōpū 3rd

Kaleiheana, sworn: . . . John Ii (now dead) pointed out the *makai* boundaries to me. The land has very small fishing rights, which are cut off by Honuaula. The sand in the sea is on Honuaula, and the aa is on Keopu. The boundary at shore between these two lands is at Puukoa, a noted place for surf riding. There is a wall here called Papaula, and the boundary comes to the middle of said wall. . . Bounded makai by the sea. . . Commencing on the other side at seashore at a large stone called Okolepohupohu *makai* of the Governor's stone house Hulihee. . . (Volume A No. 1: 302)

Kauakahi, sworn: . . . Papaula is the boundary at the shore between Keopu and Honuaula; The land had ancient fishing rights at Okolepohopohu, and from there the boundary runs *mauka* to Makakauahi, an *oioina*. . . (Volume A No. 1: 303)

La'aloa 1st

Nahina, sworn: . . . Ancient fishing rights extending out to sea. . . (Volume A No. 1: 331)

Lanihau Nui (2nd)

J.Z. Waiau, sworn: . . . It is bounded on the North side by Keahuolu and on the South side by Lanihauiki, the land has ancient fishing rights extending out to sea. The boundary at shore between Lanihaunui and Lanihauiki is Kukanapaio, an *awaawa kai* in the rocks; thence *mauka* to Kuaaona between the fish ponds, outside of the fort [at Ahuena]. I think one good sized fish pond is on Lanihauiki, called Waikauila; Waihonu is on Lanihaunui ; thence to a coconut tree on the inside of the old fort; thence to a long stone above the fort, buried in sand, some of the *kamaaina* say it used to reach wet sand. . . (Volume A No. 1:305-306)

Lehuula Nui

Hapuku, sworn: . . . I only know the boundaries of Lehuulanui below the great walled lot. Sea bounds this land on the makai and it has ancient fishing rights extending out to sea. . . Paaaoao is the boundary at sea shore between Kawanui and Lehuulanui; there is a wall and landing there. . . (Volume A No. 1:315)

Mā'ihī 1st

Ehu, sworn: . . . Honalo bounds it on the north side. Maihi 2nd on the south side. Leinakalao is the boundary at shore between Maihi I and Maihi 2nd. Ancient fishing rights extending out to sea. The Opelu belonged to Maihi and the Ahi to Keauhou; bounded makai by the sea. . . (Volume A No. 1:311)

Kailikini, sworn: . . . Leinakalao, a canoe landing is the boundary between Maihi 1st and Maihi 2nd. A *pali* between Koa Opelu [a *heiau*] belongs to Maihi 1st. The sea bounds it makai. The boundary at shore between Maihi 1st and Honalo is at Keawakui running along the south side of it. . . (Volume A No. 1:312)

Makalawena

Kahailii, sworn: . . . Commencing at the seashore, the boundary between the land of Makalawena and Mahaiula is a *kaheka* [tidal pool], called Kaelemiha. . . thence to Mokupohaku, or Kaiwikohola, a large rock in the surf. Makalawena is bounded makai by the sea, and the land has ancient fishing rights, extending out to sea. . . (Volume A No. 1:373-374)

Mamae, sworn: . . . The boundary at shore between Makalawena and Mahaiula is Nahaleoahumakaike, a *kaheka*; thence to an *ahu* called Kaelemiha. . . Thence to Pohakuaeapoapu, a large rock at the seashore, and from thence to a large rock in the surf called Kaiwi Kohola. . . (Volume A No. 1:374-375)

Pua'a 1st

Kauwa w., sworn: . . . Puaa is bounded makai by the sea and the land has ancient fishing rights near the shore, but not extending out to sea. Thence commencing at a *punawai* by the seashore called Holoke, between the lands of Puaa and Auhaukeae and running *mauka* to Poholua, a *huli pali* near the shore and just above a house. . . *makai* to Hiilia, a *punawai*; thence to Kekawa, at the seashore.

Hiilia is *mauka* of Governor Adam's wall, and Kekawa is the *awaawa kai* [an ocean inlet], with points each side. The boundary is between the two. Puaa has ancient fishing rights extending to the squid grounds. . . (Volume A No. 1:376-378)

Kahueai, sworn: . . . The boundary at shore on the Kau side is Nakakai, owned by Pupule, the *mauka* corner of Pupule's land on Puaa 2nd is at Kaopapa. . . thence *makai* along Hauanio's land and thence along Ukumea's land and then along Kole to the sea shore. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:244-245)

Puapua'a Nui

Ukumea, sworn: . . . Bounded on the North side by Piki, the boundary at shore between these two lands is Keawapuapua on the south side of the *awa* [landing]. . . thence to Huloa, a resting place above Governor Adams wall; thence to seashore. I do not know the name of this *makai* point. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:260-261)

Mahalo, sworn: . . . Commencing at the seashore on the Kau side of the Awaawa Puhuihu, the *awaawa* being on the Kau side of the canoe landing; thence to Pakuhano, *aa mauka* of the wall. . . thence *makai* to Ahuloa; thence to Puuopelu; thence to Kuapae at the seashore. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:261)

Pu'u Wa'awa'a

Aea, sworn: . . . Ono, an older cousin of mine, now dead, pointed out the boundaries to me; as the different lands had different *Konohiki* and different *koele* [planting areas worked for the chiefs] &c. The land of Puawaa is bounded on the South side by Kaupulehu and *mauka* by the same. On the North by the land of Puanahulu, and *makai* by the sea. The ancient fishing rights of the land extend out to sea.

The boundary at sea shore between this land and Kaupulehu, is at Pohakuokahai, a rocky point in the *aa* on the lava flow of 1801, the flow from Hualalai to sea. I think it is the third point from Kiholo, in the flow, as you go toward Kona; thence the boundary between these lands runs *mauka* on *aa* to Keahupuaa. . . (Volume A No. 1:253)

Wai'aha 2nd

Peahi, sworn: . . . A water hole called Waialipi is on the boundary between the two Waiahas. Waiaha 2d is bounded by Waiaha 1st to a banana grove at the edge of the woods. . . Waiaha 2d is bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:269)

South Kona District

There were twenty-nine *ahupua'a* in South Kona whose boundaries were surveyed (Table 7 and Figure 28). Of these, twenty had boundaries that extended out into the sea, and nineteen of those were identified as having ancient fishing rights. Boundary Commission testimony that included detailed accounts regarding these fishing rights were provided only for seven of these *ahupua'a* (Ka'apuna, Kahauloa 2nd, Kalamakowali, Kalamakumu, Ke'ei 1st, Ki'ilae, and Pāpā 2nd), while the testimony for 'Ōlelomoana Nui related that fishing rights and resources belonged to the *konohiki*. With respect to Ki'ilae and Pāpā 2nd, fishing rights only extended out to where the bottom of the sea was no longer visible. Several other *ahupua'a*, including Kahauloa 2nd, Kalamakumu, and Ke'ei 1st, likely held rights only in shallow water, with Kalamakumu being cut off by the fishing grounds of Kealakekua. Similarly, the fishing grounds of Ka'apuna, although they extended out further out into the deep sea, were truncated by Honomalino. The rights of Kalamakowali were geographically restricted to a fishing place known as Mokunui. Excerpts of Boundary Commission testimonies for the *ahupua'a* of South Kona that discussed ancient fishing rights and boundaries are presented below (underlining and italicization added for emphasis and clarity).

'Alikā

Kahinalua, sworn: . . . Bounded *makai* by the sea. *Pali* called Kahoolewlewa is the boundary at shore between Alikā and Kipahoe. There is a rock marked K. I think by land surveyed by Wiltse. (Volume B:322)

Makia, sworn: . . . Bounded *makai* by sea. Kipahoe bounds it on Kona side from shore to *mauka* end. Boundary at shore is at Kahoolewalea a *pali* at shore. The rock is marked. (Volume B:322)

Table 7. Oceanic boundaries and fishing rights in the South Kona District.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Ala'e 1 st	Yes	Not specified	Not specified	-
Ala'e 2 nd	Yes	Not specified	Not specified	-
'Alikā	Yes	Yes	Not specified	-
Anapuka, Ho'opūloa	No	-	-	-
Haleili	No	-	-	-
Haukālua 1 st	No	-	-	-
Haukālua 2 nd	Yes	Yes	Yes	-
Hōnaunau	Yes	Yes	Yes	-
Honokua	Yes	Yes	Yes	-
Honomalino	Yes	Yes	Yes	-
Ho'okena	Yes	Yes	Yes	-
Ho'opūloa	No	-	-	-
Ilikahi	No	-	-	-
Ka'apuna	Yes	Yes	Yes	Extending into deep sea until it became jurisdiction of Honomalino
Kahauloa 2 nd	Yes	Yes	Yes	Only shallow water
Kalāhiki	Yes	Yes	Yes	-
Kalamakowali	Yes	Yes	Yes	Only at Mokunui
Kalamaililoa	Yes	Not specified	Not specified	-
Kalamakāpala	No	-	-	-
Kalamakumu	Yes	Yes	Yes	Only to short distance out, truncated by Kealakekua's fishing rights
Kalamaumi	No	-	-	-
Kalamawaiawaawa	No	-	-	-
Kalihi	No	-	-	-
Kalukalu, Hokukano	Yes	Not specified	Not specified	No testimony given
Kamakaolohe	No	-	-	-
Kanakau	No	-	-	-
Ka'ohe 1-3	No	-	-	-
Ka'ohe 4 th	Yes	Yes	Yes	-
Ka'ohe 5 th	No	-	-	-
Kapu'a	Yes	Yes	Yes	-
Kapuai	No	-	-	-
Kauahia	No	-	-	-
Kauhakō	No	-	-	-
Kaulanamauna	No	-	-	-
Kauleolī 1 st and 2 nd	No	-	-	-
Kealakekua, Ka'awaloa	Yes	Not specified	Not specified	No testimony given
Keālia 1 st	Yes	Yes	Yes	-
Keālia 2 nd	Yes	Not specified	Not specified	No testimony given
Ke'ei 1 st	Yes	Yes	Yes	Possibly only in shallow water

Table 7 continued on next page.

Table 7. continued.

<i>Ahupua'a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Ke'e'i 2 nd	Yes	Not specified	Not specified	-
Ke'eke'e 1 st 2 nd , Kanakau	No	-	-	-
Keōkea	Yes	Not specified	Not specified	-
Keopuka	No	-	-	-
Ki'ilae	Yes	Yes	Yes	Only as far as can see bottom of sea
Kiloa	No	-	-	-
Kīpāhoehoe	No	-	-	-
Kipu	No	-	-	-
Kolo	No	-	-	-
Kukuiopa'e 1-2	No	-	-	-
Maku'u	No	-	-	-
Maunaoni 1-6	No	-	-	-
Miloli'i	No	-	-	-
Okoe 1-2	No	-	-	-
‘Ōlelomoana Iki	Yes	Yes	Yes	-
‘Ōlelomoana Nui	Yes	Yes	Yes	Fishing rights belonged to <i>konohiki</i>
Omoka'a	No	-	-	-
‘Ōpihihale	No	-	-	-
Pāhoehoe 1 st	No	-	-	-
Pāhoehoe 2 nd	Yes	Yes	Yes	-
Pāpā 1 st	No	-	-	-
Pāpā 2 nd	Yes	Yes	Yes	Fishing rights extend out to where bottom is no longer visible
Waiea	No	-	-	-
Waipunaula	No	-	-	-
Waikāku'u	No	-	-	-

End of Table 7.

Haukalua 2nd

Hoolau, sworn: . . . Bounded on the *makai* side by the sea. Ancient fishing rights extending out to sea. . . . (Volume B:214)

Hōnaunau

Kila, sworn: . . . Ancient fishing rights extending out to sea. . . . (Volume A No. 1:282)

Kuiline, sworn: . . . Know a place called Anapuka; it is way on Honaunau. The boundary as it was told to me runs from Anapukalua to Puulehu, and then to Mahana. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . . (Volume B:223)

Honokua

Kaleikoa, sworn: . . . The sea bounds it *makai*. Ancient fishing rights extending out to sea. . . . (Volume B:211)

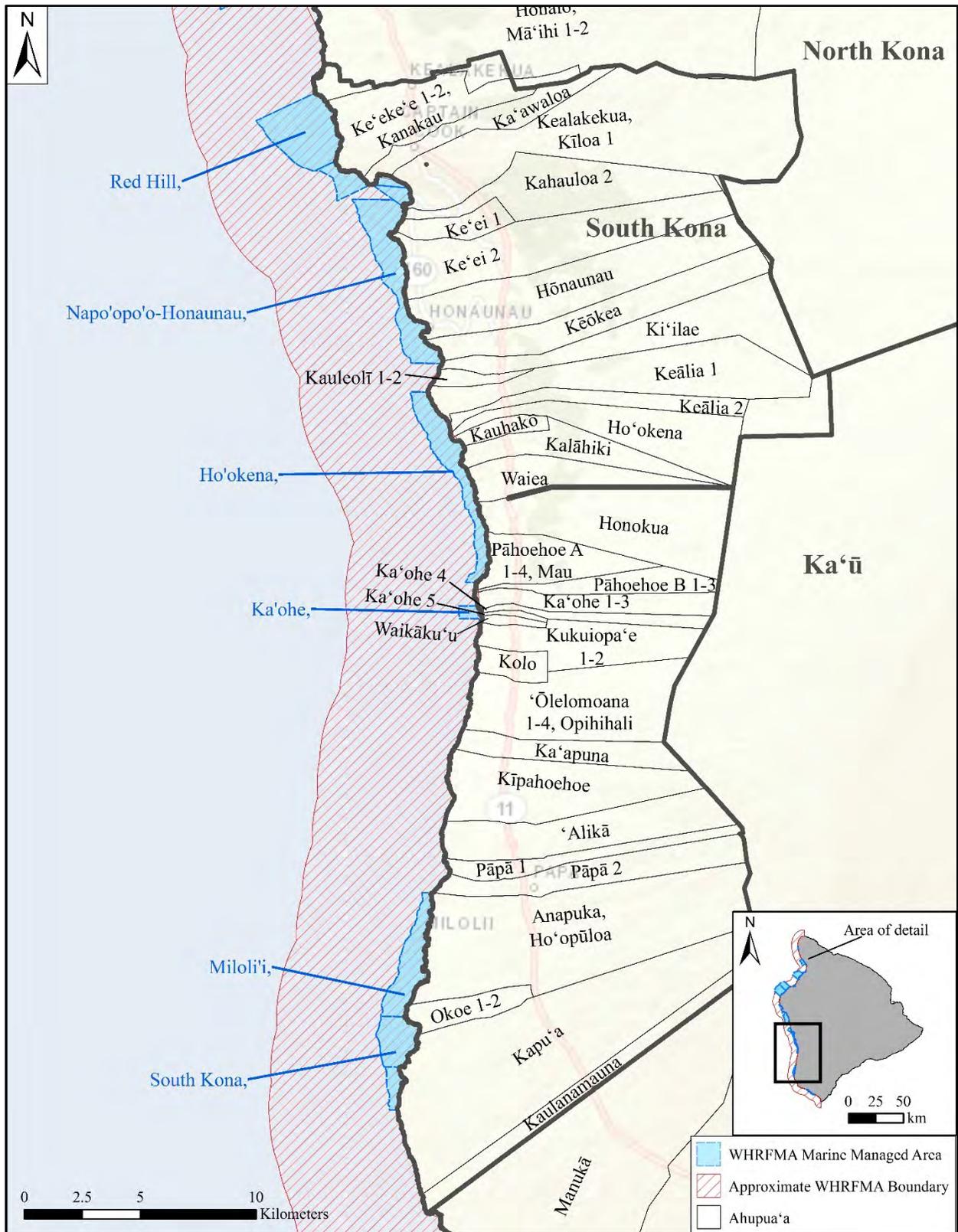


Figure 28. Ahupua'a of the South Kona District.

Honomalino

Kuakahela, sworn: . . . Bounded *makai* by the sea, ancient fishing rights extending out to sea. Kalipo is the boundary at shore between this land and Kalihi. Kalihi has been sold by Government from shore to the Government road. . . (Volume B:190)

Ho'okena

Kekuhaulua, sworn: . . . Hookena had ancient fishing rights extending out to sea. . . (Volume A No. 1:275)

Kamaka, sworn: . . . Hookena had ancient fishing rights extending out to sea. . . (Volume A No. 1:277)

Ka'apuna

Kama, sworn: . . . Commencing at *ahupuaa* on the South side of Kipahoehoe bounded at the shore by Kaleokane, a point extending into the sea, boundary in the middle of the point. . . running *mauka*, then returning on southern boundary to *makai*. . . Thence along land sold to Kapunanaka, a *puu pahoehoe* all cracked up, at the shore, bounded *makai* by the sea. Ancient fishing rights extending out to the sea. . . (Volume B: 198-200)

Kahauloa 2nd

Kahula, sworn: . . . From Kaneaa the boundary runs *makai* along an *iwi aina* to Kahuamoa, a pile of stones; thence *makai* to Mahana, a pile of stones; thence to Kaneahuea, the *pahoehoe* at the foot of the *pali* being on Keei and the *pali* on Kahauloa. Fishing rights in shallow water only. . . (Volume A No. 1:297)

Kalahiki

Palea, sworn: . . . Pohokinikini is the name of two water holes on Waiea, where Cummings' land ends and my lands bound Kalahiki from there to the seashore. The sea bounds it on the *makai* side and the land has Ancient fishing rights extending out to sea. . . (Volume A No. 1:291)

Kalamakowali

Naili, sworn: . . . Kaaemoku's land on Kalama 4th bounds Kalama 3rd at seashore on the South side; and the place called Mokunui is said to be the only fishing place belonging to Kalama 3rd [Kalamakowali] From the seashore the boundary runs *mauka*, along *kuleanas*, and lands sold, and along remnants, belonging to Government. . . (Volume A No. 1:310)

Kalamakumu

Kamauoha, sworn: . . . Kalamakumu is bounded *makai* by the sea and it has ancient fishing rights extending out a short distance; the outside sea belonging to Kealakekua. My father-in-law, who was *Konohiki*, pointed out the boundaries to me. I am *Konohiki* now. The boundary at sea shore between this land and Kalama Ililoa is at a landing on Kalama Ililoa, at the south side of Kaiwikahua; Kapahukula's *kuleana*; thence the boundary runs *mauka* along a stone wall. . . (Volume A No. 1:300)

Ka'ohē 4th

Palea, sworn: . . . Pohokinikini is the name of two water holes on Waiea, where Cummings' land ends and my lands bound Kalahiki from there to the seashore. The sea bounds it on the *makai* side and the land has Ancient fishing rights extending out to the sea. . . (Volume B:219)

Huakano, sworn: . . . Bounded *makai* by the sea. Ancient fishing rights extending out to the sea. . . (Volume B: 219)

Kapu'a

Nakai w., sworn: . . . In old times they were very particular about the boundaries of lands. Kaulanamauna bounds it on the Kau side, Okoe on the Kona side, I do not know the *mauka* boundary. The boundary at the sea shore on the Kau side is at a fishing place called Ahulua, there is a large rock there called by that name; thence *mauka* to Kaanamalu, a cave. . . (Volume B:185)

Makea, sworn: . . . I lived at Manuka for a while. The last witness is my wife and she was the cause of my going there. I know the boundary of Kapua at the shore. Keau, my father (now dead) told me that Ahuloa was the boundary between Kapua and Kaulanamauna . . . From the shore to the Government road I do not know the boundaries, the boundary there is the *pa heiau* [temple wall] *makai* of the road. . . (Volume B:186)

Kuakahela, sworn: . . . Ahuloa is at the sea shore, the sand is on Kaulanamauna ; thence along the *aa* to Kahepapa where the boundary leaves the *aa* and runs up a short distance...across the *aa* to *koa* woods, to a place called Kawiliwahine where they make canoes for both lands, thence to Koolau where Kapua ends, it is here cut off by Kaulanamauna and Honomalino, this is where *Kokoolau* grows, in the *koa*. . . thence along Okoe along the *awaawa* to Makalei, at the sea shore. I can go and point out all the places I have been to and I can tell the marks the *kamaaina* showed me. Bounded *makai* by the sea, ancient fishing rights extending out to sea. . . (Volume B:189)

Keālia 1st

Kekuhaulua, sworn: . . . the boundary turns toward Kona, to Keawe o Kini the *makai* boundary at seashore. Ancient fishing rights extending out to sea . . . (Volume A No. 1:274)

Ke‘ei 1st

Kaluna, sworn: . . . Mokuape, a rock in the sea, is the boundary at shore between Keei 1st iki and Kahauloa it is on the North side of a place called Kaneahuea. . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:225)

Kahula, sworn: . . . Fishing rights in shallow water only. . . (Volume B:226)

Ki‘īlae

Kila, sworn: . . . Kuwaia, a water spring, under the *pali*, at the seashore, is the boundary between Kiilae and Keokea; the land has ancient fishing rights extending out, as far as you can see bottom; Commencing at the spring at the sea shore, the boundary runs *mauka* along Keokea to a *kahawai* (gulch) called Keokea. . . (Volume A No. 1:292)

‘Ōlelomoana-Iki (1st)

Kimo, sworn: . . . Commencing at a large rock in the sea called Kaluahee; thence *mauka* to Kapulehu. . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. The boundary at shore between Kolo and Olelomoana 1st iki is a large hill, as large as this house, called Kaluaolapauila... (Volume B:206-207)

Kapule w., sworn: . . . Commencing at the seashore, the boundary between Olelomoana 2d nui and Olelomoana 1st iki is at Kaluahee; the boundary line running in an *awaawa* to the right of it... The boundary I have testified to is the boundary of Olelomoana 1st iki from the shore to Papai. . . Bounded on the North by Kolo Kapuaau, or Kaleiulala is the boundary at shore. . . Puaau is a *moku* in the sea. Bounded on the *makai* side by the sea. Ancient fishing rights extending out to sea. . . (Volume B:208)

‘Ōlelomoana Nui (2nd)

Kamaka, sworn: . . . The boundary at the shore is in an *awaawa* on the North side of Kaluahee; thence *mauka* up the *pali* to the North side Kauhiuli, a *kauhale*. . . Bounded *makai* by the sea. Fishing rights belonging to Konohiki; bounded on the South side by Opihale... (Volume B:204)

Kapule w., sworn: ...Opihale 1st bounds it on the South side. The boundary at shore between Olelomoana 2d nui and Olelomoana 1st iki is Kaluahee; there is an *awaawa* at the right side of it; thence up the *awaawa* to Kauhiuhi. . . The boundary at shore between Opihale and Olelomoana 2d nui is at Kukulu; thence *mauka* to Kapakoholua. . . I can point out the boundaries from woods to shore. Bounded *makai* by the sea. Ancient fishing rights extending out to sea. (Volume B:205)

Pāhoehoe 2nd

Kuaimoku, sworn: . . . Bounded *makai* by the sea and I have always been told that the land has ancient fishing rights extending out to sea. I was born here. . . (Volume B:196)

Papa 2nd

Kuakahela, sworn: The boundary at shore between the two Papas is at Keawemoku. . . There is *koa* on this land fit to make canoes, but the most of the *koa* is on Honomalino. Anapuka bounds it on the South side of a point called Namakahiki. . . Bounded *makai* by the sea. Ancient fishing rights extending out to sea. . . (Volume B:193-194)

Makia, sworn: . . . Anapuka bounds it on the South side at a large *puka* on the South side of Namakahiki; thence *mauka* along a line of craters or holes, to the woods. . . Sea bounds it on the *makai* side. Ancient fishing rights as far out as you can see bottom. . . [Volume B:194]

Ka‘ū District

Of the six *ahupua‘a* in Ka‘ū that extend southward from Kaulanamauna in South Kona to Ka Lae, Pu‘u‘eo within the study area (Table 8 and Figure 29), one (Kī‘ao) is landlocked, and five extended from *mauka* to *makai*. The significance of landlocked *ahupua‘a* such as Kī‘ao, represented “a very significant anomaly, since this means inhabitants of these *ahupua‘a* were either not using any marine resources, which seems unlikely, or they needed to trade them from outside communities” (Gonschor and Beamer 2014:69). The boundaries of three of the five remaining *ahupua‘a* (Kahuku, Pākini-iki, and Pākini-nui/Pu‘u Lena) were brought before the Boundary Commission in 1873. With respect to these *ahupua‘a*, the testimonies collectively relate that all three extended out to sea and retained fishing rights. However, in the case of Kahuku, it appears that although the *ahupua‘a* indeed had ancient fishing rights, it was said in the testimony the inhabitants preferred hunting birds to fishing. Excerpts of Boundary Commission testimonies for the *ahupua‘a* of Ka‘ū that discussed ancient fishing rights and boundaries, are presented below (underlining and italicization added for emphasis and clarity).

Table 8. Oceanic boundaries and fishing rights in the Ka‘ū District.

<i>Ahupua‘a</i>	<i>Boundary Testimony</i>	<i>Boundary Extends to Sea</i>	<i>Fishing Rights</i>	<i>Notes</i>
Kahuku	Yes	Yes	Yes	Natives did not fish, they hunted birds
Kamā‘oa, Pu‘u‘eo, Ke	No	-	-	-
Kī‘ao	No	-	-	Landlocked
Manukā	No	-	-	-
Pākini-iki	Yes	Yes	Yes	-
Pākini-nui, Pu‘u Lena	Yes	Yes	Yes	-

Kahuku, Kau District

Kumauna, sworn: The sea bounds Kahuku on the *makai* side and the land had ancient fishing rights. The cave Kanupa is between Puulonolono, Puukeokeo and Pohaha on the *aa*; a hill called Hapaimamo is on Kahuku and the boundary between kapuhonu and Puuohia runs *makai* of this hill. I am an old canoe maker. . . In ancient days the people of Kahuku did not go fishing, but were after birds of all kinds to eat and this is the reason all the land on the mountain belonged to Kahuku. My *makua honowai* and others always took their weapons with them as they used to have fights when they found people from other lands catching birds. . . (Volume A No. 1:141-142)

Pākini-iki

Puhi, sworn: . . . I was born at Kawela, Kau three months before the Okuu and have always lived at same place near there. I am a *kamaaina* and know the boundaries of Pakiniiki. I used to go with my parents, cultivating and fishing and they showed me boundaries of the lands. . . (Volume A No. 1:391)

Kuehu, sworn: . . . thence to Pohakukulua, two rocks in the sea on the boundary between Pakini iki and Kamaoa; thence along shore to Pakini nui. Ancient fishing rights extending out to sea. . . (Volume A No. 1:392)

Pākini-nui, Pu‘u Lena

Puhi, sworn: . . . thence to Kanikaula a *heiau*; thence to Pouli, a kauhale and canoe landing; thence to Mokuhonu, a rock in the sea. The sea bounds it on the *makai* side, and the land has ancient fishing rights extending out to sea. . . (Volume A No. 1:395)

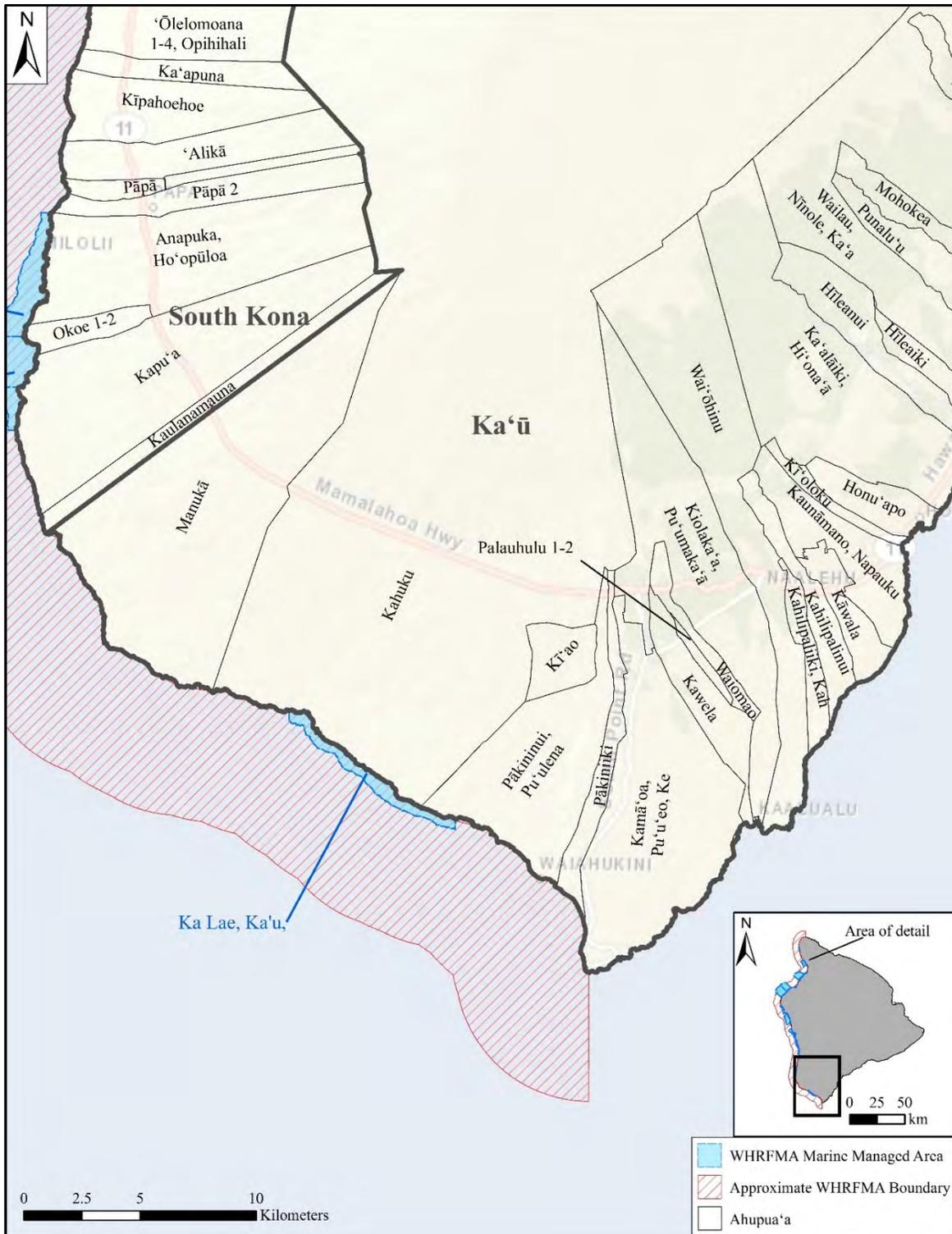


Figure 29. Ahupua'a of the Ka'u District.

POST-*MĀHELE* TO EARLY TWENTIETH CENTURY COMMERCIAL FISHING

In the decades following the *Māhele ʻĀina*, Kānaka Maoli sought to navigate their way through a major land and political transitions, moving from a time when fisheries were strictly managed by appointed *aliʻi* and *konohiki*, to one where fee-simple interest and broader public rights existed (Maly and Maly 2003). While the *Māhele ʻĀina* enabled foreigners to own property in fee-simple, it simultaneously resulted in the displacement of many Kānaka Maoli from their ancestral lands, which severely disrupted the ancient system of land management (Kameʻeleihiwa 1992). Galzier (2007:66) suggests that during these challenging times, subsistence fishing remained an important part of the Kānaka Maoli lifestyle. He points out that during this time “certain beliefs and ways of living were not abandoned in full, but rather subverted” (ibid.). The years following the *Māhele* of 1848 were filled with difficulties for Kānaka Maoli fishers, as fishing laws continued to be redefined as a means to address a wide range of fishery-related issues including access rights, *konohiki* rights, and taxation. Maly and Maly (2003:312) report that by 1850, the traditional method of using plant-based poisons, specifically *ʻauhuhu* “or other substance deleterious to fish” was made illegal. Regardless of these changes, for close to 100 years—through the whaling era (1820-1865) and well into the 20th century—Kānaka Maoli continued to play the leading role in Hawaiʻi’s commercial fishing industry (Cobb 1905; Glazier 2007; Schug 2001). Despite the vast socio-political and economic changes that occurred in the islands during this time period, Kānaka Maoli managed to adapt their subsistence lifestyle and culture to meet the demands brought about by a market economy.

The shift to fee-simple ownership of land ultimately paved the way for large scale commercial agriculture, which led to successive waves of migrant contract laborers, including those of American, Chinese, Portuguese, Filipino, and Japanese descent. Schug (2001:17), who conducted historical research on Hawaiʻi’s commercial fishing industry, reports that in 1872 “Hawaiʻi’s non-indigenous population” numbered around 5,366, but that by the turn of the 20th century, that number had increased to some 114,345 individuals of foreign descent. Of all of the ethnic groups to arrive in Hawaiʻi to support the burgeoning sugar industry, the Japanese had become the most heavily involved in Hawaiʻi’s commercial fishing industry. Schug explains:

When their plantation contracts expired many Japanese who had previously been skilled commercial fishermen in the coastal areas of Wakayama, Shizuoka, and Yamaguchi Prefectures remained in Hawaiʻi and turned to the sea for a living. The earnings of these fishermen were on average higher than those of plantation workers. (ibid.:17)

Many of the *issei* (first generation Japanese migrant laborers) become deeply invested in Hawaiʻi’s commercial fishing sector. Gradually, these Japanese fishers introduced fishing gear and methods that were well suited for deep-sea and some nearshore fishing. Some of the more popular technological introductions included long line fishing and the sampan fishing vessel, originally propelled by oar or sail (Glazier 2007; Schug 2001). Sampan fishing vessels were later outfitted with an engine which gave access to previously unexploited deep-sea fisheries (ibid.). Additionally, the introduction of the Japanese cast net sometime around 1890, which was well-suited for near-shore fishing, was quickly adopted by Kānaka Maoli fishers, who then later dubbed it the *ʻupena hoʻolei*, or throw net (Figure 30) (Mitchell 2001; Pukui and Elbert 1986). During the late 19th century, Hawaiʻi’s political system underwent a series of monumental changes as the Island Kingdom shifted to an American Territory. In summarizing the political climate of the islands during this time, and its impact on local fisheries, Maly and Maly (2003:viii) write:

This system was radically altered in 1893, when the Hawaiian Monarchy was overthrown by foreign residents and American forces. Subsequently, the leaders of the parties responsible for the overthrow, made a steady move towards annexation of the Hawaiian Islands by the United States, which occurred in 1898. Then in 1900, the Hawaiian Islands became a “Territory” of the United States, and the resulting “Organic Act” set in place the legal parameters for freeing up the fisheries of Hawaiʻi.

In 1901, John N. Cobb, Agent of the United State Fish Commission visited the islands to investigate the condition of the islands’ commercial fisheries. Cobb (1905) compiled his findings in his 1903 report titled, *The Commercial Fisheries of the Hawaiian Islands*, which provided details about fishing practices of this time, as well as the changing cultural tapestry of the islands. In relating what he observed during his visit, Cobb (ibid.:718) wrote:

In numbers the native Hawaiian fishermen surpass all others combined, but this is partly because so many women and children engage in the hand fishery for octopus, algae, etc., and these have been counted in total. Some of the natives are at the head of quite important fisheries, and for many years held a monopoly of the industry, but more recently the Japanese have been engaging in it in large numbers and now occupy second place. The native fish spasmodically, as a rule, while the Japanese give to it their whole time and attention, and as a result are profiting much more. They are especially

3. Culture-Historical Context

numerous on Oahu and Hawaii, most of them being engaged in deep-sea line fishing, which they virtually monopolize. They have several companies at Honolulu, Lahaina, and Hilo, and in this way control certain features of the fishing industry, thus enhancing the cost of the products to the general public.

Furthermore, Cobb (ibid.) reported that much of the same fishing methods and apparatuses used in early times were still being employed by Kānaka Maoli fishers. These technologies included fishing from canoes and from the shore using nets of various types, spears, basket traps, lures, hand lines, snares, and poles, all of which have been previously described in this study (see Traditional Hawaiian Nearshore Fishing Techniques section). While Cobb provides a variety of statistical information on Hawaiian fisheries during the turn of the 20th century, most interesting is perhaps his detailed list of catch yields sorted by island. His detailed list indicates that near-shore reef species, particularly on Hawai‘i Island, constituted a significant portion of the catch yields during 1900. Throughout the early part of the 20th century, the participation of Japanese in Hawai‘i’s commercial fishing continued to increase, while Kānaka Maoli participation gradually waned (Glazier 2007). As the commercial fishing industry continually expanded to meet the demands of the growing consumer population in the islands, the fish and other marine resources became more scarce. With the shift to a market economy and a commercial fishery these marine resources were valued mostly for their economic potential, and little to no regard was paid to the myriad of traditional values and more that emphasized the spiritual, cultural, familial, and ecological importance of the fish and other marine species. Maly and Maly (2003:ix) contend that “this trend has continued through the present-day and fostered the decline in health and well-being of the broad range and diversity of Hawaiian fisheries.”



Figure 30. Fisherman using the *‘upena ho ‘olei* (throw net) ca. 19th century (Hawai‘i State Archives Call No. PP-22-8-003).

Commercial Aquarium Fishing in Hawai‘i

After the turn of the 20th century, on March 19, 1904, the Honolulu Rapid Transit and Land Company established the first public aquarium in Waikīkī, O‘ahu. Known then as the Honolulu Aquarium, Frederick A. Potter (for whom the Potter’s Angelfish; *Centropyge potteri* is named after), who worked as a clerk for the Honolulu Rapid Transit Company became the aquarium’s first Director. During its early years, the Honolulu Aquarium showcased various marine animals that were collected by local fishermen (University of Hawai‘i n.d.; Wiegel 2008). By the 1940s the collection of reef fish and other marine species to be used in aquariums had developed into a commercial industry. Throughout the mid-20th century, the aquarium fish industry went through a period of expansion, moving from O‘ahu to the outer islands. In 1953, the territorial government of Hawai‘i enacted Act 154, which authorized the Board of Agriculture and Forestry to establish a permit system for the use of fine-mesh nets and traps for the taking of aquarium fish (Walsh 2000).

The history of the aquarium fishery in West Hawai‘i has been detailed by Dr. William J. Walsh, of the Division of Aquatic Resources. The following section presents a brief history of aquarium fishing leading up to the creation of the WHRFMA, as described in Walsh’s (2000) report, *Aquarium Collecting in West Hawaii: A Historical Overview*. By the early 1970s, growing public concern over the take of fish in West Hawai‘i prompted the Division of Fish and Game to temporarily suspend the issuance of additional aquarium fish permits. A week later, the Division of Fish and Game resumed issuing aquarium fish permits, but stipulated that permittees submit monthly catch reports—a process that by 1983, was called into question by Fish and Game biologist. Throughout the latter half of the 20th century, as the number of permits continued to increase so did the conflict between different marine user groups, but most notably, dive tour operators. In July of 1987, as a means to deescalate the mounting conflict, DAR (formerly the Division of Fish and Game) in conjunction with Sea Grant helped to establish a “Gentleperson’s Agreement” between the two groups “whereby aquarium collectors agreed to refrain from collecting in certain areas,” and in return, dive tour operators “agreed to not initiate legislative-opposition collecting and to cease harassment” (ibid.:1). This agreement had only short-lived success, however, as conflict continued to mount following the expiration of the agreement a year later, when it was reported that aquarium collectors had resumed operations in the previously closed areas.

Over the next decade, a series of legislative actions were undertaken to establish areas that would prohibit the removal of fish for aquarium purposes. In 1991, the areas previously defined under the “Gentleperson’s Agreement,” were incorporated into the Kona Coast Fisheries Management Areas (FMA), and a year later the Old Kona Airport Marine Life Conservation District was established. In May of 1996, House Resolution (HCR 184) established rules that required DLNR to work in conjunction with a task force in order to develop a comprehensive management plan that would regulate the collection of aquarium fish. In May of 1993, the task force was formed and duly named the West Hawai‘i Reef Fish Working Group (WHRFWG). The roughly seventy member working group met over a period of fifteen months to gather the information that would assist in the management efforts. The working group helped to identify areas where user conflict was most intense, and proposed various management recommendations, which were later included in DAR’s 1997, legislative package.

During this time, DAR staff worked with groups from Ho‘okena and Miloli‘i, Kūki‘o, and Ka‘ūpūlehu—where there was a native Hawaiian presence and participation in fisheries management, and also strong opposition to the take of reef fish for the aquarium industry (Brandt personal communication 2019)—to develop FMA rules for these communities. To improve understanding of the biological impact of aquarium collecting, DAR also established a joint research project with the University of Hawaii at Hilo. These efforts, however, did not come to fruition during the following legislative session. In response to this outcome, several members from the WHRFWG branched out and created the Lost Fish Coalition, who pushed for a complete ban on aquarium collecting in West Hawai‘i. House Bill 3349 was introduced in January 1997 by Republican Paul Whalen, a Representative for the Kona and Ka‘ū Districts. This bill sought to ban aquarium collecting between Kawaihae and Miloli‘i. House Bill 3349 was killed in the following legislative session. House Bill 3457, which eventually established the WHRFMA, and included a provision to set aside 50% of the FMA as FRAs where aquarium collecting would be prohibited, was also introduced in 1997 by Democratic Representative, David Tarnas (North Kona and South Kohala). Following the committee hearings on House Bill 3457, the 50% provision was reduced to 30%, but the bill was ultimately approved by the Hawai‘i State Legislature, where it became Act 306, and thereby established the WHRFMA extending from ‘Upolu Point in Kohala to Ka Lae in Ka‘ū.

4. CONSULTATION

Gathering input from community members with genealogical ties and long-standing residency or relationships to the study area is vital to the process of assessing potential cultural impacts to resources, practices, and beliefs. It is precisely these individuals that ascribe meaning and value to traditional resources and practices. Community members often possess traditional knowledge and in-depth understandings that are unavailable elsewhere in the culture-historical record of a place. As stated in the OEQC Guidelines for Assessing Cultural Impacts, the goal of the oral interview process is to identify information “relating to the practices and beliefs of a particular cultural or ethnic group or groups” (State of Hawai‘i, Office of Environmental Quality Control 2012:11). It is our contention that, in addition to assessing the significance of any identified traditional cultural properties, oral interviews should also be used to augment the process of identifying traditional cultural properties. Thus, it is the researcher’s responsibility to utilize the gathered cultural-historical background information, as well as the information collected through the consultation process, to identify and describe potential cultural impacts to resources, practices, and beliefs, and to propose appropriate mitigative measures for those impacts as necessary.

In an effort to identify individuals knowledgeable about traditional cultural properties, practices, beliefs, and/or uses associated with the entire WHRFMA, a public notice was submitted to the Office of Hawaiian Affairs (OHA) for publication in their monthly newspaper, *Ka Wai Ola*. The notice was submitted via email on February 14, 2019, and was subsequently published in the March 2019 issue. A copy of the public notice is included as Appendix A of this report. As of the date of this publication, one individual, Diane Maka‘ala Kaneali‘i responded to the public notice. Mrs. Kaneali‘i invited ASM staff to the Kailapa Hawaiian Homestead Community located in Kawaihae 1st Ahupua‘a, as well as to the April 2019 Kai Kuleana Network quarterly meeting held at Manini Beach in Nāpo‘opo‘o. The summaries from these consultation efforts are detailed below. Sixteen individuals participated in the Kailapa Hawaiian Homestead Community interview all of whom reviewed and approved their interview summaries; another thirteen individuals participated in the Kai Kuleana Network interview, of which ten individuals responded with approval to include their thoughts in this study.

In addition to the responses received from the March *Ka Wai Ola* publication, ASM staff contacted an additional thirty-eight individuals (via email and/or telephone) with requests for consultation. Table 9 (presented below) lists all the individuals and/or organizations contacted for consultation and presents brief comments concerning the outcome of the consultation effort. In addition to the thirty-eight individuals contacted by ASM directly, another twenty-five individuals also participated in the consultation process (either through recommendation or invitation of those contacted). In all, a total of fifty-five individuals, representing various communities within the WHRFMA and various user groups (including cultural practitioners, aquarium collectors, subsistence and commercial fishers, dive tour operators, and researchers), participated in the consultation process. The consultation process commenced in March of 2019, and the interviews were conducted between April and September of 2019.

Table 9. Persons/organization contacted for consultation.

<i>Name</i>	<i>Initial Contact Date</i>	<i>Date of Interview</i>	<i>Comments</i>
Bimo Akiona	3/13/2019	4/2/2019	Summary below
Henry Cho III	3/13/2019	n/a	No response
Makani Christensen	6/6/2019	n/a	Makani called on 6/6, spoke with Aoloa. Lokelani called on 6/7, left message with request for interview. Aoloa called 6/10 with request for interview. Did not receive a call back.
Kevin Awa	5/21/2019	9/7/2019	Summary below
Chelsea Faavesi	5/21/2019	9/23/2019	Summary below
Elena Waiwaiole	5/20/2019	n/a	No response.
Kela Pule	5/20/2019	n/a	No response.
Adrian Kuauhia	5/20/2019	n/a	Number was disconnected.

Table 9 continued on next page.

Table 9. continued.

<i>Name</i>	<i>Initial Contact Date</i>	<i>Date of Interview</i>	<i>Comments</i>
Nicki Kohia	5/20/2019	n/a	Aoloa spoke with Nicki. Nicki stated she would call back to set up a time to meet. Aoloa followed up but no response was received.
Henani Enos	3/28/2019	5/5/2019	Interview not approved as of 9/26/2019
Kamehameha Schools, Jason Jeremiah	3/28/2019	n/a	No response
Kehau Springer	3/28/2019	4/29/2019	See summary below. Recommended we speak to the 'ohana at Miloli'i
U'ilani Macabio	3/28/2019	n/a	No response
Pelika Andrade	3/28/2019	4/12/2019	Summary below
Milton "Shorty" Bertlemann	3/28/2019	n/a	No response
Randy Vitousek	3/28/2019	4/2/2019	Summary below
Mele McPherson	3/28/2019	n/a	Responded via email. Declined to comment and recommended ASM staff speak to Pelika Andrade.
Leina'ala Lightner	3/28/2019	n/a	No response
Leivallyn Ka'upu	5/15/2019	n/a	Contacted 5/15 by Kehau Springer. ASM staff followed up on 5/16 to schedule interview. Was interested in participating but was not able to secure a date. Followed up again 6/14. No response
Ka'imi Kaupiko	5/15/2019	6/28/2019	Contacted 5/15 by Kehau Springer. ASM staff followed up with Ka'imi. Summary below.
Laila Ka'upu	5/15/2019	n/a	Contacted 5/15 by Kehau Springer. ASM staff followed up with Laila. No response
Wilfred Kaupiko	5/15/2019	6/28/2019	Contacted 5/15 by Kehau Springer. ASM staff followed up. Summary below.
Bobo Lopez	5/15/2019	n/a	Contacted 5/15 by Kehau Springer. ASM staff followed up. No response.
Limah Lopez	5/15/2019	n/a	Contact 5/15 by Kehau Springer. ASM staff followed up. No response.
Greg Asner	n/a	6/28/2019	Was invited by Ka'imi Kaupiko to the interview. Summary below.
Gail Garoutte	n/a	6/28/2019	Was invited by Ka'imi Kaupiko to the interview. Participated in the interview but did not approve her portion of the summary.
Alan Holokai Brown	3/28/2019	n/a	No response.
Akoni Palacat-Nelson	6/21/2019	6/28/2019	Summary below.
Charles Young	3/28/2019	n/a	No response.
Damien Kenison	6/25/2019	8/1/2019	Summary below.
Joe Balsimo	n/a	8/1/2019	Invited by Damien Kenison to the interview. Summary below
Stanford Cho	n/a	8/1/2019	Invited by Damien Kenison to the interview. Summary below.
Hawila Alani	n/a	8/1/2019	Invited by Damien Kenison to the interview. Interview not approved as of 9/29/2019
Nohea Ka'awa	3/28/2019	6/12/2019	Summary below.
Mel Johansen	n/a	6/12/2019	Invited by Nohea Ka'awa to the interview. Summary below.

Table 9 continued on next page.

4. Consultation

Table 9. continued.

<i>Name</i>	<i>Initial Contact Date</i>	<i>Date of Interview</i>	<i>Comments</i>
John Replogle	n/a	6/12/2019	Invited by Nohea Ka'awa to the interview. Summary below.
Meghan Lamson	n/a	6/12/2019	Invited by Nohea Ka'awa to the interview. Summary below.
Shaylan Crysdale	n/a	6/12/2019	Invited by Nohea Ka'awa to the interview. Summary below.
Lester Gebin	n/a	6/12/2019	Invited by Nohea Ka'awa to the interview. Summary below.
Kala Mossman	3/28/2019	n/a	Recommended ASM staff speak with James Mahona and Luka Mossman.
James Manoha	5/20/2019	5/23/2019	Summary below.
Luka Mossman	3/28/2019	n/a	No response.
Diane Maka'aka Kaneali'i	3/14/2019	4/16/2019	Responded to OHA public notice. Requested that ASM staff meet with members of the Hawaiian Homestead community at Kailapa, Kawaihae as well as the Kai Kuleana Network. Summary below.
Cindy Sharp	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Jordan Hollister	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Kaena Peterson	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Justin P. Asing	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Jonah Yardley	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Robin Yardley	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Ted Angelo	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Jimmy Bouns	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Pualani Lincoln Maielua	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Tani Waipa	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Keali'i Maielua	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.

Table 9 continued on next page.

Table 9. continued.

<i>Name</i>	<i>Initial Contact Date</i>	<i>Date of Interview</i>	<i>Comments</i>
Mark Keali'i Freitas	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Roger Kaneali'i	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Susan Fischer	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Paul Fischer	n/a	4/16/2019	Invited by Diane Maka'ala Kaneali'i to Kaipala Hawaiian Homestead Community interview. Summary below.
Chad Wiggins	4/2/2019	4/16/2019	Arranged for ASM staff to meet with the Kai Kuleana Network.
Cecile Walsh	4/12/2019	4/16/2019	Arranged for ASM staff to meet with the Kai Kuleana Network.
Hannah Kihalani Springer	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Kalani Hamm	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Reggie Lee	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
George Fry III	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Pi'i Laeha	n/a	4/16/2019	Member of the Kai Kuleana Network. See summary below.
Aric Arakaki	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Ku'ulei Keakealani	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Krista Johnson	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Chuck Leslie	n/a	4/16/2019	Member of the Kai Kuleana Network. Summary below.
Francis Ruddle	n/a	4/16/2019	Member of the Kai Kuleana Network. Did not approve summary.
George Roberson	n/a	4/16/2019	Member of the Kai Kuleana Network. Did not approve summary.
Mike Nakachi	6/21/2019	6/26/2019	Summary below.
Ling Nakachi	n/a	6/26/2019	Invited by Mike Nakachi to interview. Summary below.
Kaiakea Nakachi	n/a	6/26/2019	Invited by Mike Nakachi to interview. Summary below.
KAHEA Hawaiian Environmental Alliance	6/21/2019	n/a	Called on 6/21, left message. Sent interview request to Jon Osorio on 6/25 and to Bianca Isaki on 7/2. Corresponded with Bianca but was not able to secure a date for an interview.
Kealoha Pisciotta	6/25/2019	7/5/2019	Summary below.

Table 9 continued on next page.

Table 9. continued.

<i>Name</i>	<i>Initial Contact Date</i>	<i>Date of Interview</i>	<i>Comments</i>
Department of Hawaiian Homelands (DHHL), William Aila	6/25/2019	n/a	No response.
Office of Hawaiian Affairs (OHA)	n/a	6/29/2019	Request for consultation forwarded from Shane Palacat Nelson, OHA Outreach Coordinator for West Hawai'i to Kamakana Ferreira, OHA's Lead Compliance officer.
Joseph "McGee" Akiu, Jr.	9/10/2019	9/10/2019	Summary below

End of Table 9

INTERVIEW METHODOLOGY

ASM staff utilized a combination of informal one-on-one interviews as well as informal group interviews. The locations at which the interviews took place were determined by the individual, or the point of contact for the group interviews. While one-on-one interviews afford the researcher the opportunity to gather more detailed personal history, the group interviews (which ranged from five or six to more than sixteen participants) allowed for more nuanced discussions about the topic, but limited the researcher's ability to gather detailed personal history. As a result, most of the group interviews focused more on knowledge of past, and/or ongoing cultural practices, general thoughts on the proposed action, and recommendations, rather than personal recollections. All of the interviews were conducted in person with the exception of the interviews conducted with Pelika Andrade, Kevin Awa, Joseph Akiu, Jr., and Chelsey Faavesi, which were conducted by phone.

Prior to the interview, ASM staff provided a written description of the proposed action, its location—which included maps showing all current marine managed areas in the WHRFMA (see Figure 1)—and the “white-list” species that included any known Hawaiian names, scientific name, and common names (see Table 3). The interviewees were asked five primary questions about:

- 1) their personal background and connection to the study area;
- 2) their knowledge of any past and or ongoing customary cultural uses, beliefs, traditions, and practices within the proposed project area;
- 3) any traditional cultural knowledge, beliefs, and uses of the forty “white-list” species;
- 4) their thoughts on whether the proposed action would result in any impact on traditional cultural practices, beliefs, and uses associated with the study area or the “white-list” species; and
- 5) their recommendations to mitigate any identified cultural impacts as well as share any additional through about the proposed action.

Some of the interviews, with the consent of the interviewees, were audio recorded for note taking purposes only (audio files are not available). Where audio recordings were not permitted, ASM staff recorded hand-written notes throughout the interview process. Upon completion of the interview, ASM staff prepared an interview summary, which was later emailed to the interviewees for review. To ensure that the summaries prepared by ASM staff accurately reflected the thoughts, feelings, and information shared by the interviewees themselves, ASM staff afforded the interviewees the opportunity to review the summary and revise, edit, or delete any information as they saw fit. Where revisions were requested, ASM staff continued to work with the interviewees, making all requested changes. The approval to publish the summaries was obtained by ASM staff via email or phone. The final interview summaries are presented below, these summaries were all reviewed and approved by the interviewees prior to the publication of this CIA.

BIMO AKIONA

On April 2, 2019, Lokelani Brandt interviewed Mr. Edward “Bimo” Akiona, a retired firefighter for the County of Hawai'i and a former aquarium fish collector. Born in Hilo, Hawai'i in 1954, Bimo shared fond memories of spending the entire summer at his uncle's home in Kahalu'u, Kona, where he gained his love and respect for the ocean. At the age of eight, Bimo recalled being given a pair of bamboo goggles by his uncle Jimmy, with instruction to peer under the water. Bimo remembered peering under the water and was amazed by the active reef and ocean life below. It was this childhood experience that established his deep connection to the ocean, leading him to become an expert diver

and fisherman. Bimo shared that one of the most important traits of being a diver or fisherman is their observation skills, which includes understanding changes in the tide, the moon cycle, the time of day that was most ideal for fishing, fish habits, and conservation practices. From a very young age, fishing and diving was simply a way of life for Bimo.

Bimo's involvement with aquarium collecting began when he returned to Hawai'i Island and later joined the Hawai'i Police Department. Bimo shared that his very first case as a police officer involved a dive shop, which eventually led to his involvement in the aquarium collection industry. In 1985, Bimo started his own aquarium fish collection company, which he operated for eight years. He shared that growing up and learning about the ocean from his family helped to guide much of his business practices. Bimo recalled his primary collection areas extending from Kulaimano to Hōnaunau as well as from Kawaihae Harbor to 'Anaeho'omalu as well as Ka Lae. His experience in diving and fishing in these areas and observing fish behavior and cycles had led him to believe that certain areas should be restricted from all forms of commercial activities, namely Puakō, Kaiwi Point (from Honokōhau to Kailua Bay) as well as Ka Lae. Bimo stated that the aforementioned areas are where breeding groups congregate and for this reason, should be protected. He also stated that at Ka Lae in the district of Ka'ū, the ocean conditions in this area can be treacherous to novice fishers and divers.

When asked if he knew of any traditional practices within the region, he shared that he would see people gathering 'ōpīhi or laying net but believes the lack and difficulty in coastal access have limited the number of practitioners. Bimo believes that over time these families that no longer have access to these areas have lost their connection and as a result no longer possess the traditional knowledge and practice of these places. He believes it is important for families and people with ties to the area to be given access. However, although Bimo is in favor of giving access to families and communities he recommends that certain areas should be restricted from commercial use in order to improve and restore the ocean resources.

When asked if the proposed project could result in any potential cultural impacts, Bimo did mention that aquarium collecting methods can have a damaging effect on the reef, which in itself, is considered a valued cultural resource. He spoke specifically about the method used to capture and remove Potter's Angelfish (*Centropyge potteri*), Hawaiian Flame Angel (*Cirrhilabrus jordani*), Hawaiian Saddleback Butterfly (*Chaetodon ephippium*), and Angler fish (*Antennarius sp.*) and all eels. Bimo explained that these species often conceal themselves deep within the coral reefs and that removing them requires significant damage to the reefs. He believes that the economic value of these fish does not justify the environmental damage required to catch them. Because of the damaging effects, he strongly recommends that these fish not be caught and removed from Hawai'i. However, Bimo shared that the collection and removal of invasive species would yield long-term benefits to Hawai'i's reef systems. He has witnessed firsthand the dramatic impacts of introduced species such as the Bluestripe Snapper (*Lutjanus kasmira*), also known as Ta'ape, that has contributed to a decline in reef fish population. Bimo noted additional impacts to Hawai'i's reef system which includes runoff and pollution. Following major storms, he has witnessed drastic changes that have completely devastated ocean wildlife and reef systems, which has adversely impacted many subsistence fishers.

Mr. Akiona shared that the business of fish collection requires a great deal of "self-management" and should always include conservation practices. He further explained that policies and restrictions did not exist when he was involved in the industry, but managed to heed the teachings of his elders to "mālama your resources." He strongly feels that these businesses should have a "connection to place" and be respectful of the resources, particularly in Hawai'i, where cultural values and traditions continue to thrive. In his experience, Bimo was involved and witnessed many disputes between "shop divers" and "dive operators." Dive operators have argued that aquarium collectors were "raping the ocean," implying that they were taking all the fish from certain areas. Disturbed by the untrue statements, Bimo began attending public meetings to stay informed and remain involved in the process when policies and restrictions were being written. Bimo also spoke about the safety issues of the business, having been put in a hyperbaric chamber several times due to having the bends, or decompression sickness. The demand of the business may affect "self-management" practices and suggests that divers take caution not just from a cultural standpoint but also for a person's health as the industry requires divers to spend a substantial amount of time in the ocean.

RANDY VITOUSEK

On April 2, 2019, Lokelani Brandt interviewed Randy Vitousek, a third-generation fisherman and long-time resident of Waimea on Hawai'i Island. Randy frequents the coastal fisheries in West Hawai'i, primarily in the areas between Kīholo in North Kona and 'Upolu in Kohala. He is experienced in shoreline fishing and diving but now prefers deep-sea vessel fishing. He has held a commercial fishing license for the past twenty-five years. Randy shared that he comes from a family of fishermen and learned how to fish from his father at a very young age. His grandfather owned a boat and his grandfather and father would bring the boat from Kewalo to Kailua-Kona or Kawaihae to fish. Randy stated

that he learned about the ocean from his father and from other men and women of his father's generation, and this accumulation of knowledge is something he has passed on to his children and grandchildren.

When asked if he was aware of any ongoing traditional cultural practices along the West Hawai'i coastline, Randy stated that "modern fishing is a continuation of cultural practices, but with more durable gear." He describes that fishing practices are based upon a person's awareness of the ocean and marine life patterns, such as understanding what areas are abundant with a certain species of fish and the reasons they are so abundant in these specific areas. Randy added that these basic observations are considered traditional knowledge, the difference being that *kupuna* (ancestors) depended on this intimate knowledge much more than we do today. He noted that the advancement of fishing technology and equipment has altered our dependency on the ocean and our understanding of marine life patterns. Randy, however, emphasized that the activity is the same, more so for those fishing for subsistence purposes. He noted that subsistence fishing and even some commercial fishers help to provide food for family and friends, which continues the practice of connecting with the ocean environment.

Randy believes that living on an island is a remarkable experience as it forces people to take care of their resources and each other. Randy noted that this same kind of behavior that is seen in other island communities around the world who depend on the ocean. This involves developing common practices and beliefs based on environmental conditions and understanding the limitations of the land, which necessitates harvesting resources from the ocean. Randy opined that there is something important to be said for people who make a living on the ocean. He went on to explain that when we lose the ability to make a living on the ocean or from the ocean resources, we also lose important knowledge about the ocean. He believes that having vibrant marine employment is this is an important part of living on an island and that all people have a unique place in our communities. He emphasized that markets are ever-changing and noted some of the historical changes in Hawai'i's fishing industries. Randy pointed out that at one time there was a big market for *aku* (*Katsuwonus pelamis*) and now economically the aquarium fishing is or can be a big component of this ever-changing market.

When asked if there were any potential cultural impacts associated with the proposed action, Randy stated that he has witnessed many changes in fishing in Hawai'i, particularly along the West Hawai'i region. Although Randy is not against aquarium fishing, he stated that easily accessible areas like Puakō, NELHA, and Kawaihae Harbor should be temporarily closed, have restrictions, or have bag limits, as he has seen a major decline in reef population in these areas, which he believes is associated with "catch and kill" fishing. Although seasonal changes pose some difficulty in determining an overall trend and knowing the catch statistics, he has personally not seen any significant changes in off-shore and in deeper waters. He recommends and advocates for easily accessible areas to be a preserve as a "no-take, catch and release" or limit fishing to families and children so they can stay connected or reconnect to the ocean. Randy emphasized that these simple fishing practices teach basic skills and knowledge in fishing and the practice of observation, which are vital for our future generations. Despite this, he believes that there should be an appropriate and regulated amount collected for all fishing, commercial and non-commercial that is based on reliable scientific evidence. He explained that there should be "controls based on sustainable yields of different species" as well as having certain areas restricted and catch areas rotated. He believes aquarium fishing is a good thing for the communities because it allows for the "continuation of the tradition to harvest the sea" and further added that aquarium collection "is not culturally inappropriate as long as the practice is done with respect for the ocean and its resources."

Randy also spoke about *ko'a* (traditional fishing grounds) and when asked if the tradition of fishing at the *ko'a* in West Hawai'i would be impacted by the proposed action, Randy spoke specifically of 'ōpelu (*Decapterus pinnulatus* and *D. maruadsi*). He has seen about four or five 'ōpelu *ko'a* situated between Kawaihae and 'Upolu and added that it tends to be associated with a *hale wa'a* (canoe house) on land. These highly concentrated areas of 'ōpelu have a thriving ecosystem that builds up around them. He mentioned that off-shore fishing *ko'a* is not fixed to a particular spot rather it shifts in a known area and its location is determined by where the fish congregate. Randy expressed that aquarium fishers will not likely affect these traditional fishing *ko'a* because aquarium fishers often fish close to the shore. Randy believes that Native Hawaiians should be allowed to continue their practice and hopes that the proposed action does not adversely affect Native Hawaiians communities who rely on the ocean.

Randy's understanding of the aquarium industry is that they try to limit the destruction to the reef and to the fish. He explained that using a finer mesh net instead of a gill net would allow for the proper handling of the fish and limit any damage to the fish. Based on his knowledge of the industry and if the proper measures based on valid science are taken to ensure sustainable harvesting of aquarium fish, Randy does not anticipate any major cultural or environmental impacts.

Randy believes that regulatory efforts should focus on enforcing existing fishing laws, developing science-based quotas, size limits and fishing areas, and improving parks, harbors and public marine and coastal facilities to encourage residents and visitors to have easy, authentic connection to the ocean around us.

PELIKA ANDRADE

Pelika Andrade, an Extension Agent for the Hawai'i Sea Grant was interviewed via phone by Lokelani Brandt on April 12, 2019. Born on the island of Kaua'i, to a family adept at the cultural and physical aspects of the ocean, Pelika recalled spending most of her childhood on and in the ocean. Her upbringing and later experiences led her to the field of marine resource management, where she has earned a degree in Hawaiian Studies and certificates in Marine Science and Pacific Island Studies. Currently residing in Waimea on Hawai'i Island, Pelika continues to develop educational programs that integrate traditional knowledge and science to address issues facing marine resource management in Hawai'i.

When asked if she knew or witnessed any traditional fishing practices occurring within the West Hawai'i region, Pelika offered an in-depth perspective on the "traditional" practice of *lawai'a* (fishing). She described the *kai* as inseparable from the *'āina* (land), literally translated as "the thing that feeds (us)," and just as a farmer would tend to their fields to ensure its productivity, the *lawai'a* (fisher) did the same. In describing how the Hawaiian fisher tended to the ocean, she explained that the people fed the ocean with food that they grew and noted the *ko'a* as an example of this feeding practice. She highlighted that the practice of *kilo* (astute observation) played an important role for the fisher that allowed them to understand the nuances of the ocean environment as well as any seasonal correlations. *Kilo* provided the *lawai'a* with an in-depth understanding of natural fish cycles and its relationship to its ecosystem and the greater ocean. Pelika stated that in some areas, the *lawai'a* (fishers) role in a community was so valued that the chiefs often relied on the *po'o lawai'a* (head fisher) to determine what and when certain practices were to take place—a role that was often delegated to the *konohiki* or headman of an *ahupua'a*. She explained that the *lawai'a* (fisher) spent a large majority of their time "tending to the ocean garden," and that the act of *lawe i'a* (taking fish from the ocean) constituted a very small component of this tradition. She noted that when large communal fishing was performed, it was done at the order of the *po'o lawai'a* or the *konohiki* and the collected resources benefitted the whole community, providing both a short and long-term supply of food. Adding to this, she explained that traditionally, when decisions were made, an individual was held accountable to that community. Pelika edified that fishing is a practice that is found around the world, but in Hawai'i the traditional practice of fishing encompassed caring for one's equipment and gear, understanding the natural cycles, seasonality, and productivity; but most importantly, traditional *lawai'a* in Hawai'i is fully engaging in the practices of managing marine resources, and being an active contributor to its productivity and its ecosystems. She expressed that *lawai'a* are acts of sustainability, which in her view is the balance of sustainable marine resources and thriving and productive communities.

When asked if the proposed project would lend to any potential cultural impacts, Pelika compared the practice of *lawai'a* to aquarium fish collection as it is practiced in Hawai'i today. She evaluated that *lawai'a*—the reciprocal relationship between man and the environment—and aquarium collection, which focuses on the act of *lawe i'a*, removing fish from the ocean does not align with the Hawaiian worldview of caring for the ocean and its resources. She stated that aquarium fishing is not about feeding those at your table, but a business that impacts that larger community. She feels that there is no accountability to the communities that are impacted by this industry, which was a fundamental aspect of traditional fishing practices. Based on this, Pelika believes that the proposed project would lend to adverse impacts to the community and is not aligned with traditional fishing practices. She went on to explain that with aquarium collection, "there's no tending process, only *lawe i'a*." She argued that modern aquarium collection practices negatively impact fisheries and disrupts traditional knowledge systems, because there is no input or contribution to maintaining the very resource that the industry is dependent upon. She emphasized that the practice of *kupuna* (Hawaiian elders) was not based exclusively on *lawe i'a* (taking fish), rather the act of *lawe i'a* was carried out after a fisher understood all of the other components that allowed for healthy marine resources. She argued that identifying oneself to the act of *lawe i'a* (taking fish) with no forms self-management, severely limits the individual from fully embracing the traditional practice of *lawai'a*, which emphasized caring for the resources. Pelika opined that the act and the sense of entitlement associated with *lawe i'a* (taking fish) can be applied to other fishing industries, from commercial to subsistence fishing. She explained that this mindset shift from caring for our resources, to entitlement to our resources, is a result of a lifestyle change. For these reasons, Pelika does not support aquarium fishing and other fishing practices or industries that make no effort towards contributing to maintaining the resources or encourages self-management.

While Pelika was not against utilizing our resources to support our families and communities, she strongly advocated for changing the current mindset and practice of *lawe i'a* (taking fish). She argued that Hawai'i's current

system of marine management, which is comprised of western concepts and rules, is set up in such a manner that accepts the mindset and practices of *lawe i'a*—a causal element that has led to the decline of our marine resources along with other important factors such as water diversions (affecting estuary and nursery habitat), development (increasing nitrification and affecting water quality), and management rules/regulations that work against productive fisheries. She opined that the contemporary practice of establishing marine preserve areas, rest zones, and conservation areas, have also impacted the traditional practice of *lawai'a*, because it disrupts people's ability to interact with and understand the productivity of the resource in an area. She noted that there are conservation models that are trying to counter western system of marine resource management. Despite these efforts, she explained that these models often fall short, because they do not support caring for the resources nor do they foster developing a relationship to place, both of which were crucial to sustaining traditional *lawai'a* practices. Pelika also questioned the industry's techniques and methods to harvest fish, noting that some methods are known to be destructive to coral heads and general productivity of targeted species. She also questioned the quantity of fish that are being harvested from Hawai'i's reefs for the aquarium industry.

When asked for recommendations on how we can improve the current state of aquarium fish collecting in Hawai'i, Pelika commented that anyone choosing to utilize our marine resources whether for subsistence or commercial use should have a more holistic understanding of the resources. She believes that these individuals and industries should sustainably interact with our marine systems and make more than financial contributions to ensuring Hawai'i's marine resources are thriving and productive. She noted that most people seem to be aware of the industry's failures and drawbacks rather than its benefits. She expressed that all aspects of this industry have remained shrouded in mystery resulting in a poor public perception and understanding. While Pelika felt that she did not know a significant amount about the aquarium industry or how to resolve the contentious relationships, she does know that the conservation proponents are at one end of the spectrum and noted that "rarely is the loudest voice, the one in the middle or the voice of reason." She expressed that many who are screaming "conservation" rarely are attached to the lifestyle that is dependent upon fishing. She opined that this is also true for those proponents advocating for aquarium fishing. She believes that this is not a fair representation and what has resulted is an emphasis on "bad practices" of the industry.

Pelika also explained the importance of having a proper balance of small and large fish in Hawai'i's reefs to ensure minimal disruption to natural fish cycles. She believes that the aquarium industry as well as others that remove fish from the ocean should have export limits that are reasonable and are based on the percentage of local fish stocks. Hypothetically, Pelika explained that if the amount allowed to be collected is based on the percentage of local fish stocks, when the number reaches below a certain percent, then the industry needs to advocate for management and better fishing practices and only then will we all benefit. She believes that as a part of their responsibilities to their industry and to Hawai'i's fisheries, the aquarium industry should invest in aquaculture, which would teach them how to grow and spawn their own supply and make contributions to replenishing the fish removed from our waters. Pelika believes that if the aquarium industry and fishers want to continue to reap the benefits of removing fish from the sea, it needs to be a shared initiative and there must be a shift towards a more reciprocal relationship.

KAI KULEANA NETWORK: ARIC ARAKAKI, GEORGE FRY III, KALANI HAMM, PI'I LAEHA, REGGIE LEE, MAKALANA KANEALI'I, HANNAH KIHALANI SPRINGER, KU'ULEI KEAKEALANI, KRISTA JOHNSON, AND CHUCK LESLIE.

In response to the OHA public notice published in February 2019, Lokelani Brandt was invited to the April 16, 2019, Kai Kuleana Network quarterly meeting held at Manini Beach in Nāpo'opo'o, Kealahou, Hawai'i. Kai Kuleana Network is comprised of multiple members representing various *ahupua'a* communities from Kohala to South Kona on Hawai'i Island. A total of fifteen individuals were in attendance of which twelve participated in the talk-story, sharing their knowledge of traditional cultural practices associated with their respective areas throughout West Hawai'i as well as their knowledge of some of the fish species listed on the "white-list." Participants included, Aric Arakaki of Ala Kahakai National Historic Trail, George Fry III of Puakō, Kalani Ham of Keauhou-Kahalū'u and La'aloa, Pi'i Laeha of Kalāhuipua'a, Reggie Lee of Kaloko-Kohanaiki, Makalana Kaneali'i of Kawaihae, Hannah Kihalani Springer and Ku'ulei Keakealani of Ka'ūpūlehu, and Krista Johnson and Chuck Leslie of Nāpo'opo'o. While the individuals spoke at various points throughout the interview, for readability, their individual thoughts and insights have been compiled into paragraph form and are presented below.

Kalani Hamm: Kalani noted that her family often used the beach as part of their cleansing ceremonies. She also recalled one of the last *hukilau* taking place in Kailua-Kona in 1948. She described that in the past, these large communal fishing efforts provided food for multiple communities. Kalani recalled going to *kū'ula* to *pule* (pray). She remembered going to the ocean while the fish were sleeping to catch them and using them as offerings.

Reggie Lee: Reggie spoke about the importance of *mālama*, caring for our resources, a practice that was handed down to him by his mother tūtū Malu‘ihi. He shared that knowledge of different fishing spots was handed down in families. He added that the aquarium industry should consider raising their own fish to supply its industry. And if fish are to be taken out of the ocean, the industry should assist with supplementing the fish stock by investing in hatcheries. Reggie also emphasized the importance of having adequate enforcement, noting that there are very few DOCARE officers that patrol this region. With the aquarium industry potentially adding to the workload, he recommended that the aquarium industry should help to supplement DOCARE’s efforts so they can be productive in enforcing the rules and regulations.

Hannah Kihalani Springer: Hannah explained that in the past, people delighted in eating a wide variety of reef fish, but today, peoples preferences are more limited and fewer varieties of fish are eaten. She spoke of encouraging each other to develop an ‘ono for different kinds of fish. She also emphasized the importance of restoring our food producing capability and capacity. In reviewing the “white-list” species, Hannah remarked that the wrasse, the *hīnālea* fish, is a *kinolau* or physical embodiment of the god Kanaloa. She described another wrasse, the *hilu*, as being representative of positive attributes and that in traditional times it was venerated and that its importance is recorded in several traditional accounts. Hannah stressed the ecological importance of reef fish, describing them as cleaners and rehabilitators of reef ecosystems. She questioned what the aquarium fish industry’s contribution to the public trust, that includes the aquatic resources of Hawai‘i is. She questioned the sustainable yield quotas for the aquarium fish industry and stressed the importance of them.

Maka‘aka Kaneali‘i: Maka‘ala highlighted the extent of the traditional *ahupua‘a* boundaries. In her community in Kawaihae, she explained that the traditional *ahupua‘a* rights extended three miles out into the ocean. She explained that in her community, they are working towards restoring their traditional fishing rights and practices so that families can once again utilize the ocean for sustenance. She strongly opposed the proposed issuance of commercial aquarium collection permits because this action is not aligned with the current efforts to restore physical and cultural aspects of the fisheries in West Hawai‘i. She commented that aquarium collection is disrespectful to the fish and that when we capture fish without having the intent to consume them, then we lose the function of the fish. Maka‘ala added that what are the fines and repercussions for aquarium collectors that do not comply with the laws. She hopes that DLNR considers having more rigid fines and serious repercussions to those who violate the law.

George Fry III: George spoke of many subsistence fishermen who access the Puakō area to gather fish and ‘opihi. He described this area as once having an abundance of fish but noted that today the fish stock has been seriously depleted, which he attributes to overfishing, warming waters, and poor water quality.

Pi‘i Laeha: Pi‘i opposed the proposed action and stated that there should absolutely no collection of fish for the aquarium industry outside of Hawai‘i, especially any endemic fish that is listed on the “white-list.” Pi‘i emphasized that having fish in the ocean is important for educational purposes but also with the education and awareness process, it should allow established institutions in Hawai‘i, those that show a perpetual responsibility for fish sustainability, the opportunity to responsibly collect fish under a Special Activity Permit. Pi‘i described the near-shore zones as the place where it is the safest for *keiki* (children) to learn about marine life and added that... ‘a‘ohe pau ka ‘ike i ka hālau ho‘okahi (all knowledge is not taught in a single school).

Aric Arakaki: Aric spoke about coral bleaching in West Hawai‘i and asked if coral bleaching is being accounted for in the scientific studies that are being done for the EIS?

Ku‘ulei Keakealani: Ku‘ulei emphasized that culturally fish are connected to humans and that this connection is well recorded in the Hawaiian cosmogony chant, *Kumulipo*. In referencing the *Kumulipo*, Ku‘ulei further explained that certain fish was paired with a land/forest counterpart. In Hawai‘i, certain fish often shared familial bonds with particular individuals and families who cared for them. In turn, these fish aided the fisher in their endeavor. She noted that within one generation in her family, their reliance on fish and some of the associated cultural practices such as praying to *kū‘ula*, a Hawaiian fishing deity, has changed significantly. Despite these changes, she stood firm in her belief that Hawaiian today must continue to maintain our traditions. She stressed that familial bonds to our oceans must be considered as an important cultural tradition. Ku‘ulei also spoke of the ceremonial aspects of fish, noting that some fish were desirable for certain cultural practices. She stated that these aspects of Hawaiian culture are still being practiced. Adding to this Ku‘ulei stated that “the *kai* is medicine for us, truly something or place that is sought for healing, a sense of well-being, a familiar part of the *kanaka* being. *I‘a* (fish) therefore, is looked at as *lā‘au* as well.” She expressed that she has family stories of *kupuna* (elders) requesting certain species of fish to treat particular

ailments. Ku‘ulei explained that whether it’s the fish name and or color, healing properties are held in fish species and this knowledge and practices are still in the living memory of folks and further applied in our lives. She added that the lack of fish necessary for these facets of our cultural ways has a direct impact on the health of our *kanaka*. In her closing remarks, Ku‘ulei stated, “truly, healthy land and sea, healthy people!”

Krista Johnson: Krista commented that there is so much death with aquarium collection and spoke of instances when bags of dead fish were found in Kona. She questioned whether the industry is going to self-regulate? She worried that the current enforcement is not adequate and hope that more enforcement officers will be added.

Chuck Leslie: Chuck asked, “why should people take our fish just for pleasure?” He emphasized that we should be encouraging people to come to the ocean and view our marine life first hand. Chuck, who has fished at *ko‘a* was asked specifically whether the proposed action would impact the tradition of *ko‘a* fishing. He explained that *ko‘a* are typically located offshore and in deeper waters and that aquarium collectors fish closer to shore and are targeting different fish species. For these reasons, he didn’t anticipate the proposed action to have an impact on the traditional fishing *ko‘a*. He did, however, recall the tradition of *imu*, which involved the construction of stone houses on the reefs. He explained that stones were often stacked in the water on the reefs and that these houses would attract fish. After the fish had become accustomed to living in the *imu*, people would throw their net over the house and catch the fish. Ku‘ulei added that the *imu* was typically built so that *kupuna* (elders) and *wahine* (women) could fish easily and safely. Hannah noted that fish *imu* was known to exist at Ka‘awaloa and Kīholo. Chuck expressed that the *imu* fishing method is a dying art.

KAILAPA HAWAIIAN HOMESTEAD COMMUNITY: CINDY SHARP, JORDAN HOLLISTER, KAENA PETERSON, JUSTIN P. ASING, JONAH YARDLEY, ROBIN YARDLEY, TED ANGELO, JIMMY BOUNCS, PUALANI LINCOLN MAIELUA, KEALII MAIELUA, TANI WAIPA, MARK KEALII FREITAS, MAKĀ‘ALA AND ROGER KANEALI‘I, AND SUSAN AND PAUL FISCHER

In response to the OHA public notice published in February 2019, Lokelani Brandt was invited by Maka‘aka Kaneali‘i, (the President of the Kailapa Community Association) to the Kailapa Hawaiian Homestead Community in Kawaihae Ahupua‘a, Kohala. Maka‘ala Kaneali‘i organized a community meeting, which was held at the Kailapa Community Center and a total of sixteen individual representing two distinct communities (Kailapa Hawaiian Homestead community and the nearby Kohala Estates), were in attendance all of whom participated in the talk-story. The names of the participants from Kailapa are Cindy Sharp, Jordan Hollister, Kaena Peterson, Justin P. Asing, Jonah Yardley, Robin Yardley, Ted Angelo, Jimmy BounCS, Pualani Lincoln Maielua, Kealii Maielua, Tani Waipa, Mark Kealii Freitas, Diane Maka‘ala Kaneali‘i and Roger Kaneali‘i. Representing Kohala Estates, were Susan and Paul Fischer. The community members expressed that they would like their *mana‘o* and concerns to be expressed as a unified voice instead of individually.

When asked if they were aware of any ongoing traditional cultural practices, the community expressed that fishing from the reef is an ongoing traditional cultural practice. They emphasized the traditional practice of taking only what is needed is a practice that has been taught to them and is something they are passing down to their children. They stressed that culturally, fish that was caught was for eating and that the Hawaiian saying, “*ka ‘ai a me ka i‘a*” literally translated as “the vegetable and the fish” constituted a complete meal. In looking at the “white-list”, some individuals added that *i‘a* (fish) was and will always be an important part of the Hawaiian diet. They noted that many of the fish on the “white-list” are still caught for subsistence purposes and stressed that fishing is part of Hawai‘i’s subsistence economy. They also spoke about the Hawaiian cosmogony chant *Kumulipo*, and urged for the need to maintain balance in our marine ecosystems. Some members shared that *pule* (prayer) was integral to maintaining balance and to traditional fishing practices.

Several community members spoke about the fishing *ko‘a* in their area and noted that some fishers continue to *hānai* (feed, care for) these *ko‘a*. They described that every family in an *ahupua‘a* had and maintained a *ko‘a*. They stated that everything in the ocean is a part of Hawaiian culture and that every species has a role in maintaining a healthy marine ecosystem.

One community member noted that the Kohala shoreline was once considered a spawning ground and that the historical changes that have occurred on land have severely impacted the coral reefs in some areas. One community member recalled seeking a lot of black coral in the area and that today, it is almost impossible to find any. They noted

that during episodic rain events, the runoff from land clouds the ocean for weeks at a time, leaving the coral reef severely depleted.

In their collective efforts to better steward their marine resources and the entire Kawaihae *ahupua'a*, the Kailapa community has been active in maintaining the traditional practice of *kilo* or astute observation. One community member emphasized that *kilo* is one way they are improving their understanding of their resources so that they can properly manage these resources. This community member also emphasized that proper stewardship is “always about management” and “never about taking.” It was also stressed that Hawaiians continue to maintain and revive their traditions, practices, and beliefs. Also, highlighted was that the idea that society today requires the culture to evolve and naturally the practices, traditions, and beliefs coevolve with it.

The Kailapa Community members and those from the Kohala Estates spoke openly against the collection of reef fish to supply the aquarium industry. Many stated that the practice of catching fish without intending to consume it goes against traditional belief and that this act is not *pono* (proper, morally fitting, beneficial). They expressed that all fish are part of the public trust and that removing fish to supply a “lucrative” industry undermines traditional practices and beliefs associated with the ocean. They urged people to view fish in their natural environment where their colors are bright and brilliant. Several community members expressed concern for the high mortality rates of aquarium fish. They believe that removing any part of the ecosystem alters the natural balance and that removing small fish disrupts the natural food chain. The members from Kohala Estates believe that the aquarium industry is unsustainable.

They urged for more fish studies, and for establishing open and closed seasons that are based on fish stocks. They believe that if the permitting is approved then there should be more DOCARE officers and that the aquarium industry should help to offset the additional operating costs. The community did support the removal of those invasive species noted on the “white-list” and saw this as a benefit to restoring balance to the reef system in West Hawai‘i.

JAMES MANOHA

On May 23, 2019, Aoloa Santos conducted an interview with James Manoha, a *kama'āina* of Na‘alehu and retired fireman. James is also a recreational and commercial fisherman, which he has done for over thirty years. James frequents the coastal fisheries in West Hawai‘i, primarily in the Ka Lae or South Point region in the Ka‘ū District. He is experienced in a range of fishing activities such as spearfishing, diving, pole fishing, throwing net, and boat fishing, and utilizes the ocean resources primarily for subsistence purposes.

When asked if he was aware of any ongoing traditional cultural practices along the West Hawai‘i coastline, James stated that traditional cultural practices have definitely evolved and fishing practices have changed, though the need to survive has remained. James shared that he has witnessed many native Hawaiians fishing, using various methods, for subsistence purposes. He identified species on the white-list that were traditionally and are still utilized as an important source of food. James noted that within his *'ohana* (family) the *pāku'iku'i*, *lā'ī pala*, and *kole* are amongst some of their favorite eating fish.

When asked if there were any potential cultural impacts associated with the proposed action, he stated that the fish on the white-list are numerous and therefore feels aquarium collection of these species would not negatively impact fish population and subsistence practices. However, he strongly advocated, with respect to the general harvesting of resources for subsistence or commercial purposes, that any permitting process give preference to those of “Native Hawaiian blood.” James believes that the ocean is a resource that should be utilized to support families, whether for subsistence or financial and therefore, supports recreational or commercial fishing practices as long as it is done sustainably and responsibly. He further emphasized that “it is our responsibility to take care of our resources” and does not support the “abuse of resources,” or overfishing practices.

James also spoke extensively about the implementation of “restricted areas” and explained that over the years, he has witnessed significant growth in fish populations which he credits to the implementation of “restricted areas.” He also added that the literature and research he has reviewed supports many of his observations. Argumentatively, James added that although “restricted area” designations have produced positive results for heavily impacted coastal fisheries, he, in turn, has witnessed unnecessary designations that negatively impact subsistence fishing practices. He stated that he is concerned about a recent “restricted area” designation from Ka‘alu‘alu to Kahuku, an area that is renowned for its “bottom-fishing” grounds. He argued that this new restricted area is “self-regulated” due to rough seas and numerous predators. He added that there is no scientific basis that supports the creation of this “restricted area” which has led him to believe that it was created due to federal demands and pressures to establish conservation areas. Additionally, he stated that with a small number of fishermen that frequent this region, implementation of this restricted area would be met with less resistance in comparison to other areas. As a result, the local fishermen have reverted to unsafe and expensive practices in order to continue fishing near these fishing grounds. James recommended

that these designations should only be considered if backed by extensive scientific data. He also stated that such studies should be conducted by a neutral third-party to ensure an unbiased representation of those fisheries so that rules and regulations can be formed that would benefit all parties and establish a “common ground.” James also added that areas have different resources and disapprove of the “blanket approach” for an entire region. He recommended that extensive research should be conducted to identify areas, its resources, and impacts in order to develop specific management practices.

James concluded that from his experience and observations in fishing within the WHFMA, the designation of “restricted areas” has positively impacted these areas resulting in increased fish populations. However, in order to safeguard these outcomes, he recommended that substantial scientific data must be included when identifying areas proposed regulated areas. In addition to “restricted areas,” he also supports the idea of “residential only” areas, as demonstrated by the community of Kaimū, in which only the residents of the area are allowed to fish. He strongly believes this designation will encourage fishing communities to develop and implement sustainable management practices resulting in improved resources. Based on scientific data and from his personal observations, he firmly stated that he does not anticipate any major cultural impacts as a result of aquarium fish collection as long as collectors conduct sustainable and responsible practices.

KEHAU SPRINGER

On April 29, 2019, Aoloa Santos met with Kehau Springer of Volcano, Hawai‘i. Born and raised on O‘ahu, Kehau always had a “love of the *kai*, growing up.” Her deep love of the ocean coupled with her academic career inevitably led her to the field of marine resource management, where she has earned degrees in both Marine Science and Hawaiian Studies and a master’s degree in Tropical Conservation Biology. As the Coastal Community Capacity Development Advisor for Conservation International Hawai‘i, Kehau shared her knowledge and extensive experience in working within the West Hawai‘i region but has declined to provide any recommendations.

When asked if she is aware or has witnessed any ongoing traditional cultural practices along the West Hawai‘i coastline, Kehau provided a candid perspective on some of the traditional and customary practices. She stated that traditional fishing is contingent upon access of *kanaka* (man) to places in order to maintain sustainable and “*pono*” relationships with the resources which then ensures the perpetuation of traditional harvesting practices. She also added that traditional customary practice is not one singular or specific practice, such as “paddling a canoe or using a specific type of net to catch a specific type of fish,” but in the actions of caring for and acknowledging the communities, we harvest from. Kehau provided examples of this which includes traditional practices such as offering an *oli* (chants) or *ho‘okupu* (offering) or *mālama ‘āina*, the acts of caring for the land.

Through her work, Kehau has witnessed different communities along the West Hawai‘i region that maintain specific cultural practices. In North and South Kohala, particularly in the Kawaihae area, she observed the use of *wa‘a* (canoe) which are used to access adjacent fisheries. At Puakō, she has witnessed “*lawai‘a*” (fishermen) catching *he‘e* or using a three-pronged spear for diving. At Kīholo, a place known for its freshwater and groundwater input, the community is knowledgeable in managing *loko i‘a* (fishponds). She has also seen salt gathering, diving, “throw net” and active use of ‘*ōpelu ko‘a*, areas that mackerel scad (*Decapterus pinnulatus* and *D. maruadsi*) gather. Through her collaborations with the community, Kehau has seen the active use of the *ko‘a* in various ways including education by teaching children to clean and prepare fish for consumption.

In North Kona, Kehau observed a large number of anchialine pools, that are very healthy and continue to maintain ‘*ōpae ‘ula* (*Halocaridina rubra*), an endemic shrimp species known to be ideal ‘*ōpelu* bait. Kehau has seen people still use ‘*ōpae ‘ula* as bait but due to the difficulty in collecting this shrimp the practice is not as common. However, she has seen these communities take on the initiative to maintain these anchialine pools with the intent to revive the practice of using ‘*ōpae ‘ula*. Additional practices she has observed in this district is salt gathering, diving, and pole fishing.

In areas of South Kona, particularly at Nāpo‘opo‘o, Hōnaunau, Ho‘okena, Miloli‘i, the tradition of *hānai ko‘a* continues. Kehau explained that *hānai ko‘a* is the traditional practice of feeding and caring for a *ko‘a*, which she described as “natural areas within the ocean where fish gather.” Kehau stated that this phenomenon is influenced by the mixing of currents and natural formations underwater that attract the fish to these areas. The tradition of *hānai ko‘a*, is a method to gather the fish to eat. A bag or handkerchief is filled with cooked vegetables such as pumpkin, avocado, papaya, *kalo* (taro), or ‘*uala* (sweet potato) and with an attached lead weight, the bag is lowered down onto the *ko‘a*. She explained that the use of pumpkin is popular because as it disperses into the water and that the color of the pumpkin resembles that of ‘*ōpae ‘ula*. The practice of *hānai ko‘a* ran throughout the year but *kapu* (restrictions,

prohibitions), are enacted to restrict harvesting during the months of April through August, which coincides with the *‘ōpelu* spawning period.

Through her interactions with various communities in West Hawai‘i, and in speaking with *kama ‘āina* of the areas, certain harvesting and fishing practices have changed due to a decrease in fish population and environmental changes as exemplified by the *pākuikui* (*Achilles tang*). Kehau shared that this is a favorite delicacy in South Kona. Elders of the area shared that this fish was highly favored for parties and gatherings. However, according to oral interviews with various community members, in the last decade, there has been a major population decline. As a researcher, she confirmed that she has observed a very small population of *pākuikui* in these areas and in comparing scientific monitoring data, statistics, and literature reviews, their numbers have decreased significantly over the years. She does contend that there are other factors that may affect the population, such as their monogamous behavior, urbanization, pollution, and overharvesting.

Kehau shared from her experience and observation that the influx of ocean activities, including aquarium fishing, has caused a major disruption to fish behavior. With the increase in boat traffic and people, she has seen a change in fish aggregation patterns and thus has seen the differences in the natural patterns of ocean wildlife. These increased activities have not only affected ocean life behavior but have consequently altered human behavior and as a result, affected traditional and cultural practices.

HENANI ENOS

On May 5, 2019, Lokelani Brandt interviewed life-long fishermen and educator Henani Enos. Born in the Hawaiian Homestead community of Anahola, East Kaua‘i, Henani relocated to Hawai‘i Island and currently lives in ‘Ōla‘a, Puna District. With his experience and upbringing in Hawaiian fishing practices and beliefs, art, and traditional navigation and wayfinding, Henani has taught ethnozoology, Hawaiian lifestyle, and Hawaiian moon phases courses at Ka Haka ‘Ula O Ke‘elikōlani College of Hawaiian Language at the University of Hawai‘i at Hilo since 2001. He is also a high school math, science, and navigation teacher at Ke Kula ‘O Nāwahīokalani‘ōpu‘u, a Hawaiian immersion school. Early in the email correspondences, Henani explained that he was aware of how different Hawaiian fishes were used by *kūpuna* (ancestors) but added that he did not have much knowledge about any ongoing cultural practices in West Hawai‘i. Henani, however, provided a wealth of knowledge concerning the traditional aspects of certain fish including those listed on the “white-list.” The interview was conducted in ‘Ōlelo Hawai‘i (Hawaiian language) and what appears below is a translated summary.

Henani stated that nearly all of the fish listed on the “white-list” are considered *‘ai* (food). With the exception of butterfly fishes, puffers, and boxfishes, which were not considered safe to eat, Henani explained that traditionally any fish that could be consumed safely was eaten. He opined that today people are *pailani* (spoiled) and favor certain fish over others, which he believes is one of the reasons for the decline in the more popular fish species.

With respect to traditional fish naming practices, Henani shared that sometimes fish were named based on their characteristics, body shape, behavior, or where they live, which differs from the classical scientific taxonomy. He shared that while some of the general names have been retained, many people today do not know the specific Hawaiian names that were given to distinct fish species. He also added that certain fish names changed based on their growth stages and including such names in the cultural impact study are important to understanding the Hawaiian cultural value of those fish. He believes that the names given during each growth stage attest to the cultural value of that fish and indicates that its life cycle was carefully observed by *kūpuna*.

Henani described in detail the importance of certain fish in traditional house blessing ceremonies and described several occasions when friends have asked his help in obtaining certain fish for such ceremonies. He noted that the yellow ring around the eye of the *kole* was considered a sign of luck and that this fish was planted under the wall on the eastern side of the house where the sun rises. Henani noted that when the sun rises in the east, the belief is that it raises the luck for the occupants of the home. He expressed that there were other fish that were used in these types of ceremonies including *āholehole*, which is believed to *hole* (strip) a house of unwanted spiritual energy and therefore kept the occupants safe from harm. The *weke* was placed at the entrance of a new home when being blessed as a way to *weke* (open) the home. The *‘ama‘ama*, which is associated with enlightenment and knowledge was also placed inside of a new house during the blessing so that the house would have light and the occupants will receive constant enlightenment and knowledge. The *kūmū* fish was used during *‘ūniki* (graduation ceremonies) as its name means “master”. Henani emphasized that from a *kuana‘ike* Hawai‘i (Hawaiian perspective), fishes carry cultural connotations that are often articulated in their name and sometimes their behavior. If certain energies or beliefs were desired for a home, then the homeowner tried to obtain a fish that possessed those qualities. He added that while there were

prescribed fishes for certain ceremonies, there was flexibility and other fishes that shared similar qualities, whether behavioral, physical characteristics, or in name, could be substituted.

With respect to the *kikākapu* (butterfly fishes), Henani explained that these fish were considered extremely *kapu* (restricted) and were not caught because they were associated with *kauwā*, a menial class of people that lived apart from the general populace and were drawn upon for human sacrifices. Henani specified that the black band of color that marks the forehead of the fish was similar to the tattooed marking of the *kauwā*. Henani added that while growing up, *kūpuna* enforced the practice of releasing this type of fish back into the ocean because of its association with *kauwā*. He explained that if this fish was accidentally caught in a net, it was immediately released and as a child, he was not allowed to take this fish home.

Henani described that traditionally each family had their respective fishing areas at the ocean and that growing up, they were not allowed to roam or fish in another family's area. He laughingly explained that there were no signs to indicate whose fishing spot it was, rather, that knowledge was held within the families and passed on to the children while they were fishing with elder relatives. Henani stated that these areas were sometimes referred to by elder relatives as a family's "icebox." He believes that this practice followed the traditions associated with the *ahupua'a* system and lamented that these traditions are no longer practiced. Henani expounded on this, noting that families tended to their fishing areas just as they did to their gardens. He added that growing up, they would prepare and cook vegetables such as *kalo* (taro) and pumpkin which they took to the ocean to feed the fish. He lightheartedly commented that it was a lot of work to prepare vegetables and to feed the fish. When asked if this practice of feeding the fish was associated with the *ko'a* fishing, Henani clarified that the concept was the same but that feeding was done near the shore where other favored fish lived.

Henani spoke at length about how this type of detailed cultural knowledge was a natural way of life. He stated that while growing up, what the *kupuna* shared was adhered to and that questions were not asked. He stated that these types of practices were "*a mea ma'amau, a hahai wale nō*" (a customary thing, to which we just followed). He explained that people today want to know why certain traditions are followed and for these reasons, Henani stated that he takes the time to learn why certain traditions were practiced and now shares that information with his children and students. He believes that if we don't take the time to understand why certain traditions were practiced, then we cannot convey its importance to the youth and to others who don't understand. He opined that knowing why our *kupuna* did certain things is critical to the perpetuation of Hawaiian cultural practices and traditions.

He emphasized that the detailed cultural knowledge associated with the seasonal changes in the ocean and its lifeforms were carefully developed by *kupuna* because of their ability to *kilo* (astutely observe) the subtle distinctions. He stressed that *kilo* is a skill that needs to be practiced all of the time and that it required a great deal of self-motivation and discipline. He expressed that *kilo* should allow one to observe and be able to convey the subtle distinctions in the natural environment. In describing how *kilo* can be practiced at the ocean, Henani explained that when you continuously observe your environment, you will be able to see things like the gradations of color and that over time, you will be able to observe and distinguish things in nature such as fish types. He emphasized that fishing and preparing and repairing equipment requires a lot of time and energy but if one is able to develop skills in *kilo* they can become more efficient at fishing.

Henani also spoke about changes to the ocean environment that he has observed throughout his lifetime and questioned whether these changes are associated with environmental change or whether it was having a sort of limited understanding of the ocean. He described changes in fish habitat and noted seeing *uhu* (parrot fishes) in rocky areas devoid of coral and has observed *'ō'io* (bonefish) in rock filled areas with no sand, which to his understanding are not their preferred habitats. He stated that these observations are unusual and is likely attributed to the changes in the environment and supposes that these are *hō'ailona maika'i 'ole* (not good signs). He stated that today, fish habitats seem to be disrupted and recalled knowing where certain fish could be found. Henani added that today, fish seem to be moving into other areas outside of their preferred habitat and noted that this is cause for concern.

When asked about his thoughts on the proposed action, Henani shared that he has always enjoyed observing fish and therefore, has an appreciation for aquariums. However, he explained that when fish are removed from their habitat, it severs the natural life cycle which is of no benefit to the overall health of the ocean. He believes that what is most important is that the proper studies be conducted, and that the aquarium industry and the public remain vigilant and watchful. Henani stated that what is most important is that aquarium collection is not "*'ae wale 'ia*" (freely allowed) and that too many fish are not taken because what we do not know now, are the long-term effects of taking too much fish from the ocean. Henani added that there is a reason these fish exist in the ocean and that these fish have been there since the beginning of time, so they are, therefore, an important component of the ecosystem. He emphasized that many people don't realize this and added that this idea is not only applicable to the aquarium industry, but to all people

that harvest marine resources. Henani spoke about a mindset that causes people to take what they can, even if they don't actually need it and the notion that if they don't take it, someone else will. He stated that this is an unfortunate mindset. In light of these thoughts, Henani believes that aquariums can serve as an important educational tool.

When asked if he had any recommendation, Henani stated that since they are extracting natural resources, the “*hana kūpono*” (proper things to do) would be to provide a give back. He added that if those within the industry have an understanding of how to properly care for a fish in a tank, he believes that some of the targeted fish species could be farm raised, which could be used to restock the ocean or to supply the industry.

NOHEA KA ‘AWA, MEL JOHANSEN, JOHN REPLOGLE, MEGHAN LAMSON, SHAYLAN CRYSDALE, AND LESTER GEBIN

On March 28, 2019, ASM staff contacted Nohea Ka‘awa, a *lawai‘a* practitioner and educator from Wai‘ōhinu, Ka‘ū. Nohea invited five other community members to lend their *mana‘o* to this study and on June 12, 2019, Lokelani Brandt, Matt Clark, and Aoloa Santos conducted a group interview with six individuals representing several communities from the Ka‘ū and South Kona Districts. Participants included employees of The Nature Conservancy (TNC), Nohea Ka‘awa (Hawai‘i Island Forest Program Coordinator), Mel Johansen (Kona Hema Field Coordinator), Shalan Crysdale (Hawai‘i Island Forest Program Coordinator) and Lester Gebin (Field Coordinator); Former TNC employee, John Replogle, and Megan Lamson, a coral reef fish biologist. While the individuals spoke at various points throughout the talk-story, for readability, their individual thoughts and insights have been compiled into paragraph form and are presented below.

Nohealani Ka‘awa: Born and raised in Wai‘ōhinu, Ka‘ū, Nohealani “Nohea” Ka‘awa currently resides with her family in the Palauhulu Ahupua‘a in Ka‘ū. She is the Hawai‘i Island Forest Program Coordinator for TNC and has worked for the Hawai‘i Wildlife Fund. She serves in various capacities within her district including a volunteer and educational outreach teacher for the ‘Imi Pono No Ka ‘Āina program with the State of Hawai‘i’s, Department of Forest and Wildlife in partnership with Three Mountain Alliance in addition to serving as a board member of Ka ‘Ohana O Honu‘apo. She is also working with the Department of Hawaiian Homelands to develop a management plan for the South Point area. Nohea has long-standing genealogical ties to Ka‘ū where she and her family continue to reside. She learned many of her cultural values and traditional practices from her *‘ohana*, particularly her grandfather, which has been passed down in their family over the generations.

When asked if she was aware of any traditional practices and beliefs within the WHRFMA and with any of the fish on the “white species” list, Nohea named the fish she was most familiar with and elaborated on some of her family’s traditions, customs, and beliefs. She also described fish characteristics and behaviors which she has observed as a fisher and diver that are important for certain traditional practices and customs. Nohea explained that many of these family traditions and beliefs were learned from direct experience. She emphasized that unless you ask the why questions, the elders will not openly disclose that kinds of information. Described below are some of the cultural practices and beliefs that were shared by Nohea.

Nohea stated that the *pāku‘iku‘i*, is sometimes referred to as *pākakui* or *pākukui*. She explained that this fish is symbolically connected to the *kukui*, or the candlenut tree (*Aleurites moluccana*). Nohea described that when a family member passes away, it is customary to bring a *lei* made of *kukui* to the funeral as this plant is believed to bring enlightenment so that the *‘uhane* (spirit) can transition into the afterlife. She shared that the beliefs and customary practices associated with the afterlife may differ between families but the practice of bringing a *lei kukui* to a funeral continues to be an important part of the funerary rituals maintained in her *‘ohana*. Nohea added that if the deceased was “an ocean person,” then *pākukui* was gathered for the *‘aha ‘aina make*, or funerary feast. She explained when this fish is cooked it produces a distinct bright yellow color, which is something that does not occur when cooking other fish. In explaining why the *pākukui* was consumed during the *‘aha ‘aina make*, Nohea explained that to consume this fish during such an event “served as an added layer of protection.” Nohea elaborated on this practice, stating that:

...so just as the *pele*, the sulphur, the yellow is a layer of protection or when you wear your *kīhei* (traditional garb), you dye your *kīhei* yellow with *‘ōlena*, the *pākukui* kinda serves as that layer of bodily protection...your body possessed a lot of oils and so to um, consume the fish and to have that oil a part of the things running throughout the system of your body, all of the *wai*, all of that *‘au* going on, the currents moving, the *pākukui* kind serves as that shield of protection.

Nohea then pointed out the *hilu* and explained how this fish is utilized in the rituals associated with depositing a child’s *piko* (umbilical cord). Nohea explained that all fish, like humans, have personalities and the *hilu* is considered as an easy-going, “go with the flow” type of fish that is not fearful of human nor does it stick around during times of

danger. Nohea expressed that although there are different rituals that are used when depositing a child's *piko*, she described that in her family, the *piko* was deliberately placed into the mouth of a *hilu* and the fish was allowed to swim away. The belief is that as the child grows it takes on the characteristics of the *hilu*, which was much desired by certain family members because "the *piko* is an extension of the physical person."

With respect to the *hīnālea 'akilolo*, Nohea described how this fish was used medicinally to treat brain-related trauma or illness. She described how the *hīnālea 'akilolo* was used to treat an uncle that had suffered a stroke. Nohea explained that when the family became aware of this person's condition, some family members ordered the gathering of the *hīnālea 'akilolo*. She explained that this fish is valued for its medicinal properties and is used specifically to treat brain-related trauma or illness. She described that there are differing opinions with the use of the *hīnālea 'akilolo*, noting that some *'ohana* believe that it will improve brain function because it *'aki* (snip) at the *lolo* (brain) thereby removing those things that have brought confusion to the brain, while others contend that consuming the fish may worsen a person's condition and make them more *lōlō* (feeble-minded).

Nohea spoke about the cultural beliefs associated with the *kīkākapu* fish, noting that this fish along with other fish species are considered a *kapu* class of *i 'a*. She explained that just as the *kauā* was set aside as a *kapu* class of people, there was also a *kapu* class of fish which included the *kīkākapu* and other fish species that have a black marking on its forehead. Nohea expressed that the distinct black colored band or marking on the forehead of the fish resembled the tattoo that was inked onto the forehead of the *kauā* class of people and for this reason, this fish was not intentionally caught.

In referencing the *kala*, Nohea shared that this fish is used in the rituals that accompany *ho'oponopono*, a ceremonial process held to resolve disputes and restore peace between feuding family members. She emphasized that the *kala*, whose meaning translates to forgive is a part of the repertoire of rituals items that were utilized in this ceremony.

Nohea expressed that the *kūpuna* of Ka'ū fought hard to protect their area from overexploitation and development and that this sentiment and practice continues to be maintained by the people of Ka'ū. She added that today, especially during large fishing tournaments, many people flock to Ka'ū because they have fished out their areas. She described aquarium collectors as just another group that comes to Ka'ū to take its resources and lamented that "it's hard to watch." Nohea added that many people come to Ka'ū just to take its resources and that these people do nothing to give back to these resources. She expressed that seeing these kinds of extractive practices have significantly altered her family's fishing practices to the point that today, she and her family "rarely go *holoholo* at the *kai* because there's just too much taking and the balance is not in place anymore." Nohea then reflected on the efforts at Ka'ūpulehu in North Kona and noted that since the implementation of the fishing ban, they have seen a tremendous increase in the fish population. She noted that although there was protest regarding the creation and implementation of the fishing ban at Ka'ūpulehu, it has, however, allowed the fish population to flourish.

Nohea also expressed concern for the size of fish harvested by aquarium collectors and related memories from her childhood where she learned about the role of juvenile fish in the ecosystem. She described that as a child her family would cross-net at Ka'alu'alu Bay and that the grandchildren would help to *paipai* (the act of slapping and scooping the surface of the water to excite the fish into the net) and were responsible for sizing the fish, a method that was done using their hands. Nohea added that any fish that was smaller than the length of their hand was returned to the ocean. She stated that although her uncles would pull in a large catch, "not everything went home with us" and what was taken was just enough for the families to sustain themselves. She added that "when you start to take the *keiki* from the families, you're not going to have future *kupuna*."

Nohea then reflected on some of the potential cultural impacts that could result from the proposed action and expressed that many of the fish species listed on the "white-list" are widely used in various traditional practices and for subsistence purposes. Nohea cautioned that if these fish continue to be adversely impacted or their numbers continue to decline, it will indisputably have an adverse impact on many traditional Hawaiian cultural practices. Nohea stressed that these fish play an integral role in these customary traditions and rituals and opined that these traditions are critical to maintaining the traditional Hawaiian family system. She also stated that "by taking away the fish, you take away certain traditional practices" and *'ike kupuna* (traditional knowledge), such as understanding the relationships between *mauka* (upland) and *makai* (ocean).

Mel Johansen: Mel Johansen was born and raised in Pāpā Ahupua'a and grew up in the areas of Manukā, Honomalino, Kapu'a, and 'Ālika—lands that are within a region known traditionally as Kapalilua in South Kona. He is an avid diver, pole and boat fisherman, and recalled spending many weekends and even weeklong expeditions where he camped and utilized the reef purely for subsistence purposes. Mel openly expressed that he is "totally against collecting fish that aren't yet ready for harvest because that seems like a totally different, opposite concept" than what he grew

up with. Mel stated that he grew up with the understanding that when you took “resources from the reef it was for home use and to sustain yourself.” He added that all of the kūpuna he has ever encountered also shared in this same philosophy, which was “to take what you need and you take what’s ready...you don’t harvest small fish.” Mel stressed that taking small fish was never traditionally practiced and is an “odd concept” that he cannot relate to.

Mel reflected on the changes to the reef that he has observed over the past sixty years. He recalled the first time he had jumped into the water with a dive mask as a child and recalled seeing the reef covered with all kinds of colors and different varieties of fish. He shared that today when he visits this same place, he no longer sees the diversity of fish he experienced as a child—a change that he believes is associated with the increase in people utilizing the reef and its resources. He believes that the overall decrease in reef species and abundance should be a motivating factor to revive the traditional beliefs and practices of taking only what is needed and what is ready for harvest. Mel stated that some of the fishing grounds he frequented as a child are now protected from aquarium collecting and since the implementation of these no-take areas, he described seeing some recovery to the reef ecosystems but added that “it is still not the same as before.” Mel also stated that many of these coastal areas are historically significant and shared that Kapu‘a Bay is known to be one of the training grounds for Kekūhaupi‘o, a famed lua fighter. Mel stressed that the current aquarium collection practice of taking small fish to be sold elsewhere is “a terrible concept.” He equated the current aquarium collection practice with going to the forest and pulling young native plant species and selling them to another place.

In reviewing the “white-list” fish species and providing recommendations, Mel expressed that all fish have ecological value and that we do not know the impacts of removing too much of anyone species from the reef. Mel stated that for issues as important as the proposed action, he believes that the public and culture of the affected communities should be allowed to weigh-in on the issue and discuss the appropriateness of the fundamental concept of the industry—“is it a good concept or a bad one?” He stated that “what is important is the concept, not whether you can prove it scientifically.” He explained that culturally, everything he has ever learned about resource management stresses the importance of leaving juvenile fish so that they can mature, and taking only what is needed for subsistence purposes. Mel recommended that larger group interviews and public surveys should be included for issues that relate to the use of a public resource. He believes that the results from such interviews and surveys may offer a better understanding of the cultural appropriateness of the proposed action.

John Replogle: Born in Laupāhoehoe, Hilo District, John Replogle at the age of three moved to the Ka‘ū District and currently resides in the Ocean View subdivision. He is retired from TNC where he served as an environmental outreach educator. During his youth he spent a lot of time fishing from the lands of Ka‘ū. At age of twenty-three, around the same time John began his career as a cowboy, John began to notice the crisis of overfishing and made a personal decision to stop nearshore fishing. Although John no longer fishes regularly, he has, at times, accompanied his friends on subsistence focused fishing trips which has allowed him to witness the use and impacts of modern fishing equipment and technology, such as jet skis, scuba gear, and boats.

John shared that while growing up, access to the Ka‘ū coast was often long and arduous and that the rough conditions severely limited human access to the coastal areas and its resources. He shared that at Waio‘ahukini—a place that was frequented by his father—a private access road was built and despite this road, access was still very limited. He added that the *ulu* fishermen that wanted to get to Waio‘ahukini had to hike down the *pali* (cliff) to get there. He noted that after his return from college, sometime shortly after 1974, his father informed him of a group of young fishermen that had come down to Waio‘ahukini to night dive. In explaining the story shared to him by his father, John stated that this group of fishermen would spear the sleeping *‘uhu*. John shared that “these young people saw no harm in what they did; filling coolers of *‘uhu*. He referenced several images that he saw on the web that showed fishermen standing over a plethora of reef fish that were laid out in their garage. John opined that it’s these kinds of fishing practices that “have brought us to where we are at.” John sees the aquarium industry as “adding to this crisis.” John explained that today, access to nearshore resources is no longer limited to roads or trails as fishers now utilize modern technologies such as boats and jet skis which makes everywhere accessible to them. He added in the past, to get to Waio‘ahukini took almost two hours by vehicle, but with boats and jet skis, people can access this area from South Point within minutes. In describing the importance of Waio‘ahukini, John shared that Mary Kawena Pukui described it as a very rich fishing ground. In describing what makes this area rich, John explained that the Hala‘ea current that sweeps around Ka Lae is nutrient-rich and as this current moves, it deposits a great deal of nutrients into the vicinity of Waio‘ahukini.

In speaking about the history of aquarium fishing in West Hawai‘i, John shared that during the late 1980s, when aquarium fishing began to expand, there were huge public rallies where people paraded through the streets of Kona to stop the taking of fish for the aquarium industry. He added that although there was tremendous public opposition, the State of Hawai‘i continued to allow aquarium collecting because of the tax revenue.

John also raised concern for the mortality rate of the fish and noted that there have been several instances when bags of dead aquarium fish were dumped and “thrown out like garbage.” He described that culturally when something of value needs to be disposed of, it is done so properly and cited the example of a *lei*, where once it is no longer needed, it is returned to the land. John contends that although only a few cases of dumped aquarium fish have made public headlines, he believes that such cases may be more common.

In describing some of his concern about the proposed action, John exclaimed that in fifty years from now, what will those people think of the culture that would allow this type of activity to happen. He stated that these marine resources are a part of a living culture and are a part of a living ecosystem that is intimately connected to the land. John stressed that currently, Hawai‘i’s reefs are under severe stress brought about by things like introduced toxins from sunscreen, overfishing, rising ocean temperatures, pollution, and unregulated fishing. He made reference to the hunting of the Pacific Sea Otter to near extinction, which led to an explosion of sea urchins that in turn created ocean floor deserts. John expressed that “man has no brakes” when it comes to the take of natural resources. He opined that we are surrounded by water and that in Hawai‘i you don’t need to have any license or education to use this resource. He exclaimed that today, all people need to do is go down to their local fishing store and “buy the stuff and catch um...catch as many as you can.” John believes that this current mindset is tied to proving one’s masculinity and dominance over Nature which he described as a “western civilization mindset.

In reflecting on the current state of land and marine resource management, John stated that “we can’t even take care of where we are, what we have, and what we have been given responsibility for, yet we want to go and take more!” John added that “these reefs existed just fine without us and now it’s a race to catch the next fish with no regard for the whole reef.” John stated that “the State of Hawai‘i is incapable of managing such an industry” as the State does not have the funding or the enforcement to regulate this industry. John stated that in Ka‘ū and because of the way the management boundaries were drawn, DOCARE officers from both east and west Hawai‘i have to patrol this district. He stated that this is problematic because depending on where the infraction occurred will determine what region will respond. He expressed that DOCARE on Hawai‘i Island is under staffed and related a saying from a former DOFAW manager who exclaimed “I would rather poke my eye with a sharp stick than work in Ka‘ū.” John shared that this statement is not just about Ka‘ū but is a reflection of the entire state and the “need to stop prostituting Hawai‘i for personal gain.”

John shared that there is a hand full of people collecting and about three million dollars in tax revenue is generated by the aquarium industry. John stated that the ecological value of Hawai‘i’s marine ecosystem to the islands and to the planet should supersede any dollar amount. He advocated, at the very least, for an ecosystems services fees and believes that we should not be freely giving away our natural resources. He argued that the state and county agencies are so “focused on visitors and pleasing the outside world” that we have overlooked proper management of our island resources. John shared that once a place is depleted of fish, fishers will just move to the next location. He expressed that this is one of the reasons why people come to Ka‘ū, because they have fished out their areas and that it will only be a matter of time before Ka‘ū is depleted of its marine resources. He also added that the rough ocean conditions in Ka‘ū have helped to protect the area’s resources because it limits accessibility. John does not support the taking of reef fish for the aquarium industry and believes that reef fish should only be collected for educational purposes within the State of Hawai‘i. While he does support the taking of fish for subsistence purposes, he believes that even recreational fishing should be regulated because most fishers don’t know the damage they are doing to the marine ecosystem. He reflected on the current hunting license fees and noted that if the fees were higher, it would generate more income that could be used to improve management of the resources and that people would be more invested in protecting their resources. He stated, “it cost money to take care of our resources.” John shared that even in Pre-contact times, people had to learn about the ocean first before they caught their first fish. He would much rather see people visit the island and view fish in their natural habitat accompanied by knowledgeable practitioners. John stated that “we cannot take care of what we have and we want to give more...enough already! It’s well past time to turn this trend around within the whole state, not just West Hawai‘i.”

Megan Lamson: Born and raised in California, Megan Lamson moved to Hawai‘i and currently resides in Honalo Ahupua‘a, South Kona. She has earned degrees in marine biology and tropical conservation biology and has a background in coral reef fish ecology and community-based resource management. She is a Board member for Ka

‘Ohana O Honu‘apo, a community organization based in Ka‘ū. She also works for Hawai‘i Wildlife Fund and the Pacific Cooperative Studies Unit for the Hawai‘i Division of Aquatic Resources in Kona.

With respect to the role of technology in altering traditional fishing practices, Megan shared that access to the coast coupled with the advancement in technology has drastically altered traditional fishing practices. Additionally, Megan pointed out that changes to Hawai‘i’s commercial jetliners have aided in the transportation of aquarium fish, the bulk of which are shipped to offshore locations. She added that improved scuba technology now makes it possible for divers to go deeper and for longer periods of time.

Megan also spoke about the invasive species that are listed on the “white-list” (*roi* and *ta‘ape*) and noted that while most people believe removing these fish are good for the reef ecosystems, she shared that more recent scientific research is dispelling the anecdotal myths that associate declining reef health with *roi* (*Cephalopholis argus*). She stated that it is really easy to point to any one aspect as the leading cause of declining reef health, but she stressed that declining reef health is a consequence of multiple stressors. Megan pointed to the 2015 coral bleaching event that resulted in the loss of close to fifty percent of live coral covers in West Hawai‘i. She added that the drastic reduction in coral has severely altered the very foundation upon which reef fish and other marine life need to survive. She emphasized that although some fish listed on the “white-list” are highly valued in Hawaiian culture, she explained that all fish have a role in maintaining the necessary balance of the ecosystem. She stressed that we don’t fully understand the ecological relationships that exist between the different species. Megan explained that the forty species listed on the “white-list” was passed in 2012 when Governor Neil Abercrombie signed and approved it along with the “rules package” and noted that prior to this, people “could essentially take whatever.” Megan clarified that it took years and the effort of many people and organization to get these rules approved. She added that these rules apply only to the WHRFMA and believes that all fisheries in the State of Hawai‘i are deserving of such stricter legislative protection. Megan also pointed to the endemic species on the “white-list” and stated that there should be no taking of any endemic species because these species are found only here in Hawai‘i and should be protected.

With respect to her personal thoughts on aquarium collecting, Megan shared that unless these fish are being used as an instructional tool to teach the current and next-generation about fish and marine ecosystem or environmental education (such as in public aquariums and schools/university classrooms), she stated that she cannot fully support the take of fish for the aquarium industry. Megan added that from a scientific perspective, she would like “to support sustainable harvest of any species as long as it is not detrimental to native wildlife.” Reflecting on the data that has been analyzed for the no-aquarium take areas in the WHRFMA that goes back to 1998, Megan stated that there has been an overall increase in fish abundance, but noted that when analyzing specific species, the population of *pākukui* has been decimated. For this reason, Megan strongly opposes the take of *pākukui*. Megan further explained that *pākukui* is one of the top three fish species that is collected within the WHRFMA.

Megan added that despite the WHRFMA being one of the best-managed fisheries in the state, the State of Hawai‘i still does not have the capacity to manage all of the aquatic resources on its own, and needs continued support from communities and other partner agencies. She added that historically for West Hawai‘i, the State of Hawai‘i relies heavily on funding from partner agencies such as the National Oceanic and Atmospheric Administration (NOAA) to monitor the effectiveness of the aquarium fishery within the WHRFMA to help best manage the fishery. She believes that every fishery in the State of Hawai‘i deserves to have environmental and cultural impact assessment study because even one fish taken from the reef, whether for home consumption or for an aquarium, has the same impact to the reef. She explained that there are, however, different ethical and cultural concerns with respect to collecting fish for subsistence purposes and for the aquarium industry. Megan also contends that the State should look into options to charge marine usage fees for anyone who utilizes the ocean resources, which could then go towards improving the management of Hawai‘i’s fisheries.

Shalan Crysdale: Shalan Crysdale is the Hawai‘i Island Forest Program Coordinator for TNC and has worked in the conservation field for over fifteen years, with some five years in dryland forest management. Born in California, Shalan currently resides in Wai‘ōhinu with his family and has spent much of his time during the 1980s in the coast of South Kona.

When asked if he had any cultural knowledge of the “white-species” list or knew of any traditional practices and beliefs associated with these fish or in the region, he stated that he was unaware of any specific cultural practices. However, Shalan offered his perspective on “protected areas” stating that “when you assign protection to some area, you are necessarily diminishing the status of the areas that are not protected...if you have protection in one area, well, you can assume next door is getting pounded.” Shalan also spoke about the ecological connection between species and noted that we do not fully understand the ecological relationship between different species. Shalan added that from his experience, a large amount of research has focused on species that threaten the broader ecosystem but has

seen limited information on the positive relationships between species. He believes that understanding both positive and negative relationships between species may result in better management practices and regulation policies. Shalan concluded that the recognition to protect Hawai‘i’s resources is a common thread between different agencies, however, varying political agendas inhibit the development of necessary policies and regulations for the best interests of each region.

Lester Gebin: Born and raised in Kona, Lester now lives in Ocean View in Ka‘ū and has been employed with TNC for the past thirteen years. Lester asked, “how many of fish they [aquarium collectors] catch survive?” He noted that depending on the depths at which these fish are caught, may require the air bladders to be manually punctured before they can be brought to the surface. Lester advocated for people to view fish in their natural habitat.

MIKE NAKACHI, LING NAKACHI, AND KAIAKEA NAKACHI

Mike Nakachi accompanied by his father and life-long fisher and waterman Ling Nakachi and his son Kaiakea Nakachi, currently a graduate student in the Tropical Conservation Biology and Environmental Science program at the University of Hawai‘i at Hilo met with Lokelani Brandt on June 26, 2019, to share their insights about traditional cultural uses and knowledge with respect to the WHRFMA. Mike is a fisherman and owner of ‘Ohana Moana, a Kona-based fishing and dive tour company. Mike has also served as a member of the West Hawai‘i Fisheries Council and has on multiple occasions spoke publicly against the illegal take of fish for the aquarium industry. Mike shared that his family has always had a profound respect for the ocean and all of its life forms and that on his father’s side, where his Hawaiian lineage comes from, they were *kahu manō* (caretakers of sharks). Because of years of daily interaction with the ocean in West Hawai‘i, Mike has developed astute observation skills and can detect subtle color gradations, name ocean currents and its characteristics amongst many other attributes of the ocean environment.

When asked about any ongoing traditional cultural practices within the WHRFMA, Mike explained that women have always been the keepers of the cultural knowledge and traditions and that men are often tasked with some of the more physical aspects of these traditions. He spoke of several occasions when he was asked by certain respected women to gather specific fishes that were used ceremonially. He explained that I never questioned why certain species were requested or how it was used, rather I just do as the aunties and *kupuna* ask of me. Kaiakea added to this discussion, explaining that it’s hard for some of the *kupuna* to gather certain resources. Mike also spoke of subsistence gathering of fish and other marine resources, which is used to supply food at traditional *lū‘au* celebrations and for household consumption. Mike also pointed out some of the cultural sites, such as fishponds and historically significant places (which are numerous) along the West Hawai‘i region. In describing another long-standing Hawaiian customary practice, Mike spoke about *mālama ‘āina*, a deeply-rooted belief that was translated into daily practices that made the land and ocean resources *momona* (fertile, fruitful). Mike described these practices which promoted fertility and richness of the land and ocean as *mālama momona*. He stated that the aquarium industry does not apply this cultural practice at all to any part of their industry.

Mike spoke about the practice of showing respect while on the ocean, which includes providing a safe and respectful distance between others who are fishing or diving as well as showing respect for the resources. He described how this has changed over the years as more people that have no sense of the culture or the cultural significance of the ocean utilize it for various ocean activities. He described this new attitude and behavior as carrying an air of entitlement to the ocean resources and not having any sort of give-back to the resources. He noted that this change in attitude and behavior has at times led to intense conflicts between different ocean users. He described during his younger years while fishing with older fishermen, they would encounter collectors and described shouting matches that would occur on the water between aquarium collectors, fishermen, and dive-tour operators.

Mike made several references to the importance of having healthy coral and reef ecosystems explaining that many of the species found in West Hawai‘i are endemic. He noted that in other parts of the Hawaiian archipelago, some reef systems are comprised purely of endemic species. He stressed that this means that these species are not found anywhere else in the world and described how this has led to a highly conflicted values assessment. Mike opined that culturally, preserving and caring for these resources is often motivated by cultural/familial values, uses, and beliefs associated with these resources, whereas the State of Hawai‘i and others are solely motivated by the economic value of these resources. He noted that the Hawaiian cultural value of our reef resources as with other resources is never considered an integral component in management strategies, which as a result, continues to adversely impact Hawaiian cultural traditions, practices, and beliefs. Mike also shared that the reef system in West Hawai‘i have and continue to be impacted by other external stressors such as rising sea temperatures and remarked on the 2015 coral bleaching event that resulted in acres of dead coral. Mike referenced the *Kumulipo* and clarified that the process described in this chant is ongoing, not merely something of the past. He described how healthy fish populations repair damaged

coral reefs noting how certain fish like the *uhu* graze on dead coral thereby providing a clean foundation upon which new coral polyps can form.

With respect to the aquarium industry, Mike disclosed that in the past, he has been approached by several individuals to participate in this industry, but affirmed that he has never participated in it because it never felt right in his *na'au* (guts, moral nature). He expressed that the feelings that come with taking fish to be sold outside of Hawai'i to be placed in someone's tank never felt appropriate to him nor does it contribute to the health of the ocean. He acknowledged knowing several Native Hawaiians that have participated in this industry but stated that many of them have left after learning about the workings of the industry. Mike lamented that in some smaller Hawaiian communities, especially in South Kona where traditional methods of harvesting fish are still practiced, the aquarium industry has created serious discord and tension amongst its members, which he feels is very sad and unfortunate.

Mike worries that since the banning of aquarium collecting in West Hawai'i, many of the collectors have migrated and are now impacting other areas around the island, including eastern Ka'u and emphasized that the impacts to these areas are not being assessed in this process. Although aquarium collecting is prohibited within the WHRFMA, it is still occurring in other parts of the island, which is worrisome for Mike. He believes that an assessment should be conducted for all of the islands, not just West Hawai'i. He described the aquarium industry as keeping a low-profile and working under the radar and noted that they are not active in any other community issues other than those that pose a direct threat to the viability of their industry. He believes that this type of veiled operation has not lent to the credibility of their industry. Additionally, Mike described several instances when collectors were caught illegally harvesting fish which he believes has led to a degraded public profile. Mike believes that it is important to give back to the communities and to the ecosystem which you depend upon.

Mike also shared his thoughts on the regulatory component and lamented on the fact that there are very few DOCARE officers that patrol this massive region and its resources. He expressed that currently there is not enough enforcement to regulate all of the different kinds of activities that are occurring in West Hawai'i, including the aquarium industry. He stated that the lack of enforcement has led communities to implement Makai Watch, where community members have taken on the responsibility of raising awareness about the resources and reporting illegal activities. Mike expressed that there is little reliance on the State to execute their fiduciary responsibilities to care for and properly manage our resources.

In contrasting the past to the present and looking to the future, Mike strongly believes that we are now in a new time, where cultural traditions are being practiced and Hawaiian youth are actively engaged in their culture in innovative and meaningful ways. He described today, more people being culturally aware and that knowledge of our cultural places are being revitalized, preserved, and passed on to the next generation. Mike hopes that he can continue to pass on his love and knowledge of the ocean to his grandchildren as has been done in his family for generations. He hopes this tradition can be carried on. He described the knowledge of the ocean as understood by *kupuna* as being profound and is still highly applicable to us today. Mike was very earnest in his feelings regarding the capture and selling of Hawai'i's reef fish to places outside of Hawai'i and believes this is not *pono*.

WILFRED KAUPIKO, KA'IMI KAUPIKO, AND GREG ASNER

Lokelani Brandt contacted Ka'imi Kaupiko, a Hawaiian fishing practitioner and educator with long-standing genealogical ties to the Hawaiian fishing village of Miloli'i in South Kona. Ka'imi extended the invitation to other family and community members, to which his father Wilfred "Uncle Willy" Kaupiko, and Greg Asner with the latter residing in the adjacent Miloli'i beach lot subdivision responded to Ka'imi's request. On June 28, 2019, Lokelani Brandt met with these individuals at Miloli'i to discuss past and ongoing traditional cultural practices and beliefs associated with Miloli'i and the adjacent coastal areas including Papa Bay and to get their general thoughts on the proposed action. All of the community members openly expressed that they were not aware that an EIS was being prepared and were disappointed that no community meetings had been held by the applicant to discuss their proposed action. Both Ka'imi and Uncle Willy spoke about their involvement with the 2017 Hawai'i Supreme Court ruling that invalidated all permits issued pursuant to HRS §188-31 until compliance with the Hawai'i Environmental Policy Act (HEPA) is met.

When asked about their knowledge of any past and or ongoing traditional cultural practices, Uncle Willy shared that he comes from a long line of Hawaiian *'opelu* fishers, and noted that his father was a *'opelu* fisherman and that his uncles were master fishers, having in-depth knowledge of the ocean, fish behavior and habitat, and fishing techniques. He described spending a lot of time with his uncles where he learned how to fish according to the practices of his *kupuna*. He informed that they spoke *'Ōlelo* (Hawaiian language), often times speaking only Hawaiian amongst

each other. He described that while growing up, men were the primary *‘ōpelu* fishers but that women would often accompany the men. He also expressed that some women, particularly those that were skilled and strong *‘ōpelu* fishers would go out on the ocean alone. Uncle Willy recalled memories of his youth where the reef at Miloli‘i Bay was teeming with fish. He reminisced that when the church bell rang, it would cause the fish to flutter on the surface of the sea.

Uncle Willy described in detail how many of the old practices including the enforcement of certain *kapu* were still practiced well into the 20th century and stated that on Sundays, “fishing was *kapu*” and people were encouraged to rest. Uncle Willy described the process of *ka ‘ai*, which he described as the feeding and taming of fish. He detailed the preparation of vegetable chum which included locally grown vegetable such as pumpkin and *kalo* that was used to *hānai* (feed) the *‘ōpelu*. Uncle Willy explained how the fishers would load the prepared vegetables on the canoe and take it to the *ko ‘a* where it was released. He described how each fisher would tap on their canoe in a certain manner to call the fish up from the depths of the ocean. Uncle Willy recalled watching the dark-colored ball of *‘ōpelu* dance in the sea and the efforts of the fishermen to move swiftly to lower the nets, herd the *‘ōpelu*, and raise the nets. He stated that much of the fishing that was done during his youth was for commercial and recalled a time when *‘ōpelu* was sold at ten cents per pound. He stated that any excess fish was cleaned, salted, sun-dried and later sold to customers across the island. Uncle Willy also expressed that women were particularly adept at cleaning and preparing fish. He stated that despite the adoption of more modern fishing technology, one “still needs to know the secrets of the ocean,” including the winds and currents. Uncle Willy referred to the ocean current that runs south just outside of Miloli‘i as the *kama ‘āina* current or the Ka‘ū current. He stated that when fishing for *‘ōpelu*, one needs to be very aware of the current and winds as certain types create challenges for the *‘ōpelu* fishers.

When asked about cultural uses, traditions, and beliefs associated with any of the “white-list” species, Uncle Willy stated that many of the fish are used for subsistence purposes. Ka‘imi noted the use of *pākuikui* and *kole* in certain ceremonies and that red fish is used in their *Makahiki* ceremonies. Uncle Willy added that yellow tang was and still is used as an important indicator species because it attracts other valued fish such as *maiko*, *manini*, and *uhu*. Ka‘imi added that each fish has a role in the ecosystem and stated that the “white-list” is not *pono*. Uncle Willy described that in West Hawai‘i, the reefs are short and steep which transition abruptly into very deep water and that this unique environment provided an abundance and diversity of marine resources.

With respect to the adoption and use of fishing technology, Uncle Willy recalled being told by his father to “work smart, not hard” and noted that when gas-powered engines and other fishing devices were introduced to Miloli‘i, the fishermen, including himself adopted some of these technologies which they incorporated into their traditional fishing practices. While *‘ōpelu* fishing occurs in deeper waters, Uncle Willy described several near shore fishing techniques including the use of a crossnet to catch *akule*, lay nets, throw nets, poles, and spears to catch other reef fish. He also spoke about using homemade wire baskets which were used to remove the spines from *wana*. He also noted the use of fishing *imu* which was constructed by each family in the nearshore reefs. He explained that the stones were piled on the reef and that fish like *manini* would dwell in the *imu*. Uncle Willy described the use of a throw net which was placed over the *imu* while the stones were dismantled resulting in the entanglement of the fleeing fish in the net. Of the fishing techniques described by Uncle Willy, he indicated that only the latter is no longer practiced. Uncle Willy stated that although many new technologies have made their way into this fishing village, they still depend heavily on the land and ocean and laughingly stated: “we still use *kukui hele pō* (lanterns) at night.” Uncle Willy also spoke about their use of certain plants such as *lehua piha* (fully blossomed *lehua*) and *hala* (pandanus) as indicators for when certain marine species were ready to harvest.

In contrasting the practices he learned as a child to today, Uncle Willy expressed that a lot has changed and stated that in the past things were “real strict.” Both Ka‘imi and Uncle Willy described changes to peoples’ behavior and attitude towards the ocean resources and noted the gradual changes to the ocean environment and decline in fish abundance at Miloli‘i. Uncle Willy pointed out that while growing up, they were always taught to *mālama* and stay in their respective *ahupua‘a* and not to *maha‘oi* (intrude) in other people’s places. He stated that today, people fish wherever they can access and take everything they can. He reflected on the traditional preparation of vegetable chum and stated that some people began using meat and noted that meat chum disrupts the fishes’ diet. Both Uncle Willy and Ka‘imi expressed that community members who acted out of the cultural norms in the fishing village were held accountable for their actions and were punished by the community.

Ka‘imi added that Miloli‘i was always known for its abundance and is one of the last places to maintain traditional Hawaiian fishing practices, which is why Ka‘imi and his father have played a key role in developing educational programs for the *‘ohana* and youth of Miloli‘i. When asked about the types of educational programs they offer, Ka‘imi stated that they focus on teaching the *keiki* about traditional *‘ōpelu* feeding, net making, developing fluency in traditional Hawaiian fishing related terminology, seasonal changes, Hawaiian moon calendar, and other *pono* ways of

fishing. Uncle Willy and Ka‘imi expressed that many of the *kupuna* and fishing practitioner have passed away but there are “plenty *kamali‘i*” in the village. They described a pressing need to teach the next generation about the cultural traditions unique to Miloli‘i so that they can *maka‘ala* (remain watchful) and *mālama* (care for) these traditions, place, and resources into the future. Ka‘imi stated that today, the Miloli‘i community and its ocean resources are in a “vulnerable state” and expressed that the seasonal patterns are off, which creates challenges for their subsistence lifestyle.

While all four interview participants were aware of the Miloli‘i FRA, which prohibits that taking of reef fish for the aquarium industry, they noted that in the adjacent Pāpā Bay, aquarium collection is allowed. Uncle Willy stated that while growing up, he learned that Pāpā Bay is where the fish are born. Greg Asner, who has been diving and conducting coral and fish surveys at Pāpā Bay for the past twenty-three years highlighted some of his research findings. Greg explained that the science he has been conducting puts numbers to what people like Uncle Willy grew up learning and knowing. Greg described a phenomenon known as “bio slicks” which are visible from land as glass-like, meandering streaks that appear on the ocean surface. Greg explained that these drifting slicks contain larvae fish and invertebrates, algae, and debris and serve as an important habitat during the early growth stages of these organisms. Greg stated that these slicks are common in and near Pāpā Bay but are not generated within Miloli‘i Bay. He emphasized that coastal areas share important biological connections and from his research, he has learned that fish migrate to different areas to live out their life cycle. He went on to explain that Pāpā Bay and Miloli‘i share important biological connections because some of the larvae fish that are carried on these slicks are deposited into adjacent bays. Greg stressed that what happens at Pāpā Bay impacts Miloli‘i and other areas. Both Greg and Gail confirmed fish population crashes at Pāpā Bay and have recorded collectors walking on and damaging coral, which they expressed is key to maintaining a healthy marine ecosystem. The group stated that they have seen aquarium collectors day after day collecting fish from the same areas and feels that this intensive harvesting does not give the fish and the ecosystem a chance to recuperate from previous biological removals. Greg believes that the destructive methods used by certain aquarium collectors are dismantling this integrated system. Additionally, Ka‘imi and Greg described other events, one of which included the 2015 mass coral bleaching which devastated the corals in West Hawai‘i. Uncle Willy recalled that after this bleaching event, the *‘ōpelu* were missing.

When asked about their thoughts on the proposed action, they explained some of the reasons why they were not in support of the proposed action. The four individuals explained that while aquarium collection is not permitted within Miloli‘i Bay, they noted that aquarium collectors often launch their boats and utilize water at the Miloli‘i dock to fill their tanks. Ka‘imi and Uncle Willy described several instances when they have caught aquarium collectors illegally harvesting fish within the FRA which they reported to DLNR. Uncle Willy stated that for the past ten years and because the State cannot fulfill its duties, the Miloli‘i community has been implementing Makai Watch, a community-based watch and outreach program promoted by DLNR. Despite numerous complaints and reports to DLNR about the illegal taking of fish by collectors, Ka‘imi and Uncle Willy opined that DLNR has failed in their responsibility as they do not follow up or issue citations to violators. For these reasons and many others, Uncle Willy feels that the “State cannot take care of our resources.” Greg questioned, how does the “aquarium industry fit into the State’s 30x30 initiative” which promotes effective management of 30% of nearshore marine areas by the year 2030? Uncle Willy stated that tropical fish divers *hana‘ino* (cause trouble) in Kona. Uncle Willy added that aquarium collectors take small fish and that this kind of practice is not good for the ocean. He explained that they have wiped out areas in North Kona and have made their way to South Kona. Additionally, Ka‘imi described aquarium collectors driving over the *‘ōpelu ko‘a* with their boats which he stated disrupts the fish and the *‘ōpelu* fishing process. Ka‘imi expressed that there are virtually no rules for aquarium collectors and believes that the industry is unsustainable. He also spoke about the mortality rate of aquarium fish and believes that this kind of practice is not *pono*. Because of such events, practices, and interactions, they explained that their relationship with the collectors has been contentious. They believe that these sorts of interactions have ultimately ruined the communities interest and trust in the industry.

Ka‘imi described scuba certifications classes taking place at Miloli‘i, which attracted many local people including family members. He stated that these certification classes were used to simultaneously recruit community members into the industry. He has been saddened by the conflict that the aquarium industry has brought into their community and family. Ka‘imi expressed that while some family members participate in the industry as a way to support their family, many of them struggle with the internal conflict because the practices of the industry run counter to their familial and cultural practices and beliefs. Ka‘imi expressed that some of them have left the industry because of the internal conflict.

Ka‘imi and Uncle Willy shared their future hopes and vision for Miloli‘i. They spoke about their current initiative to develop a Community Based Management Plan for Miloli‘i and the steps they have taken to develop a more in-depth understanding of the breeding and spawning cycles for various marine species. They have partnered with several

scientists and research groups to help establish baseline data which will help with their management plan. Ka‘imi stated that they have a passion to protect their cultural ways so that they and the future generation can fish for the rest of their lives. He expressed that for them, fish are next to kin and is a staple of their diet. Uncle Willy stated that native rights have always been overlooked and that native rights always have to be negotiated. Uncle Willy advocated for the creation of protected areas that are built around the traditional Hawaiian *pu‘uhonua* (places of refuge) concept. Uncle Willy would like to see stiffer fines as a way for people to take more seriously their actions and impacts to Hawai‘i’s marine resources. He expressed that many of the current laws are obsolete and need to be revised and that in future management efforts, all parties need to *hana like* (work together).

SHANE PALACAT-NELSON

Shane Palacat-Nelson, who traces his family lineage to the lands of Kealakekua, South Kona for more than 500 years was interviewed by Lokelani Brandt on June 28, 2019. In discussing the potential cultural impacts that may result from the proposed action, Shane emphasized that Cultural Impact Assessments (CIA’s), can provide crucial information that can help determine an approach on how to moving forward on controversial issues. In referencing Kealakekua Bay, Shane stated that the current state of the bay is unknown because there is not enough fish count, water quality, or reef health data to provide feedback on the potential impacts to the area. He further related that schools of fish can be depleted in one season, but if there is no data to detect these depletions then communities witnessing the depletion of their own resources are left with no support or evidence to resolve these on-going problems. He believes that restricted areas “are not working properly” and therefore declined to comment until there is a thorough study done within these areas. With the lack of data, he is unable to accept the commercialization of aquatic fisheries until these issues are addressed. With regard to areas where aquarium collecting is allowed, Shane believes that fishery inventory studies need to be updated and assessed more frequently. Shane voiced that he is not against aquarium collecting and shared that “everyone has a place in community,” but there needs to be thorough research and community engagement. He added that it has to be more than just developing a set of rules and regulations, rather creating a lifestyle.

KEALOHA PISCIOTTA

On July 5, 2019, Lokelani Brandt met with Kealoha Pisciotta, a Hawaiian practitioner to discuss the proposed action and to identify any past or ongoing cultural practices and belief associated with the WHRFMA as well as any cultural uses and beliefs associated with the forty “white-list” species. Kealoha shared that her family, the Oneha and Ka‘anape‘a’s come from the Island of Kaua‘i and that they were *kahu* (guardians) of Mauna Kea through their worship of the gods ‘Io and Kāne. Kealoha fondly recalled memories of her childhood, where she walked the shores of Waikīkī and developed her knowledge and interest in Hawai‘i’s reef fish and other intertidal species. She vividly recalled her grandmother giving her “*pū‘olu*” (bundle) containing offerings that were used to feed and acknowledge the *akua* as *kinolau* and to acknowledge *aumākua*. She had become so well-acquainted with these species that as a child she became involved with the Waikīkī Aquarium where she was responsible for taking care of the intertidal species and monk seals. Her involvement with the Waikīkī Aquarium began when she was invited by her friend’s mama to collect specimens for her reef teaching class. Kealoha playfully recalled gathering different species, delivering and caring for them, then returning them to the ocean after the class. She did this for a number of years before working at Sea Life Park where she helped with taking care of the reef fish tank. Kealoha’s family later relocated to Volcano on Hawai‘i Island at which time she began to develop a personal relationship with the ocean in West Hawai‘i.

In conveying her cultural connection to the West Hawai‘i region, Kealoha referenced the *Kumulipo* and noted that upon moving to Hawai‘i Island as a child, she gave her first *ho‘okupu* (offering) at Kahalu‘u. She explained that because her family lived in Volcano, it was easy for them to travel to the Kona side and for her, the ocean there “felt more like home.” Kealoha continued to visit the Kahalu‘u area and noted that she has had bad experiences, particularly with people “who don’t understand practitioner use” of the ocean. She described being invited to the ReefTeach program at Kahalu‘u where she educated the volunteers about Article XII of the Hawai‘i Constitution. She explained that while she supported the ReefTeach initiative of protecting coral reefs, she noted that many of the workers did not have an understanding of the unique cultural environment in which they worked. She related that Article XII codified native rights and that these laws are “about us being able to continue our practice.” Kealoha added that while the law spells out the right for Hawaiians, she acknowledged that though she is not a *kama‘āina* (native-born resident) of Kahalu‘u she is *kama‘āina* (acquainted) with the *‘ohana* of Kahalu‘u, meaning that she shares a kinship connection to the marine life at Kahalu‘u. She described instances when she was conducting ceremonies in the ocean at Kahalu‘u and being approached and apprehended by people who blatantly stated that she cannot give *ho‘okupu*. Kealoha

emphasized that when people abruptly approach you during a ceremony, it immediately shifts the mental and physical aspects of the ceremony.

With respect to traditional cultural knowledge and practices, Kealoha related that Kūkahau‘ula, an *akua* who is associated with Mauka Kea and is one of the lovers of the goddess Poli‘ahu “is also an *akua* for the fishermen.” She explained that the blue rock used to make *lūhe‘e* (octopus lure) was sourced from an area near the summit of Mauna Kea and brought down near Hale Pōhaku where it was refined. Kealoha elaborated on this practice, stating that for this reason, Kūkahau‘ula was worshipped by fishermen and is associated with the *he‘e* (octopus) and *mūhe‘e* (squid). She explained:

The rosy hue that he [Kūkahau‘ula] is also I think is a signal for the fishers outside. Because where the sun hits on the opposite side is the shadow... so the great shadow of Mauna Kea becomes its own kind of sacred feature that traverses these certain things that make our *kilo* of timing...

Kealoha related that the only time when Kūkahau‘ula and Poli‘ahu meet is during sunrise and sunset and it is during these times that Kūkahau‘ula’s great light reaches the low-lying clouds on the Kona coast—clouds that were also favored by the fishermen of Kona. Kealoha also spoke about her experience with watching Hokule‘a depart from the Kona coast during sunset and how the shadow from Mauna Kea created a unique light formation on the ocean. Kealoha also spoke about the relationships of animals and *‘aumakua* (family guardian or god) and the deeper connections between *‘aumakua* and their interactions with *kanaka*, *‘ohana* and communities they care for. She connected this traditional belief to a *mo‘olelo* concerning the *hīhīmanu* (stingray) of Māhukona that were fed by the people during times of famine and in return, the *hīhīmanu* drove heaps of fish to the shore to feed the people.

Kealoha stated that each species has key characteristics that associate them with certain *akua*. She spoke particularly of the “animals with spots or that are spiny,” such as *hīhīmanu*, the Hawaiian whitespotted puffer (*Canthigaster jactator*), *kala* (*Naso lituratus*), *puhi* (*Gymnothorax ruepelliae*), and their relationship to the *akua* Kāne. She also shared that fish with “pokey” tails or bodies, such as *kala* and pufferfish, are protected under Kāne and are considered *kapu*. These fish were most often avoided but if they were accidentally caught, fishermen immediately asked for forgiveness because they did not want any bad omens to befall upon them or their families and to maintain their relationship with their *akua*. She also shared that species whose bodies resemble a kite are associated with Kanaloa and added that the common fish shape bears this kite-like characteristic and are therefore connected to Kanaloa. *Hīnālea*, or specifically the “rock mover” wrasse were known to be *‘aumakua* and connected to Pele.

When asked about the use of fish for traditional cultural practices or ceremonies, Kealoha shared that red-colored fish were commonly reserved for *ali‘i*. She shared that her *‘ohana* witnessed and participated in a funeral procession of the queen in which red fish were included in the ceremony. She also shared that fish were placed on a *lele*, or fishing altar, to perpetuate the practice of *‘āina momona*—traditional practices that promote abundance and fertility of both the land and sea. Kealoha also added that *kala* along with *limu kala* was placed on the altar when asking for forgiveness, as *kala* means to forgive. She also witnessed the use of fish in ceremonies to re-consecrate sacred places including chiefly *heiau* in the Kona region.

With respect to the cultural uses of the nearshore areas, Kealoha explained that traditionally, women were the caretakers of this part of the ocean. She stated that today, this traditional practiced is not acknowledge. She described how the women would create *hīnālea* houses to attract this fish. She described that in areas with heavy reef cover, it was a common practice of the ancient people to carve out trails in the reef. Kealoha opined that “our people did a lot of engineering, but engineering that’s different from modern engineering.” She stressed that traditional engineering focused on increasing the abundance of a resource and cited the example of the traditional fishpond. In reflecting on the differences between traditional and modern concepts of engineering, Kealoha stated that the current practice of the aquarium industry is purely extractive and added that if they were helping to grow the abundance of Hawai‘i’s marine resources, it would be an entirely different situation. She referenced a recent Stanford University report that provided suggestions on how to improve the fisheries in Hawai‘i, which explicitly stated the importance of following traditional Hawaiian ocean resource management strategies. Kealoha emphasized that in Precontact times, people who stole resources were severely punished and that these sorts of acts were socially unacceptable. She pointed out that while Hawaiians today no longer follow some of the ancient practices, such as punishable by death, she stressed that there are traditional management strategies that are still highly relevant and applicable.

Kealoha mentioned that fish names serve as indicators of the physical or behavioral attributes of a fish as well as its spiritual or sacred function. The yellow tang, or as her *tūtū* taught her *lau‘ikapu*, were considered fish that were off-limits, made evident from the word “*kapu*” rooted within the name. She added that *lau‘ikapu* are major contributors to the marine eco-system in that it maintains diversity and abundance of the reef thus serving as a key indicator of *‘āina momona*. Therefore, the cultural perspective surrounding this fish correlates to its significant ecological

relationship and contribution to the reef and the ocean. She also shared that although some Hawaiian fish names have been lost over time, the correlations of modern classification and Hawaiian taxonomy demonstrates that connections between fish were well understood through “thousands of years of observations.” Kealoha expressed that all ocean life were *kinolau*, or bodily forms, of *kupuna*, *‘aumakua* or *akua*. She stated that the presence of *manini* or *āholehole* in the vicinity indicates that Kanaloa, the deity of the ocean, is present and so one must always be cognizant of these fish and then conduct themselves accordingly to respect this *akua*. She explicated that the *Kumulipo* provides a catalog of life forms that are interconnected with each other and within those listings are *kaona*, or hidden meanings, identifying connections that were both physical and sacred. She added that in the first line of the *Kumulipo*, the *papa* (reef) is acknowledged thus emphasizing the value of the reef to all ocean life.

Kealoha identified *kala* as popular eating fish and *kole*, which she described as a “serious food fish that is very much eaten here on this island [Hawai‘i Island] more than other places.” She also referenced the *hīnālea*, stating that although not a personal favorite, it is a fish regularly caught and consumed by fishermen. Kealoha duly noted *lauwiliwili nukunuku ‘oi‘oi*, although a very beautiful fish, she expressed that it should not be collected at all. She shared that reef fish, despite the threat of diseases such as ciguatera, are still caught for subsistence by fishermen.

Kealoha spoke candidly about her thoughts on the aquarium industry and exclaimed that “it is non-sustainable and it can’t be sustained and that it needs to be shut down.” While she understands that people are making a living from this industry, she believes that “we can do better” and that “we can figure out better ways of living that don’t frustrate our cultural or traditional ways or disrupt the healing of the *‘āina*.” She stressed that “right now, that’s [healing the *‘āina*] the priority and anything that would frustrate the reef recovery on any level...we can’t accept.” Kealoha explained that systemically, the ocean depends on all of these species. She worries that if we continue to piecemeal management of the ocean, it will no longer be able to provide for us. She stated that the ocean has different ecosystem levels, but it does not have boundaries. She imparts that the industry has detrimental effects on the health and well-being of our ocean environment and as a consequence, instigates mental and traumatic stress on living communities that are witnessing the desecration of their “sacred houses.” Kealoha found that issues surrounding the responsibility of caring for these resources often burden folks standing on both ends of the issue, primarily those of Hawaiian descent. She edified that the health of the land is intrinsically tied to the collective health of communities and thus stated within the United States Public Law 103-150, informally known as the Apology Resolution or Bill, she described “that Native Hawaiians are inherently tied to the land. So, what happens to the land, happens to us and what happens to us, happens to the land.” She added that by “recovering,” or rebuilding the symbiotic relationship between *kanaka* and *‘āina* is congruent to the health and existence of all living species. Kealoha emphasizes that we need to acknowledge and honor these relationships that clearly outlines the impacts, not only to the environment but to the health and well-being of *kanaka*. Additionally, Kealoha expressed that she is aware that many of the fish on the “white-list” are being removed from the reef in large numbers. She expressed concern for the lack of enforcement by DLNR of these unsustainable fishing practices. She also acknowledged that the lack of enforcement is due mainly in part by not having the capacity to conduct such regulations, such as not having an adequate amount of DOCARE officers. Her concern is also that the aquarium fishing industry is “self-reporting and self-regulating” and modern concepts of “if I don’t get mine then someone else going get em,” are notions far removed from traditional perspectives. To further explain she shared that her *tūtū* always scolded them about wasting water and wisely explained that “we don’t waste the *akua*’s gift.” She added that these resources are a valuable gift that requires a reciprocated relationship to maintain the health and well-being of the environment, not only for *kanaka* but for all living forms thus arguing that the industry is:

Extractive and it’s frustrating our ability to heal the ocean but more than heal, but make it *‘āina momona*. You know, ‘fat the land’ and that is the point where our rights are being affected because if it is our tradition to make ‘fat the land,’ when we can’t make ‘fat the land’ its all wrong and it takes us out of our natural way of being and then into a way that’s foreign to us and then forces us to possibly have to act in ways against our own cultural beliefs.

Kealoha contends that although there are fish on the “white-list” that may not necessarily be consumed, these fish are still an important component to reef health. Kealoha’s observations and interactions with fish and sea animals over the years helped cultivate much of her knowledge of ocean wildlife. These interactions aided her understanding of the various functions within the ecosystem and the connections between all living forms that are directly related to the concept of *‘āina momona*. Consequently, Kealoha strongly advocates that these relationships need to be protected and that while there are competing interests for these resources, the interest in the “protection of *‘āina*” should take precedence. Kealoha shared her frustrations with the current environmental review process and stated that “if the process has integrity, so will the outcome.” She added that:

I don't know, I'm very frustrated because my feeling is though, there are *pukas* that people are swimming through...that make it so that it shifting the burden onto the public to regulate, and that, that I think is not fair.

When asked if she had any recommendations to address her concerns, Kealoha expressed that “they need to really work with us to do better.” She strongly believes that if businesses are basing their motive on profit margins it will inevitably fail and campaigns that “profits are not a right, it's a privilege.” She stated that “if they need us to advocate for them, they need to let us know and stop treating us like we're enemies,” because the “rights of the reef precede profit.” She also suggested developing a hybrid system that implements traditional *kapu* practices that are established by communities and with the state to assist in regulating those policies. Kealoha believes that in order to move forward genuine conversations need to take place and creating spaces to “maximize our communities' ability to share the impacts.” She expressed that through dialogue it can increase awareness, strengthens individual perspectives, and develop respect between opposing views. Kealoha concluded that this process if done correctly and with good intention, will help to overcome cognitive dissonance for all involved.

KUPA O HO'OKENA: DAMIEN KENISON, JOE BALSIMO, STANFORD CHO, AND HAWILA ALANI

On August 1, 2018, Lokelani Brandt was invited by Damien Kenison to conduct a group interview with members of the non-profit community-based organization Kama'āina United to Protect the 'Āina (KUPA), which consists of roughly ten board members and officers. Participants in this interview were Damien Kenison, Joe Balsimo, Stanford Cho, and Hawila Alani, all of whom share genealogical ties to the Ho'okena and or the greater South Kona District. Damien shared that KUPA was created in 1996 in response to the growing number of aquarium fish collectors who were conducting their operations in the waters fronting Ho'okena village. Despite the growing conflict between local fishermen and aquarium fish collectors, Damien shared that this conflict prompted the community to get organized. For them, establishing KUPA has resulted in a strong push to improve management of their area in addition to garnering support to ensure the perpetuation of their living cultural practices.

Damien Kenison: When asked about any past or ongoing cultural practices, Damien explained that for them, the ocean and all of its living lifeforms therein are an important part of their Hawaiian cultural identity. He added that fishing and caring for the nearshore waters has always been an important part of their lifeways. Damien exclaimed that coming onshore with fish in their canoes is what makes them feel Hawaiian and he noted that his sense of cultural identity is strongest when he is on his canoe fishing. Damien expressed that fishing is part of a process that maintains and strengthens their family bonds. He explained that catching, cleaning, and eating fish are activities that bring people together and being able to maintain this cultural custom well into the future is important to him.

Damien also related that “all fish are part of the ecosystem” and when parts of that ecosystem are removed, it will have an impact on the ecosystem. Additionally, he shared that when that ecosystem is disrupted, it has a direct impact on their cultural practices. He stressed that reef fish, in particular, play a vital role in maintaining healthy reefs because these fish keep *limu* populations in check. He added that too much *limu* on the reef will overtime, smother and kill the reef altogether. He emphasized that being able to harvest fish from the ocean is highly dependent upon a healthy reef and if the reef life continues to be degraded it will impact their ability to provide for their families in addition to perpetuating their cultural traditions.

Damien stressed that traditionally the values were based on respect for the laws, the resources, and the communities. DLNR does not have the resources to enforce fishing rules. He added that for many years, the aquarium industry had gone unregulated and noted that any “unregulated commercial venture will wipe out the fish.”

Damien shared that for him, he feels that the take of fish for aquarium purposes is a “wasteful practice” and expressed that it is a cultural value not to waste fish. He opined that this practice from a Hawaiian perspective is *maha'oi* (rude and impudent). He feels that “tropical fish collectors have no respect for the resource and the communities” and described instances when coolers of dead tropical fish were found. He stated that the aquarium industry does not have a stake in the local communities. He expressed that dealing with this growing conflict has been stressful for the community.

Stanford Cho: Stanford explained that caring for natural resources is something that is not unique to Hawai'i, but is a common practice seen in many cultures around the world, especially those who rely on such resources. He drew parallels between other parts of the world where sport and commercial fishing has resulted in a serious decline of marine resources. Stanford contends that such examples should prompt us to be more careful in managing fish take from different user groups. In looking at the “white-list” species, Stanford explained that he has grown up having seen all of these fish in the ocean and whether they were eaten or not, seeing them in their natural habitat is something he

is accustomed to. He added that things change and evolve naturally in nature, but when people begin to impact these resources and when there are indicators that show adverse impacts caused by humans, this is concerning to him. Stanford emphasized that these fish have been on this earth longer than we have and we must show respect to these creatures

Stanford also shared his thoughts on the take of fish for the aquarium industry and shared that there's a long history of mistrust and no openness between local fishers and aquarium collectors. He noted that this has escalated the conflict between different user groups. He explained that native Hawaiians are often viewed as hostile and aggressive but clarified that such a view is often a direct result of either not being included in important decision-making processes that directly impact native Hawaiians or their concerns are disregarded. He also spoke about a mentality change and noted that there are people that come here to exploit the resources. Stanford exclaimed that for such people who share the "take mentality," cultural impacts are not of value to them because they have no investment in the communities they take from.

Joe Balsimo: Joe explained that all fish play a role in maintaining a healthy marine ecosystem and that for native Hawaiians the ocean is often referred to as their "refrigerator." Joe does not support the take of fish for aquarium purposes and stated that he "doesn't agree with raiding the refrigerator." He stressed that caring for and improving the state of our marine resources is vital if we hope to have healthy reefs in the future so that they may be enjoyed by future generations. He explained that many Americans today are "apathetic to global and community issues" and that the "take mentality" is resulting in a degraded marine environment and more conflict between those who are trying to improve the state of our resources and those who want to take from it. Joe also raised concerns over the number of casualties associated with the collection of aquarium fish. Joe also spoke about the lack of DOCARE enforcement officers because of their limited resources and stated that ensuring compliance with all laws pertaining to the aquarium industry is a difficult thing to enforce. He added that the lack of enforcement means that the state relies on the "trust system," which for him is unacceptable.

KEVIN AWA

Over the phone, on September 7, 2019, Robert Rechtman interviewed Kevin Awa, a multi-generational fisherman and long-time resident of the South Kona area on Hawai'i Island. Although born in Germany, Kevin moved to Kona at age 9, and his ties to the South Kona area are through his father and grandfather, both of whom were fisherman. His grandfather worked on fishing sampans operating out of Keauhou Bay. Kevin is employed at Kona Coast Marine and provides repair and upgrade work for many of the fishing vessels operating within the WHRFMA. He is a fishing practitioner who is actively engaged in *'ōpelu*, *ahi*, and bottom fishing, making his own *'ōpelu* nets; and recognizes these activities as traditional practices. Kevin has also worked under contract with NOAA, providing local knowledge to scientific researchers with respect to local fishing practices, fish habitat, and environmental factors that affect both practices and habitat. When asked if there were any potential cultural impacts associated with the proposed action, Kevin stated that generally he foresees "no problems" with issuing aquarium fishing permits, but added that cautions should be taken to not overly impact the edible species on the White List, such as *pākukui* and *kole*, which are also target species of subsistence fishing.

JOSEPH "MCGEE" AKIU, JR.

In a brief phone conversation on September 10, 2019, Robert Rechtman interviewed McGee Akiu, a multi-generational fisherman and life-long (42 years) resident of the South Point area. McGee considers himself a "jack of all trades" fisherman. When asked about cultural practices and any potential cultural impacts associated with the proposed action, he was emphatic that there was "nothing bad" about aquarium fishing, and he believed that it could help the environment by controlling the amount of fish that in his view are too abundant. He also suggested that aquarium fishing could help get rid of invasive species such as *ta'ape*. McGee insisted that regulators should let the aquarium fishers be as they have always done a good job, and rather focus on the problem of plastic in the nearshore waters as that is killing more fish than anything else.

CHELSEY FAAVESI

Over the phone, on September 23, 2019, Robert Rechtman interviewed Chelsey Faavesi, who was born (in 1989) and raised, and still resides in the South Kona fishing village of Miloli'i. Chelsey's maternal family is generationally tied to Miloli'i, and her father is of Samoan ancestry. Chelsey described her family as closely tied to the ocean, as fishing is a way of life for them. They are multigenerational commercial fishers and her grandparents procured fish for both

food and to sell to provide for their family. These traditions continue as the family is still involved in commercial fishing and Chelsey has been involved with the aquarium fishing industry for four years as a diver/collector working for a third party business owner. Chelsey insisted that her practice is an extension of the traditions that her family has practiced for generations—making their livelihood from procuring ocean resources. She uses protocols for access to, and takes care of, the collection locations, which she noted are typically not accessed by subsistence collectors. She also suggested that during the winter months, when the sea is rougher and collecting is less frequent, the decreased pressure on the fish leads to increased fish populations. When asked if there were any potential cultural impacts associated with the proposed action, Chelsey indicated that she does not see any impacts as long as the potential permit holders treat the resource habitat respectfully and act responsibly by not overfishing and depleting the resource.

5. IDENTIFICATION AND MITIGATION OF POTENTIAL CULTURAL IMPACTS

The OEQC guidelines identify several possible types of cultural practices and beliefs that are subject to assessment. These include subsistence, commercial, residential, agricultural, access-related, recreational, and religious and spiritual customs. The guidelines also identify the types of potential cultural resources, associated with cultural practices and beliefs that are subject to assessment. Essentially, these are natural features of the landscape and historic sites, including traditional cultural properties. A working definition of traditional cultural property is present here:

“Traditional cultural property” means any historic property associated with the traditional practices and beliefs of an ethnic community or members of that community for more than fifty years. These traditions shall be founded in an ethnic community’s history and contribute to maintaining the ethnic community’s cultural identity. Traditional associations are those demonstrating a continuity of practice or belief until present or those documented in historical source materials, or both.

The origin of the concept of traditional cultural property is found in National Register Bulletin 38 published by the U.S. Department of Interior-National Park Service. “Traditional” as it is used, implies a time depth of at least 50 years, and a generalized mode of transmission of information from one generation to the next, either orally or by act. “Cultural” refers to the beliefs, practices, lifeways, and social institutions of a given community. The use of the term “Property” defines this category of resource as an identifiable place. Traditional cultural properties are not intangible, they must have some kind of boundary; and are subject to the same kind of evaluation as any other historic resource, with one very important exception. By definition, the significance of traditional cultural properties should be determined by the community that values them.

It is however with the definition of “Property” wherein there lies an inherent contradiction, and corresponding difficulty in the process of identification and evaluation of potential Hawaiian traditional cultural properties, because it is precisely the concept of boundaries that runs counter to the traditional Hawaiian belief system. The sacredness of a particular landscape feature is often cosmologically tied to the rest of the landscape, as well as to other features on it. To limit a property to a specifically defined area may actually partition it from what makes it significant in the first place. However offensive the concept of boundaries may be, it is nonetheless the regulatory benchmark for defining and assessing traditional cultural properties. As the OEQC guidelines do not contain criteria for assessing the significance for traditional cultural properties, this study will adopt the state criteria for evaluating the significance of historic properties, of which traditional cultural properties are a subset. To be significant the potential historic property, or traditional cultural property, must possess integrity of location, design, setting, materials, workmanship, feeling, and association and meet one or more of the following criteria:

- a Be associated with events that have made an important contribution to the broad patterns of our history;
- b Be associated with the lives of persons important in our past;
- c Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; or possess high artistic value;
- d Have yielded, or is likely to yield, information important for research on prehistory or history;
- e Have an important value to the native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out, or still carried out, at the property or due to associations with traditional beliefs, events or oral accounts—these associations being important to the group’s history and cultural identity.

While it is the practice of the DLNR-SHPD to consider most historic properties significant under Criterion d at a minimum, it is clear that traditional cultural properties by definition would also be significant under Criterion e. A further analytical framework for addressing the preservation and protection of customary and traditional native practices specific to Hawaiian communities resulted from the *Ka Pa‘akai O Ka ‘Āina v Land Use Commission* court case. The court decision established a three-part process relative to evaluating such potential impacts: first, to identify whether any valued cultural, historical, or natural resources are present, and identify the extent to which any traditional and customary native Hawaiian rights are exercised; second, to identify the extent to which those resources and rights will be affected or impaired; and third, specify any mitigative actions to be taken to reasonably protect native Hawaiian rights if they are found to exist.

Based on a review of the culture-historical background material presented above, and as indicated by many of the consulted parties, the nearshore waters of the WHRFMA have, since Precontact times, served as the foundation for the subsistence lifestyle of the Kānaka Maoli. While the deeper marine environment provided a wealth of pelagic resources, the nearshore waters have and continue to be the primary place where Kānaka Maoli of all ages and genders engage in the long-standing traditional practice of *lawai‘a*. Within the nearshore waters, Kānaka Maoli—since their initial arrival to the west coast of Hawai‘i Island to the present day—have always utilized an array of harvesting methods and apparatuses to gather a wide variety of nearshore marine resources, including, but not limited to, reef-fish, seaweed, urchin, shellfish, crab, octopus, shrimp, and salt. Although many of the harvesting apparatuses and means of transportation have adapted to the changing times and technologies, the act of fishing, whether for subsistence or commercial use (some of those interviewed for this study place aquarium fishing into this latter category) is an ongoing and ever-evolving cultural practice. Another more specific traditional fishing practice that was identified through the background research, and was discussed by several of the consulted parties, includes the use and maintenance of traditional fishing *ko‘a* that are designed to gather certain pelagic species, most notably *‘ōpelu*. While the above described practices focus on the tangible elements of past and ongoing traditional fishing practices, the ocean is also culturally valued for its spiritual significance.

As identified during the interview process, and supported by the culture-historical background, the ocean is considered the pathway of the ancient people and gods who, through their episodic migrations from Kahiki, came to settle these islands. In Kānaka Maoli cosmology, the ocean is an embodiment of the male deity Kanaloa, who also assumes other body forms including, but not limited to, certain marine species such as the *hīnālea*, *he‘e*, *palaoa*, and others large marine mammals. The nearshore waters are also associated with a number of additional significant deities in the Hawaiian pantheon including Hina (Hinapukui‘a), Kū‘ula, and their son ‘Ai‘ai, all of whom figure prominently in the spiritual aspect of Hawaiian fishing practices and the creation of *loko i‘a*. Likewise, the *‘āko‘ako‘a* (coral head), as identified in the *Kumulipo*, and as articulated by several consulted parties, is the foundation from which all life is derived. Several of the consulted parties also spoke about the use of the ocean for certain healing and cleansing rituals. Additionally, the nearshore waters of West Hawai‘i Island are associated with several significant Historic Period events, including the arrival of the first Europeans and American missionaries, that forever changed the trajectory of Hawaiian culture. The interactions with these early Euro-American arrivals, and with subsequent migrant populations (and their introduced technologies), resulted in opportunistic adaptations of traditional Kānaka Maoli culture and fishing practices; adaptations that allowed them to maintain a leading role in the island’s commercial fishing industry into the early 20th century. It is clear that the nearshore waters of West Hawai‘i Island, along with all of its contributing tangible and intangible elements and associations, could be considered a traditional cultural property significant under Criteria a, b, and e. Having a comprehension of the traditional cultural significance of nearshore waters of West Hawai‘i Island by all of its user constituencies, is a first step in ensuring that the activities of any one user group does not in any significant way conflict with the activities of another user group. As part of any future permitting processes associated with the WHRFMA, it is recommended that DLNR-DAR provide to potential permit issues a document that provides a synopsis of the traditional cultural significance of the fishery.

Another significant component of this study focused on the cultural uses of the forty white-list species. A review of the culture-historical background material, coupled with the information discussed by multiple consulted parties, resulted in the identification of traditional names, and/or past and/or ongoing cultural uses for thirty-three of the forty fish species. Types of identified cultural uses included subsistence, medicinal, ritual, and ceremonial. The cultural knowledge associated with these fish varies, however, as some are extensively referenced in traditional accounts and ethnographic literature, while others are mentioned only in passing with no additional descriptive details. While all of the thirty-three fish species for which traditional cultural information was found appear to have been eaten, some species, particularly wrasses, tangs, surgeonfishes, and triggerfish were, and still are, more commonly consumed. The *hīnālea ‘akilolo* (*Coris gaimard*) and the *lau‘ipala* (*Zebрасoma flavescens*), on the other hand, were noted in the culture-historical literature, as well as in the consultation, for their medicinal value. One category of white-list species

in particular, the butterflyfishes (*Chaetodon* sp.), appears to primarily have been used for rituals and ceremonial purposes. Several consulted parties expressed that these fishes was never intentionally caught for subsistence purposes because of their association with the *kauwā* class of people. Given that these particular white-list species are important for sustaining the above-described cultural practices, if the issuance of commercial aquarium permits leads to a significant depletion of the populations of the above mentioned species (either directly or indirectly through habitat disruption), then the result would be a cultural impact. Conversely, if the biological assessments (conducted by others) indicate that the issuance of the fourteen commercial aquarium permits will have no significant effect on either the fishes or their habitat, then the issuance of the permits would not result in a cultural impact.

Additionally, the background information gathered for two of the white-list species—the *Cephalopholis argus* (peacock grouper or *roi*) and the *Lutjanus kasmira* (bluestripe snapper or *ta'ape*)—indicates that these fishes are found in great numbers within the nearshore waters of West Hawai'i Island, and that reducing the overall population of these two species could improve reef-health and potentially yield long-term positive impacts. Although these fish were introduced during the mid-20th century to fill a fishery niche, there has been little success marketing them commercially, which has resulted in steady population growth. Many of the consulted parties saw a reduction in the population of these two species, which can out compete other species, as potentially beneficial for improving the overall health of the reef and fishery.

As part of this CIA, extensive oral interviews were conducted with numerous individuals from multiple user groups (including cultural practitioners, aquarium collectors, subsistence and commercial fishers, charter boat operators, and researchers) who represent various communities within the WHRFMA. While it is often difficult to disentangle each of these user groups from one another (because many, if not all, of the consulted individuals self-identify, or can be placed, with more than one of the groups), all of those interviewed expressed some degree of ongoing cultural attachment to the ocean. For many, their introduction to the nearshore waters of West Hawai'i Island stems from long-standing familial ties to the land and the ocean. While some of the consulted individuals expressed specific cultural concerns with respect to the white-list species, others stressed the ecological importance of the fish, and the need for them to live out their life cycles in their natural habitats. As evident in the statements made by multiple individuals, the take of fishes for commercial aquarium purposes within the WHRFMA has a long and contentious history, and it remains a point of conflict. Despite efforts to address these issues, the conflict has diffused into different communities and even caused rifts within some families. While it is not the prerogative of the authors to attempt to explain or resolve these long-standing issues, they are nonetheless, very apparent. Addressing such issues necessitates developing, at a minimum, mutual respect and open dialogue between the different user groups, and amongst different government and private sector agencies who oversee the management of the WHRFMA. Addressing and mitigating potential impacts is one means of bringing diverse groups together in a way that promotes understanding and opens productive dialogues.

With that said, if the analyses in the EIS determine that the conditions of effect are met with respect to the potential cultural impacts described above, then the following recommendations for mitigation are offered. As echoed in the statements made by multiple individuals, extracting marine resources needs to be done with integrity and sensitivity, as the reef-fish and the habitat in which they are found are both ecologically and culturally valued. No matter how or why these fish are extracted, their removal constitutes an irrevocable loss of bio-cultural resources that could potentially have an adverse effect on the overall health and sustainability of the fishery. In light of this, the authors recommend that PIJAC, and any commercial aquarium fishers who intend to conduct their operations within the WHRFMA, consider developing or partnering with governmental and/or local organizations to help improve the management and sustainability of the nearshore fishery as a means to not only sustain, but actually improve reef-fish populations in the take areas. Such marine management practices should be a part of all commercial marine endeavors, and not exclusively imposed on any one user group. To further limit the potential for cultural impacts (through the depletion of culturally significant fish species), it is recommended that the existing bag limits and no-take areas within the WHRFMA remain in-place, but be monitored and adjusted periodically in order to account for fluctuations in the local fish stocks. Furthermore, it is recommended that the applicant (PIJAC) continue to work with the approving agency (DLNR), and the various other user groups within the WHRFMA, to help improve the transparency of the accounting methods for fish takes, and the enforcement of the existing rules and regulations that govern those takes.

With respect to limiting the potential for cultural impacts, DLNR-DAR plays a significant role in managing and enforcing the rules and regulations that are intended to support the sustainability, viability, and fecundity of the WHRFMA. As voiced by many of the consulted parties, the lack of support and funding have hampered DNLAR-DAR's ability to fulfill its fiduciary responsibility, namely to enhance, protect, conserve, and manage Hawai'i's unique and limited resources, which are supposed to be held in public trust for the current and future generations of the people of Hawai'i *nei*, and visitors alike. While achieving this goal is not an easy task, and it certainly cannot be achieved by

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any single means, DLNR-DAR should be proactive in seeking additional funding sources, and work with the various user groups who are most familiar with the WHRFMA, including the commercial aquarium fishers, to improve its enforcement capacity. As expressed by multiple community members, the lack of enforcement by DLNR-DAR has resulted in community members feeling the need to police their respective areas themselves, which ultimately diverts time and energy from their desire to educate the next generation of Hawai‘i fishers and to perpetuate their own cultural practices. As part of improving enforcement, as expressed by some of the consulted parties, the DLNR-DAR should consider incorporating more traditional Hawaiian fishery resource management practices (as detailed above) into the management of the WHRFMA, and representatives from the aquarium fishing industry should continue to work with the other user constituencies (i.e., Native Hawaiian organizations) that maintain an interest in the WHRFMA.

In summary, the recommendations provided here are intended to help ensure that the proposed issuance of fourteen commercial aquarium permits within the WHRFMA considers the knowledge, concerns, and thoughts shared by the consulted parties. While most people do not, in general, disagree with the practice of making a living from the ocean, these recommendations are also intended to remind those who may receive commercial aquarium fishing permits within the WHRFMA to be mindful of the unique cultural, historical, social, and ecological setting in which they earn their living. If commercial aquarium fishers assume ownership of their *kuleana*—privileges and responsibilities—to utilize the marine resources in a sustainable way, and take into consideration the broader socio-cultural efforts that are underway across the state to *mālama* and *ho‘omomona*—care for and increase abundance of—the marine resources, then any potential for cultural impacts will be lessened. Understanding the cultural resources, cultural practices and cultural beliefs associated with the nearshore waters of West Hawai‘i Island, and implementation of the recommendations presented above with respect to the identified issues, will ultimately help to ensure that no such resources, practices, or beliefs are adversely affected by the proposed issuance of the fourteen commercial aquarium permits within the WHRFMA.

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APPENDIX A.
***KA WAI OLA* PUBLIC NOTICE**

PUBLIC NOTICE

ASM Affiliates is preparing a Cultural Impact Assessment (CIA) in advance of the preparation of an Environmental Impact Statement for the proposed issuance of commercial aquarium permits for areas within the West Hawai'i Regional Fishery Management Area (WHRFMA) extending along the west coast of Hawai'i Island from 'Upolu Point, North Kohala to Ka Lae (South Point), Ka'ū, excluding the following areas: Lapakahi Marine Life Conservation District (MLCD), North Kohala Fish Replenishment Area (FRA), Puakō Bay and Puakō Reef Fisheries Management Area (FMA), Puakō-'Anacho'omalu FRA, Ka'ūpūlehu FRA, Wāwālohi FMA, Kaloko-Honokohau FRA, Papawai Bay FMA, Old Kona Airport MLCD, Kailua Bay FMA, Kailua-Keauhou FRA, Keauhou Bay FMA, Red Hill FMA/FRA, Kealakekua Bay MLCD, Nāpo'opo'o-Hōnaunau FRA, Ho'okena FRA, Ka'ohe FRA, and the Miloli'i FRA.

We are seeking consultation with any community members that might have knowledge, or who are involved in, any ongoing cultural practices that may be occurring in any of the places outside of the restricted areas listed above. If you have and can share any such information please contact Lokelani Brandt lbrandt@asmaffiliates.com, phone (808) 969-6066, mailing address ASM Affiliates 507A E. Lanikaula Street, Hilo, HI 96720.

APPENDIX B—ANALYSIS OF IMPACTS ON WHAP OPEN AREA POPULATIONS

Appendix B: Analysis of Impacts on WHAP Open Area Populations

As stated in the EIS, the WHAP focuses on the WHRFMA and does not have full spatial coverage of the island of Hawai'i. In addition, it only estimates population size at depths from 30-60 feet and therefore does not adequately survey shallow- and deep-water species (or life stages of any species) that spend time outside the 30-60-foot depth range. In addition, these population estimates are only for the Open Areas, and do not include FRA or MPA populations. There is evidence for connectivity between FRAs and Open Areas around the island of Hawai'i (Christie et al. 2010), and therefore, analyzing the impact of collection on just the Open Area population is not representative of the impact since available data do not suggest the populations are geographically closed (i.e., immigration and emigration occur). Nevertheless, the impact of collection in the WHRFMA on Open Area populations is analyzed and disclosed in this Appendix and summarized in the table below.

Table 1. Summary of WHAP (DAR 2019a) Open Area population estimates, disclosed catch data from West Hawai'i since 2000 (DAR 2018a), and the impact of average (including only years with reported catch) and maximum annual collection by species for the 40 White List Species. n.d. = Not Disclosed (Section 5.1 of the EIS); NA = Insufficient data available

Common Name	WHAP Open Area Population Estimate	WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of WHRFMA Open Area Population	Max Percent of WHRFMA Open Area Population
Achilles Tang ¹	13,796	5,600 (1,809)	5,757 (2,157)	40.6% (13.1%)	41.7% (15.6%)
Bird Wrasse	66,581	345 (55)	624 (103)	<0.1% (<0.1%)	<0.1% (<0.1%)
Black Durgon	92,354	64 (9)	143 (69)	<0.1% (<0.1%)	<0.1% (<0.1%)
Black Surgeonfish	98,067	3,535 (619)	8,598 (1,813)	3.6% (0.6%)	8.8% (1.8%)
Blacklip Butterflyfish	39,734	72 (22)	129 (64)	0.2% (<0.1%)	0.3% (0.2%)
Blackside Hawkfish	23,625	42 (14)	85 (43)	0.2% (<0.1%)	0.4% (0.2%)
Bluestripe Snapper - Taape	33,290	43 (19)	98 (52)	0.1% (<0.1%)	0.3% (0.2%)
Brown Surgeonfish	2,980,402	891 (243)	2,476 (600)	<0.1% (<0.1%)	<0.1% (<0.1%)
Eightline Wrasse	187,930	119 (26)	390 (69)	<0.1% (<0.1%)	0.2% (<0.1%)
Eyestripe Surgeonfish	NA	403 (18)	1,143 (30)	NA	NA
Fisher's Angelfish	59,064*	96 (66)	288 (257)	0.2% (0.1%)	0.5% (0.4%)

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Appendix B – Analysis of Impacts on WHAP Open Area Populations

Common Name	WHAP Open Area Population Estimate	WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of WHRFMA Open Area Population	Max Percent of WHRFMA Open Area Population
Forcepsfish	39,734	1,831 (484)	3,152 (864)	4.6% (1.2%)	7.9% (2.2%)
Fourline Wrasse	227,663	73 (23)	171 (64)	<0.1% (<0.1%)	<0.1% (<0.1%)
Fourspot Butterflyfish	15,034	889 (202)	1,630 (377)	5.9% (1.3%)	10.8% (2.5%)
Gilded Triggerfish	3,222	45 (6)	157 (19)	1.4% (0.2%)	4.9% (0.6%)
Goldrim Tang	5,966	554 (156)	1,324 (651)	9.3% (2.6%)	22.2% (10.9%)
Kole	5,312,745	30,700 (9,066)	42,112 (23,014)	0.6% (0.2%)	0.8% (0.4%)
Hawaiian Dascyllus	63,359	119 (47)	231 (125)	0.2% (<0.1%)	0.4% (0.2%)
Hawaiian Whitespotted Toby	249,141	257 (100)	896 (539)	0.1% (<0.1%)	0.4% (0.2%)
Lei Triggerfish	92,354	172 (67)	301 (252)	0.2% (<0.1%)	0.3% (0.3%)
Longfin Anthias	NA	102 (3)	102 (5)	NA	NA
Milletseed Butterflyfish	2,148	106 (68)	421 (402)	4.9% (3.2%)	19.6% (18.7%)
Multiband Butterflyfish	378,843	1,206 (227)	2,951 (651)	0.3% (<0.1%)	0.8% (0.2%)
Orangeband Surgeonfish	53,694	828 (226)	2,306 (631)	1.5% (0.4%)	4.3% (1.2%)
Orangespine Unicornfish	180,099	5,827 (1,419)	8,813 (3,330)	3.2% (0.8%)	4.9% (1.8%)
Ornate Wrasse	196,879	1,657 (361)	12,445 (1,130)	0.8% (0.2%)	6.3% (0.6%)
Peacock Grouper - Roi	51,546	3 (0)	3 (0)	<0.1% (0.0%)	<0.1% (0.0%)
Pencil Wrasse	17,182	165 (69)	424 (287)	1.0% (0.4%)	2.5% (1.7%)
Potter's Angelfish	265,488	1,086 (451)	3,370 (1,379)	0.4% (0.2%)	1.3% (0.5%)
Psychedelic Wrasse	1,071*	274 (121)	599 (390)	25.6% (11.3%)	55.9% (36.4%)
Pyramid Butterflyfish	37,586	133 (52)	714 (375)	0.4% (0.1%)	1.9% (1.0%)
Redbarred Hawkfish	6,443	13 (4)	21 (8)	0.2% (<0.1%)	0.3% (0.1%)
Saddle Wrasse	140,947	602 (166)	982 (413)	0.4% (0.1%)	0.7% (0.3%)

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Appendix B – Analysis of Impacts on WHAP Open Area Populations

Common Name	WHAP Open Area Population Estimate	WHRFMA (DAR 2018a) (numbers from 10 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of WHRFMA Open Area Population	Max Percent of WHRFMA Open Area Population
Shortnose Wrasse	3,222	228 (134)	582 (390)	7.1% (4.2%)	18.1% (12.1%)
Spotted Boxfish	12,887	170 (126)	454 (275)	1.3% (1.0%)	3.5% (2.1%)
Thompson's Surgeonfish	271,693	182 (50)	947 (238)	<0.1% (<0.1%)	0.3% (<0.1%)
Tinker's Butterflyfish	NA	309 (43)	586 (159)	NA	NA
Flame Wrasse	NA	75 (24)	168 (73)	NA	NA
Yellow Tang	2,867,048	271,430 (68,184)	386,767 (130,152)	9.5% (2.4%)	13.5% (4.5%)
Yellowtail Coris	18,256	575 (172)	851 (434)	3.1% (0.9%)	4.7% (2.4%)

¹The average and maximum catch for the Achilles Tang in the WHRFMA is limited to 2015-2017 data, after the implementation of the 2014 bag limit, to more accurately reflect future trends.

Collection under the Pre-Aquarium Collection Ban Alternative, WHRFMA-only Alternative, and the Achilles Tang Conservation Alternative would be anticipated to follow historic trends, and may collect more than 5% of the Open Area populations for 9 of the 40 White List Species:

- Achilles Tang
- Black Surgeonfish
- Forcepsfish
- Goldrim Tang
- Milletseed Butterflyfish
- Ornate Wrasse
- Psychedelic Wrasse
- Shortnose Wrasse
- Yellow Tang

Population trend data for these species is provided in Table 5-4 and Table 5-8 of the EIS and is adapted from DAR (2019a). Populations of seven of these species have either not significantly changed (Forcepsfish, Goldrim Tang, Milletseed Butterflyfish, Psychedelic Wrasse, Shortnose Wrasse) or have significantly increased (Black Surgeonfish, Yellow Tang) in the Open Areas between 1999/2000 and 2017/2018, suggesting that historic rates of commercial aquarium collection are not negatively impacting the populations. Collection under the Preferred Alternative is estimated to be less than historic rates given the limited number of fishers, and is estimated to be below 5% even at maximum collection rates for the Yellow Tang, Forcepsfish and Black Surgeonfish.

The Achilles Tang and the Ornate Wrasse have had significant declines in the Open Areas as well as significant declines in areas both open and closed to aquarium collection, suggesting that aquarium collection is not driving the decline (DAR 2019a). Both species reported greater declines in FRAs (which are closed to aquarium collection) than in Open Areas (DAR 2019a). Additionally, under the Preferred Alternative, collection of the Ornate Wrasse is anticipated to be less than 1% of the Open Area population. Collection of the Achilles Tang would be approximately 62%-68% lower than under the Pre-Aquarium Collection Ban Alternative if collection rates stay similar to historic trends, but it is anticipated that collection will actually decrease by approximately 50% due to the reduction in the bag limit under the Preferred Alternative, further lowering the impact of commercial aquarium collection on the Open Area populations.

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In conclusion, of the 36 White List Species for which Open Area population estimates exist, collection under the Preferred Alternative would result in collection of less than 5% of the Open Area population for 31 species. For the remaining five species for which collection would be above 5% of the Open Area population, four have had stable or increasing populations even under higher collection rates over the past 18 years, and it is anticipated that the lower collection rates under the Preferred Alternative would not result in decreasing population trends. The last species, the Achilles Tang, has had significant declines in areas both open and closed to aquarium collection, suggesting that aquarium collection is not driving the decline (DAR 2019a). Nevertheless, the Preferred Alternative would be anticipated to lessen the impact on the Achilles Tang by limiting the number of Aquarium Permits to 10, and by imposing a reduced bag limit of 5 Achilles Tang per day.

**APPENDIX C—COMMENTS RECEIVED ON THE DEIS AND
APPLICANT RESPONSES**

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> The DEIS lists the proposed action as the “issuance of 14 Commercial Aquarium Permits.” It would be more accurate to describe the proposed action as “the collection of aquarium fish pursuant to 14 Commercial Aquarium Permits.” 	The cover letter for the FEIS has been edited.
	HI	1/7/2020	What is the maximum number of aquarium fish that could be collected annually under the proposed action?	<p>There is no annual take limit under any of the alternatives under consideration. However, bag limits exist for certain species (see Section 1.2.3.2 of the EIS), and would be reduced for the Achilles Tang to 5 per day. While bag limits do not exist for all species (or for certain sizes of a species), the concept of “unlimited” collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the “expected consequences” of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
State of Hawaii,	HI	1/7/2020	Section 2.5 of the DEIS (p.16) states: “As Aquarium Permits for the 14 fishers requesting permits come up for renewal each year, DLNR will	In accordance with its statutory and other obligations, DAR will continue to monitor fish populations within the WHRFMA per Act 306

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
Department of Land and Natural Resources, Division of Aquatic Resources			evaluate whether there are significant new circumstances or information relevant to environmental concerns and bearing on the commercial aquarium fishery or its impacts requiring a supplemental HEPA review.” How will DLNR evaluate whether there are significant new circumstances or information that would trigger a supplemental HEPA review? Will this applicant bear responsibility for supplemental HEPA review?	(see Section 1.2.3 of the EIS). The most recent DAR report (2019a) did not indicate that aquarium fishing was driving any declines in the 40 White List Species. If future reviews indicate that commercial aquarium collection is driving any decline in fish populations or resulting in adverse environmental impacts, the DAR will assess if supplemental HEPA review is needed, or additional regulatory actions required (e.g., limited entry fishery). Furthermore, if catch data or population data collected by the DAR or CREP differ significantly from that analyzed in the EIS, the DAR may decide that additional reviews and regulatory actions are needed during their 5-year reviews. The scope and content of any HEPA process will be determined by DAR in the future if such a process is triggered.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • “It is also necessary to analyze the potential impacts under the no action alternative resulting from non-issuance of aquarium permits, including the increased take of larger, reproductively mature aquarium fish in East Hawai’i using legal mesh nets.” o The DEIS states in section 5.4.1.1 (p.96): “Without the use of fine mesh nets, the size class of fish collected may increase over that which is caught with fine mesh nets (i.e., the smaller fish would escape the larger mesh), but again this impact cannot be quantified at this time.” What length of Yellow Tang (and other spp.) would be captured in 2” mesh? Has this change in mesh size resulted in overall larger specimens being harvested since the Court ruling? Does the larger mesh result in greater harm or mortality to the fish? This should be discussed in the EIS. 	Comment noted. The following statement has been added to Section 5.4.2.1 of the FEIS "With only a few exceptions for certain species where fishers classify fish as “small”, “medium” or “large”, the size of fish collected under CMLs is not required to be reported to the DAR, and thus these data are not available."
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • “The FEA identifies the scope of analysis as one year and states that an EA with updated data and analysis would need to be completed on an annual basis. This improperly segments the analysis which must include long-term and cumulative impacts over time of aquarium collection.” o The DEIS uses available catch record, WHAP, and CREP data to demonstrate long-term trends in catch and species density. o Section 5.0 provides 5-year projections of economic and population data. 	Comment noted, the Applicant extended the analysis to 5 years and included data on long-term trends in the EIS in response to the DAR comments on the FEA.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • “There is no statistical analysis of population growth compared to the life span of each fish and the numbers of years to size of first reproduction against which this annual proposed take can be measured for purposed of estimating sustainable take.” o This level of life history and resulting impact on population growth or decline given aquarium take is not discussed in the DEIS. 	Section 4.4.1 of the EIS contains individual species accounts of each of the 40 White List Species, including information on size and fecundity. To the Applicant’s knowledge, this information is not known for all 40 White List Species. Section 5.4.1.2, under the "Impact of Collection on White List Species Populations", discusses the general fecundity information of Hawaiian reef fishes, and why Ochavillo and Hodgson (2006) represents the best available science for establishing a sustainable threshold.

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Commenter	State/ Location	Date Received	Comment	Response
				<p>Although species-specific population growth and fecundity information is not known for all 40 White List Species, the EIS does cite data from the DAR (2019a) on population trends between 1999/2000 and 2017/2018, that show that 24 of the 38 White List Species with population data have had stable or increasing populations, even under higher rates of collection than what would occur under the Preferred Alternative. For the 12 species which have experienced declines, 11 of those species experienced declines in areas both open and closed to aquarium collection, suggesting that aquarium collection is not driving the decline (DAR 2019a).</p>
<p>State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources</p>	<p>HI</p>	<p>1/7/2020</p>	<ul style="list-style-type: none"> • “With regard to proposed levels of sustainable catch, using “5%-25%” annual take of estimated populations as a proposed in several research papers, we note that 5% to 25% is a wide range, and the precautionary principle calls for applying the lowest estimated percentage of take in the absence of scientific certainty.” <ul style="list-style-type: none"> o The DEIS references the Ochavillo and Hodgson (2006) Total Allowable Catch(TAC) range but does not try to define appropriate rates within the range to apply to White List species. Neither does it take into account rates of population growth by species to determine impact of different levels of take on different species. 	<p>The FEIS has been revised, and as such the Preferred Alternative is now limited to 10 Aquarium Permits. The collection of any of the White List Species under the revised Preferred Alternative is below the lower end of that range (i.e., <5%).</p>
<p>State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources</p>	<p>HI</p>	<p>1/7/2020</p>	<p>“We also note that there are no bag limits for most species, and that the fishery as currently regulated does not limit the number of permits, so that the annual take as a percentage of estimated population could rise significantly. Alternatives of overall annual take limits, a limited entry aquarium fishery program, and restrictions including full moratoria on the take of herbivores, species of special concern, and species evidencing severe population declines have not been proposed or analyzed.”</p> <p>Five alternatives are analyzed in the DEIS: No Action Alternative, Pre-Aquarium Collection Ban Alternative, WHRFMS-Only Programmatic Issuance of Permits Alternative, Achilles Tang Conservation Alternative, and Limited Issuance (Preferred) Alternative. These alternatives address some of the concerns above, but not in detail. The preferred alternative does not provide any measures to limit increased take, except for a reduced bag limit on Achilles Tang.</p>	<p>The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. Even looking at maximum historic collection rates of these 10 fishers, and applying a growth rate for the 5 year period, collection is below 5% of the population for all White List Species with population estimates.</p> <p>The concept of “unlimited” collection is speculative and not reasonably foreseeable. The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of an unlimited number of the White List Species is not feasible for the following reasons: (1) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (2) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • “The FEA asserts that certain types of fish such as Psychedelic Wrasse, Tinker’s Butterflyfish, and Fisher’s Angelfish inhabit waters deeper than the CREP monitoring studied, resulting in populations being underestimated and thus the annual take as percentage of estimated populations being overestimated.” o This information is disclosed in the DEIS (pp.76-77) 	Comment noted, the Applicant disclosed this information in the EIS.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • “In addition, we note the proposed alternatives for reduction in bag limits for Achilles Tang, but do not see a scientific basis for concluding that the proposed reduction would be sufficient to sustain the population.” o The DEIS still does not address the scientific basis for the reduction in daily bag limit or for allowing any take at all of at-risk species given steep declines in population. 	<p>The Applicant believes that a 50% reduction in Achilles Tang collection under the Preferred Alternative is reasonable. A statement has been added to the FEIS explaining that a 50% reduction in collection of Achilles Tang is assumed if a 5/day bag limit were imposed, as collection decreased markedly from an average of 7,732 and a maximum of 13,615 prior to imposing the bag limit of 10. Since the bag limit of 10 was imposed, collection has stayed fairly constant, ranging from 5,473 to 5,757 (difference of 284 fish), indicating that fishers may be collecting near the maximum allowed under the bag limit since there has been no growth in collection. Therefore, if fishers are currently collecting at or near the maximum allowed under the bag limit, it is reasonable to assume that reducing that bag limit by 50% would result in a 50% reduction in collection.</p> <p>The collection of Achilles Tang under the Preferred Alternative will be less than 2% of the island-wide population estimate, which is well under the 5% to 25% sustainable threshold (Ochavillo and Hodgson 2006). As stated in the EIS, there has never been a bag limit on this species for other fisheries, and they remain a popular food fish.</p>
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • “Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action’s potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis.” o Section 5.3 for the DEIS does not disclose certain information and opinions disclosed in the consultation section. Most notably, that some interviewees expressed the belief that collection for aquarium purposes, regardless of impact or sustainability, is a violation of 	The CIA, and all interviews, were included as an appendix to the EIS and incorporated by reference. However, additional information from the CIA has been added to Section 5.3 of the FEIS. In addition, the following statement has been added to Section 5.3.1 of the FEIS: "However, some interviewees expressed the belief that collection for aquarium purposes, regardless of impact or sustainability, is a violation of traditional beliefs (see Appendix A). "

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
			traditional beliefs. See consultation of Maka'aka Kaneali'i, Pi'i Laeha, Kailapa Hawaiian Homestead Community, and Damien Kenison	
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • "Enforcement and compliance needs and challenges are key factors in the effectiveness of fisheries management, and should be analyzed as a part of the environmental impact statement." <ul style="list-style-type: none"> o The DEIS provides no analysis of existing or proposed enforcement or compliance measures. 	<p>Information on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS. The Applicant is not proposing any additional enforcement measures.</p> <p>In addition, a discussion on underreporting and poaching has been added to Section 5.4.3.6 of the FEIS.</p>
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<p>"We are interested in proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions even in the absence of or prior to establishing other regulations to accomplish the same purpose."</p> <p>Aside from the reduced bag limit for Achilles Tang, the DEIS does not include any proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions.</p>	Language has been added to the Preferred Alternative that a permit condition would be added limiting the permit to the WHRFMA. All current permit conditions, including the required monthly reports, would continue to be required under any of the alternatives.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • Table 5-2 shows total fish and invertebrates collected under Aquarium Permits from East Hawai'i and total White List Species collected from the WHRFMA annually from 2000-2017 (DAR 2018a). Also included for comparison are data from collection of fish within East Hawai'i in 2018. <ul style="list-style-type: none"> o The numbers for East HI (all fishers) from 2000-2017 include invertebrates. o The numbers for East HI (all fishers) from 2018-2019 don't include invertebrates. o The numbers for West HI include only white list spp. o The data cannot be meaningfully compared because they include different categories of resources. The table would be more useful if it included a column for the East HI (all fishers) from 2000-2017 that excluded inverts or only included white list spp. 	Table 5-2 has been revised as requested to show the total number of White List Species collected in East Hawai'i each year. However, due to confidentiality rules (see Section 5.1), the data cannot be analyzed for invertebrates versus finfish in the way the DLNR is requesting.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> • Table 5-3 shows the % of CREP island wide population that would likely be collected in East HI under the no action alternative. It would be useful to see the % of the East HI population that would likely be collected under the no action alternative. 	The Applicant does not have population estimates specific to East Hawai'i.

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> In the absence of Total Allowable Catch (TAC) quotas for each species, the overall impact of the proposed fishery will largely be limited by the number of permittees and their individual efforts. The group of 14 fishers has steadily over time increased their total catch as a percentage of the entire West Hawai'i aquarium fishery (Table 5-2). They have demonstrated that they collectively can be responsible for up to 77.8% of all WHRFMA catch in a single year. Yet, the DEIS suggests that take under the preferred alternative will likely be lower than pre-ban (2017) rates due to the limiting of permits to the 14. Given that catch records have shown a clear and steady increase in the proportional take of the 14 applicants, what assurance does DLNR have that fish collected will not continue to increase once permits are granted? 	The FEIS has been revised, and the Preferred Alternative is now limited to 10 Aquarium Permits. These 10 fishers have collectively been responsible for up to 46.4% of the total collection in the WHRFMA. The Preferred Alternative was analyzed looking at the 10 fishers maximum collection rate, and a 1.49% annual growth rate (based on DAR 2019a data on growth from 2000 to 2017, see Section 5.4.1) was applied to that.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> In addition to the number of live specimens that make it to market, total take will also be determined by capture mortality and mortality incurred throughout the supply chain. Section 4.3.2 of the DEIS briefly describes general capture methodology used but does not cite any available literature on the WHRFMA aquarium fishery, i.e., Munday et al 2013 and Stevenson et al 2011. The DEIS also does not discuss mortality during transport, which can be highly variable depending on capture and handling procedure. Standardized collection and handling procedures should be well-defined in the DEIS along with expected rates of bycatch, injury, and mortality. Included in this should be a discussion of the overall health of aquarium fish as they move down the supply chain, with suggested procedures to minimize loss during transport. 	<p>Because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of the analysis in the EIS to evaluate effects on individual fish once they are removed from the population. Nevertheless, a discussion on post-collection mortality has been added to Section 5.4.2 of the EIS. This discussion includes both references mentioned by the DAR (Munday et al. 2013, Stevenson et al. 2011). Based on the available data, the two methods commonly used in the Hawai'i fishery for avoiding barotrauma to collected fish (either ascent without decompression stops, or ascent with one decompression stop, followed by venting) both avoid any immediate or delayed mortality (Munday et al. 2015).</p> <p>The Applicant is not aware of any publicly available post-collection data for fish collected in Hawai'i. However, cyanide-free net-caught fish in the Philippines have been found to have mortality rates of less than 10% through the chain from the reef to retailer (Rubec et al. 2001). This is compared to rates of 14.12% to 21.69% (depending on the experience of the final aquarist) found by Cartwright et al. (2012), which included fish collected using cyanide or other methods.</p> <p>As stated in the EIS, while it is possible that higher post-collection mortality rates could result in the need to collect more fish from the reef, it is not expected that mortality rates will increase over what has previously occurred under historic collection rates. Therefore, because post-collection mortality is not expected to increase under any of the alternatives, it is not anticipated that collection rates will need to increase as a result of increased mortality.</p>
State of Hawaii, Department of Land and	HI	1/7/2020	The applicants cite Tissot and Hallacher (2003) as evidence that commercial aquarium fish harvest has no marked effect on coral destruction in the WHRFMA, contrary to the expressed opinion (and photographic documentation) of some commenters. At the very least,	Language has been added to Section 5.4.1.2 of the FEIS stating that, similar to any other boat user group, it is possible that coral could be inadvertently damaged by an anchor. In addition, similar to other user groups who interact with the reefs, the activities of aquarium

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
Natural Resources, Division of Aquatic Resources			we can assume anchoring and regular contact with the bottom will have some negative effect on live corals. The applicants should recognize this impact in the DEIS and offer some form of mitigation or procedural alternatives to avoid such destruction.	collectors could inadvertently damage coral. Damage of coral will continue to remain unlawful as described in Section 1.2.3.2 of the EIS.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> Quantifying the impact of the proposed fishery as requested in the EIS criteria is ultimately difficult to perform without establishing some sort of catch rate. Establishing TAC limits at least for species of high demand allows for adaptive management based on data collect in real time. The best available data (Ochavillo and Hodgson 2006) provides an acceptable TAC range of 5%-25% allowable catch for similar species in the Philippines. An acceptable and conservative level of take should be established within that range per species, with steps taken in the future to establish species-specific TACs for the WHRFMA. 	Under the revised Preferred Alternative, the collection of all White List Species is below 2% of their population estimates, which is below the lower end of the Ochavillo and Hodgson (2006) TAC range of 5% to 25%.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> When possible, WHAP and CREP data should compared side by side to demonstrate differences in how trends are reflected. Specifically, population trends derived from CREP surveys should be reported instead of WHAP data alone. 	The Applicant does not have population trend data for CREP surveys.
State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	HI	1/7/2020	<ul style="list-style-type: none"> For <i>Acanthurus Achilles</i>: <ul style="list-style-type: none"> Catch should be analyzed using Open, FRA, and MPA data for the WHFRMA, instead of island-wide data. While studies have shown connectivity between FRAs and Open areas, there is no specific evidence/literature cited for connectivity of this species island-wide. The DEIS states that the "bulk of Achilles Tang population is not surveyed in the WHAP data." However, WHAP surveys are conducted in prime habitat for Achilles Tang recruitment, which is the size collected for aquarium purposes. 	<p>While the EIS maintains that the CREP population estimates provide the best data for evaluating impacts, the impacts of collection on WHAP Open Area population estimates have been added in Appendix B of the FEIS for comparison.</p> <p>As stated in the EIS, WHAP transects are not located in all collection zones found within the WHRFMA (Figure 4), including the two zones (100A and 108) with the highest percentage of the Achilles Tang collection, suggesting that the population of Achilles Tang in the WHRFMA is likely higher than estimated by the WHAP. This is supported by CREP (2018) data which show approximately 43% (approximately 79,000 individuals) of the island of Hawai'i Achilles Tang population (approximately 184,000 individuals) resides in collection zones 100 and 108.</p>
State of Hawaii, Department of Land and Natural Resources, Division of	HI	1/7/2020	<ul style="list-style-type: none"> For Tinker's Butterflyfish, Psychedelic Wrasse, Flame Wrasse, and Hawaiian Longfin Anthias: <ul style="list-style-type: none"> The DEIS cites observational/anecdotal data from one diver. While informative, this data does not seem sufficient for the standard of the DEIS of for ensuring sustainability of harvest of these species. 	It is unclear what reference the DAR is referring to. In Section 4.4.7.1, the EIS states that "based on deep diver observations, Tinker's Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs)." However this reference is from DAR (2019a), and is not "observational/anecdotal data from one diver". The citation has been added to clarify where this statement is from.

Comments and Applicant Responses to DAR Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
Aquatic Resources				<p>In Section 5.4.1.2, referring to Fisher's Angelfish, Tinker's Butterflyfish, and Psychedelic Wrasse, the EIS states that "Kane and Tissot (2017) demonstrate that densities of all three species are greater at depths below the 98-foot survey depth of the CREP surveys, suggesting that the actual populations of all three species are higher than those reported by the CREP surveys", but again, this statement cites a scientific study that is summarized elsewhere in the document.</p>

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CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

January 7, 2020

Pet Industry Joint Advisory Council
c/o Mr. James Lynch
925 Fourth Ave., Suite 2900
Seattle, WA 98104

Comments on Draft Environmental Impact Statement: Issuance of Commercial Aquarium Permits for the West Hawaii Regional Fishery Management Area

The Department of Land & Natural Resources (DLNR), Division of Aquatic Resources (DAR) submits the following comments on the Draft Environmental Impact Statement (DEIS) on the Issuance of Commercial Aquarium Permits for the West Hawaii Regional Fishery Management Area.¹

Comments Regarding Nature of Proposed Action

- The DEIS lists the proposed action as the “issuance of 14 Commercial Aquarium Permits.” It would be more accurate to describe the proposed action as “the collection of aquarium fish pursuant to 14 Commercial Aquarium Permits.”
- What is the maximum number of aquarium fish that could be collected annually under the proposed action?

Comments Regarding Scope of DEIS

- Section 2.5 of the DEIS (p.16) states: “As Aquarium Permits for the 14 fishers requesting permits come up for renewal each year, DLNR will evaluate whether there are significant new circumstances or information relevant to environmental concerns and bearing on the commercial aquarium fishery or its impacts requiring a supplemental HEPA review.” How

¹ As the approving agency, DLNR is responsible for determining whether the Environmental Impact Statement (EIS) adequately discloses the reasonably anticipated impacts of the proposed action. The EIS need not be exhaustive to the point of discussing all possible details bearing on the proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider fully the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives. Finding that the EIS adequately describes the environmental impacts of a project does not mean that the project must be approved. As stated above, it just provides information on which the agency can make a reasoned decision.

will DLNR evaluate whether there are significant new circumstances or information that would trigger a supplemental HEPA review? Will this applicant bear responsibility for supplemental HEPA review?

Comments Regarding Issues raised in Final Environmental Assessment, Notice of Determination

- *“It is also necessary to analyze the potential impacts under the no action alternative resulting from non-issuance of aquarium permits, including the increased take of larger, reproductively mature aquarium fish in East Hawai‘i using legal mesh nets.”*
 - The DEIS states in section 5.4.1.1 (p.96): “Without the use of fine mesh nets, the size class of fish collected may increase over that which is caught with fine mesh nets (i.e., the smaller fish would escape the larger mesh), but again this impact cannot be quantified at this time.” What length of Yellow Tang (and other spp.) would be captured in 2” mesh? Has this change in mesh size resulted in overall larger specimens being harvested since the Court ruling? Does the larger mesh result in greater harm or mortality to the fish? This should be discussed in the EIS.
- *“The FEA identifies the scope of analysis as one year and states that an EA with updated data and analysis would need to be completed on an annual basis. This improperly segments the analysis which must include long-term and cumulative impacts over time of aquarium collection.”*
 - The DEIS uses available catch record, WHAP, and CREP data to demonstrate long-term trends in catch and species density.
 - Section 5.0 provides 5-year projections of economic and population data.
- *“There is no statistical analysis of population growth compared to the life span of each fish and the numbers of years to size of first reproduction against which this annual proposed take can be measured for purposes of estimating sustainable take.”*
 - This level of life history and resulting impact on population growth or decline given aquarium take is not discussed in the DEIS.
- *“With regard to proposed levels of sustainable catch, using “5%-25%” annual take of estimated populations as a proposed in several research papers, we note that 5% to 25% is a wide range, and the precautionary principle calls for applying the lowest estimated percentage of take in the absence of scientific certainty.”*
 - The DEIS references the Ochavillo and Hodgson (2006) Total Allowable Catch (TAC) range but does not try to define appropriate rates within the range to apply to White List species. Neither does it take into account rates of population growth by species to determine impact of different levels of take on different species.
- *“We also note that there are no bag limits for most species, and that the fishery as currently regulated does not limit the number of permits, so that the annual take as a percentage of estimated population could rise significantly. Alternatives of overall annual take limits, a limited entry aquarium fishery program, and restrictions including full moratoria on the take*

of herbivores, species of special concern, and species evidencing severe population declines have not been proposed or analyzed.”

- Five alternatives are analyzed in the DEIS: No Action Alternative, Pre-Aquarium Collection Ban Alternative, WHRFMS-Only Programmatic Issuance of Permits Alternative, Achilles Tang Conservation Alternative, and Limited Issuance (Preferred) Alternative. These alternatives address some of the concerns above, but not in detail. The preferred alternative does not provide any measures to limit increased take, except for a reduced bag limit on Achilles Tang.
- *“The FEA asserts that certain types of fish such as Psychedelic Wrasse, Tinker’s Butterflyfish, and Fisher’s Angelfish inhabit waters deeper than the CREP monitoring studied, resulting in populations being underestimated and thus the annual take as percentage of estimated populations being overestimated.”*
 - This information is disclosed in the DEIS (pp.76-77)
- *“In addition, we note the proposed alternatives for reduction in bag limits for Achilles Tang, but do not see a scientific basis for concluding that the proposed reduction would be sufficient to sustain the population.”*
 - The DEIS still does not address the scientific basis for the reduction in daily bag limit or for allowing any take at all of at-risk species given steep declines in population.
- *“Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action’s potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis.”*
 - Section 5.3 for the DEIS does not disclose certain information and opinions disclosed in the consultation section. Most notably, that some interviewees expressed the belief that collection for aquarium purposes, regardless of impact or sustainability, is a violation of traditional beliefs. See consultation of Maka’aka Kaneali’i, Pi’i Laeha, Kailapa Hawaiian Homestead Community, and Damien Kenison
- *“Enforcement and compliance needs and challenges are key factors in the effectiveness of fisheries management, and should be analyzed as a part of the environmental impact statement.”*
 - The DEIS provides no analysis of existing or proposed enforcement or compliance measures.
- *“We are interested in proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions even in the absence of or prior to establishing other regulations to accomplish the same purpose.”*

- Aside from the reduced bag limit for Achilles Tang, the DEIS does not include any proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions.

Comments Regarding Impacts to Biological Resources

- Table 5-2 shows total fish and invertebrates collected under Aquarium Permits from East Hawai'i and total White List Species collected from the WHRFMA annually from 2000-2017 (DAR 2018a). Also included for comparison are data from collection of fish within East Hawai'i in 2018.
 - The numbers for East HI (all fishers) from 2000-2017 include invertebrates.
 - The numbers for East HI (all fishers) from 2018-2019 don't include invertebrates.
 - The numbers for West HI include only white list spp.
 - The data cannot be meaningfully compared because they include different categories of resources. The table would be more useful if it included a column for the East HI (all fishers) from 2000-2017 that excluded inverts or only included white list spp.
- Table 5-3 shows the % of CREP island wide population that would likely be collected in East HI under the no action alternative. It would be useful to see the % of the East HI population that would likely be collected under the no action alternative.
- In the absence of Total Allowable Catch (TAC) quotas for each species, the overall impact of the proposed fishery will largely be limited by the number of permittees and their individual efforts. The group of 14 fishers has steadily over time increased their total catch as a percentage of the entire West Hawai'i aquarium fishery (Table 5-2). They have demonstrated that they collectively can be responsible for up to 77.8% of all WHRFMA catch in a single year. Yet, the DEIS suggests that take under the preferred alternative will likely be lower than pre-ban (2017) rates due to the limiting of permits to the 14. Given that catch records have shown a clear and steady increase in the proportional take of the 14 applicants, what assurance does DLNR have that fish collected will not continue to increase once permits are granted?
- In addition to the number of live specimens that make it to market, total take will also be determined by capture mortality and mortality incurred throughout the supply chain. Section 4.3.2 of the DEIS briefly describes general capture methodology used but does not cite any available literature on the WHRFMA aquarium fishery, i.e., Munday et al 2013 and Stevenson et al 2011. The DEIS also does not discuss mortality during transport, which can be highly variable depending on capture and handling procedure. Standardized collection and handling procedures should be well-defined in the DEIS along with expected rates of bycatch, injury, and mortality. Included in this should be a discussion of the overall health of aquarium fish as they move down the supply chain, with suggested procedures to minimize loss during transport.
- The applicants cite Tissot and Hallacher (2003) as evidence that commercial aquarium fish harvest has no marked effect on coral destruction in the WHRFMA, contrary to the expressed

opinion (and photographic documentation) of some commenters. At the very least, we can assume anchoring and regular contact with the bottom will have some negative effect on live corals. The applicants should recognize this impact in the DEIS and offer some form of mitigation or procedural alternatives to avoid such destruction.

- Quantifying the impact of the proposed fishery as requested in the EIS criteria is ultimately difficult to perform without establishing some sort of catch rate. Establishing TAC limits at least for species of high demand allows for adaptive management based on data collect in real time. The best available data (Ochavillo and Hodgson 2006) provides an acceptable TAC range of 5%-25% allowable catch for similar species in the Philippines. An acceptable and conservative level of take should be established within that range per species, with steps taken in the future to establish species-specific TACs for the WHRFMA.
- When possible, WHAP and CREP data should compared side by side to demonstrate differences in how trends are reflected. Specifically, population trends derived from CREP surveys should be reported instead of WHAP data alone.
- For *Acanthurus Achilles*:
 - Catch should be analyzed using Open, FRA, and MPA data for the WHFRMA, instead of island-wide data. While studies have shown connectivity between FRAs and Open areas, there is no specific evidence/literature cited for connectivity of this species island-wide.
 - The DEIS states that the “bulk of Achilles Tang population is not surveyed in the WHAP data.” However, WHAP surveys are conducted in prime habitat for Achilles Tang recruitment, which is the size collected for aquarium purposes.
- For Tinker’s Butterflyfish, Psychedelic Wrasse, Flame Wrasse, and Hawaiian Longfin Anthias:
 - The DEIS cites observational/anecdotal data from one diver. While informative, this data does not seem sufficient for the standard of the DEIS of for ensuring sustainability of harvest of these species.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
<p>Website Template; each commenter could select any or all of these items</p>	<p>n/a</p>	<p>n/a</p>	<p>I am concerned about the impacts of the aquarium trade on the following species: Yellow tangs Butterflyfishes Surgeonfishes All 40 White List species Bandit Angelfish Angelfishes Forcepsfish/Longnose butterflyfish kole Achilles tang (paku ikui) All herbivores</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Yellow Tang: As stated in the EIS, the DAR (2019a) concluded that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>Butterflyfish: Only species on the White List can be collected from the WHRFMA. Under the Preferred Alternative, Aquarium Permits would only be issued for the WHRFMA.</p> <p>Surgeonfish: Only species on the White List can be collected from the WHRFMA. Under the Preferred Alternative, Aquarium Permits would only be issued for the WHRFMA.</p> <p>40 White List Species: The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>Bandit Angelfish: The Bandit Angelfish is not on the White List, and thus cannot be collected from the WHRFMA. Under the Preferred Alternative, Aquarium Permits would only be issued for the WHRFMA.</p>

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
				<p>Angelfishes: Only species on the White List can be collected from the WHRFMA. Under the Preferred Alternative, Aquarium Permits would only be issued for the WHRFMA.</p> <p>Forcepsfish: As stated in the EIS, since the establishment of the WHRFMA, populations of this species have remained stable in Open Areas and MPAs and has increased significantly in FRAs (DAR 2019a); all in the presence of commercial aquarium collection.</p> <p>Kole: Since the establishment of the WHRFMA, populations of this species have increased significantly in Open Areas, MPAs, and FRAs (DAR 2019a), when commercial aquarium collection was occurring.</p> <p>Achilles Tang: The Preferred Alternative includes a reduced bag limit on this species and would limit the number of Aquarium Permits to 10, further reducing impacts on the species. It should be noted that there has never been a bag limit on this species for other fisheries.</p> <p>Herbivores: As stated in the EIS, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	The natural beauty of coral reefs is diminished by aquarium collecting.	Your comment has been forwarded to the decision makers.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Species once depleted by the trade are now returning. We should continue, not reverse, this trend.	<p>Your comment has been forwarded to the decision makers.</p> <p>The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the</p>

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
				alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Species abundance is significantly reduced by aquarium collecting.	Your comment has been forwarded to the decision makers. The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Communities of reef species are disrupted by aquarium collecting.	Your comment has been forwarded to the decision makers.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Marine life is threatened with local extinction	Your comment has been forwarded to the decision makers.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	The real possibility that future generations may not encounter these species	Your comment has been forwarded to the decision makers.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.	Your comment has been forwarded to the decision makers. The Preferred Alternative in the EIS includes a reduced bag limit for the Achilles Tang. All Alternatives would include the existing size and bag limits outlined in Section 1.2.3 of the EIS.

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Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.	Your comment has been forwarded to the decision makers. It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.	Your comment has been forwarded to the decision makers.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.	Your comment has been forwarded to the decision makers.
Website Template; each commenter could choose whether to select this concern.	n/a	n/a	Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.	Your comment has been forwarded to the decision makers.
Website Template; each commenter could select any or all of these items	n/a	n/a	I believe some of all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s): North Kona South Kona Ka'u North Kohala Puna Hilo Hamakua South Kohala Unfamiliar with these reefs, but still concerned.	Your comment has been forwarded to the decision makers.

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Website Template; each commenter could choose whether to select this statement.	n/a	n/a	I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.	Your comment has been forwarded to the decision makers.
Kimi Abbottjackson	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kimi Abbottjackson	HI	12/6/2019	My additional comment: As a regular swimmer in the ocean I have noticed a decline in aquarium fish it saddens me to think that this is going to continue until they are totally gone	Your comment has been forwarded to the decision makers.
Cameron Ahia	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Katrina Ahia	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Katrina Ahia	HI	1/5/2020	The reef fish need to stay on the reef to promote a healthy diverse ecosystem. Please do not let these fish be collected and sold to the detriment of our reefs and local environment.	Your comment has been forwarded to the decision makers.
Noelani Ahia	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Noelani Ahia	Hi	1/5/2020	Our entire eco system is interconnected. The impacts to our reefs will be irreparably damaged which leads to a negative cascade affecting the entire ecosystem. We must think holistically and protect these reef fish.	Your comment has been forwarded to the decision makers.
Waiala Ahn	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Waiala Ahn	HI	1/7/2020	this trade is hurting our Reef, Reef Wildlife and our ability for practice our Cultural Practices and negatively impacts our life-ways and styles. this is destroying our Ocean Ecosystem—and it need to BE STOPPED NOW not next year NOW!!!	Your comment has been forwarded to the decision makers. The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Kahililaulani Alapa'i	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kahililaulani Alapa'i	HI	1/6/2020	Educate more impacts	Your comment has been forwarded to the decision makers.

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Jennifer Alcorn	Visitor / Non-HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jennifer Alcorn	Visitor / Non-HI	1/4/2020	It's come time we have to save and preserve our natural wonders. Greed brings over fishing with little to no care to the oceans biological systems. This is not acceptable.	Your comment has been forwarded to the decision makers.
Hilary Alexander	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Hilary Alexander	HI	1/7/2020	Commercial aquarium fishing shouldn't be allowed. This is harmful to the environment and fish populations	Your comment has been forwarded to the decision makers.
Lynn Allen	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lynn Allen	HI	12/6/2019	There is no need to disrupt the ANY reef ecosystem by harvesting ANY of these fish for the aquarium trade. The downstream consequences, in combination with the stress of warming ocean temperatures, are dire and will cause extreme harm and likely kill of entire reef ecosystems.	Your comment has been forwarded to the decision makers.
Nathan Allen	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karen Altergott	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Altman	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Altman	HI	12/9/2019	Having been a former salt water reef tank hobbyist when I lived on the mainland, I am all too familiar with the fact that the vast majority of the fish will die within 6 months of purchase and I have personally witnessed 3 Hawaiian wrasses go insane from their captivity. Also, virtually all of the desirable species can be bred in captivity. These collectors just want free inventory, with no regard for the impact of their greedy pillaging...	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Rae Andre	Visitor / Non-HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rae Andre	Visitor / Non-HI	12/11/2019	Are you all crazy out there? The local fish are one of your most valuable tourist assets--alive and beautiful, not dead and gone.It's why many people come to the Kona Coast from all over the world. Last time I was there the fish were nearly gone and I vowed not to come back until you guys get this figured out. Figure it out! No fishing the reefs! It's as simple as that. Many local livelihoods depend on you.	Your comment has been forwarded to the decision makers.
Jen Angeli	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Jen Angeli	HI	12/11/2019	Hawaii's resources are being on land at sea. We are destroying the balance of nature on so many levels and our earth is dying. We need to be stewards of the earth and protect the future of our planet.	Your comment has been forwarded to the decision makers.
David Anton	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Anton	HI	1/6/2020	As a scuba instructor I have witnessed over the last 20 yrs the decline of Hawaii's reefs and fish populations. We owe it to the future Hawaiians to preserve the health of our oceans.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that there are many threats to reefs, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Tanya Aynessazian	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Caroline Azelski	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eric Baicy	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eric Baicy	HI	1/4/2020	Marine life is not a trophy to put into small tanks in homes or doctors' offices. They are living creatures and don't deserve to be collected on a massive commercial scale and be sold for profits. There are fewer and fewer reef fish every year and this is just adding more unnecessary pressure on the ecosystem.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that there are many threats to reefs, and that some species are declining, the DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Kerri Ballard	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Kerri Ballard	HI	12/6/2019	Our reefs are being impacted primarily by climate change and also often from runoff exacerbated by construction and from chemical fertilizers. Other effects from collecting, sunscreens, and e-Coli are also contributors. It only makes sense to do everything we possibly can, however large or small the impact, to protect these reefs which protect us, feed us and are a vital asset to our tourism industry. Collecting benefits only a few while impacting many. I have true compassion for those who have been making their livings from this practice. I would like to see some discussion about providing funding for training for these members of our community in other areas. Their knowledge of the animals and the areas could be put to better uses.	Your comment has been forwarded to the decision makers.
Bonnie Bator	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bonnie Bator	HI	1/4/2020	La'aloa (Magic Sands) In the early 1980's Reef Fish were teaming...Now, AUWE (barely)	Your comment has been forwarded to the decision makers.
Jerome Bautista	HI	12/3/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jerome Bautista	HI	12/3/2019	Our reefs cannot protect themselves. The protections we have afforded our natural resources are one of the best things we can do to allow the marine life to flourish to what we imagine a healthy reef to look like. Allowing the aquarium trade to almost freely take can severely disrupt the process we've made. Our reefs and marine life are already fighting pollution, run-off, climate change, invasive species, etc. Why add another pressure and make it nearly impossible for them to thrive? Please consider doing the pono thing for the future of our oceans so generations to come can know what a healthy and thriving natural environment in Hawaii is.	Your comment has been forwarded to the decision makers.
Malia Becklund	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Malia Becklund	HI	12/6/2019	These reef rapers are here in Hawaii only to make money. They do not care about conservation or Hawaii. They are greedy and wasteful. They are known for dumping fish like garbage. They are evil and no amount of pity should be shown to them. They do not deserve to live here or make their living here. They are parasites and their industry is toxic to our islands. Furthermore, the life the animals lead in aquariums is extremely cruel and short. They are easily disposable. The animals bleach out under artificial lights, get sick and die and are instantly replaced by another. They are forever lost from their school to live the remainder of their short life in a glass prison. This is cruel and wrong. Fish collectors are monsters and I am against their presence in Hawaii. As a native Hawaiian I say Aole to all Trop divers!	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.

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Lynn Beittel	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lynn Beittel	HI	1/5/2020	The Big Island has the best snorkeling in Hawaii. Fish should be protected for current and future generations. Thank you for listening, Lynn Beittel	Your comment has been forwarded to the decision makers.
Richard Belas	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Belas	HI	12/7/2019	This is an abomination. We rely more on tourists who dive or snorkel more than people who by fish for aquariums. I know on the east coast where I spend my time, offices that had salt water aquariums have switched to fresh water. Do we really need to have more stories about fish dumped for lack of a market?	Your comment has been forwarded to the decision makers.
Gillian Bell	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mona Bell	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Josephine Bertram	Visitor / Non-HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rebecca Bicker	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rebecca Bicker	HI	12/6/2019	I am a resident of Maui and frequent diver. Aquarium trade has NO PLACE WHATSOEVER taking fish from our waters . This disrupts the already precarious balance of wildlife in our waters. Climate change, coral damage and now aquarium trade- no just No. I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.	Your comment has been forwarded to the decision makers.
Glenn Billaber	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Glenn Billaber	HI	12/5/2019	These species play a major part in the reefs and in the community with all fish, tell them to stop letting greed ruin this world. Go find somewhere else to ruin but Hawai'i will not have it!	Your comment has been forwarded to the decision makers.
Christopher Biltoft	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Binder	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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shaunara bitanga	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
shaunara bitanga	HI	12/7/2019	I believe within the past 3 decades since I have been alive alot of people come to hawaii and try to steal, exploit, and swindle our beautiful hawaii home. At the least we are sad to call home anymore because people are not being respectful of the natural resources/beauty or taking care of it by anymeans at all. Since our state was annexed aka stolen over 200 years ago our natural resources have dwindled and our state is looking more and more like the mainland each year it is so sad to say and see. The natural inhabitants of hawaii's land and sea should all be protected because they are very important in having a different role in helping and naturally caring for our local as well as global ecosystem. If we do not put more strict rules on people overfishing and fishing at all for our indigenous fish for aquariums or wether it be for sale or for so called museums it will not stop. People need to learn to leave things the way they found it because you never know how important it could be for the local environment regardless if it be for research or anything else. Our natural environment will be no so natural the more we mess with it so we should leave mother nature alone as it was originally intended. Thank you a local loving resident of OAHU.	Your comment has been forwarded to the decision makers.
Todd Black	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Todd Black	HI	12/10/2019	Our family has lived at Puako for over 60 years. During the past 30 years there has been a significant decline in the local fish population due to overfishing, aquarium fish taking, and pollution. Do not allow the fish takers to return, in any capacity, to these shores.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Kieba Blacklidge	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kieba Blacklidge	HI	1/6/2020	I used to swim and snorkel often around Kapoho area and Pohoiki and have noticed big changes over the last 15 years with fewer tropical fish and a dying reef. Please keep our sea life plentiful and allow it to naturally flourish and grow.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or

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				increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Kaikea Kaleikini Blakemore Blakemore	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kaikea Kaleikini Blakemore Blakemore	HI	1/7/2020	Please stop poaching our islands. We're in the middle of a climate collapse. Things that are alive should not be sold as commodities anymore. You're stealing from Hawaii's people and our future letting people profit off disruption to our ecosystems.	Your comment has been forwarded to the decision makers. The EIS is evaluating the impacts of collection that would occur under the issuance of 10 Aquarium Permits, which would allow for legal collection. A discussion on underreporting and poaching has been added to Section 5.4.3.6 of the FEIS.
Kalena Blakemore	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kalena Blakemore	HI	1/6/2020	As a Native Hawaiian I am opposed to commercial aquarium collection! The EIS has disregarded 45 opinions out of 5 claiming there will be no natural & cultural impacts! This is illogical, repulsive & acutely disrespectful to me & our Island. My aumakua is in the ocean as is Kanaloa, our ocean deity! The practice of extracting fish for beauty in a fish tank is vulgar & offensive. I OBJECT to this EIS! Please listen to the voices of the people not corruption & payoffs to sell our natural & cultural resources!	Your comment has been forwarded to the decision makers. A Cultural Impact Assessment was completed that includes a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.
Marjorie Bonar	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marjorie Bonar	HI	12/7/2019	Decimation on South Maui reefs is an example of how slowly recovery happens. Do not undo the progress made on Hawaii. Restrict the aquarium trade to non-wild caught populations.	Your comment has been forwarded to the decision makers.
Andrew Boorman	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Andrew Boorman	HI	12/13/2019	Fish for salt water aquariums should be captive bred, not taken from the wild.	Your comment has been forwarded to the decision makers.
Mary Brady	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Mary Brady	HI	12/7/2019	The young people are mad and insisting that we to save the planet for their generation.The world leaders agree on the need to save our planet....this includes the oceans, reefs, and marine life. Why then is Hawaii even thinking about lifting the aquarium fishing ban? This runs opposite these efforts. Aquarium fishing is no different than the poaching of African wildlife....beautiful animals, but still illegal and immoral to hunt these merely for their economic value.	Your comment has been forwarded to the decision makers.
Antonia Brandle	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Antonia Brandle	HI	12/8/2019	My avider, Dr. Gail, at Chaminade has shown us her photos as well as photos from her students of the reefs in O'ahu over the past few years. It is obvious that these reefs are unhealthy considering the lack of fish and biodiversity. Aquarium collecting is one of the ways reefs are damaged. Collectors take vital species in large numbers out of the ecosystem with little management and they can use very harmful ways of collecting these fish (chemical or physical bombs for example). Herbivores are especially important for reef health since they eat the algae off of the reef making the reef habitable for all species that inhabit it. Healthy reefs are far more valuable than sales from the aquarium trade since reefs provide safety for the island, medicine as well as food. Short term economic growth is not a viable reason for opening up the reefs for aquarium fishing since there cannot be unlimited economic growth dependent on finite resources.	Your comment has been forwarded to the decision makers. The use of cyanide or other harmful methods is not currently allowed in Hawai'i nor would it be allowed under any of the alternatives under consideration in the EIS. The Aquarium Permit is only for the use of fine mesh nets. Damage of coral will continue to remain unlawful as described in Section 1.2.3.2 of the EIS. As stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. As stated in the EIS, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.
Aaron Braud	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Aaron Braud	HI	1/7/2020	Though recovering, the amount of tang and other fish in Mahukona are still below expectations. Aquarium fishing is wasteful of important prey fish.	Your comment has been forwarded to the decision makers.

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Elizabeth Bridygham	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carol Broadley	Visitor / Non-HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carol Broadley	Visitor / Non-HI	12/16/2019	I believe the ocean should be left alone. It is in danger and needs all species to stay right where they are.	Your comment has been forwarded to the decision makers.
Jennifer Broadley	Visitor / Non-HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jennifer Broadley	Visitor / Non-HI	12/17/2019	Leave the fish where they are!!! Let them be seen by the world in their natural setting rather than in a tank at a home or business. Your tourism depends on it took.	Your comment has been forwarded to the decision makers.
Linda Brooks	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Linda Brooks	HI	1/6/2020	Our reefs are suffering now with the temperatures. We must protect them	Your comment has been forwarded to the decision makers.
Jesse Brown-Clay	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jesse Brown-Clay	HI	12/9/2019	The ruling by Hawaii's Supreme Court to halt aquarium collecting was valid and should be upheld. The Supreme Court that day made a choice to protect Hawaii's ecosystems for future generations to come. Please consider the needs of these marine ecosystems and of the residents of Hawaii over industry demands (aquarium collecting). Please help us to limit extractive practices such as aquarium collecting. It's time for us to conserve and protect our biodiversity and natural resources. Thank you for all of your hard work.	Your comment has been forwarded to the decision makers. The Supreme Court decision was that issuance of Aquarium Permits required HEPA review.
Mackenzie Buckner	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mackenzie Buckner	HI	1/7/2020	The country council on the Big Island of Hawai'i once listened to the woes of our keiki and proceeded to ban all tobacco products at Kahalu'u State Park. These same keiki proved that where there were more tobacco products and cigarette chemicals there were less sand crabs. I am one of those children who stood up for our precious marine life that day, over 12 years ago now. Please, follow suit and protect our land and people.	Your comment has been forwarded to the decision makers.
Lori Burgoon	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Lori Burgoon	HI	1/7/2020	I have lived in Kona for eight years. On the big island for 15 years. In this time frame I have seen our reefs overfished and ignored. When DLNR places the ban on aquarium fishing I was so happy. This is a business that only takes from Hawaii. Nothing is given back. We need to enforce the ban and keep it intact.	Your comment has been forwarded to the decision makers.
Dolores Burke	HI	12/3/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dolores Burke	HI	12/3/2019	Most of the fish die within days of being collected! When the fish do make it to an aquarium store and are sold 90% die this makes for a never ending demand for more fish. It's an unsustainable industry.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Eric Burkhardt	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Danielle Burnside	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Danielle Burnside	HI	1/7/2020	I have lived in Hawaii for three years. Within those three years, I have swam over the same reef many times. And can pinpoint where it is dying, and which fish don't show up anymore. The reefs are in such delicate conditions in this point and time, that I strongly urge you to please allow them time and space and a chance to recover. They already have so many extra stressors, that anything we can do to prevent harm will not only allow our reefs to prosper in better health, but ourselves.	Your comment has been forwarded to the decision makers.
Donna Burrows	Visitor / Non-HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Emily Burt Burt	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Emily Burt Burt	HI	1/6/2020	As an outrigger canoe paddler, I have been witness to the aquarium trade's practice of throwing away fish that have died during capture or in boats. I have witnessed drifting dead fish along the South Kona coast in direct relation to the aquarium collectors. This type of waste is inexcusable. Without the waste, though, I do believe that aquarium fish collecting is not an ethical use of our nearshore waters. Please do not allow this practice to continue.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Kate Butler	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Kate Butler	HI	1/7/2020	<p>As avid scuba divers, my husband and I moved to Kona because we fell in love with, not only the incredible diving that the Kona reef system has to offer, but the incredible amount of marine life that we see here, some endemic, some just plain amazing. We dive every weekend, and you never know what you are going to see. I want it to stay that way. It would be heartbreaking to know that aquarium fishermen would be allowed to take these fish from their home, purely for the aquarium trade. I cannot understand why anybody would want to take these beautiful creatures away from the only world they know, completely stressing them out in the process and possibly doing permanent damage, or even worse, death.</p> <p>Some of these species of fish are already rare to see. This reinstatement would make it virtually impossible to see them. We need to turn our focus on ocean conservation now more than ever, rather than being selfish and ripping these innocent creatures from their home. They cannot voice their own opinion, so we need to do it for them, and for our future generations to come.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Tom Butterworth	HI	12/3/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tom Butterworth	HI	12/3/2019	I've been diving and snorkeling around Maui and Kauai for over 15 years now and saw first hand the fish disappear as I saw the collectors boats on water and at the boat ramps. The damage they are doing is unacceptable.	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui or Kauai under any of the alternatives evaluated in the EIS.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Patricia Cadiz	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Patricia Cadiz	HI	12/6/2019	The reef fish are part of the reef ecosystem which is already under stresses from warming waters, run off, anchors, and other anthropogenic affects. This proposal is irresponsible and needs to be voted down please.	Your comment has been forwarded to the decision makers.
Carmen Calderon	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brooke Caldwell	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matt Caldwell	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matt Caldwell	HI	1/7/2020	I regularly scuba and free dive off the coasts of the big island, primarily off the reefs from Puako to Two-step/Honaunau. I have seen the reefs and fish population diminish dramatically over the last 6 years. Our tourism industry relies on our waters as well and the fish population is important to our economy, as well as the ecology of the reefs.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Miranda Camp	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tom Campbell	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sara Carl	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Sara Carl	HI	1/7/2020	When I am on island I spend as much time as possible underwater and it breaks my heart to see how empty the ocean is becoming. Most particularly affecting I believe, is Honaunau Bay. The waters at 2 step are so empty and the coral is almost all bleached. Collecting fish will only hurt the ocean more, not only the species being collected, but the other species who are effected but their removal. Please, do not lift this ban. All life depends on the ocean and we need to keep her healthy.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Nancy Cassel	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nancy Cassel	HI	1/6/2020	I am a swimmer in Kona bay, the last few years have seen a decline in all species of fish. This is a grave concern.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Nicolyn Charlot	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nicolyn Charlot	HI	1/7/2020	Please protect our reefs and do not take any more fish. Our oceans are more important than our aquariums.	Your comment has been forwarded to the decision makers.
Marjorie Chase	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Marjorie Chase	HI	1/4/2020	I have lived on the island since 1984 and have snorkeled and scuba dived on the reefs on the west side many hundreds of time. The recent bleaching has been sad but the loss of fish and diversity has also been especially bad. After the moratorium went into place it was noticeable when the fish population rebounded. I strongly feel the benefit for the reefs, especially considering the likelihood of warmer and more acidic oceans, outweighs the desires of the few collectors who have the potential to do much harm. Mahalo.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Ryan Christopher	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ryan Christopher	HI	1/6/2020	I have personally watched the reefs around Maui and Big Island decline over the last 20 years. They will continue to do so. Collecting and exporting marine animals will only make this problem worse. I have been involved with the aquarium trade for decades and (aquacultured) or captive breeding of marine fishes has become a very viable option. If Hawaii wants to support "business" the instead of supporting people robbing the ocean and selling their plunder they should support a large scale captive breeding program and let Hawaii supply the aquarium market with those fish. Aloha, Ryan Christopher Honokaa HI	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui or Kauai under any of the alternatives evaluated in the EIS. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Kane Clawson	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Kane Clawson	HI	1/4/2020	The world works BECAUSE of biodiversity, every time we annihilate a species it is like taking a piece out of the puzzle, or even better, a piece of machinery out of the machine... without ALL their pieces machines don't work! Let the Cod fishery in Canada be a huge example to you. It was overfished and has NEVER come back to anywhere NEAR the levels it existed at only 50 years ago... fish should be fished sustainably for food IF possible and captured for scientific purposes only in small numbers. Rampant collection for private sea tanks is NOT sustainable or WISE!	Your comment has been forwarded to the decision makers.
Orange Cleghorn	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Orange Cleghorn	HI	12/7/2019	I've been swimming in the Kona Coast for 19 years. Both fish & coral are significantly healthier where there is less human traffic! Leave the fish in the ocean! Fewer fish, fewer tourism.why ruin the beauty of what we have?	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Brittney Coates	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brittney Coates	HI	12/14/2019	We live on Maui. We depend on the the tourist, it's big income for the islands. People come to see the fish we have. This would deeply hurt all the incomes of the people who depend on any trade such as snorkeling trips, dive trips. Fishing would be affected. Fish come to hunt small fish and grab bait on their way through. This will affect life so much deeper then it appears!!	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui or Kauai under any of the alternatives evaluated in the EIS. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one

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				species, indicating that aquarium collection is not driving the decline.
Michael Cooling	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Cooling	Visitor / Non-HI	12/6/2019	As a diver I have seen a decline in Hawaiian reefs first hand, from Molokini and Lanai, to Kawaii and Kona. Cozumel has already had to close some of their reefs to diving due to new resorts polluting their waters. Whether it's pollution or over fishing, don't destroy Hawaii's reefs.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jeanne Cooper	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeanne Cooper	HI	12/13/2019	I'm a travel writer and guidebook author as well as a full-time resident on Hawaii Island, and I believe the importance of an abundance of reef fish to the visitor industry as well as to the ecosystem itself cannot be overstated. It is already hard to recommend some areas for snorkeling or diving, knowing how smaller the schools of fish or fewer the number of individuals are compared to when I first started visiting Hawaii Island some 15 years ago. But seeing yellow tang and others starting to increase along the shoreline near old Kona Village on the Hualalai resort or Kamakahonu Cove in Kailua-Kona has given me hope for Puako, Anaehoomalu, Mauna Lani Resort beaches and other Kohala reefs near where I live. Please, please don't turn back the clock for short-sighted gains for one small group that would inflict lasting financial and ecological consequences on a much larger community.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection. As stated in the EIS, the DAR (2019a) concluded that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150%

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				(over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Stevie Cooper	Visitor / Non-HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Colin Cornforth	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Colin Cornforth	HI	1/7/2020	The fish on are reefs is one of the most important resources for our community. People travel the world to see the diversity of our ocean environment. A handful of collectors send our fish abroad and don't necessarily give back to the community they are taking and profiting from.	Your comment has been forwarded to the decision makers.
Tristan Cortez	Visitor / Non-HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tristan Cortez	Visitor / Non-HI	1/6/2020	It's been 5 years since I last visited Kona, and the amount of aquatic life at that time had obviously diminished since I would visit as a child. If we do not care for our fish, the oceans will die and that will lead to the destruction of our land. Nature is a gentle balance, tip the scales, and all will crumble.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Warren Costa	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Chris Crosby	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jason Crowder	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lois Crozer Crozer	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lois Crozer Crozer	HI	12/6/2019	<p>I live on Oahu and I snorkel 2x a week except in the winter months. I have noticed over the two years I have been snorkeling a drastic decline in coral health in the reefs I swim. There is major coral bleaching, and the coral that dies is eventually covered with algae. There are so few herbivore fish left that this just turns into wasteland if left unchecked. It's gotten so bad I now only go to Hanauma Bay reserve to snorkel because there are FISH.</p> <p>There is NO excuse to take fish from OUR reefs for people to display in their homes and offices. The mortality rate is high and the reefs suffer as well as the fish populations. The collectors say there is an over abundance of fish and their collecting will have no impact. Anybody with any sense would recognize this as false. You who make the laws should be protecting the reef and not the interests of people who can't see past their own self interests.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Oahu under any of the alternatives evaluated in the EIS. A separate EIS is being prepared for Oahu commercial aquarium fishing.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Joe Culbertson	Visitor / Non-HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Joe Culbertson	Visitor / Non-HI	12/4/2019	As a regular visitor for many decades the highlight of snorkeling on the Kona Coast has been greatly diminished in my experience. I am simply astounded that the theft of natural resources such as reef fish for profit by aquarium collectors is in any way sanctioned by the state of Hawaii. This needs to stop as of yesterday!	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Millicent Cummings Cummings	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Millicent Cummings Cummings	HI	1/4/2020	Enough Already. Aloha.	Your comment has been forwarded to the decision makers.
Jason Cunefare	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jason Cunefare	HI	1/7/2020	I work in tourism and am in Kealakekua bay. It should be teeming with fish as it is a marine sanctuary but it is not. This is an indicator of the health the populations.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Carol Curran	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carol Curran	HI	12/8/2019	If DLNR reopens West Hawaii reefs to the aquarium collectors, fish populations will plunge and all the gains over the last 2 years since the ban will be lost.	Your comment has been forwarded to the decision makers. The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Sharron Cushman	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sharron Cushman	HI	1/7/2020	Please make sure that the reef fish and ecosystems are here for future generations to be able to enjoy and flourish.	Your comment has been forwarded to the decision makers.
Krista L Cutter Cutter	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Krista L Cutter Cutter	HI	12/7/2019	I've been snorkeling the whole west side of the big island of Hawaii for 20 years. I live in North Kohala(Kapaau). Over the years the dramatic decline in reef fish in general should be a priority concern for all of us. My favorite place to have observed this loss is at Mahukona Beach Park. Many local people swim there regularly. There is a general mindfulness of the reef and its inhabitants. We don't wear sunscreen in the water, and fishermen seldom take more than their share. The listed fish, all fish, have to contend with radioactivity, plastic and other pollutants. and climate change. Please don't add to their struggle by allowing aquarium pet trade. Thank you for your attention to this matter. Krista Cutter	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Thalia Davis	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Thalia Davis	HI	12/7/2019	Kahaluu, Kuamoo, Kailua/Kamakahonu are some favorite places to swim and snorkel. Three years ago these reefs were looking depleted and colorless. Today they are getting healthy once again. Please do not allow the aquarium trade to rape our reefs!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Michelle Deal	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anne Dignam	Visitor / Non-HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Suzanne Dmytrenko	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Suzanne Dmytrenko	HI	1/7/2020	Please continue the restriction of fish collection from Hawaii reefs. Mahalo nui loa	Your comment has been forwarded to the decision makers.
Michael Dudenhoefter	Hi	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Michael Dudenhoeffer	HI	12/12/2019	As a dive professional here, I feel this would deplete current and future fish sticks and have a big impact on tourism for our area	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Walter Dudley	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Walter Dudley	HI	1/3/2020	As an oceanographer who has monitored coral reefs in Hawaii for over 30 years, I have witnessed the decline in reef fishes taken by the aquarium trade. Furthermore, visitors who wish to observe these fishes in their native habitat bring far more money in to the islands than does the aquarium fish trade.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a</p>

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				new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Clarissa Dunlap	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Clarissa Dunlap	HI	12/7/2019	Aquarium fish should be born and raised in aquariums and our corals and free ocean fish should be protected and left alone not captured and sold as merchandise.	Your comment has been forwarded to the decision makers.
Laura Dvorak	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bidi Dworkin	Visitor / Non-HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kate Earman	Visitor / Non-HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Greg Edwards	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Greg Edwards	HI	12/10/2019	I Have been Snorkeling around the big Island for many years and noticed a decline in schools of small fishes especially yellow tangs in Kona N. & S. beaches . i believe from what i have observed is the result of the taking of species of fish taken for Aquariums.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by</p>

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				commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Mary-Loue Edwards	Visitor / Non-HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Suzanne Egan	Hi	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Suzanne Egan	HI	12/15/2019	I live on Oahu. I witness our south east reefs dying where I live. Much due to illegal fishing practices (using chemical bleach bombs) by the Micronesia population. Used to be about 2 times a month. Also, Hanauma Bay needs to be completely shut down for a while. Plz, not just this ban, which of course is a no brainier to continue. Do EVERYTHING you can to protect, preserve, regenerate. Hello, global warming. Jeeze, do we really have to give testimony. This should be known by EVERY person on the planet already.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Oahu under any of the alternatives evaluated in the EIS. A separate EIS is being prepared for Oahu commercial aquarium fishing. The use of chemical bleach bombs is not currently allowed in Hawai'i and would not be allowed under any of the alternatives considered in the EIS. Damage of coral will continue to remain unlawful as described in Section 1.2.3.2 of the EIS.
BJ Elessar	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
BJ Elessar	HI	12/7/2019	These "collectors" have been doing just fine for the last two years. There is no good reason to reopen this business enterprise now or ever. Our reef fish are too important to the environment and our local tourist trade to waste them for short term profit. The process is horribly wasteful and kills most of the fish taken.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the

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Commenter	State/ Location	Date Received	Comment	Response
				<p>decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Jim Ellism	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jim Ellism	HI	12/10/2019	The fish in the Kona area are seriously depleted.	Your comment has been forwarded to the decision makers.
Darylwin Emmsley	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Darylwin Emmsley	HI	1/7/2020	Stop this trade NOW!!! We must protect our recovery of the OCEANS Ecosystem. It is our right to practice our cultural Rights.	Your comment has been forwarded to the decision makers.
Melissa Emond	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Melissa Emond	HI	1/7/2020	<p>I was raised here and am currently 36. I have seen and incredible decrease in the number of fish on reefs in Kona. We are losing the diversity and beauty of our coral reefs. There are a number of factors involved in this including climate change, pollution/chemical, overuse and collection and sale of species for profit. I am also concerned that if limits were to be set on fish collection numbers as a compromise to a no collection law that the law would easily get broken and collectors could take more than allowed with little consequence. The more rare these creatures become the more valuable to these collectors they become. Stop reef fish collection, at this point every individual has a roll to play. Mahalo</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial</p>

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				<p>aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Erika Empey	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Erika Empey	HI	12/4/2019	I'm in the ocean everyday, and it's disheartening to see how much fish diversity and population numbers have seriously declined over the years. It would be grossly negligent to allow more degradation and removal of fish from this environment.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Neil Erickson	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Neil Erickson	HI	12/10/2019	The harvesting of our aina should be stopped and protected from fishing for sale or sport. Areas should be set aside for our future generations.	<p>Your comment has been forwarded to the decision makers.</p> <p>All alternatives under consideration would include the existing regulations put in place for the WHRFMA, including MPAs, FRAs, and bag limits. Commercial aquarium collection would only be allowed within the Open Areas, and not within any managed areas (see Figure 1 of the EIS).</p>
Marjorie Erway	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marjorie Erway	HI	12/12/2019	Why is this now coming up again? It was stopped a few years ago, and the fish population dramatically improved; with the yellow tang, because they are so visible, the most obvious in Kahalu'u, Two Step, and in the bay by the Kona Tiki Hotel on Ali'i Dr., as well as the Waikoloa beach. Please do NOT allow this travesty to happen.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Michael Essner	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Michael Essner	HI	12/11/2019	Fish are a reward they clean the algae off the reef. Without the fish algae overtakes the reef and the reef dies the fish will not return it is called habitat collapse it is happening right now in Hawaii!	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Dale Evans	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dale Evans	HI	12/31/2019	We are not doing enough to protect Hawaii's wildlife, and authorizing these harvests is a step in the wrong direction. I stand for aloha 'aina and against the prostitution of precious natural resources.	Your comment has been forwarded to the decision makers.
Cindy Fallis	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Leslie Farnel	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Leslie Farnel	HI	12/11/2019	I grew up on Maui and have seen it go from living corals with schools of fish to a wasteland. This can't continue. If the oceans die so do we. Stop it now.	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p>
Heraldo Farrington	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Heraldo Farrington	HI	1/2/2020	Given the numerous, varied, and increasing threats to our coral reef systems brought on by global climate change, we must do all we can to protect and enhance all reef ecosystem components -- especially herbivorous reef fish, given their critical role in consuming and controlling algae. The aquarium trade wastes too many fish and incentivizes the physical stressing and outright destruction of corals, and it must be tightly controlled and regulated.	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of climate change are discussed in Section 5.4.3.5 of the EIS.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4%</p>

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				<p>increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p> <p>Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
MKim Ferris	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
MKim Ferris	HI	1/4/2020	Molokini Kapalua bay Reefs are dying, not enough fish. Very noticeable	Your comment has been forwarded to the decision makers.
Mary Finley	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Peter Fitch	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Peter Fitch	HI	1/5/2020	<p>Aloha, I would like to extend my concern over the continuation of the depletion of our fish stocks, in particular, those collected by aquarium harvesters. I reside in South Kona and recreate (swim,snorkel,kayak) frequently along the North and South Kona coast and parts of the Kau coast. I do this year round and have done so for many years. One area, in particular, Papa Bay has seen its coral trampled and the diversity of fish significantly impacted from overfishing by aquarium gatherers. The mature older/larger fish were reduced easily to 25-50% of their normal population. The recent ban on the aquarium trade has seen many of the threatened fish bounce back significantly. Its encouraging to see the yellow tang, Moorish idols, butterfly, and other species regain their place in the ecosystem. But we all know that's only because other areas further from the public eye are suffering the impacts due to no real enforcement of the laws on the books. DLNR enforcement is a joke as has been evidenced by past infractions and lack of prosecution. On an island dependent on tourism for a large percentage of its employment, its hard to fathom how destroying the fish and coral ecosystem for the aquarium trade (which only benefits a miniscule workforce island wide) really serves the greater population. Mahalo, Pete Fitch</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no</p>

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				significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Sara Flake	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Judy Forehand	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Judy Forehand	HI	1/7/2020	These fish should be raised in captivity for captivity. Not collected in the wild. If some are collected for the purpose of propagation strict limits should be set.	Your comment has been forwarded to the decision makers.
Ralph Fred	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ralph Fred	HI	12/15/2019	balance is the key for life. Our unique location in the center of the largest ocean on the planet allows great biological diversity with species found in nowhere else. Native Hawaiians gathered according to guidelines that benefitted the earth, sky & sea.	Your comment has been forwarded to the decision makers.
Sharde Freitas	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
William Fritz	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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William Fritz	HI	1/6/2020	I swim in Kailua Bay five days a week. Certain Butterfly and Wrasse fish have diminished to almost non-existence. The Yellow Tangs and Moorish Idols are just starting to come back but are not plentiful. In addition to the ban on taking fish for aquarium purposes, I would like to see a fishing ban in Kailua Bay in alternating years.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>Collection of the Moorish Idol is not permitted in the WHRFMA, as this species is not on the White List.</p>
Taylor Fukumitsu	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dee Fulton	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dee Fulton	HI	1/6/2020	I am concerned about the veto of the use of glyphosphate/Roundup on public lands, and especially around children. Given that the herbicide is recognized as carcinogenic, I think it best that we keep it out of the coastal waters as well.	Your comment has been forwarded to the decision makers.
Sheila Gage	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Sheila Gage	HI	12/5/2019	The reefs on Oahu waters are protected in certain areas. There is an abundance of fish now that as a kid I've never witnessed before. Born and raised in Hawaii it is important to protect the younger fish. To fish to eat a larger fish is reasonable, however to catch these for aquarium use for profit should not be done. If they "need" aquarium fish, they should "farm" them themselves and produce their own. That would be the logical way to do it. Leave the ocean reefs alone. Thank you.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Oahu under any of the alternatives evaluated in the EIS. A separate EIS is being prepared for Oahu commercial aquarium fishing.
Len Gambla	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Len Gambla	HI	1/3/2020	Aloha, I realize this may be a challenging and difficult decision yet believe from having worked, lived and/or traveled to more than 40 countries, that an area's natural resources be they living such as the fish or be it a natural beauty, are the foundation for a thriving community. Applying this to the Big Island, please uphold the ban on this unsustainable practice.	Your comment has been forwarded to the decision makers.
Emily Garland	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Emily Garland	HI	1/4/2020	Snorkeling is one of my favorite activities. Snorkeling and diving are also huge tourist draws. To maintain snorkeling and diving, the fish that live on the Hawaiian Islands' reefs must be protected.	Your comment has been forwarded to the decision makers.
Kevin Gavagan	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kevin Gavagan	HI	12/5/2019	Stop take take taking. Stop colonization mentality. Give back	Your comment has been forwarded to the decision makers.
Koch Gérard	Visitor / Non-HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Koch Gérard	Visitor / Non-HI	12/11/2019	In the early 1900s, indigenous people were collected, which were put on display and demonstrated in the cage and circus. Have we learned nothing from this or are we still living in those years? Why do you do this with animals? That's the same! Just so few people earn a lot of money with it? I'm really tired of the fact that only the economy and money counts, but not the protection of the ocean. Where is our and our descendants the future? The fish belong in their ocean. I am against fishing for aquariums. This is not Hawai'i and your Aloha !!	Your comment has been forwarded to the decision makers.
Karen and Craig Goard	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karen and Craig Goard	HI	12/17/2019	Please understand the reef fish are threatened by aquarium collection. Please help save the habitat of the reef fish. Over the past 30 years I have seen the reef fish depleted by aquarium hunters, and believe this must stop.	Your comment has been forwarded to the decision makers. The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased

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				between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Catherine Goeggel Goeggel	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Catherine Goeggel Goeggel	HI	12/6/2019	The aquarium trade is raping our reefs; Hawai'i needs to stop the collection of our beautiful reef fish- We demand that state agencies that purport to protect our fishes DO THEIR JOB TO STOP THIS !!!!!	Your comment has been forwarded to the decision makers.
Jenny Gordon	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sue Green	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sue Green	HI	1/5/2020	I remember very clearly going snorkeling at Honaunau 20 years ago and being nearly overwhelmed at the beauty, diversity, and numbers of fish. I went back to Honaunau in 2018 and was shocked and saddened by what I did NOT see.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Michael Greenspan	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Greenspan	HI	12/8/2019	I have been coming to Hawaii since 1982 and have noticed the decline of all fish populations in the ocean here. There is now about 70% less fish in the ocean than there was when I first started coming to Hawaii. I have talked to people that have been here since 1949 and they tell me there were many more fish than in 1982 than there was in 1949. How long do we think the fish will last if we keep taking them?? I was in the mexican rivera around Akumal this year after not being there since the 1980s and almost all the fish are gone now because of over fishing and the corals	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR

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			are all dead in huge piles of what looks like bones. IS THAT WHAT WE WANT TO HAPPEN IN HAWAII???????	(2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jo Greenwald	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jo Greenwald	HI	12/6/2019	Jo Greenwald. As a resident of Hawaii, and of our endangered planet, I urge you to protect all endangered species. To allow these species to be exploited, captured and 'kidnapped' just for the economic benefit of non essential industry is madness. Our planet is under so much stress and damage that we need to do whatever we can to protect and restore the balance of nature. Our waters and reefs are essential to maintaining and restoring our oceans to health. This impacts all of us. The greater good and common sense demand that this is not a time to be further raping our reefs for some minor, very select profits. I implore you to consider the health of our oceans, reefs and planet. This is not hyperbole. Thank you.	Your comment has been forwarded to the decision makers.
Pat Griffith	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Pat Griffith	HI	12/14/2019	To Whom it May Concern, I am a resident of Kauai. Over the years, I have seen fish populations and coral populations fluctuate. I am not a Marine Biologist or professional diver but I do swim the Anini Reef several times a week. It is obvious that our fish are an important and integral part of the Hawaiian ecosystem. Removing them for decoration is unconscionable. During these fragile times we need to protect our oceans at all costs. Please do not allow commercial collectors to harvest our precious recourses. We need them to keep our reefs and our 'aina healthy for generations to follow. Mahalo nui loa, Pat Griffith Kauai	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Gwyn Griffiths	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Gwyn Griffiths	HI	1/6/2020	I have seen the decline of the coral reefs in south kona over the last 4-5 years. Sometimes I avoid swimming because it is so sad to see the state they are in. We should be working to revive the reef, not destroy it further.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Ilene Grossman	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ilene Grossman	HI	1/7/2020	I work for The Kohala Center and used to work at Kahaluu Bay Education Center. Our island communities depend on the health, beauty, and diversity of our coral reefs for our livelihoods, enjoyment, food, and tourism. We have had so many impacts to our reefs coming from so many sources. If we can control any of those impacts than we should in order to protect our valuable natural resource that we all depend on. The aquarium trade is not a necessary use of coral reef species. It is a luxury use and one we cannot afford. There are alternatives to wild fish collecting-fish farms/aquaculture can provide sustainably raised fish for the aquarium trade. This is an excellent viable alternative to wild fish collection. Given the current poor state of much of our near shore coral reefs, it is imperative that we protect as much as we can of the species that maintain our reef health. The coral reef ecology is a delicately balanced mix of species that we are still learning about. Please don't gamble with our precious, fragile, unique, and beautiful coral reef animals. Please keep the aquarium trade ban in place. Mahalo for your consideration. - Ilene Grossman	Your comment has been forwarded to the decision makers.
Gregg Gruwell	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gregg Gruwell	HI	1/6/2020	I first started snorkeling Kona as a tourist in the mid-80's and moved to Kona in 1999, then to Oahu in 2002. In that time, I have regularly snorkeled from North Kolala to Hōnaunau, as well as numerous spots on Oahu. (I am also scuba certified and a retired Naval Officer.) Most recently I spent six days snorkeling in North Kohala in April 2019. 1. From the mid-80s to 2001, you could walk downtown on Ali'i Drive to the old Kona Hilton in Kona Town and see thousands of Yellow Tang in the water	Your comment has been forwarded to the decision makers. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range

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			<p>with your naked eye. ALL those fish are gone. Collected. 2. Based on my personal observation since the mid 1980's, I'd estimate that over 75% of the reef fish are gone. Some fish, (Pufferfish and Boxfish) I don't see anymore anywhere on the Kona Coast. 3. Collectors continue to push a false narrative that there are plenty of fish. The fact is DLNR has never counted fish populations and has no real idea what % of fish has been taken. 4. DLNR has aided and abetted the fish collection industry at every turn. A fish collector was even appointed as Director of DLNR. A DLNR scientist, Alton Miyasaka, even published a guide, "Hawaii's Aquarium Fish Industry: A Business Profile", to assist Aquarium Collectors. 5. DLNR's role is to protect Hawaii's natural resources! Instead, their partnership with the collection industry has gone from a glaring conflict of interest to outright corruption. It is finally time for DLNR to do the right thing and stop all aquarium collection! At the present rate, aquarium collection along with climate change and pollution will wipe out this huge draw of tourist revenue and there will be no turning back the clock.</p>	<p>over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Matthew Gurewitsch	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Gurewitsch	HI	12/9/2019	<p>Mostly, I snorkel on my home reefs in South Maui. But I do get over to the Big Island from time to time, and it breaks my heart to see the declining biodiversity. The comeback of the yellow tang is encouraging, but by no means encouraging enough. It is obscene that our wildlife is being treated as a commodity for the enrichment of traders. At best, we are stewards of the creatures in the aina. At best, we can protect them. At worst, we should at least coexist with them. None of us "owns" them. They must not be trafficked. I use this word advisedly--what's going on here (or what will go on here if the 2018 ban is lifted) is the moral equivalent of trafficking human beings. It has to stop, and stay stopped.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>While the EIS acknowledges that reefs and reef fish face many</p>

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				threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Gerald Gushiken	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gerald Gushiken	HI	1/3/2020	I am a local fisherman and diver in my 60's. I have personally seen the steady decline of all small "aquarium" species especially on the west side. The reefs off Napopo, Keauhou Bay, Kealakekua Bay and Honokohau Harbor have all been impacted. This is a exploitative industry that robs the general public of this priceless resource. The local sea life belongs to everyone and no one. Will our children be able to enjoy this resource? Why should a small segment of the population [mostly non-locals] benefit financially? This is a unfair and unsustainable industry that destroys the local ocean life. STOP THE EXPLOITATION!!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Geoffrey Hajim	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Geoffrey Hajim	HI	12/6/2019	The reefs are doing far worse than the DLNR reports. I've been an active free diver in these waters for over 25 years and the reefs are over 70% dead now. The first are a life line for the restoration of these ecosystems. Taking them is a death sentence for the reef.	Your comment has been forwarded to the decision makers.
Lisa Hallett	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Lisa Hallett	HI	1/6/2020	I was raised on Oahu and have seen what the aquarium fish trade has done to Reefs there. It is so sad how Hawaii island is being so negatively impacted by aquarium fish trade also. No way to 14 new permits being issued to collectors. The reef environments of Hawaii island are far from stable. Malama the Reefs now!!! Climate change and coral bleaching are going to be doing enough damage as it is all results of human actions. Enough is enough.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Christian Hamilton	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christian Hamilton	HI	1/7/2020	its illegal to take sand from our beaches but these people are somehow allowed to rape our reefs for profit people don't just come to Hawaii for the warm weather and sandy beaches but also schools of exotic fish please do not allow these people to take what does not belong to them	Your comment has been forwarded to the decision makers.
Ida Hanohano	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ida Hanohano	HI	1/6/2020	Balance is the key for life. Our unique location in the center of the largest ocean on the planet allows great biological diversity with species found in nowhere else. Native Hawaiians gathered according to guidelines that benefitted the earth, sky & sea. Because of this lifestyle, when Captain Cook arrived in the late 1700's, the population of Hawaii was 400,000 - 1,000,000 & was entirely self sufficient on the environment. Their goal was a vision to provide for community now & for future generations. Having worked in Kona for 9+ years and visiting for over 50 years, I have seen the changes just by observing from the shoreline. Creating special rules for a special interest groups that can severely impact an environment is NOT supportive of the whole community. Don't let commercial enterprises tip the scales beyond repair.	Your comment has been forwarded to the decision makers.
Diane Harmony	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Diane Harmony	HI	1/5/2020	West Hawaii Reef is to be protected from aquarium collectors as was determined in the 2018 ban!	Your comment has been forwarded to the decision makers. The Supreme Court decision was that issuance of Aquarium Permits required HEPA review.
Caleb Harper	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Caleb Harper	HI	12/16/2019	Natural beauty is becoming limited as population of humans increases. Consequently, we have already seen massive eradication of a lot of animal species, whether on land, air, or sea. This would only expedite the horrendous dilemmas we now face as we watch creatures quickly disappear from this planet. Leave the fish alone.	Your comment has been forwarded to the decision makers.
Gary Harrold	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gary Harrold	HI	12/5/2019	As a 75 y o long time visitor, SCUBA diver and snorkeler, now a full time resident of Hilo, I am *extremely concerned* about the unhealthy imbalance of our coral reef ecosystems. I have seen a tremendous decline over the years at the following locales: Richardsons's, Carlsmith, Onekahakaha, Kealakakua Bay and heavily impacted reef section along Ali'i Dr in Kailua Kona. Kindly enforce 'no taking' of any organisms in the entire state, beginning ASAP. Climate Chaos is gobbling up species rapidly. This is an emergency situation. Max Mahalos. Gary (a lifetime member of The Sierra Club)	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Fawn Hatch	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Fawn Hatch	HI	1/5/2020	We have been coming to the island and snorkeling for 26 years, and have noticed a marked decline in the variety and abundance of fish. Kids and doctors offices don't need the fish as much as the reefs do. We are seriously concerned about the potential kickbacks and corruption involved in allowing these collectors to start decimating the populations again. It's bad enough they are still ILLEGALLY taking them - please don't give them free reign. I know because I have snorkeled 2 days in a row in bays where they have been plentiful one day, and almost non-existent the next....after their boat was seen in the bay.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.

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Lisa Hauptmann	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Hauptmann	HI	12/16/2019	I swim just about everyday on west side Oahu. I see the impact of the aquarium collectors with their nets. We will go months and months with no fish. They slowly come back and then they'll be wiped out. It's devastating.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Oahu under any of the alternatives evaluated in the EIS. A separate EIS is being prepared for Oahu commercial aquarium fishing.
Grant Heidrich	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Grant Heidrich	HI	12/6/2019	I adhere to the wisdom of the State Supreme Court. This practice does no benefit to Hawaii , is subsidized by out of state pet industry beneficiaries like the pet trade, and equipment manufacturers. All at the expense of the native Hawaiian reefs and aquatic life. It is time to wake up and end these diliterious practices and preserve our natural resource for subsequent generations.	Your comment has been forwarded to the decision makers. The Supreme Court decision was that issuance of Aquarium Permits required HEPA review, not a permanent ban on commercial aquarium collection.
Jeannette Heidrich	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeannette Heidrich	HI	12/6/2019	I live on in West Hawaii. I have noticed the decline in all species of reef fish. Do not let the aquarium collectors begin to collect again.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
R. Hermann Heimgartner	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
R. Hermann Heimgartner	HI	1/7/2020	<p>Aloha, I have been surfing on the West Hawaii coast for the last 20 years. I have seen a noticeable reduction of reef fish in the waters, especially Yellow Tang. Yellow Tang are easy to notice as they are bright yellow and can be seen when paddling on my surfboard. I have taught both of my young sons to surf. At the start, before they could really surf, they would look down and see the yellow fish in the water in swarms and would be delighted. I still remember large swarms of the yellow tang at several of the surf spots. I have noticed that there are less of these yellow swarms of yellow tang. The reef fish are not a resource to be exploited for the benefit of some large mainland associations and collectors. Our reefs should not be pillaged for the benefit of a few. The DEIS is obviously very skewed in favor of the collectors. Mainland associations, mainland law firms, mainland lobbyists, and mainland "scientists" with an obvious bias. The aquarium trade should be banned State wide. Hawaii's reef and reef fish need to be protected, not opened up for pillaging. Our reefs and reef fish are a fragile gift to the people of Hawaii and the world. We all marvel and are fascinated by Hawaii's kaleidoscopic reefs and reef fish. The more...the better. The DLNR should lead the way in protecting Hawaii's reef and reef fish. In doing so, the first step is to ban aquarium collecting. Mahalo, R. Hermann Heimgartner PO Box 1839 Kailua-Kona, HI 96745 808-756-7022 www.kona.attorney</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Lauren Helgeson	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lauren Helgeson	HI	12/7/2019	I love on north shore Oahu and you don't see much of a variety of fish where there's reef. It's really sad :(<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Oahu under any of the alternatives evaluated in the EIS. A separate EIS is being prepared for Oahu commercial aquarium fishing.</p>
Jeanne Herbert	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Jeanne Herbert	HI	12/15/2019	The increase of numbers of fish during the no take time period on the Kona coast is a stunning example of how we can restore and protect our marine life and coral reefs. Why are we even considering bowing to the aquarium trade.? Are we interested in supporting the aquarium trade or protecting our precious marine life? It is long past time to say no to the aquarium trade. Aloha	Your comment has been forwarded to the decision makers.
Jeffrey Hill	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeffrey Hill	HI	12/9/2019	I have been a resident of Hawaii Island for thirty years. During this time I have made careful observations of fish populations using bird watching techniques. There is no doubt that our fish populations are in danger. To allow aquarium collecting, which benefits only a handful of Hawaii residents and quite clearly hurts everyone else, is unconscionable. Definitely not pono. I recognize that the mandate of DNLR is not to protect the environment but to utilize it for personal gain. Even so, is killing off our fishes a good thing? tourism is one of our main sources of employment. We need our fish on the reef to promote tourism. Not in some dentist office in West Orange, New Jersey. Try to do the right thing. Malama the fishes. DO NOT ALLOW Aquarium Collecting on Hawaii Island. Mahalo, jeff	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Laurie Hillyard	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laurie Hillyard	HI	1/3/2020	There is no reason to permit a few people to kill Hawaiian fish for the profit of the rich. Our ecosystem is already over stressed from ocean warming and pollution. And there is no adequate way to enforce the "industry". Until our ecosystem is sustainable this aquarium business can not be sustainable. Instead they should use aquarium raised fish only.	Your comment has been forwarded to the decision makers.
Heidi Hofelich	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Heidi Hofelich	HI	12/6/2019	I grew up in Kona snorkeling and scuba diving as a child. My family owned a dive shop in the 90s and the oceans were thriving then. When I returned home to get engaged in Kona, I cried in the water while snorkeling. There were no fish at any of the usual reefs outside of the state parks. I saw under 10 fish at each reef and this is concerning. Kona's tourism and destination will plunge when we see these reefs die, this is the biggest asset to the island. Please consider halting all tropical fish collecting forever on Hawaii.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Kathleen Hori	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laurie Hrdlicka	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laurie Hrdlicka	HI	1/7/2020	Over the past 15 years I have witnessed a dramatic decline of Flora and fauna off of Hawaii Island, especially in Kealahou Bay and additional reefs north and south of the bay. Going backwards is not an option. Capturing any species for the pet industry in the world that we live in today is just unacceptable. This shouldn't even be considered.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Alice Hughes	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Alice Hughes	HI	12/8/2019	The reefs a I am concerned about are off the west coast of hawaii I am concerned about the lifting of the moratorium on aquarium fish collection on the west coast of the big island. This area is a rare and beautiful pristine place, one of the few places in the world that people can see the beautiful tropical fish that exist and grow here. I have experienced with my own eyes in my many years of snorkeling that when the moratorium was put in place slowly we began to see a few more fish. Especially schooling yellow tang. Also the tang are getting larger , it is very very rare to see a fully grown yellow tang. Numbers are getting better since the moratorium. Please please do not lift it, we owe future generations the right to be able to see this sea life in our waters.	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>In addition, as stated in Section 1.2.3.2 of the EIS, there is a bag limit for Yellow Tang larger than 4.5 inches.</p>
Marc Hughes	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marc Hughes	HI	1/7/2020	I have been scuba diving on the reefs of Hawaii for the last 25 years and have seen the difference it has made in closing areas to aquarium collecting. The reefs will suffer incredible consequences from this ban reversal especially because of the coral depletion due to increasing local water temperatures and 2 coral bleaching events over the last two years. I have a marine science degree from UH Hilo and study the reefs on Kona coast and teach Marine conservation (voluntarily) in the local school system. I have given several presentations showing video proof of both massive coral die offs and fluctuating fish populations due to collecting in Hawaii.	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Heather Huitt	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Heather Huitt	HI	12/6/2019	My family has owned a property directly across from Kahalu'u Bay. I have snorkeled there since my childhood days in the 60's. I have seen the decline and the rise in fish populations there. They are only recently rebounding. From what I see Kahalu'u is not even protected now, so to allow any increase in collection could only result in a new decline. I hope the people that are placed with the well-being of an entire ecosystem will err on the side of caution. Mahalo, Heather Huitt	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Nicholas Hurd	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nicholas Hurd	HI	12/6/2019	Why should we be the aquarium for collectors? Let them build their own ecologies	Your comment has been forwarded to the decision makers.
Autumn Isaacson	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Autumn Isaacson	HI	1/7/2020	I was born and raised in Hawaii and over the 25 years I've lived here, I've seen a major decline in our fish and coral reefs. Please help protect our precious oceans and marine wildlife. Thank you	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Bianca Isaki	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Ishii	Visitor / Non-HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Michael Ishii	Visitor / Non-HI	1/6/2020	I have family in Hawai'i and have visited a number of times. As a life-long lover of the outdoors and the ocean I have been an avid tourist/snorkeler in Hawai'i. I have observed the decline of reef fish over the decades and it's deeply alarming.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Stephanie Ishii	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kyoto Isobe	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gail Jackson	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gail Jackson	HI	12/6/2019	Until I broke my right femur my husband and I used to snorkle regularly. Really enjoyed watching the fish. I have been an environmentalist since I was in my early 20s. I'm now 80. This administration is accelerating our race to extinction. Anything we can do to save life on earth we should do.	Your comment has been forwarded to the decision makers.
R Jankowski	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
R Jankowski	HI	1/5/2020	In North Kohala at Mahukona, plentiful schools of yellow tang have not returned after aquarium fishers took so many. Please continue to ban this type of fishing. Thank you.	Your comment has been forwarded to the decision makers. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang

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				density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Renee Janton	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Jarve	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Jarve	HI	12/12/2019	Please preserve the reef fish for future generations. Mahalo,	Your comment has been forwarded to the decision makers.
Kersten Johnson	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Amanda Johnson	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Amanda Johnson	HI	1/5/2020	It is ludicrous to think this is acceptable. Our reefs, not only valuable in their own right but also one of our main economic tourism draws, are already under extreme pressure, this is absolutely unacceptable. Do NOT grant these permits.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Mary Johnson	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Johnson	HI	12/6/2019	I have noticed a drastic change in the Hawaii reefs due to the impacts of aquarium trade. Please change and enforce laws protecting these animals.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Bradley Jones	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Bradley Jones	HI	12/6/2019	I have lived in Hawaii and been visiting for 40 years. In that time I have noticed the disappearance of fish on the reefs of Kauai, Maui, Oahu, and the Big Island, as well as disease of the coral itself. The fish and animals of the reef are a resource of Hawaii that is extremely important not only to the health of the reef, which protects our islands from erosion and hurricanes and storms but also to the tourism industry. People want to see these fish in the wild, and the aquarium trade has absolutely no right to harvest them for profit. The fact that resumption of harvesting is even being considered it outrageous. This business model isn't sustainable for Hawaii or anywhere else in the world. The aquarium trade must learn to breed species that are adaptable in captivity and leave all others in the wild. Period. No exceptions. Concerned citizens like me and investigative journalists are looking into campaign donations and undue political influence by the aquarium trade in Hawaii and local civil servants and politicians should be very aware that if they are accepting donations or bribes from the aquarium trade to influence their votes and decision making they will be exposed publicly in Hawaii and nationwide. Thank you.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jeremy Jones	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jordy Jones	HI	1/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jordy Jones	HI	1/6/2020	Reef fish belong in reefs. You know this. Collectors know this. Everyone knows this. Human greed is consuming the world. This is a chance to change. Do it. Now. Stop the collecting. For the fishes.	Your comment has been forwarded to the decision makers.
Tracy Jones	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tracy Jones	HI	12/6/2019	I am a marine biologist by education and a practicing attorney on Maui. The practice of tropical fish collecting for the aquarium trade should be a band activity. Unless there is sufficient oversight, regulation, reporting and study, we as a community should oppose the harvest. The trade is for profit and export and serves no important purpose to society. Please excuse any typos I'm submitting this on the phone. Thank you.	Your comment has been forwarded to the decision makers. Information on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS. As stated in Section 4.0 of the EIS, as of 2014, Aquarium Permit holders are required to keep daily trip reports and submit on a monthly basis. As stated in Section 1.2.3 of the EIS, a review of the effectiveness of the WHRFMA plan shall be conducted every five years by the DLNR in cooperation with the University of Hawai'i (UH). The DLNR shall submit a report of its findings and recommendations based on the review to the legislature no later than 20 days before the convening of the regular session following the review. The most recent review was completed in 2014 (DAR 2014a), though data from that report has been updated as of 2019 (DAR 2019a).

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Karmen Jones-Cox	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dana Jones-Viering	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dana Jones-Viering	Visitor / Non-HI	1/7/2020	The islands are a special place. If we keep removing natural species a downward spiral will continue. We are losing too many species of animals in the world to allow taking of inhabitants from their homes. This is absolutely, without question not acceptable.	Your comment has been forwarded to the decision makers.
Rhea Jose	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rhea Jose	HI	12/6/2019	We should protect our reefs because if we continue to damage or negatively impact them, nature loses its pristine aspect. If we remove these species, we are disrupting the ecosystem. Us humans are also a part of the ecosystem meaning that it could be detrimental to us as well. There are so many efforts to preserve our environment and we should keep persisting on. This is just another problem added that we do not need.	Your comment has been forwarded to the decision makers.
Al Jubitz	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Al Jubitz	HI	12/7/2019	As the world changes we must respect nature more and change our behaviors to support all species in all places. Man's hostility to habitats must change.	Your comment has been forwarded to the decision makers.
Douglas Junkins	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Douglas Junkins	Visitor / Non-HI	1/7/2020	I travel to Hawaii at least once per year to snorkel and scuba dive. There has been a noticeable improvement on the number of reef fish seen in the last couple years, especially in Puako where I have been snorkeling for many year, but the reefs are still under stress from coral bleaching and climate change. It seems incredibly short-sighted to remove the ban on collection of reef fish at this time. Removing the ban will likely impact my desire to return to Hawaii and enjoy the fish in their native habitat.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Joy Kaaz	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Joy Kaaz	HI	12/12/2019	Our oceans and reefs are in serious danger from climate, including but not limited to warming ocean waters, acidification, coral bleaching, toxic pesticides, fertilizer and human and animal waste runoff and discharge, the impact of tourism. These fish are an important part of the web of life necessary to maintain the health of our reefs and ocean, and ultimately human survival. In light of all the current environmental threats to the safety and wellbeing of our oceans and planet, allowing the resumption of fish harvesting for personal aquariums is foolish and contributes to the continued degradation of our planet.	Your comment has been forwarded to the decision makers.
Margaret Kahoilua	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Margaret Kahoilua	HI	1/6/2020	I am a Native Hawaiian, past Expedia Local Expert, member of The Coral Reef Alliance, Bail Bondsman, and a current participant on the Vibrant Hawaii Leadership Team. I am concerned w/the condition of our coral reefs. In September of 2019, I joined some guests on a snorkeling tour to Kealekekua Bay. My heart was broken by the vast difference/depletion of diversity among our reef fish. Given the fact that this area is a conservation area, it was surprising to observed the devastation. There are many factors already impacting the health of our local reefs. Allowing the collection/removal of our reef fish only exacerbates an existing crisis & may lead to the depletion of essential reef species. Please ensure any decisions made regarding permits to collect fish are made with the sustainability of our coral reef ecosystems as TOP PRIORITY. Mahalo...	<p>Your comments have been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Ana Kahoopii	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ana Kahoopii	HI	1/6/2020	This severely impacts cultural practices. The aumakaua of my ohana reside with the reefs of Hawai'i. You can expect massive resistance	Your comment has been forwarded to the decision makers.

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Commenter	State/ Location	Date Received	Comment	Response
			should you decide to move forward with this. Don't you ever learn your lesson?	
Shelly Kaiyala	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keoki Kamaka	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keoki Kamaka	HI	12/5/2019	Do you remember why the Kailua-Kona area was called the "Gold Coast"? It was because when the Yellow Tang would feed on the reefs, they would lay on their sides thus turning the reefs "golden". Need I say more?	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Kathleen Kane	Visitor / Non-HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kathleen Kane	Visitor / Non-HI	12/15/2019	I am a life long snorkler. My first time Snorkeling in Hawaii was 1960, and it was wondrous. Since then I have watched the horrendous ruin of the magical underwater world I remember from my teens. Please do what you can to save what is left.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Rebekah Kaufmann	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Rebekah Kaufmann	HI	12/6/2019	I have been diving the Kohala coast weekly for 20 years. The decline in healthy coral seen in the last few years is devastating and the only chance of recovery is to limit taking any unnecessary resources. The reefs need our herbivore fish more than ever to try to recover from coral loss caused by rising temperatures. Even exporting one reef fish is to many to spare!! While there are many factors in the reefs declining the taking of reef fish to export is one major contributor that could be easily stopped.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Kaimi Kaupiko	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kaimi Kaupiko	HI	12/13/2019	As a Native Hawaiian, we have fought long and hard to stop the trade in HAWAII. As we continue to fight for justice, we have stayed on the right side of and we continue to say that the cultural impacts are significant to	<p>Your comment has been forwarded to the decision makers.</p> <p>A Cultural Impact Assessment was completed that includes a</p>

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			<p>us and our way of life. We worked hard that an EIS be done when the supreme court decision was made, and now with this report we continue to stand in defiance of our claim and the lackluster work of DLNR to do their job within our community. Furthermore, PIJAC is a lobbying group for the commercial pet trade. PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. This sneak attack on Hawaii reefs has a comment period that spans Thanksgiving, Christmas and New Years. When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, aquarium collector. When the Intermediate Court of Appeals ruled for the aquarium trade, DLNR Director/NatureConservancy Director Suzanne Case said, "It's been litigated!" She scoffed the Supreme Court ruling. She met with aquarium collectors to advise on speech and behavior in the legislative season. These meetings are in the public record. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, Case prevailed again on Governor Ige to veto the bill. Ige knows nothing of ocean species or habitat. The Hawaii Supreme Court ruled that no further permits should be issued until Environmental Assessment, with injunctive relief to SHUT IT DOWN NOW! DLNR Director Suzanne Case trumped that ruling with permits are no longer required, for aquarium collecting. It takes only a commercial fishing license. Many Kona aquarium collectors never stopped collecting, with tacit support from Kona DAR and Hawaii DLNR. When an aq collector attacked a woman with a GoPro camera at Keawaiki, DLNR visited Kona to comfort the aquarium collectors. Now DLNR Director/TNC Director Emeritus Suzanne Case promotes the TNC agenda, deferring to Big Fishing. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes nearshore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater. Spirit and intent in the Supreme Court ruling are clear. The PIJAC PROMO piece claims a surge in recovery to justify a new wave of reef carnage. The PIJAC PROMO piece notes a catch limit on Achilles tangs of 5 per collector per day, down from 10 per day. Few people have seen 5 Achillies tangs in a single day in many years. This PIJAC Promo piece is not an environmental review but a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people of iconic, endemic and economic treasures, to support a mainland amusement industry, to</p>	<p>detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.</p> <p>Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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			condemn reef wildlife in a vicious cycle of replacement. THAT is what the aquarium trade calls "sustainable." Enough! mahalo Kaimi N Kaupiko and Wilfred Kaupiko	
Bernadette Keeling	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bernadette Keeling	HI	12/5/2019	This is unnatural to our ecosystem and to our culture this needs to stop!	Your comment has been forwarded to the decision makers.
Phaethon Keeney	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Phaethon Keeney	HI	1/5/2020	Aloha, please, our reefs are stressed enough due to climate change, water pollution, golf course and construction runoff and so many other reasons, the 2 year break was a welcome change (it was so nice as yellow tang and others returned to our shores!) but we cannot afford to let the profit of a few individuals damage healthy reef ecosystems, the impact is greater than just the fish themselves, the web of life on these reefs is immensely complex and just a few factors can tip these systems into other states. Just this year the "heat blob" took a toll on West Hawaii reefs again, and there's more sure to follow, we need to do everything we can to protect these beautiful creatures which make Hawaii so unique and amazing and ensure a more abundant future for everyone. Hawaii's residents and visitors love those fish dearly and like "Finding Nemo" impacted us all, taking these beautiful creatures impacts us all. It's just awful trying to explain to the keiki how in the face of Climate Change and so much environmental injustice that the decision-makers in Hawaii could possibly put the profit of a few over everyone else, please help us have a more inspirational conversation by deciding to continue the ban the aquarium trade on West Hawaii's reefs... big mahalos! :)	Your comment has been forwarded to the decision makers.
Anita Kelleher	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anita Kelleher	HI	1/5/2020	The gold coast is no longer Gold!	Your comment has been forwarded to the decision makers. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this

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				depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
James Kelleher	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Kelleher	HI	1/5/2020	We dive and snorkel then reefs from Keahou to the Kohala Coast. We need to STOP aquarium collecting so the fish and the environment can recover.	Your comment has been forwarded to the decision makers.
William Kelly	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laura Kempen	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laura Kempen	HI	12/6/2019	We need to protect our reefs. They face enough danger from climate change without adding unnecessary dangers.	Your comment has been forwarded to the decision makers.
Wayne Kendall	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Wayne Kendall	HI	12/31/2019	I am a saltwater aquarium owner, all fish that I purchase are tankraised, I will not purchase a fish that I know has been harvested from the sea. I hear to many times that people buy a marine fish ,and just let it die because of neglect to there aquarium or because there tired of taking care of them. I believe our Ocean's and reefs are in danger, because of the pollution, and over harvesting.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Andrew Kennedy	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Andrew Kennedy	HI	1/7/2020	Save the reefs!!	Your comment has been forwarded to the decision makers.
Dennis Kent	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Dennis Kent	HI	12/8/2019	As an employee of the airlines in the 70's, I saw the shipments of tropical fish coming in from Hawaii to the West Coast. The half starved, half dead fish that arrived were often rejected by the tropical fish dealers due to die off. They would leave them with the airlines to dispose of as no one wanted to pay to fly them back and they would most likely be dead by the time they arrived back in the islands. The Tropical Fish Industry pays nothing for the fish and as a result they have no respect for them alive or dead. This industry should be outlawed in Hawaii as they have shown themselves to be corrupt and without any concern for our treasured fish populations or the health of our reefs.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Kathryne Kent	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kathryne Kent	HI	1/2/2020	Don't be so stupid DLNR!!!!!! Come on - pay attention. The environment needs protection not exploitation for stupid aquariums.	Your comment has been forwarded to the decision makers.
Shana Kent	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Shana Kent	HI	12/11/2019	I am a scuba instructor and diving the reefs daily. Within the last few months we have begun to see a few of the above list species in small numbers but consistently. In previous years we were lucky to ever see any of the species. Aquarian fishing is selfish and benefits only a few. We should preserve the reefs, fish species, and the environment for all of society as well as our planet.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Swarn Khalsa	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Swarn Khalsa	HI	12/7/2019	I think it would be better for the aquarium trade to breed the fish they want to sell instead of robbing the protected Hawaiian reefs. Thank you	Your comment has been forwarded to the decision makers.
Jeanie Kilgour	Hi	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kwi Kim	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brandon Kloth	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brandon Kloth	HI	1/7/2020	The value of our environment is much more valuable than the value of the dollar.	Your comment has been forwarded to the decision makers.

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Loren Knappenberger	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Loren Knappenberger	HI	12/4/2019	The pakuikui is Kapu for my family to eat as it is reserved for Pele, our Aumakua(ancestor). Sad to see that they are being exploited for sale to tanks.	Your comment has been forwarded to the decision makers.
Lorraine Kohn	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lorraine Kohn	HI	1/4/2020	It's crazy to stress the Reef with all the coral bleaching going on. Don't let the benefit to a few people trump the good of the majority. Save the reefs!	Your comment has been forwarded to the decision makers.
Cynthia Kruger	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Cynthia Kruger	HI	12/10/2019	Confining living beings for the entertainment of humans is cruel and wrong.	Your comment has been forwarded to the decision makers.
Risa Kuroda	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Risa Kuroda	HI	1/4/2020	The DEIS and the final EIS needs to fully address alternatives and explain why those alternatives are inadequate. It should also make clear why their proposed action is appropriate at the present time given that it has been ruled inappropriate previously. Failure to disclose the aforementioned points adequately for public review opens the DLNR to public citizen suits. Separately, DLNR should be more prudent in assessing long term financial and political impact to the State. Being transparent with the cost benefit analysis would mitigate public backlash. As a Hawaii resident, disappointment is an understatement when our leaders sell out our natural resources. Its beauty is the one thing that keeps our economy going and gives physical dimension to our culture. To sell that so that richer people can put it in boxes to look at is shameful.	Your comment has been forwarded to the decision makers. The supreme court decision was that issuance of Aquarium Permits would require HEPA review, not necessarily that commercial aquarium collection had to stop forever.
C Lam	Visitor / Non-HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
C Lam	Visitor / Non-HI	1/5/2020	I was born and raised in the islands. Through I reside on the mainland, the preservation of this sea life is important to me and my family. Hawaii is such a unique place with unique wildlife both on land, sea and in the sky. Do NOT put profits before the preservation of this wildlife that could result in irreversible damage of the delicate balance of the environment. Think of the future generations and not short-term financial gain.	Your comment has been forwarded to the decision makers.
Sally Lambert	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Sally Lambert	HI	12/6/2019	It is important to note that anything that can be done to save our reefs will help minimize the onshore impacts of climate change. All properties within a minimum of 10 feet above sea level will and are now being impacted by climate changes. Not only are we better off for all the fish species we preserve in their native habitat, we also preserve the beauty of our islands for our own pleasure and Hawaii remains a place tourists visit and provides a good deal of our economy. It's almost a virtuous cycle. The tropical fish aquarium trade really needs to come to an end. Giving up aquariums in a home or office is a small sacrifice for people to pay in order to preserve our reefs, our ocean environment, and the many ocean side homes and businesses that are at risk. Mahalo for your kokua and understanding. Sally J. Lambert	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of climate change are addressed in Section 5.4.3.5 of the EIS.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Joan Lander	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Teresa Landreau	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Teresa Landreau	HI	12/10/2019	My snorkeling experience back in the 1970s compared to now makes clear to me the diversity and numbers of reef fish has plummeted. Strongly support ending private collection of wild fish.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Sandy Lane	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sandy Lane	HI	12/7/2019	Only 10 yrs ago, the reef fish populations were noticeably more robust. It is not common to find the large schools of fish that once existed. It is a sad day for reef populations. Keep them all protected now.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one</p>

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				species, indicating that aquarium collection is not driving the decline.
Maureen Langberg	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Maureen Langberg	HI	1/5/2020	Dear Hawaii Dept. of Land and Natural Resources DLNR: We are asking your support to help reduce the declines, missing species, and diminished beauty we have personally experienced while snorkeling, out on small boats and reefs. We have noticed a significant decline in numbers. Please help ensure the return to abundance necessary to keep Hawaii's fishes and reefs in their best possible condition for today, tomorrow, and future generations. Thank you, Mr. and Mrs Fredrick Langberg North Kohala	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Barbara Lasich	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Barbara Lasich	HI	1/5/2020	I notice way fewer fish and variety of fish than 30 years ago. Fish collecting has impacted the reefs.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Richard Layton	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Richard Layton	HI	12/13/2019	Kapoho tide pools, kona reefs, kohala reefs... each year there is less and less fish overfishing and now aquarium fish? There cannot be added distress on our oceans reef/marinelife systems. Its sad and heartbreaking to see the ocean slowly dying because of things like this, people who want to make money taking animals that dont belong in aquariums... This is one of thw many many things that makes hawaii unique... if you want to see fish go swimming in the ocean. Period	Your comment has been forwarded to the decision makers.
Sandra Lee	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Katherine Lees	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Katherine Lees	HI	1/2/2020	I snorkel several times a week in local Hawaii Waters and I am very concerned about the Marine life.a few collectors should not have the right to destroy the environment against the enjoyment of the rest of us. Kahaluu and other popular snorkel sites should be off limit for all types of collecting and fishing.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Sandi Legacy	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Senna Leith	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Francesca Leonetti	Visitor / Non-HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Francesca Leonetti	Visitor / Non-HI	12/10/2019	As a long time visitor to Hawaii's Islands, I believe fish should be left in their home sin the ocean, not taken by humans to live in small tanks, often to the detriment of their health and lives. How would you like it if someone took you out of you natural environment and put you in a glass box for others to stare at? Stop the aquarium trade now.	Your comment has been forwarded to the decision makers.
Kristen Lesley	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Kristen Lesley	HI	1/7/2020	I am not familiar with what reefs are being used to harvest aquarium fish, but should that matter? My concern is we are exploiting these species for the entertainment of a handful of people. The reef ecosystem is so delicate, and should not be tampered with in any way.. at the very least we should NOT have a government that allows it, or profits from it. Couldn't we find other ways? Maybe sell mongoose as pets, or pigeons. Send them off to the mainland. Mainlanders are fascinated by all things Hawaii. I went to a pet shop in California that were buying Anoles from Hawaii and selling them as pets. Anoles are abundant, and their decline wouldn't have so much of an effect on our ecosystem as the reefs would. Please reconsider allowing fishermen to harvest reef fish. I hear that they use chemicals to stun the fish being harvested, and that ruins the coral. Fish should only be harvested for consumption, and for no other purpose.	Your comment has been forwarded to the decision makers. The use of chemicals or other harmful methods is not currently allowed in Hawai'i nor would it be allowed under any of the alternatives under consideration in the EIS. The Aquarium Permit is only for the use of fine mesh nets. Damage of coral will continue to remain unlawful as described in Section 1.2.3.2 of the EIS.
Martha Levick	HI	1/1/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lenley Lewis	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Lim	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Little	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Little	HI	1/4/2020	There are plenty of Hawaiian reef fish in the pet trade already. More real efforts should be on captive breeding of what's already in the pet trade, this disposable fish attitude is the real problem. I visited Hawaii with my wife and was very excited to see the reefs, I was very depressed by how terrible the reef conditions were in Hawaii, they looked barren, so barren in fact that I decided to not return to Hawaii again unless they take their ecosystems more seriously. The main driver of the Hawaiian economy is the eco tourism, once you destroy what makes Hawaii beautiful for such a short sighted financial gain, you will pay the price in lost tourism and revenue. Hawaii should look to Palau when it comes to their eco tourism mgmt. That's where I went for my next vacation instead of returning to Hawaii and they have the best reefs in the world, they know what they are doing and it shows.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a

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				new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
John Little	Visitor / Non-HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Little	Visitor / Non-HI	12/9/2019	All the creatures removed from the ocean will die in captivity...	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Sue Little	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sue Little	HI	1/2/2020	I snorkel swims several days per week. The loss of fish was tragically apparent after the aquarium collectors visited the bay, usually at night it seems. The populations are finally starting to improve but many types are still very limited. I want the personal collection numbers to be severely restricted too. Most fish taken die and it's a horrible business. Breed in captivity should be encouraged instead.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Craig Lomnicki	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Craig Lomnicki	Hi	12/15/2019	Reef fish need to be reef fish not aquarium fish. Man should not disrupt the natural ecosystem just for his self pleasure. Many reef fish die in the collection,transport and display. We must remind ourselves as "Hawaiians" (Hawaiian is a state of mind that must be spread with our Aloha) that we are the stewards of our environment. If we can not show that responsibility here in Hawaii an island ecosystem how can we expect others to respect in the world that the natural world is important.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Bruce Lowrey	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bruce Lowrey	HI	12/17/2019	Mostly, I snorkel on my home reefs in South Maui. But I do get over to the Big Island from time to time, and it breaks my heart to see the declining biodiversity. The comeback of the yellow tang is encouraging, but by no means encouraging enough. It is obscene that our wildlife is being treated as a commodity for the enrichment of traders. At best, we are stewards of the creatures in the aina. We must protect them. At worst, we should at least coexist with them. None of us "owns" them. They must not be trafficked. I use this word advisedly--what's going on here (or what will go on here if the 2018 ban is lifted) is the moral equivalent of trafficking human beings. It has to stop, and stay stopped.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.

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Natalie Lum	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Natalie Lum	HI	1/3/2020	When I was young the colorful fish were abundant nearby the shoreline as I snorkled on the shallow reefs. Now there is hardly anything in the shallow reef area. Since I am not a strong swimmer going into deeper water is not an option.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jolene Lushine	Visitor / Non-HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jolene Lushine	Visitor / Non-HI	12/14/2019	Please just leave things how they are in their natural habitat. This is unnecessary disruption to the ecosystem. We may never know the long term repercussions of our actions such as this in our own lifetimes. I used to live in Maui and thoroughly enjoyed everything the beautiful ocean had to offer.	Your comment has been forwarded to the decision makers.
Patty Machado	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Patty Machado	HI	12/6/2019	We snorkel on a regular basis. We also bring our guests to the reefs. We are careful not to touch the coral and use sunscreen that doesn't harm the reefs. If we are taking care the DNLR should back us up! We had noticed that the fish in the reefs near the shore had really thinned out. During the last couple years they might have been increasing but we only really noticed it in the last 6 months. It is imperative that we protect the reefs. The global warming that is coming will stress the populations and it doesn't make sense to have a less robust start! It is also really wrong to put in a ban for local fishermen that the aquarium industry isn't subject to. I would hope that they could breed the fish on the mainland so that they don't ruin the wonderful reefs we have here.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The cumulative impacts of climate change are addressed in Section 5.4.3.5 of the EIS.

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				It is not clear what "ban on local fisherman" the commenter is referring to.
Maria Macias	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Maria Macias	HI	12/16/2019	We need to do whatever we can to preserve our reefs & the fish that make it their home.	Your comment has been forwarded to the decision makers.
Pamela Madden	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Pamela Madden	HI	1/7/2020	I think without drastically improving DLNR's enforcement capabilities of the aquarium trade, resuming aquarium collection should not occur. Realistically, there is zero enforcement of this industry. In my years of shore diving all along the Kona-Kohala coast (200+ dives) I have never seen an enforcement officer either on land or a boat, checking fish collectors catch (either aquarium collectors or spearfishermen). Plus, the volunteer reporting system so collectors only have to "self-report" how many fish they captured is woefully inadequate and ripe for corruption. A 2004 Division of Aquatic Resources (DAR) report has even acknowledged that there is no way to verify the accuracy of the data submitted. This same report also states that there are indications of underreporting. An effective DOCARE enforcement presence on the water and along the coastal areas is essential for long term sustainability of our marine resources. And since, enforcement officers can't open an aquarium collector's cooler to check what species, how many, and what size were obtained, currently there is no practical way to currently enforce this industry with our status quo enforcement procedures. At the 22nd Annual Hawaii Conservation Conference, a DLNR enforcement officer even publicly stated that his department did not have the financial ability to do its job properly since there are only 3-4 enforcement officers for all the West Hawaii coastline, and they are supposed to take care of both land and sea issues. Furthermore, in another DLNR "State of the Reefs" report, it was noted that "removal of significant numbers of these aquarium collection species could result in an increase in algal growth due to a lack of grazers to keep the algae in check and a corresponding decrease in coral cover." With all of the stressors that our reefs are currently experiencing (i.e. warming temperatures/bleaching, pollution, cesspools, increased visitor use, sunscreen chemicals etc.) stopping aquarium collection has an immediate and impactful preservation of the reefs. Another recommendation from the DLNR "Report of the Findings and Recommendations of Effectiveness of the West Hawaii Regional Fishery Management Area" is that DLNR should prioritize the adoption of the Hawaii Administrative Rule requiring a marine dealer report. This would allow for comprehensive verification of the aquarium dealer and collector catch reports to determine reporting accuracy. So until the State of Hawaii allocates more financial resources and personnel to properly regulate and enforce the aquarium trade, reopening the reefs to aquarium collection is premature and should not occur! Malama Aina.	Your comment has been forwarded to the decision makers. A discussion on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS. A discussion on underreporting and poaching has been added to Section 5.4.3.6 of the FEIS.
Deb Mader	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Megan Magdalene	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Megan Magdalene	HI	1/5/2020	Aloha, In Africa and Asia it has become unthinkable and illegal to trade in either the following (live or dead) wildlife: Elephants, Tigers, Primates Rhinos ...AND MANY OTHER SPECIES. The international community has intervened and declared this practice of killing or extracting wildlife illegal. This kind of extraction is known by it's common name: POACHING. Marine habitats are in jeopardy. The trade in aquarium species of fish is for a luxury market and in no way is connected to a traditional food source and is fundamentally unjustifiable. Now in 2020 is a time where it is critical for people and government officials everywhere in the world to act to protect creatures everywhere. This is not a time to make short term profit a higher consideration that the preservation of wild places and wild habitats. I regularly snorkel in Hawaii and have seen plenty of evidence of depleted marine environments. I'm aware of the coral death that is occurring and other signs that our marine environments are in distress. Further, my livelihood and the livelihood of many others in my community in East Hawaii relies upon the high value that visitors place on the beauty and eco-diversity of Hawaii and plentiful, healthy marine life. Any compromises to the health of our coastlines, reefs and beaches will come at a huge cost to our communities and our economy. Please do MORE to protect our reefs, not less. Genuine measures of protection would further include banning the sale of all non reef-safe sunscreen, introducing more measures to prevent run-off from golf courses and remediating marine pollution from septic tanks and industry. Please end all POACHING of marine life now and please act now to do more to protect marine habitats.	Your comment has been forwarded to the decision makers.
Tisha Mallon	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tisha Mallon	HI	1/2/2020	I am a part time resident of Kona, Hawaii and swim regularly at the City of Refuge in Honaunau for over 35 years. I cannot understand the overwhelming changes in the coral, fish and nature the dolphins resting place, especially over the past five plus years. Tisha Mallon	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Wendy Manley	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Wendy Manley	HI	1/6/2020	Most fish die in aquariums anyways. There is just no real need for the collection of the fish. Please leave them on the reef.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Megan Mant	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michelle Marsh	HI	1/1/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Marshall	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Marshall	HI	12/12/2019	The reefs need a healthy balance of stable proper water temp., & fish, shellfish etc. to survive into the future! Any disruption of the natural balance of these extremely valuable reefs during this critical time of stress with widespread bleaching and other assaults on this ecosystem is not proper and DOES NOT support the science for overall reef health. The taking of reef fish for profit does not help, but instead hurts the Hawaiian people in the long term. The decline of the reefs and reef species will have a major negative effect on tourism & tourism dollars. I believe it is morally and ethically wrong to ignore the negative impacts and to try to extract VERY SHORT TERM PROFIT from the major long term disruption and damage of these harvesting activities, ignoring such things as success of reef fishing & subsistence gathering activities of the Native Hawaiian people & all Hawaiians & visitors. These aquarium fish harvesting activities will hurt ALL Hawaiian Residents and also people from all over the world who travel here to see the amazing and unique beauty of Hawaii. They book charter boats, dive & glass bottom boats to see Healthy Reefs with an abundance of sea life! Hawaii visitors also support dive shops, snorkel gear and beach equip. rental stores, hotels & essentially all businesses across the islands! This proposed DLNR harvest plan is designed for short term greed & profit, while ignoring court decisions and the wishes of (DLNR's!!!) Hawaiian residents. I STRONGLY request that you abandon this damaging Aquarium Harvest Plan and follow the will of the courts and people of Hawaii! Respectfully, Dave Marshall	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Karen Martinez Martinez	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marty Martins	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marty Martins	HI	12/6/2019	I snorkel almost every day and have seen the effect of fish trapping over the years.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many

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				threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Rita Massey	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rita Massey	HI	12/18/2019	I live in South Maui and paddle and swim and snorkel in the area. Over the years I have seen a great deal of degradation of the reef and major decline in the number of fish. 20 years ago I would snorkel at Ulua reef in Wailea and see fish everywhere, such that they were all around and couldn't be avoided. Angel fish, tangs, parrot fish etc. Now I see one or two fish here and there. Seldom do I see yellow tangs. Tourists spend a lot of money to come here and now there are so few fish for them to enjoy. How long can we keep the tourists coming if the reefs are no longer viable? There is widespread bleaching of the reefs so I know all the animals are stressed as it is and they should not have any more. I say NO taking of fish off the reefs. It is bad for the reefs and it is cruel to the fish.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.
Willa Mathison	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Willa Mathison	Visitor / Non-HI	12/6/2019	We are an elderly couple who have had the pleasure of observing Hawaii's fishes through snorkeling extensively on Oahu, Hawaii, Kauai and Molokai. We would like future generations to enjoy them as well. Through the years, we have watched the populations decline, which we believe to be the result of the aquarium collectors. Please don't let them continue to decimate populations. Even Hanauma Bay has been impacted, and that is a fish reserve.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Joel Matsunaga	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Joel Matsunaga	HI	12/6/2019	Kawaihae/South kohala stretch from kapakahi to the harbor has deteriorated so much in the last 10 years. Fish are far rarer!	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Nancy Maupin	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nancy Maupin	HI	12/16/2019	I snorkel frequently at Puako, Mauna Lani Beach Club, & 69. The bleaching events have stressed the reef and that puts strain on the ecosystem. There are definitely less fish at these reefs now than when I snorkeled them several years ago. Taking fish out of the ecosystem will further harm it. Our state is very dependent on tourism and much of that tourism takes place in the ocean. People visit here to see our beautiful reefs and the fish who populate them. Why risk the tourism that benefits so many for the few who benefit from the aquarium trade?	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Jacqueline May	Visitor / Non-HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jacqueline May	Visitor / Non-HI	1/4/2020	I used to keep an aquarium, until I woke up to the damage the trade is causing to nature. There is no need for it. We can live without this. It creates so much damage and suffering.	Your comment has been forwarded to the decision makers.

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Theresa McCargar	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff McKnight	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lokelani McMichael	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lokelani McMichael	HI	1/7/2020	Tourist come to Hawai'i to see fish in the Ocean, that's good for our economy . Why should the wild fish go to personal aquariums for profit. Growing up in Kona, I've noticed less and less fish! I don't see nearly as much fish as 30 years ago. I used to work next door to a Scuba Dive Shop. They told me that in the 1970's the Big Island had a yellow ring around it showing in pictures, taken from space. The Yellow ring was the tang fish. Please leave our wild fishes in the Ocean, for everyone to enjoy. Mahalo	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang</p>

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				density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
James McNabb	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James McNabb	HI	12/13/2019	I think there should be a band for 10 years so that the numbers can get back and fill a reef with colorful fish then the population will be more sustainable	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jolene Mears	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Denise Meechan	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Denise Meechan	HI	1/7/2020	I live in Captain Cook and spend a lot of time scuba diving at local spots like Two Steps, Kealakekua Bay, Ka'ei Beach and other spots. I have been diving for 15 years and have just recently seen improved populations of the above fish and especially the yellow tang. To remove these fish from the endangered list and to allow them to be taken for aquariums will greatly harm the advances the species has made. They are important to the coral and to the other fish and plant life in the bays. Please consider keeping them protected!	<p>Your comment has been forwarded to the decision makers.</p> <p>It should be noted that none of the 40 White List Species are listed as threatened or endangered. Neither the Proposed Action nor any of the alternatives considered propose the collection or delisting of any species.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Peter Meechan	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Peter Meechan	HI	1/7/2020	I have been an avid diver and snorkeler in West Hawaii since first visiting there in 2004. I have lived there now for three years. When I first visited, I wondered why there were abundant yellow tang in Kealekakua Bay but not elsewhere. I found out it was due in large part to the aquarium trade. I was once an aquarium hobbyist but after learning the destruction that live catching had, gave up my hobby. Allowing any live catching will mean open season. It will be extremely difficult, if not impossible to limit how much people catch and when they do this. Every day, I see people fishing in areas that are supposedly protected, with throw nets. In recent months, the numbers of Yellow Tang (and many other species) have increased along the coast and this is obviously due to the catching ban. While the conditions of the coral are still of grave concern, the fish count looks like it is bouncing back. Please do not reverse this gain. I have experience at many reefs, including Two Steps, Miloli'i, Kona Paradise, Mahukona Beach Park, Puako and many more.	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Matt Meier	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sherie Messier	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Sherie Messier	HI	1/7/2020	When I visited my sister on the Big Island last year, I was dumbfounded but the significant decreased amounts of wildlife we saw! In the difference of 4 years, the same oceans my sister swam in and documented the amount of marine life all around her. In any direction she was surrounded by vibrant fish of multiple species, sea turtles that would swim up to her, healthy full coral, and clear crystal waters. During whale season the beaches were covered. Now locals and tourists are concerned if the whales will come at all. I'm afraid that if we keep taking from the oceans, they're be nothing left to repopulate. Hawaii is a melting pot where multiple species come and thrive. For the benefits of education, beauty, and preserving the bountiful gift that has been given to the Hawaiian islands. We need to protect the marine life that's left. Thank you.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Mary Metcalf	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Metcalf	HI	1/6/2020	I have been snorkeling the West Hawaii reefs since the late 1980's and have seen first hand the destruction of these reefs and the huge decline in fish population. It is a travesty that the aquarium collecting has been allowed and this harmful practice must not resume. The pace and extent of anthropogenic climate change is accelerating and aquarium fish collecting is just compounding the harmful effects to West Hawaii reefs. Our reefs must be saved at all costs due to the enormous benefits they provide and reef fish are integral to their health.	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The cumulative impacts of climate change are addressed in Section 5.4.3.5 of the EIS.</p>

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Heather Metzler	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Heather Metzler	HI	1/2/2020	I am an avid snorkeler. I have seen the extreme depletion of all types of marine life. The Aquarium trade doesn't need to add to the depletion.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
D Miller	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
D Miller	HI	1/7/2020	The very survival of Hawaii's coral reefs is at stake. For years studies documented impacts to species taken for the aquarium pet trade. The most impacted species, including yellow tangs, certain butterflyfishes, and other rare native fishes, saw population declines ranging from 60% to 99% in the areas where they were taken	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this</p>

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				depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Kurtis Minnick	Visitor / Non-HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jennifer Mitchell	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jennifer Mitchell	HI	12/14/2019	The fudh belong in the ocean not in an aquarium	Your comment has been forwarded to the decision makers.
Colleen Miyose-Wallis	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Colleen Miyose-Wallis	HI	1/6/2020	Since 2010 I have been a volunteer Reef teacher at Kahalu'u beach and have spoken to countless number of visitors about our fragile reef and the wonderful sea creatures living on and around it. The Aquarium fish industry care nothing about our coral reef or the marine life that it sustains. All they care about is filling their wallets with money and nothing about our economy and our environment. The Aquarium fish industry should be permanently banned from all Hawaiian water. Sincerely, Colleen Miyose-Wallis	Your comment has been forwarded to the decision makers.
David Monasevitch	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nina Monasevitch	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nina Monasevitch	HI	1/5/2020	Our oceans are in serious peril. I have witnessed first hand the decimation of marine life and ocean ecosystems in the past 42 years of living, diving and open ocean swimming on Kauai and most of the other main Hawaiian Islands. All science is documenting that over extraction (i.e. fishing) is one of the top causes of degradation to reefs, and ocean health. It is time to wake up from the spell of greed and protect our ocean home--the ocean is literally our life support system. The extraction of ocean wildlife for aquariums is inhumane, unsustainable and not pono! To help Hawaii's coral reefs recover from bleaching, we need to	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR

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			<p>protect and maintain a healthy population of the herbivorous fish that are essential to reef ecosystems. A Coral Bleaching Recovery Plan prepared for the Department of Land and Natural Resources identified herbivore management as “critical to post-bleaching coral recovery in Hawaii.” These fish are valuable in the wild because they keep algae from overgrowing recovering corals. Parrotfishes and surgeonfishes, in particular, are widely acknowledged for their importance in reef resilience and recovery. The report identified a prohibition on the take of herbivorous reef fish as one effective action to help in reef recovery. Please care for and protect marine life, ocean ecosystems and the future of our planet by banning aquarium fish collecting. "First live a compassionate life, then you will know" -Buddha</p>	<p>(2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Carol Mone	Visitor / Non-HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kristina Montoya	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kristina Montoya	HI	1/6/2020	The aquarium fish trade has proven to be detrimental to Hawaiian reefs. With increased threats from ocean acidification and temperature rise, it is our duty to protect an already vulnerable asset. Do not let the greed and interests of a few dictate the future of the our reefs for future generations.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Mike Moody	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Mike Moody	HI	12/11/2019	In my lifetime I have seen the amount of reef fish drop a staggering amount. Seeing this makes me sad for future generations! Please do not let this out of date practice go on any longer!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Blake Moore	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Blake Moore	HI	12/14/2019	I have personally witnessed the decline of fish since arriving in Hawaii 18 years ago. You don't need to be a scientist to see the depletion of reef fish in Hawaii. Our fish are worth far more to visitors and residents alike than the economic gain by allowing fish collection. Please don't allow this incredibly destructive practice to return to Hawaii's coastlines	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Melody Moore	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Melody Moore	HI	12/15/2019	I swim at Mahukona. North Kohala. Many fisherman on land in boats and spear fishing are out there taking fish and other water life. We don't need one more unnecessary loss stressing the survival of the underwater community.	Your comment has been forwarded to the decision makers.
Jackie MooreAndresen	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Jackie MooreAndresen	HI	1/7/2020	I think the the “proof is in the pudding” as the saying goes. Statistics show fish collection has a significant impact to the the decline of several species and is on opposition of the states objectives in the 30/30 goals. Let’s save the reefs, the marine life, and the beauty of our island by continuing to disallow the collection of any all fish for aquariums.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Mike Moran	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mike Moran	HI	12/6/2019	How long will Hawaii allow commercial interests to destroy our environment? No more	Your comment has been forwarded to the decision makers.
Anna Moreno	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anna Moreno	Hi	1/7/2020	Please save the eco systems on these reefs.	Your comment has been forwarded to the decision makers.
Mary Morris	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Morris	HI	12/6/2019	I have snorkeled the Puako reef for forty years now. There has been such a decline in fish population. There were hardly any yellow tang a few years ago and this year we all noticed that there were finally some large schools of yellow tang once again. (20 to 30 in a school). Please don't let the aquarium trade back into South Kohala. I recall seeing several men collecting at Paniau in years gone by, and there is no-one to enforce the limit, so they take as many as they can get and hope not too many of them die. So sad, so wasteful. I am also concerned about the decline in Hawaiian day octopus, there were a number of them last year, now we see certain people coming every day up and down the reef and removing the octopus. I am not sure what they do with them, if they eat them or use them as bait, but there need to be restrictions on the number of octopus that can be taken per day. They are going to decimate that population!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The Hawaiian day octopus is not on the White List, and collection would not be permitted under the Proposed Action.
Brian Morton	Visitor / Non-HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Commenter	State/ Location	Date Received	Comment	Response
Rebecca Morton	Visitor / Non-HI	1/1/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Shelley Muneoka	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Shelley Muneoka	HI	1/7/2020	The aquarium trade is a frivolous use when compared to the cultural significance ecological services these fish provide to the reef. It is inexcusable that future generations may not know these animals or what a thriving reef system looks like for someone's hobby or profit. These fish, particularly pakukui and kole are eaten at special occasions and are important to the social/cultural fabric of Hawai'i communities. In a moment where our planet is facing catastrophic changes on the land and in the sea, we can't afford to remove animals en masse for the simple pleasure of collectors. The proof is in just one year of ban -- stopping the aquarium trade take of these species will lead to improved fishstocks, a safety net for food security and self-sufficiency that Hawai'i desperately needs.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Ryan Murphy	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jason Murray	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Jason Murray	HI	12/5/2019	<p>Aloha, I am an avid snorkeler, underwater photographer and I snorkels every chance I get. Over the last 6 years I have watched many coral populations along the Kona coast die due to climate change and a warming ocean. These corals that are stressed need every fish they can to help keep them clean of the onslaught of ever growing algae. It does not make any sense to sell these fish for novelty pets so a few people can make a buck. These islands make money from tourist dollars, people come here to see these essential, beautiful, native fish. Last night I read the passage below on an underwater photography guide for travelers to Kona and it made me very sad. "Hawaiian Fish Life Some people report that the aquarium trade has taken its toll on the fish life here, and the reef fish around Kona do tend to be on the smaller side. However, there are still plenty of fish to see, especially on the lessdived sites south of Kona." The word is out. Fish collection takes it's toll. Please leave the aquarium collection ban in place and move to stop the collection of reef fish in all of Hawaii. This does not line up with the pono practices of caring for the 'aina in Hawaii. You would never sell a I'iwi or Nene to a pet store, these fish are our native wildlife as well, and they deserve protection. Mahalo Jason Murray Small business owner and Kailua Kona Resident</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a</p>

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				new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Ronn Murray Murray	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sean Nagamatsu	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sean Nagamatsu	HI	1/7/2020	I live on O'ahu and don't know the ocean as well as I would like. However, I remember growing up and snorkeling all the time with my dad; the water was so clear. It's not like that anymore, at least in Honolulu. Whatever we can do to protect our reefs, I hope we do. Thank you.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Oahu under any of the alternatives evaluated in the EIS. A separate EIS is being prepared for Oahu commercial aquarium fishing.
Helen Nahoopii	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Helen Nahoopii	HI	1/6/2020	I am concerned about the safety and sustainability of our native marine species	Your comment has been forwarded to the decision makers.
Buffy Nakachi	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Buffy Nakachi	HI	1/7/2020	I have been snorkeling and diving on the Big Island since 1986. I have seen first hand the depletion of reef fish and the affects on the coral during these 30+ years. Taking reef fish for aquariums is not helping our reefs. We need to do everything we can to protect our reefs. Stop tropical fish collection now.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Kaikea Nakachi	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Kaikea Nakachi	HI	1/6/2020	The aquarium trade goes against every practice Hawaiians have done for centuries. The fish are fellow Hawaiians, and they have been allowed to be stabbed, starved, and shipped off to foreign lands where the few surviving fish are used for decoration. How disrespectful and wasteful. Protect our resources, protect our identity as a healthy Hawaii. We need our reefs to be as healthy as possible if we are going to weather the effects of climate change in the coming years. This extractive practice has NO place in Hawaii.	Your comment has been forwarded to the decision makers.
Awai Nalu	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Awai Nalu	HI	12/5/2019	Many spots I've dove over the years I've seen huge depletion of all species of fish. Puako if we'd like to get into specifics.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jeff Nance	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Nance	HI	1/4/2020	My wife and I are both Master Scuba Instructors as well as teaching Technical diving here on Oahu for just over 20years. We have worked all sides of Oahu and the other islands too. We have seen the decline of several species, (Bandits, Reticulated Butterflies, Harlequin Shrimp and many others. This was more than a full time job for us. In addition I was the Dive Master for the Nature Conservancy on Palmyra and worked with several top marine scientists and my wife has BS in Marine Bio. We have a keen understanding of the marine habitat here. We have also witnessed the practices of the Aquarium trade. In short it is not sustainable, however eco tourism can be sustainable and depends on maintaining the health and diversity of the reefs. Please don't buckle under pressure from the aquarium trade, we cannot get the fish back once gone. Mahalo, Jeff & Melanie Nance	Your comment has been forwarded to the decision makers. Under the Preferred Alternative, collection would limited to the 40 White List Species in the WHRFMA. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.

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Birgit Neher	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Derek Nelson	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Derek Nelson	HI	12/14/2019	Unreal that this is even being considered again. Our reefs are being damaged by so many other influences. We can not allow fish to be taken, further damaging this fragile ecosystem.	Your comment has been forwarded to the decision makers.
Pamela Neswald	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Pamela Neswald	HI	1/4/2020	It's illogical to think that such a small area can afford to supply a vast industry. The fish, as a resource, belong to their natural area. And as a creation of God, they require respect in and of themselves.	Your comment has been forwarded to the decision makers.
Anthony Nguyen	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anthony Nguyen	Visitor / Non-HI	1/7/2020	This has to stop	Your comment has been forwarded to the decision makers.
Wally Nicholas	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Wally Nicholas	HI	12/10/2019	Even if you do not care about the reef system or the fish you should care that the waters of Hawaii are part of what brings in tourists and tourists dollars. Why would they want to explore a dead reef systems with a scarcity of life.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Kim Nichols	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kim Nichols	HI	1/7/2020	I was born and raised in Kona and have lived here over 30 years. In my lifetime I have seen significantly less fish and drastic, irreparable damage to our coral reefs that the reduction of herbivorous fish greatly exacerbates. No Hawaiian reef fish should be taken to supply the mainland pet trade. This is wildlife trafficking.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one

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				species, indicating that aquarium collection is not driving the decline.
Elmar Niewerth	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tammy Noeske	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tammy Noeske	HI	12/4/2019	Please do not allow the aquarium collecting in any way, shape, or form in Hawaii. It is nothing but human greed. No one needs or should have wild fish swimming in their aquariums. Shame on this even being an issue.	Your comment has been forwarded to the decision makers.
Jesse Nordwall	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jesse Nordwall	HI	1/7/2020	I have noticed a rapid decline in the marine life especially the Yellow Tang as I snorkel at Richardson's Beach in Hilo, as well as Two Step in Kona, and the Honokohau Harbor. In the wild, yellow tang travel alone or in loose schools, and spawn around the time of the full moon. Yellow tang are group spawners, so it is extremely difficult to breed them in captivity. Only since 2015 have researchers managed to keep a group of juvenile yellow tang alive past the larval stage. Yellow tang are also the cleaners and help sea turtles keep their shells clean, allowing the turtles to glide through the water better. With the continual removal of such species from the reefs, this not only poses a risk of the decline of Tang population in the area, but also pose serious danger to other marine life and the health of the coral reef as well. I believe enforcing stricter rules and regulations will not only benefit the local marine life and coral reefs, but also will also put Hawaii in the forefront of environmental preservation and rejuvenation. Environmental preservation and rejuvenation is still a sunrise market. Lets show the world that Hawaii stands for the land and the sea.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West</p>

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				Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Dorothy Norris	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dorothy Norris	HI	12/31/2019	I am an avid diver and marine biologist. I am delighted to see recruitment of the smaller herbivore fish when I explore the local reefs. If we allow the reduction of these species we may never see the recovery of the reefs that every Hawaiian wants to see. Please help the recovery and do not allow these fish to be removed from their natural habitat.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Lauren Northrop	Visitor / Non-HI	12/3/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lauren Northrop	Visitor / Non-HI	12/3/2019	I see these fish for sale in tiny tanks in Michigan pet stores. Unbelievable that Hawaii would allow its beautiful natural native species to suffer and die in tanks. The success of this ban means that protections absolutely must continue. There are enough threats facing marine life. Hawaii is my dream destination but I absolutely will not travel there if marine life is exploited.	Your comment has been forwarded to the decision makers.
Larry O'Brien	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Larry O'Brien	HI	1/7/2020	I'm a frequent diver on the reefs from North Kona to Miloli'i. Anyone who has been in the water over the past several years can attest to the devastating damage of the 2015 bleaching event. This year's event was not as dramatic, but set back the recovery. It is established that herbivore populations are a critical part of the recovery from bleaching. (For instance, https://www.frontiersin.org/articles/10.3389/fmars.2019.00557/full#h6). The health of our reefs, and their economic impact, will only face greater stress in the coming years and decades. The cost of climate change is real, and that includes having to make management decisions that impact extraction and exploitation. That is the reality we face and that our elected officials and public servants must act upon.	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of climate change are discussed in Section 5.4.3.5 of the EIS.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Eri Okada	Visitor / Non-HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eri Okada	Visitor / Non-HI	12/10/2019	we need to preserve all the native tropical fish population for maintaining biodiversity in its natural state so we, our children and their children will continue enjoying them and their beauty in their natural environment, not in aquarium tanks.	Your comment has been forwarded to the decision makers.
Michael Olson	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Olson	HI	1/6/2020	We can't spare any fish for pets. We can't spare any for any reason. Our reefs are at risk of death. Not now.	Your comment has been forwarded to the decision makers.
Perry Olson	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Perry Olson	HI	12/6/2019	With the current West Hawaii ban now in place, it is very apparent that the fish populations are returning and the reefs environment is improving. These fish are a treasures of the Hawaiian ocean, and there is absolutely no reason why Aquarium harvesting should ever be permitted. All marine biologists that we have spoken with adamantly agree.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

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Ty Onuma	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ty Onuma	HI	12/13/2019	Whenever I go shoreline fishing, I have not been seeing much local species in and around hilo bay.	Your comment has been forwarded to the decision makers.
Kirah Orian	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kirah Orian	HI	12/16/2019	Some members of my family are fishermen and divers. Over the past 20 years, we have noticed a steady decline of fish. Reefs that once thrived are now almost bare. Some reefs are now over grown with invasive algae. "Aquarium fish" play an essential role in the marine life ecosystem. This balance must not be compromised. Scientists predict (and have noticed) that with a decline in fish populations: (1) coral bleaching will continue to drastically rise, (2) complex food chains will continue to remain imbalanced, (3) by 2048 almost all our fish will be driven to extinction/over harvested, and (4) our oceans will be infested with jellyfish. We must unite and fight for healthy reefs and high biodiversity. We must fight for the principles of "aloha 'aina," which sustains life on Earth. We have the power to bring about a positive change- we need to use it!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Sunny Page	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Koohan Paik	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Stephanie Panzarino	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Stephanie Panzarino	HI	12/5/2019	The fish belong in our ocean. Please consider the big picture & the environmental impact to our water & reefs.	Your comment has been forwarded to the decision makers.
Jamie Pardau	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jamie Pardau	HI	12/31/2019	According to an article in West Hawaii Today (Dec 31,2019) the USGS stated that Hawaiian coral reefs are valued at \$863 million dollars per year. Removing the fish from our reefs that help maintain a healthy balance is short-sighted. Pawai is an area that demonstrates the deterioration of our reef system due to multiple stressors. Without the herbivores to keep a check on the alga, this would be even worse than it is.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one

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Commenter	State/ Location	Date Received	Comment	Response
				species, indicating that aquarium collection is not driving the decline.
Maya Parish	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Maya Parish	HI	1/4/2020	I've lived here 6 years and have seen the reefs on the west side of the island on worse and worse shape.	Your comment has been forwarded to the decision makers.
Laura Parks	Hi	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laura Parks	HI	12/6/2019	I am an ocean and sea-life advocate and built a business around my advocacy. My late husband and I went to HI every year. I live in CA and have special feelings for HI.	Your comment has been forwarded to the decision makers.
Natalie Parra	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Natalie Parra	HI	1/7/2020	I'm greatly concerned by the impact the aquarium trade has had on Hawaii's reefs. I'm baffled that the state of Hawaii would risk so much for the short term profit of a handful of aquarium collectors.	Your comment has been forwarded to the decision makers.
Darby Partner	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Darby Partner	HI	12/7/2019	Do not allow fish to be taken from the reef!!!	Your comment has been forwarded to the decision makers.
Bal Patterson	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bal Patterson	HI	1/6/2020	In the past 6 decades that I have fished, picked limu, gone squidding and snorkeling around the various reefs of our pae aina the decimation of our reefs and fish population is truly appalling. The aquarium trade no longer has a legitimate place when it comes to Hawaiian waters and should have no legitimate standing. Hawaiian fish belong in Hawaiian waters and should not be kidnapped for profit in order to be sold to rich collectors. The earth and the oceans and all the creatures that reside within are already in great peril. No changes should even be considered regarding opening West Hawaii reefs for such a repugnant purpose, and certainly not for another 15-20 years. Allowing the interests of business to rule over our collective responsibility to protect our unique environment and all the creatures within is wrong.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.

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Monica Patterson	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Monica Patterson	HI	12/6/2019	As an avid fish/aquarium keeper, I will say that the same joys of saltwater aquariums can be found in the freshwater hobby. There is no reason to take from our precious oceans. The reefs of Maui I've swam amongst as a child, that once held hues of vibrant orange corals and schools of adorable yellow tang and gorgeous angelfish plucking food from the rocks have been reduced to an empty wasteland of white and brown death. The changes are drastic, and occurred so quickly. We need our fish and we need our reefs; what we don't need are aquariums in our home, and this is coming from someone who has many freshwater tanks and absolutely loves them.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.
Robert Pecoraro	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Robert Pecoraro	HI	12/12/2019	I have been diving Hawaii's reefs for over 20 years. First as a visitor, and now as a full time resident. One of the reasons that I chose Hawaii Island as tourist, and now as my home, is the beautiful reefs and abundant fish life. As a diver, I have personally seen the impact of tropical fish collecting over those 20 plus years. I have seen destroyed coral heads, where Harlequin Shrimp once lived. I have seen dwindling numbers of 'high priced' fish, such as Flame Angelfish and Dragon Morays. I have seen the decline in the number of herbivores, such as Yellow Tangs and Achilles Tangs. On the flip side, I have also seen the increase in fish species in those areas that have been protected from tropical fish collection. The no take zones along the Kona Coast have had significant increases in fish mass, since the protections went into place. I have also noticed increases in reef fish since the ban on fish collection went into affect last year. I dive mostly along the Kona Coast, from Kawaihae down to Kona Paradise, but I occasionally get one to the Hilo side. I think that collection of tropical fish for personal aquariums is selfish and wasteful. Many fish die in transport and their lifespans are severely decreased due to stress. They belong on the reefs where they live for the enjoyment of all visitors and residents. I have nothing against tropical fish aquariums, but fish should be bred in captivity for those purposes. Captive breeding produces less stressed and healthier fish. I am aware that some fish do not breed or are difficult to breed in captivity, but aquarium keepers should just do without those particular fish.	Your comment has been forwarded to the decision makers. Under the Preferred Alternative, Aquarium Permits would only be valid within the WHRFMA, where only the 40 White List Species can be collected. Flame Angelfish and Dragon Moray collection is not currently permitted in the WHRFMA and would not be permitted under any of the alternatives considered in the EIS. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on

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				<p>percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
Alisha Pekor	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alisha Pekor	HI	1/7/2020	My family has been traveling to Hawaii for years, we practice leave no trace and only take pictures and memories. I think it is important for future visits / locals to be able to enjoy nature and get the same feeling of awe that I have. However, more importantly, I think it is vital that we let creatures live where they are meant to live - zoos and aquariums have their time and place however I cannot see a real reason to disrupt nature and an animals freedom just because someone wants to look at a pretty fish in their home.	Your comment has been forwarded to the decision makers.
Peri Re	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Peri Re	Visitor / Non-HI	1/7/2020	We have been diving in Kona for years and you can really tell the impact on the reefs in the last years. They need all the help they can get	Your comment has been forwarded to the decision makers.
Patty Peters	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Patty Peters	HI	12/10/2019	This cannot be allowed. The reefs are barely hanging on and until there are more preserves put into place to ensure specie biodiversity (at least 30% of each island) the recovery will be incredibly hard. The recovery I am speaking of is the fact that Managment and reinforcement of laws and regulation for offshore operation specific to the DLNR are NOT enforced. It may as well be 200 collectors out there because once the flood gates are open our state Managment does not manage. We are already seeing endangered species of shark offshore being shot, tortured, dismembered and killed. Specific to the Oceanic White Tip shark. But never not once have we seen a single DLNR or other Managment boats/eyes out to check on fishing operations. It is ignorant to think they would even show up in the daily to ensure aquarium trade was being respectful to ensure the health of a future reef. Kona specifically is loosing it's draw and it could be one of the most beautiful calm places for tourists to interact with the ocean and it's inhabitants. While only "14" aquarium trade companies exploit and take the reef for personal profit the whole state could make much more money on our tour industry if we maintain and build a better reason to come here.	<p>Your comment has been forwarded to the decision makers.</p> <p>Under the Preferred Alternative, Aquarium Permits will only be valid within the WHRFMA. As stated in Section 1.2.3.1, 35.2% of this coastline is closed to commercial aquarium collection, exceeding the 30% goal. Some of these areas are also closed to other types of fishing.</p> <p>A discussion on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS. However, the concept of "unlimited" collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Issuance of additional Aquarium Permits would require their own HEPA review.</p>
Kirsten Peterson	Visitor / Non-HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kirsten Peterson	Visitor / Non-HI	1/2/2020	As a former resident of Hawaii, I believe that it is unnecessary to harvest the fish for aquarium collecting. These fish are important to the ecosystem of Hawaii. Please ban all collecting.	Your comment has been forwarded to the decision makers.
Erin Pinto	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Erin Pinto	HI	12/6/2019	I am extremely disappointed that this issue is coming up again. It was already determined that the aquarium industry is decimating reef fish and needs to be stopped. It is hypocritical for DLNR to go around killing land animals that they say harm the reef ecosystem, only to propose another harm to the reef ecosystem.	<p>Your comment has been forwarded to the decision makers.</p> <p>The supreme court decision was that issuance of Aquarium Permits would require HEPA review, not the permanent banning of commercial aquarium collection.</p>
Elisa Plauche	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Elisa Plauche	HI	12/11/2019	The aquarium trade does not care about the future of our coral reef's fish populations, only the money they will make.	Your comment has been forwarded to the decision makers.

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Matthew Playter	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Playter	HI	1/2/2020	I have been diving and snorkeling for 30 years in Hawaii Protect what is left	Your comment has been forwarded to the decision makers.
Sheldon Plentovich	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sheldon Plentovich	HI	12/17/2019	Given the current threats to the ocean, including increased temperature and acidification and decreased oxygen content, it is not pono to allow people to collect reef fishes which our final components of healthy reefs, for personal financial benefit.	Your comment has been forwarded to the decision makers.
Ryan Plunkett	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mahinamalamalama Poepoe	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anne Pontius	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anne Pontius	HI	12/7/2019	I've lived and snorkeled mainly in West Hawaii 42 years and am concerned for the general decrease in aquatic life. Please prevent more depletion by protecting our precious ocean life. Thank you. Anne Pontius Hawi, Hawaii	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Nicklaus Porter	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nicklaus Porter	HI	12/5/2019	The reefs are in danger I see them dying everyday	Your comment has been forwarded to the decision makers.
Louise Priest	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Louise Priest	Visitor / Non-HI	12/6/2019	I am a scuba diver instructor. I have seen the adverse effects of fish collection. I have seen attacks on fish monitors by the collectors. The beneficial effect of the ban will be reversed if you allow collecting. Scuba divers will only come if the fish are there. You risk losing a huge revenue stream for the benefit of a few suspect collectors. This makes no economic sense. You'll get more revenue from divers if you keep the ban	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Mary Quinn	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Quinn	HI	12/6/2019	Thirty years ago I began diving on Maui. I remember thinking that diving off the shores of Makena was like diving in an aquarium. I moved away from the islands for a while and when I returned and again began diving on Maui, I was shocked at the lack of fish, and especially at the lack of brightly colored fish. This was due to incredible overfishing by the aquarium trade. I think it is a travesty that we allowed this to happen, and having seen this decimation, that our DLNR would even consider allowing aquarium collecting again. It is almost unthinkable.	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Erica Rainhart	HI	12/22/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Erica Rainhart	HI	12/22/2019	Lanikai & Kailua easily accessible to snorkelers & divers show sparse inner reef fishes; coral communities depletion is obvious! Including the proximity to urban chemicals/toxins - stream & river deposited onto all coastlines!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Dawn Reed	Visitor / Non-HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Julie Reinholdtson	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Julie Reinholdtson	HI	1/4/2020	Bring people to the fish tourism	Your comment has been forwarded to the decision makers.
Annie Reisewitz	Visitor / Non-HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Annie Reisewitz	Visitor / Non-HI	1/6/2020	<p>If DLNR reopens West Hawaii reefs to the aquarium trade, nothing in the DEIS would prevent them from collecting every day and taking even more. Hawaii can't afford to waste these fish! Experts predict that climate change will cause 70% of Hawaii's coral reefs to die by 2050 without major policy changes. This summer DLNR asked the public to stop taking the algae-eating fish necessary for Hawaii's coral reefs to survive. But the pet trade wants DLNR to allow their aquarium collectors to take unlimited numbers of those same important species. Stantec, the company responsible for this DEIS has a long history of ignoring environmental risks and disrespecting citizen voices. Take for example the Keystone Pipeline, a project greenlit by Stantec as "environmentally sound" that has since been plagued with large oil spills, including one last month that leaked 383,000 gallons of oil into wetlands. Their 490 page DEIS similarly concludes aquarium collecting causes no significant impact to Hawaii's unique natural, socioeconomic or cultural resources. They do so by claiming that aquarium trade operations would take just 1% - 2% of the entire island-wide populations of the species they target (see page 2 of the DEIS Executive Summary), though nothing would prevent the trade from taking every last one of the species they want from any of the reefs that would reopen to them along the majority of West Hawaii's coastline.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS. However, the concept of "unlimited" collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs.</p>

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				<p>While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
James Resor	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rhiannon Rhiannon	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rhiannon Rhiannon	HI	1/4/2020	All fishes taken for aquariums are wasteful and harmful. No more. Time and past time to leave the fishes where they live.	Your comment has been forwarded to the decision makers.
Neysa Ricciardi	Visitor / Non-HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jean Riley	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Jean Riley	HI	12/7/2019	When we first came to the Big Island of Hawaii as visitors, about 10 years ago, we were so impressed by the variety of fish we saw in various places on the island. We were surprised to find out that these numbers were significantly smaller than Hawaii had experienced before harvesting of fish for the aquarium trade was allowed. We moved to the island a few years later. Over the last couple of years, in particular, we've noticed a distinct downturn in the amount of fish--particularly yellow tangs--visible in the waters around the Big Island. And this was WITH protections in place. We need to take care of the fish we have, before it gets any worse. The aquarium trade needs to find another place to vandalize...or better yet, stop the aquarium trade altogether.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Vicky Robbins	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Greg Roberts	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
Greg Roberts	HI	12/6/2019	Aquarium Fish collection in Hawaii should stop! There used to be Yellow Tang in Waikiki even but collection reports show they were taken annually until there weren't any left. Maunalua Bay has an algae problem but no Yellow Tang left to eat it.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Richard Roberts	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Richard Roberts	HI	12/7/2019	We are barely seeing the return of the reef fish in the Keauhou area where I paddle. No way should there be collection allowed, especially with unlimited numbers.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The concept of “unlimited” collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the “expected consequences” of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>

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Susan Roberts	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Susan Roberts	HI	12/7/2019	There is only just barely a return of the reef fish in the Keauhou area where I paddle. No way should there be collection allowed, especially with unlimited numbers.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The concept of “unlimited” collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the “expected consequences” of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the</p>

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				fishery was open to all collectors in order to take 100% of the Open Area population.
P.K. Roberts-Lindauer	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Terry Robinson	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Francine Roby	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Francine Roby	HI	12/5/2019	Progress was being made-- I don't understand undoing that.	Your comment has been forwarded to the decision makers.
James Rodrifues	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Rodrifues	Hi	12/4/2019	For our reef to thrive all evolved species are a vital contribution to it health. Over abundance of a type means an imbalance needing to be normalized. Removal of a single fish or organism prevents balance. NO TAKE is best plan. KAPU entire reef system for healthy recovery.	Your comment has been forwarded to the decision makers.
James Rodrigues	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Rodrigues	HI	1/6/2020	Haunauma bay is a prime example of protecting reef near shore resources. Hawaii's reef and marine resources need protection to insure reef health as the ecosystem is dependent on each species living in balance. NO Reef Resources exploitation	Your comment has been forwarded to the decision makers.
Georgia Rogers	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Georgia Rogers	HI	12/13/2019	Two step used to be proclaimed the world's best ay for snorkeling and scuba diving because of the biodiversity found on the reefs. People used to come from all over the world to see it. We need to keep our fish here in the oceans where they belong, so residents can enjoy them and where they attract more visitors to boost the local economy. Letting aquarium dealers take them to line their own pockets with profits	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Dominic Romer Romer	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dominic Romer Romer	HI	12/11/2019	The ornamental fish trade has no place in Hawaii. It is no different than trophy hunting. The health of the reef depends on these fish. Once they are gone there is no coming back. The fish and the reefs in Hawaii are for the people of Hawaii. Not a fishtank in Ohio. Money should be spent on breeding captive fish, not stealing from Hawaii's ecosystem.	Your comment has been forwarded to the decision makers.
Mike Rude	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mike Rude	HI	1/7/2020	I'm a scuba instructor, I work in the ocean every day. People come to Hawaii to enjoy the ocean and see beautiful tropical fish. Eco-tourism is ever growing, but with no bright and beautiful reef fish (such as Tangs and all other herbivores) the reef will be dead, which means less people will travel to Hawaii to enjoy it. Commercial aquarium fishing will bring irreversible damage to already harmed reef and its habitants. The riches of Hawai'i are in the ocean, please don't let them to be taken away. Especially knowing that about 80% of collected reef fish dies during the process and never makes it to aquarium.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
Shannon Rudolph	HI	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Shannon Rudolph	HI	1/3/2020	Aloha, There is NO reason in the world we should be allowing private companies to exploit Hawai'i's natural resources! Virtual aquariums are all the rage now and you can't even tell the difference between real or cyber. Too many real fish die in transit. Save our fish for residents and for our visitors, to view in the wild. I have lived on the Kona Coast for 32 years - and it seems every year, our reef fish are fewer & fewer. The aquarium industry must end. I am a 37 year resident of Hawai'i Island. Mahalo, Shannon Rudolph - Holualoa	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
Steve Sakala	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Steve Sakala	HI	1/5/2020	Aloha, Thank you for taking the time to review these comments. We are in unprecedented times on this planet. Why has the opportunity to be a model of recovery and restoration. We look to our government agencies to protect our limited resources. I hope in this instance the corporate interests do not win over the interest of the majority of Hawai'i's population that wants to see a healthy marine Ecology protected.	Your comment has been forwarded to the decision makers.
David Sansone	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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David Sansone	HI	12/6/2019	Aloha kakou, the changes occurring in the ocean due to continued fossil fuel burning pose a major threat to our reefs and the life that depend on it. Now more than ever, we need to focus on promoting healthy fish stocks who can clean the coral. The increasing coral die offs and subsequent overwhelming by invasive algae have been shown to be worse where there were lower numbers of herbivores. Areas that had more herbivores had healthy reefs. As it stands now, it is projected that we will lose 70-90% of our coral if we reach the Paris Climate Accord goals by 2100 (1.5 degree Celcius increase). It appears we will not reach that goal, so face the potential of 99% coral dieoff by 2100 with 2.0 degree Celcius increase. We are on track to reach 3-14 degree Celcius increase by 2100 according to various sources. At 6 degree Celcius increase marine photosynthesis becomes jeopardized threatening to cut off the world's main oxygen supply. Considering the imminent threats we face, it is imperative we protect the remaining fish to clean the reefs and keep them healthy as well as increase the gene pool for nature to select survivors. Abundant fish and coral are also vital to continuing the tourist economy which comes here to see beautiful nature, not a robbed and depleted landscape. Mahalo for your consideration.	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of climate change are discussed in Section 5.4.3.5 of the EIS.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Shawn Sato	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Shawn Sato	HI	1/7/2020	I grew up in Kona fishing with my grandpa. Back then there was a lot of beautiful reef fish. After a while I started to notice that there were less and less yellow tangs and other fishes. Since the ban they have come back.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of</p>

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				approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Ryan Scalf	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ryan Scalf	HI	12/11/2019	Protecting what is left of the reefs is extremely important. People travel here to see marine life. When you allow it to be taken.... You lose money from tourism too	Your comment has been forwarded to the decision makers. The cumulative impacts of climate change are discussed in Section 5.4.3.5 of the EIS. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Siena Schaar	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Siena Schaar	HI	1/7/2020	As a Hawai'i based biologist and environmental manager, I have become increasingly concerned and disturbed by the decreasing reef fish populations across the Main Hawaiian Islands, especially on the Kona coast of Hawai'i Island. I have watched as this trade has decimated reefs and left them desolate, all for huge profit margins that are leaving the State. I am concerned that very little cultural assessment was utilized in this DEIS, and believe that more effort should be made to include pertinent cultural importance of herbivorous reef species that are common in this trade, especially Kole. The unequal social equity aspect of this fishery is also extremely disturbing...Hawai'i is essentially allowing our resources to be depleted all for the profit of a handful of collectors - this is not an environmentally or economically sustainable fishery and I will continue to oppose this fishery and the proposed measures of this DEIS. From an economists perspective, there are many more costs to this fishery than there are benefits. I encourage the State to conserve and protect, rather than continue to allow the exploitation of our very fragile nearshore reef environments that will become even more depleted in coming years due to global climate change and associated effects.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.. Cultural impacts were analyzed in the CIA, which is included as Appendix A of the EIS, and summarized within the EIS.

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Mark Schacht	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mark Schacht	HI	12/17/2019	The 490 page DEIS by the aquarium trade industry concludes that aquarium collecting causes no significant impact to Hawaii's unique natural, socioeconomic or cultural resources. It does so by claiming that aquarium trade operations would take just 1% - 2% of the entire island-wide populations of the species they target (see page 2 of the DEIS Executive Summary), though nothing would prevent the trade from taking every last one of the species they want from any of the reefs that would reopen to them along the majority of West Hawaii's coastline.	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Lisa Schattenburg-Raymond	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Schattenburg-Raymond	HI	12/6/2019	Our ocean and reefs are in such a fragile state, they cannot withstand further degradation. On Maui the coral bleaching is shocking. We must to our utmost to protect all these species and keep their habitats balanced.	Your comment has been forwarded to the decision makers.
Gaby Schmidt	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gaby Schmidt	HI	12/10/2019	I am concerned about our reef on all Hawaiian islands. In the past 30 years they have been dying. We need to stop this now.	Your comment has been forwarded to the decision makers.

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Henri Etta Schmitz	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Victoria Schroeder	Visitor / Non-HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Victoria Schroeder	Visitor / Non-HI	12/12/2019	I'm gonna be honest, I don't like the ocean that much, it makes me nervous but I respect it. And the fish are important, and honestly everything in the oceans. For the economy, it provides a gain with the tourist industry who come to see the fish. It keeps balance in the oceans that rely on these fish for food and control the populations of whatever they eat. These fish are beautiful and colorful and shouldn't be trapped in cages just for people to show off. I'm worried because the world needs beautiful fish for a hopeful future, and watching these animals disappear and die because of humans leaves me feeling hopeless that the world is doomed to become a wasteland. Also I'm doing this instead of studying for my exam and am thus feeling reckless. Fuck rich people who're just going to kill the fish anyway because they don't know anything except that they can get away with anything.	Your comment has been forwarded to the decision makers.
Angel Seery	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Angel Seery	HI	1/6/2020	When you have to start going deeper and deeper to find beautiful endemic fish species, it's incredibly disheartening. You know that anything that tries to settle and grow up in the shallows will be picked off the reef never to see home again. Everything that was once there is now gone. Flame angels are some of the most striking fish. Knowing that a small fish has had such bad experiences with divers that it cowers in between crevices is like watching someone with post dramatic stress syndrome. Please put an end to this.	Your comment has been forwarded to the decision makers. Flame angels are not on the White List, and thus their collection is not permitted in the WHRFMA.
Shereen Seibert	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Shereen Seibert	HI	12/7/2019	I have been scuba diving throughout the islands since 1999 as a dive master. The number of fish has significantly decreased since I began. Please do not allow collection again.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.

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Jill Shidler	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Deb Shields	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Deb Shields	Visitor / Non-HI	12/6/2019	I travel yearly to dive Hawaiian reefs and have done so for 18 years. During this time I have noticed a big drop in fish species, particularly yellow tang. Last summer I was diving on the Aggressor and failed to see a single school of yellow tang in all of my 22 dives all along the north and south kona coasts...it was so sad. Please stop this aquarium trade madness!!	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Lisa Sigler	Visitor / Non-HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Sigler	Visitor / Non-HI	1/5/2020	We have been visiting Hawaii island for 27 years. The livelihood of this island is dependent on tourism and tourists want to see fish. We have snorkeled and Kaha'u Bay for years and have seen fish populations reduce and recover. This is due to more education about caring for the coral and the reduction of pet fishing. We implore regulators to protect his ocean and its wildlife over commercial interests.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have</p>

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				<p>had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Rachel Silverman	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rachel Silverman	HI	12/5/2019	I have been swimming and snorkeling with my husband and daughter on our beautiful coral reefs, in the last six years we have seen two major bleaching events in Hawaii. More than 80% of cauliflower coral colonies have died due to warmer temperatures caused by climate change. The White List fish species are all dependent on the health of the reef as it is their birthplace, nursery, and home. Just as the fish depend on the coral, the coral depends on the fish to help fight off the ever encroaching algae. We have seen the reef habitat for the fish, that this DEIS proposes we start collecting again, shrink and contract. The reef needs a healthy balance and right now there are so many factors that are impacting it that it would be harmful to the continued efforts to protect these vital habitats in West Hawaii. Our main industry is tourism, and harming this potential revenue stream for the benefit of a small number of people actually in Hawaii is inappropriate and reckless. Please leave the aquarium fish collection ban in place and protect these vulnerable resources for our communities and keiki! Mahalo, Rachel	Your comment has been forwarded to the decision makers.
Jeffrey Simao	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeffrey Simao	HI	1/5/2020	I learned to dive off the reefs of Hau'ula. My first dive off Hawai'i was off Kapoho. I was amazed at the abundance compared to O'ahu. It was off the shores of Mahukona that I learned to feed myself from our kai, and removing ANY reef fish for commercial use goes against every precept of Aloha 'Aina, and 'Aina momoa.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of</p>

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				<p>the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Lisa J Sims	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa J Sims	HI	12/9/2019	Stop taking our fish. Protect our oceans and reefs	Your comment has been forwarded to the decision makers.
Pamela Small	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Pamela Small	HI	12/12/2019	<p>Dear Councilmembers: I want to be very clear that I oppose ANY and ALL aquarium collection in the state of Hawaii, not just the Big Island (which is where I live). I scuba dive extensively and know what the reefs looked like when I was young (beautiful and abundant), as I aged (so depleted that I stopped diving Hawaii waters), and the past year (on the road to recovery with keiki fish finally making an appearance). If you were to allow collecting in West Hawaii waters to begin again, it would be devastating to our reefs and underwater ecosystem. I would also like to point out that since the laws changed to stop collecting in West Hawaii the collectors have NOT STOPPED collecting. They just moved their operations to the EAST SIDE of Hawaii Island where they take unlimited amounts with NO PERMITS. They then truck their takes to the west side to ship to the mainland. I have watched this happen in a local industrial area. The ban needs to be island wide. As the collectors cry and claim that their livelihoods have been effected by the West side laws, they strip the east side of its fish. This aquarium collection is an embarrassment to Hawaii. The biggest appeal of the island is the ocean and the activities of the ocean. Once the fish are gone and reefs are dead, Hawaii will have very little to offer tourists and ocean lovers alike. Stop this abysmal aquarium collection trade. It's time to shut them down for good.</p> <p>Sincerely, Pamela Small Kamuela</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>Commercial aquarium collection has continued in East Hawai'i using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an</p>

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				<p>assessment of the "expected consequences" of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Linda Smisko	Visitor / Non-HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Linda Smisko	Visitor / Non-HI	12/4/2019	I have been in the water at Kahalulu and Two Step for the past 20 years as a annual visitor to Hawaii. This past September I noticed a decline in fish at both sites as well a Captain Cooks. I assumed it had to do with the warm waters and bleaching of the coral. I can't imagine that removing more fish would be advantageous to our already deteriorating ecosystem that is so vital and beautiful to the island. Please don't let more fish be removed. Leave them where they belong and are needed.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Robert Smith	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Robert Smith	HI	12/16/2019	I have been snorkeling for 20 year in Hawaii, mostly on the North Shore of Oahu and South Kihei. And I go most every day. It's absurd to think that we have excess fish for someone to harvest and sell at a profit. You really have to hunt around to find fish and rarely do you see large schools of fish. I live in Hawaii and pay the taxes so I don't like what is natural here to be taken from me for someone to sell. Who ever entertained this notion should be removed from their position and leave the state.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Tanya Smith	HI	12/5/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tanya Smith	HI	12/5/2019	I believe all wildlife should be left untouched and we should respect all living beings. We should notice our connection in observation and scientific study only. Wildlife is not there to be taken for our visual enjoyment as home décor	Your comment has been forwarded to the decision makers.
Gloria Snyder	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lorraine Sonoda	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lorraine Sonoda	HI	1/5/2020	Stop fish collecting trade!	Your comment has been forwarded to the decision makers.
Donita Sparks	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Donita Sparks	Visitor / Non-HI	12/6/2019	With all due respect, what in the world are you thinking? Please protect the reefs and their inhabitants from the aquarium trade - a selfish, ego based business. I am a frequent tourist to the Big Island and the reef fish are less bountiful every time I visit. Wildlife belongs in the wild. PROTECT OUR REEFS! Thank you, but why is this issue still coming up? Do the right thing or I'll SPEND MY VACATION DOLLARS ELSEWHERE. Donita Sparks	Your comment has been forwarded to the decision makers.
Sandy Sshimmon	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sandy Sshimmon	HI	12/6/2019	East side Oahu especially Lanikai reefs unhealthy because of fish depletion.	Your comment has been forwarded to the decision makers. The Preferred Alternative would limit issuance of permits to the WHRFMA. No permits would be issued for Oahu under this Proposed Action. A separate EIS is being prepared for Oahu commercial aquarium fishing.

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Jennifer Stabrylla	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jennifer Stabrylla	HI	1/6/2020	I am an ocean swimmer, and personally witnessed aquarium collectors literally vacuuming up reef fish. The reefs were nearly barren, and it was such a relief when the taking of fish for aquariums was banned, and the populations started building back up. Let's not destroy this again! Also, there is little or no "official" presence to monitor these takers, and they have proven themselves not trustworthy. Keep the ban.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. Information on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS.
Linda Stahmer	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lynne Stanker	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Erik Stein	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Erik Stein	HI	12/6/2019	Please do not create a double standard where in the local population is asked to not take herbivores but taking herbivores for mainland customers is allowed	Your comment has been forwarded to the decision makers.
Ava Stettler	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ava Stettler	HI	12/16/2019	I reside on Kauai, and am a avid snorkler. I have noticed a steady decline of fish on our reefs in the past few years. Between coral deaths and over fishing, our reefs are in great danger. Please don't let even more fish be removed from an already weakened ecosystem.	The Preferred Alternative would limit issuance of permits to the WHRFMA. No permits would be issued for Kauai under this Proposed Action.
LaVonne Stewart	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
William Stockton	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
William Stockton	HI	12/7/2019	Ban aquarium reef fish collection. Permanently.	Your comment has been forwarded to the decision makers.
Peter Strandjord	Visitor / Non-HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Rick Switzar	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Tada	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Tada	HI	1/5/2020	I worry about our coral reefs in and around Waikiki Beach.	Your comment has been forwarded to the decision makers.
Kimberly Ann Takata	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kimberly Ann Takata	HI	12/9/2019	Taking fishes for aquarium use is causing harm to our reef, and water. Fishes are meant to be in the ocean/fresh water because that's where their habitat is. Hawaii was one of the best places to be until state started turning our Island into a more tourist attraction. I believe tourists would like to see the natural beauty of this state, it has so much more to offer than expensive hotels and stores. Let's keep our fishes where they belong.	Your comment has been forwarded to the decision makers.
Arthur Tarsa	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jack Taylor	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jack Taylor	HI	1/4/2020	These fish are a natural resource for all of us, not just aquarium owners. It is criminal to allow a few to profit at the expense of the thousands who view our reefs without damaging or exploiting them.	Your comment has been forwarded to the decision makers.
Diane Taylor-Thompson	Visitor / Non-HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Diane Taylor-Thompson	Visitor / Non-HI	12/31/2019	I am a saltwater reef owner. But I am more concerned about the health of the wild species. You must remember that fish in aquariums are in a more balanced and healthy environment than the wild with the state of our oceans these days. That being said, if wild caught fish are harder to get and therefore more expensive the chances of encouraging captive breeding are greatly increased. Then of course as the "pet" fish become more expensive, the amount of poaching will increase. I think that you need to put a limit on the folks who can take pet fish and also need a limit on the number of fish they can take. There are other reefs in the world that could follow the example that you set.	Your comment has been forwarded to the decision makers. The EIS is evaluating the impacts of collection that would occur under the issuance of 10 Aquarium Permits, which would allow for legal collection. A discussion on underreporting and poaching has been added to Section 5.4.3.6 of the FEIS.
Victoria Teague	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tammy Teige	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Tammy Teige	HI	12/8/2019	Coral reefs around the world are dying, beyond the damage taking reef fish does to the reef communities, we have no right to remove ANY species from its natural habitat, and put it on display, we need to do better, be better, before there is nothing left	Your comment has been forwarded to the decision makers.
Sherri Thal	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sherri Thal	HI	1/7/2020	This is a no brainer! Our planet is dying because of Capitalism. We, as humans, need to stop trading our ecosystems for money! My solace, temple, peace is found whilst communing with our underwater friends that live in the reefs. Snorkeling and ocean activities are a huge reason why I make my home in Hawaii. Global Climate Change has wreaked havoc on our reefs; the least we can do is leave the fish in their natural habitat so that they have a chance to continue creating healthy ecosystems in our oceans. The planet's survival depends upon our interrelationships of species--flora, fish, and fauna. PLEASE CHOOSE LIFE OVER THE AQUARIUM TRADE!! PLEASE KEEP THE BAN ON CAPTURING OUR TROPICAL REEF FISH. Aloha, and Mahalo for your time	Your comment has been forwarded to the decision makers.
Alice Thompson	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alice Thompson	Visitor / Non-HI	1/7/2020	We own a timeshare in Kona & love snorkeling & diving. We can to Hawaii for two weeks every Christmas for 18 years and come as often as possible now. The lovely ocean & its beautiful wonderful marine life is a huge part of the reason we love Hawaii.	Your comment has been forwarded to the decision makers.
Terry Thompson	Visitor / Non-HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Terry Thompson	Visitor / Non-HI	12/7/2019	We had this resolved. Why are you undoing it?	Your comment has been forwarded to the decision makers. The supreme court decision was that issuance of Aquarium Permits would require HEPA review, not a permanent ban on commercial aquarium collection.
Corine Tilton	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Corine Tilton	HI	1/4/2020	Aquarium trade has no business in Hawaii. Aloha Aina will prevail. The reef is already being raped by toxic golf course run off, navy sonar blasts, etc. STEALING these fish from their environment is a disgusting crime, and should not be allowed or profited from!	Your comment has been forwarded to the decision makers.
Richard Tilton	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Richard Tilton	HI	12/6/2019	To have the DLNR ignore the need to preserve our reef fish populations is to ignore their principle reason for being. I want to see hard data, scientifically gathered, to show the long term effects of the aquarium trade. If collecting is ever re-instituted, meaningful regulations need to be implemented, with collecting allowed at certain times and places. I'm also curious: What's in it for Hawaii when collectors sell to the aquarium trade? Seems like it's pretty easy money, with no benefit to us.	Your comment has been forwarded to the decision makers. The DAR (2019a) report included 20 years of monitoring data, and is cited throughout the EIS. Under the Preferred Alternative, collection would be limited to the WHRFMA, which includes a series of FRAs and MPAs where collection is not allowed (35% of the coastline).
Vivian Toellner	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Vivian Toellner	HI	12/6/2019	Aloha, I have snorkeled all around the Big Island of Hawai'i and am saddened to see NO Puffer fish. Just now a google of Puffer fish Hawaii, brought the first choice of selling for \$50.99 https://www.saltwaterfish.com/product-hawaiian-spotted-puffer . So Sad selling off Hawaii's natural resources is the main concern of our DLNR government. Conservation is the wise use of our natural resources. We should only sell what we have a great overabundance of....and we DO NOT have an overabundance of reef fish. DLNR should be in the job of PROTECTION, not exploitation of Hawaii. Most sincerely. Vivian Toellner, Animal Advocate, Voter, Land Owner, Taxpayer.	Your comment has been forwarded to the decision makers. The Hawaiian Whitespotted Toby (puffer) has an estimated population of 685,517 on the island of Hawai'i. Collection under the Preferred Alternative would collect 0.01% to 0.08% of this population, well below the lower the end of the 5% to 25% sustainable threshold (Ochavillo and Hodgson 2006).
Tlaloc Tokuda	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tlaloc Tokuda	HI	1/6/2020	Before the 2018 ban, the aquarium trade in West Hawaii took nearly two times more fish than were taken by all food fishers, combined. The 14 aquarium collectors who want the reefs reopened, accounted for nearly of 80% of that take according to the DEIS, though they engaged in fish collecting just three days per week. If they get their way, and DLNR accepts this DEIS, nothing will prevent them from taking even more fish, and causing even more harm to Hawaii's threatened coral reefs. Since the 2018 ban, there are more fish on West Hawaii reefs than there have been in decades. Don't cave into the aquarium trade!!!	Your comment has been forwarded to the decision makers. As stated in the EIS, if Yellow Tang, which is primarily collected at small sizes and generally not targeted by other fishers, is excluded, on average the recreational and commercial fisheries combine to take 3 times the number of reef fishes (194,674/year) caught annually by aquarium collectors (64,815/year) (DAR 2019a). The FEIS has been revised to include only 10 Aquarium Permits. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a

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				<p>reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Mikal Torgerson	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mikal Torgerson	HI	12/4/2019	I am a professional SCUBA diver and an aquarium enthusiast. Aquariums should rely on captive breeding programs for their stock given the delicate balance of the marine ecosystem.	Your comment has been forwarded to the decision makers.
Claire Trester	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Claire Trester	HI	12/31/2019	I'm a distance swimmer. I live in North Kohala,my swims include the coast North of Kawaihae to the old Coast Guard Station, in N. Kohala. I've been a Big Island resident for 35 years.I have personally seen the impacts of Aquarium Collectors and climate change on the reefs I swim over. The massive coral bleaching events the past 5 to 7 years have been stunningly noticeable with the die back of what was once healthy coral with an abundance of reef inhabitants. It's unconscionable to allow 14 Aquarium Collectors to restart their efforts to take from OUR REEFS,fish that are OUR STATE TREASURES. Especially at a time when OUR Reefs are under major stress loads from over fishing,rising Ocean temperature, Ocean Acidification. This is not Pono. OUR REEFS AND REEF FISH ARE NOT FOR SALE.THEY BELONG TO THE PEOPLE OF HAWAII,AND ARE A Natural MARINE STATE TREASURE. more revenue can be created keeping these delicate ecosystems in tact for future generations. Now is the time to think about the "Long Game Plan". For way too many years The State of	Your comment has been forwarded to the decision makers.

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			Hawaii has made decisions based on short term gain. THIS IS OUR LAST CHANCE TO SAVE OUR REEFS AND THEIR INHABITANTS. Malama Pono.	
Terry Trinidad	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary True	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary True	HI	12/10/2019	I have lived in Hawaii for 15 years and don't find the snorkeling that good here due to the lack of fish and varieties of fish, but I still do it frequently and enjoy every minute of it. The fact that aquarium collecting is even allowed on the island of Hawaii is shocking. The fish populations and varieties are barely acceptable at this point. Why on Earth would you allow the tropical fish population to be further decimated? It feels like a few people making money destroying the natural beauty for all the rest of all. That is the black heart of capitalism. I used to snorkel at the BioReserve, but now I mostly snorkel at Richardsons, Ho`okena Two Step, Ka`alu`u, 69, and Mahukona where I am told by the kapuna that the waters were once yellow with tangs. Not any more. Please save the fish and recreational snorkeling on the islands.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Carrie Trujillo	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carrie Trujillo	HI	12/6/2019	As a marine naturalist, I don't understand how hard data can be ignored. You can't dispute facts and the fact is that taking these dish off the reef destroyed the ecosystem's entire balance, threatening the longevity of the reefs, and potentially causing catastrophic, irreversible effects.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have

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				had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Ma'ata Tukuafu	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ma'ata Tukuafu	HI	1/4/2020	Please don't reverse the ban	Your comment has been forwarded to the decision makers.
Lisen Twigg-Smith	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisen Twigg-Smith	HI	12/11/2019	I am an ocean swimmer--have been swimming for over thirty years along the Kona coast. I've tragically witnessed diminishing populations of our reef fish and have been relieved that action was taken to protect the fish. I'm now horrified to learn that protections could be removed. To sacrifice such an important resource, so special to our islands, to a handful of greedy, heartless fish collectors is unimaginable. Please, let's be wiser than this.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Laura Umpierre	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Laura Umpierre	HI	12/9/2019	The beaches I frequent are Magic's, Kahalu'u, Kua Bay, Honokohau Harbor, O'oma, Manini, and Two Step. I am concerned over fishing will ruin the ecology of our reefs. And thus ruin the naturally self sustained system of our island.	Your comment has been forwarded to the decision makers.
Jules Ung	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jules Ung	HI	1/7/2020	Growing up on the East side I've witnessed serious decline in Hawaii's reefs over the past couple of decades. We need to take action to reverse the adverse effects of tourism, global warming, pollution and over-fishing. Selling reef fish for aquarium collecting is not a sustainable industry that we should support.	Your comment has been forwarded to the decision makers. Under the Preferred Alternative, Aquarium Permits would be limited to the WHRFMA. Collection in East Hawai'i may continue without the use of fine mesh nets.
Ke'ala Upchurch	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Ruth van der Weijde	Visitor / Non-HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kathy Vance	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kathy Vance	HI	1/7/2020	Leave the fish to enjoy their natural habitat so we can all enjoy them IN that habitat.	Your comment has been forwarded to the decision makers.
Andrea VanEpps	Visitor / Non-HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Andrea VanEpps	Visitor / Non-HI	1/7/2020	The ocean needs the fish, people don't	Your comment has been forwarded to the decision makers.
RMomi Ventura	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
RMomi Ventura	HI	12/6/2019	What's Happening Now With The Unnatural Decline Of Hawai'i's Fishes, They Keep Our Oceans Alive And The Coral Depletion Is Also Another Scary Fact. Please Keep Hawai'i's Fishes Life In Hawai'i Their Home.!!	Your comment has been forwarded to the decision makers.
Antonitaaq Villa	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Suzanne Villeneuve	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Suzanne Villeneuve	HI	12/7/2019	I swim every day at Mahukona and I really enjoy watching all the different species of fish. It is cruel and unnatural to take the fish for pets in aquarium. Leave the fish in their natural habitat, where they belong, please.	Your comment has been forwarded to the decision makers.
Doreen Virtue	Visitor / Non-HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Doreen Virtue	Visitor / Non-HI	12/6/2019	As a long time scuba diver in Hawaii, I hear the scuba divers on the boats always talk about the diminishing fish in Hawaii, and how they will take vacations in Mexico and Asia instead because they want to see fish while scuba diving on vacation. Allowing the aquarium collectors will affect tourism to Hawaii	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and</p>

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				that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Keo Von Gogh	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keo Von Gogh	HI	1/7/2020	5 out of 95 individual said there would not be any negative impact on cultural resources made by the aquarium trade industry. That is ludacris! This looks like another rubber stamp project like so many others in our beloved Hawaii nei including most recent Mauna Kea. If this passes it will be another tax payer funded court process. A'ole!!!	Your comment has been forwarded to the decision makers. A Cultural Impact Assessment was completed that includes a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.
John and Fran von Schlegell	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John and Fran von Schlegell	HI	12/6/2019	It would be tragic if we lost more of these fish, and collecting is almost impossible to police. The value in eco-tourism to Hawaii's economy and tax base far outweighs any benefit to fish collecting. Mahalo Nui, John and Fran von Schlegell	Your comment has been forwarded to the decision makers. Information on enforcement and compliance has been added to Section 1.2.3.2 of the FEIS. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth

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				consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Tamra Vonblankenburg	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tamra Vonblankenburg	HI	1/4/2020	Protect the fish and the reefs!	Your comment has been forwarded to the decision makers.
Marty Wakat	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marty Wakat	HI	1/7/2020	I've noticed dramatic reduction in marine life since 2007 when I moved here and I spent much of my time as an underwater photographer.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Karie Wakat	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karie Wakat	HI	12/7/2019	It is up to us to save our reefs and oceans. Do the right thing here, and ban aquarium fishing for good. Make our shoreline and oceans a marine park.	Your comment has been forwarded to the decision makers.
Karie Wakat	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karie Wakat	HI	1/7/2020	Mile marker 4 off Ali'I in Kona has no fish anymore. Compared to ten years ago when there were plenty of tang and other reef fishes. I recently dove this site for the first time in 2 years and was pleasantly surprised at	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List

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			the amount of juvenile fish. I can see the positive impact on all of our Kona side reefs of the ban on aquarium fishing. We now have juvenile fish on our reefs again. To continue to allow aquarium fishing is to allow the genocide of the tang reef fish. Don't be that legislator that allows the extension of our endemic fish for profit!	Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Mildred Walsh	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mildred Walsh	HI	1/2/2020	I have snorkeled regularly for the last 35 years and see the fish population decrease. They have not come back to the population of 35 years ago. Fish collecting is a crime against us all.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Annie Walton-Teter	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Annie Walton-Teter	HI	12/10/2019	Mostly, I snorkel When visiting my family in South Maui. But I do get over to the Big Island from time to time, and it breaks my heart to see the declining biodiversity. The comeback of the yellow tang is encouraging, but by no means encouraging enough. It is obscene that our wildlife is being treated as a commodity for the enrichment of traders. At best, we are stewards of the creatures in the aina. At best, we can protect them. At worst, we should at least coexist with them. None of us "owns" them. They must not be trafficked. I use this word advisedly--what's going on here (or what will go on here if the 2018 ban is lifted) is the moral equivalent of trafficking human beings. It has to stop, and stay stopped. A huge mahalo from California.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
James Ward	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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James Ward	HI	12/6/2019	<p>I have been Scuba diving the reefs in west Hawaii for over 10 years. In that time I've seen significant decline in reef fish (yellow tang, clown fish, butterfly etc). When the ban when into effect the Hope was that some of these species could recover. It's just recently that I've noticed an increase in their numbers. To issue these licenses now would end whatever repopulation is currently taking place. As a recently retired concierge at a Kona resort I have seen over the years what snorkeling means to the visitors to Hawaii island. The damage to our local economy as the fish populations decline are hard to measure. The decline I've experienced over the last 10 years has been dramatic. Understanding that this is due to multiple factors (water temperatures rising, pollution) we need to protect the area we can control such as allowing the reef fish to recover. I would welcome the chance to give testimony in person as I have first hand knowledge of the situation particularly on the reefs surrounding Milolii where a large collection operation stopped operations 2 years ago.</p> <p>Mahalo James Ward 808-895-9656</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Jan Watson Watson	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jan Watson Watson	HI	1/4/2020	The Oceans are dying-with them go US!	Your comment has been forwarded to the decision makers.
Sherrell Watson	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Sherrell Watson	HI	1/4/2020	In this day and age, with coral reefs and the marine life that inhabit them in danger due to climate change, proposing to open up the collection for the pet trade is absolutely ludicrous and short sited!!	Your comment has been forwarded to the decision makers.
Nickolas Weatherwax	HI	1/4/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nickolas Weatherwax	HI	1/4/2020	The fact that this is even being considered is sickening and I will be voting against anyone who tries to push this through.	Your comment has been forwarded to the decision makers.
Sheryl Weinstein	HI	12/11/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sheryl Weinstein	HI	12/11/2019	Please, please ban the Reef Rapers from collecting fish in Big Island waters!!! As a scuba diver & ocean conservationist I have witnessed the fish collector's work—and certain species are permanently depleted from the reef. Please maintain the ban!!!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Madolin Wells	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Madolin Wells	HI	12/15/2019	This is wrong. It is a crime against nature. The resurgence of fish populations after the 2018 ban is cause for celebration - but NOT for taking the abundance of nature for granted and going back to business as usual. It is also a crime against Hawai'i's DLNR regulations that shockingly flouts Hawai'i Supreme Court ruling. I urge the DLNR to withdraw consideration of reopening the reefs to outside exploitation, or the highest bidder - whatever the case may be. No amount of money can buy back species that have gone extinct. One million species overall are currently under dire threat of extinction, the consequences of which are incomprehensible - unknown until it's too late. Thank you for your consideration.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The supreme court decision was that issuance of Aquarium Permits would require HEPA review, not a permanent ban on commercial aquarium collection.

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Crystal West	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeanne Wheeler	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeanne Wheeler	HI	1/6/2020	I'm most familiar with the fish in waters in/around Kealakekua Bay & Punalu'u Beach Park areas.... I feel it's extremely important to protect our reefs & fishes for local enjoyment & for tourists who pay substantial \$ to come marvel at - when they are diminished, it'll be just yet another disappointment in their expensive trip/vacation. Word gets out fast these days re such situations! A far better idea would be to foster a captive fish & livecoral breeding industry - along the lines of the Kona seahorse farm.... It's safer for all the species involved - including humans who are reluctant to swim/snorkel, but would love to visit such a facility!	Your comment has been forwarded to the decision makers.
James Whillock	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Whillock	HI	12/6/2019	As a diver I am starting to see animals that haven't been seen in many years (dragon eels as an example). The value to Hawaii far exceeds the small value of taking these animals for display.	Your comment has been forwarded to the decision makers. Under the Preferred Alternative, Aquarium Permits would be limited to the WHRFMA. Collection in the WHRFMA is limited to the 40 White List Species, and collection of dragon eels would not be permitted.
James Whillock	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Whillock	HI	1/5/2020	As a diver with 40 years experience diving the Kona Coast I have seen a significant reduction in life on our reef system. Things are just starting to improve since the ban was put in place. Please let our reef system continue to improve.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Laurel Whillock	HI	12/7/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Laurel Whillock	HI	12/7/2019	I'm an avid recreational SCUBA diver. My first dive in Hawaii was in 1990 off the Kona Coast. In the ensuing 30 years I have been dismayed and disappointed to see the once vibrant tropical reef fish populations of the West side of the Big Island slowly diminish. Where I once saw large schools of yellow tang, only small, isolated populations remained. Then, in the last two years, since aquarium fish collecting has been illegal, I've seen the yellow tang, and many other species collected for the aquarium trade, begin to replenish themselves. This replenishment is especially critical now as the coral reefs are in dire need of any, and all, assistance to return to a semblance of the health that is essential to the marine life of Hawaii. Allowing fish collecting for the aquarium industry to resume at this critical point in the midst of the ecological disaster the Hawaiian islands have recently experienced with coral bleaching and increasing water temperatures is not just short sighted, it can set a course for a bleak future. The greed of a few cannot be allowed to jeopardize the health and well being of Hawaii's fragile marine ecosystem. Please do not allow aquarium fish collecting to resume!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Helen White	HI	12/10/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Helen White	HI	12/10/2019	I snorkel most days of the week up and down the Kohala coast and have done for the past 5 years. I am so familiar with Mahukona I have created a fish map of where certain fish can be regularly found. I have not witnessed any major increase in fish numbers since the ban. It would be a very sad day for all of us who enjoy the presence of the many varieties to have them depleted or made extinct. The aquarium industry needs to invest in their own breeding programs rather than limitlessly raiding our reefs.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Carole Wiedmeyer	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carole Wiedmeyer	HI	12/8/2019	Wild animals should not be pets. The reefs are under tremendous stress from climate change, overfishing and pollution, and we should do everything we can to ease the situation, not worsen it.	Your comment has been forwarded to the decision makers.
Linda Willaby	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
Linda Willaby	HI	12/6/2019	I snorkel regularly off the Puna coast, not just right at the shoreline, but further out too. I have seen fewer and fewer fish in my 11 years of living here. We must do all we can to protect our reef fish from greedy aquarium collectors. I am pretty much against private aquariums. People can watch a digital display of pretty reef fish without contributing to their demise and future extinction.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Liz Wilson	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Liz Wilson	HI	1/7/2020	Fish belong in the ocean!!!	Your comment has been forwarded to the decision makers.
Susan Wilson	Visitor / Non-HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Susan Wilson	Visitor / Non-HI	12/8/2019	I have been diving along the Kona Coast for over 20 years, was a full-time resident for 12 years and had noticed a dramatic decline in fish over the years, especially those targeted by fish collectors. In my opinion, fish collecting ranks right up there with sport hunting for elephants and giraffes. If the DNLR is considering reopening Hawaii reefs to fish collecting again, someone needs to take a look at whose hand is in whose pocket!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Erik Winkler	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tami Winston	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mark Winters	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anita Wintner	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
Anita Wintner	HI	12/9/2019	I am extremely concerned that even after the Hawaii Supreme Court ruled against new licenses sold and the shutdown of AQ collecting that the head of DLNR and the Attorney General failed to enforce the law and help AQ collectors get around the law. Why do we make laws that are not enforced?!	Your comment has been forwarded to the decision makers. Legal commercial aquarium collection has continued in East Hawai'i using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.
Jeff Wlters	HI	12/9/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Wlters	HI	12/9/2019	It is just common plain old common sense that you cannot take millions of fish out of an environment without causing a unbalanced problems. STOP the aquarium trade from destroying Hawaii's shoreline!!	Your comment has been forwarded to the decision makers.
Linda Wright	HI	12/8/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Linda Wright	HI	12/8/2019	In the thirty years I have been snorkeling and SCUBA diving in Hawaii I have seen an abrupt decline in marine life in the waters of Hawaii. In the past I was so entranced by the bounty of life as I stepped into the water. Now I find myself struggling to find fish on any given reef. This crisis is accelerated by the dangerous policy of blindly allowing the aquarium trade to be their own watchdog. More human greed is driving our own extinction. When the oceans die, we die. Sincerely, Linda Wright	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jim Wyban	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jim Wyban	HI	1/5/2020	I have swam in Kailua Bay for 35 years and have seen devastation of collectors. Barely any Yellow Tangs when I used to see huge schools. I say aquarium trade collecting wild fish from our reefs is not sustainable and should be stopped. They should only use Aquacultue fish for mainland aquaria. That would stimulate an industry. Instead they do the easy thing - steal from the commons. Not cool.	Your comment has been forwarded to the decision makers. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
				Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.
Lacy Yaegle	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Violet Yates	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Violet Yates	HI	1/7/2020	I remember going on a glass bottom boat cruise in 2009 from the kona pier to kahuluu beach and seeing so few reef fish, it shocked me. They're starting to come back now, don't allow the aquarium fishing to start again, they need more time.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Bessie Young	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bessie Young	HI	1/7/2020	please let the reefs rejuvenate. Look what is happening in Australia-not just the devastating fires, but the death of the barrier reefs. We don't want to suffer the same fate here. Protect our wildlife!	Your comment has been forwarded to the decision makers.
Leslie Young	HI	12/12/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Leslie Young	HI	12/12/2019	I am deeply concerned about the health of the reefs. We need a healthy amount of fish to have a healthy reef. The aquarium trade can't be allowed to take the fish.	Your comment has been forwarded to the decision makers.
Sean Robert Young	HI	12/4/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
Sean Robert Young	HI	12/4/2019	Living in Oahu's, as a resident for over 30 years I've seen yellow tangs populations decrease significantly not to mention other fish that I just don't get to see much now days! Not only fish are being depleted it's also cause more species to come around because of it. The more they take the more it destroys our natural living shores that was once abundant but due to the hobby had now killed most of our shore around. It's looking more and more like a deserted reef out there as I see this as I dive and spear fish on a weekly basis. So I'm always in the water!	Your comment has been forwarded to the decision makers. The Preferred Alternative would limit issuance of permits to the WHRFMA. No permits would be issued for Oahu under this Proposed Action. A separate EIS is being prepared for Oahu commercial aquarium fishing.
Trish Young	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nathan Yuen	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nathan Yuen	HI	1/6/2020	The aquarium trade kills many of the fish it catches in Hawaiian waters. Even when fish make it to their ultimate destination the mortality rate is high. This is an extremely wasteful trade that should be regulated by the State of Hawaii. Strict limits needs to be placed on fish catchers and they trade must be regulated.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Dawn Zierk	HI	12/6/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dawn Zierk	HI	12/6/2019	For the past 30 years, I've been swimming and snorkeling at Makalawena, Kua Bay, Kukio beach, Kaupulehu, Anaeho'omalua Bay, 49 Black Sand, Waialea, Hapuna, and Mauna Kea. There used to be so many more fish... Since the "Try Wait" period began, I've definitely noticed more baby fish, more octopus, and a healthier looking reef overall. Please, protect the reefs of Hawaii and allow them to thrive with a diverse fish population. The tourist industry will suffer if we have hardly any fish left on our reefs, but more importantly the world will suffer, since there are potentially many cures for human ailments in the biodiversity found in coral reefs.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.

Comments and Applicant Responses to Website Template - Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii

Commenter	State/ Location	Date Received	Comment	Response
Jack Zimmerman	Hi	1/3/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jack Zimmerman	HI	1/3/2020	The marine preserve at Kealakekua Bay is familiar to me and I have snorkeled there many times over a period of 25 years...I have also explored the reefs at other locations along the Kona coast...It is essential that these reefs are preserved. The aquarium trade is destructive to reefs and harmful for the fish so captured. Let's be real about our reefs and stop that trade...	Your comment has been forwarded to the decision makers. It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.

From: [Kimi Abbottjackson](mailto:Kimi.Abbottjackson)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 8:40:05 PM

Aloha Mr. Sakoda,

My name is Kimi Abbottjackson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kohala

My additional comment: As a regular swimmer in the ocean I have noticed a decline in aquarium fish it saddens me to think that this is going to continue until they are totally gone

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Hookalas@gmail.com

From: [Cameron Ahia](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:53:16 AM

Aloha Mr. Sakoda,

My name is Cameron Ahia and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: maheamoon40@gmail.com

From: [Katrina Ahia](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 11:41:52 PM

Aloha Mr. Sakoda,

My name is Katrina Ahia and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The reef fish need to stay on the reef to promote a healthy diverse ecosystem. Please do not let these fish be collected and sold to the detriment of our reefs and local environment.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Katrinaham@hotmail.com

From: [Noelani Ahia](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:17:01 PM

Aloha Mr. Sakoda,

My name is Noelani Ahia and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Our entire eco system is interconnected. The impacts to our reefs will be irreparably damaged which leads to a negative cascade affecting the entire ecosystem. We must think holistically and protect these reef fish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jennahia@yahoo.com

From: [Waiala Ahn](mailto:Waiala.Ahn@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@DLNR.hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:01:33 PM

Aloha Mr. Sakoda,

My name is Waiala Ahn and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: this trade is hurting our Reef, Reef Wildlife and our ability for practice our Cultural Practices and negatively impacts our life-ways and styles.this is destroying our Ocean Ecosystem—and it need to BE STOPPED NOW not next year NOW!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: waiala.ahn@gmail.com

From: [Kahililaulani Alapa'i](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 6:53:33 PM

Aloha Mr. Sakoda,

My name is Kahililaulani Alapa'i and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Educate more impacts

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: halehooponopono@yahoo.com

From: [Jennifer Alcorn](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 8:52:35 PM

Aloha Mr. Sakoda,

My name is Jennifer Alcorn and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Ka`u

Hilo

Unfamiliar with these reefs, but still concerned.

My additional comment: It's come time we have to save and preserve our natural wonders. Greed brings over fishing with little to no care to the oceans biological systems. This is not acceptable.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jewright@nehp.net

From: [Hilary Alexander](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:30:39 PM

Aloha Mr. Sakoda,

My name is Hilary Alexander and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Commercial aquarium fishing shouldn't be allowed. This is harmful to the environment and fish populations

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sfgrl@earthlink.net

From: [Lynn Allen](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynnch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 4:26:47 PM

Aloha Mr. Sakoda,

My name is Lynn Allen and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala

South Kohala

My additional comment: There is no need to disrupt the ANY reef ecosystem by harvesting ANY of these fish for the aquarium trade. The downstream consequences, in combination with the stress of warming ocean temperatures, are dire and will cause extreme harm and likely kill of entire reef ecosystems.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lynn.all@maui.net

From: [Nathan Allen](mailto:Nathan.Allen)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:50:56 PM

Aloha Mr. Sakoda,

My name is Nathan Allen and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

All herbivores

Seahorse, and they do get them I think, very illegal, all these Hawaii collectors should not have to do this. Whoever is behind it should go help coconut island style and grow the things legally and sell legally and stop this, help before hurt.

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: nathanmichalen@gmail.com

From: [Karen Altergott](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 9:54:02 AM

Aloha Mr. Sakoda,

My name is Karen Altergott and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kskspeedy@aol.com

From: [Lisa Altman](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 2:00:42 AM

Aloha Mr. Sakoda,

My name is Lisa Altman and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: Having been a former salt water reef tank hobbyist when I lived on the mainland, I am all too familiar with the fact that the vast majority of the fish will die within 6 months of purchase and I have personally witnessed 3 Hawaiian wrasses go insane from their captivity. Also, virtually all of the desirable species can be bred in captivity. These collectors just want free inventory, with no regard for the impact of their greedy pillaging...

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Laltman162@gmail.com

From: [Rae Andre](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 3:09:14 PM

Aloha Mr. Sakoda,

My name is Rae Andre and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: Are you all crazy out there? The local fish are one of your most valuable tourist assets--alive and beautiful, not dead and gone. It's why many people come to the Kona Coast from all over the world. Last time I was there the fish were nearly gone and I vowed not to come back until you guys get this figured out. Figure it out! No fishing the reefs! It's as simple as that. Many local livelihoods depend on you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: raeandre@comcast.net

From: [Jen Angeli](mailto:Jen.Angeli)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 2:26:10 AM

Aloha Mr. Sakoda,

My name is Jen Angeli and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Hawaii's resources are being on land at sea. We are destroying the balance of nature on so many levels and our earth is dying. We need to be stewards of the earth and protect the future of our planet.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Authorjenangeli@gmail.com

From: [David Anton](mailto:David.Anton@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 2:57:25 PM

Aloha Mr. Sakoda,

My name is David Anton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: As a scuba instructor I have witnessed over the last 20 yrs the decline of Hawaii's reefs and fish populations. We owe it to the future Hawaiians to preserve the health of our oceans.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: antondl@comcast.net

From: [Tanya Aynessazian](mailto:Tanya.Aynessazian)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:19:19 AM

Aloha Mr. Sakoda,

My name is Tanya Aynessazian and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All pet trade species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Taynessazian@gmail.com

From: [Caroline Azelski](mailto:Caroline.Azelski)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 8:14:26 PM

Aloha Mr. Sakoda,

My name is Caroline Azelski and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: forthefishes@azelski.net

From: [Eric Baicy](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 5:25:29 PM

Aloha Mr. Sakoda,

My name is Eric Baicy and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Puna
Hilo

My additional comment: Marine life is not a trophy to put into small tanks in homes or doctors' offices. They are living creatures and don't deserve to be collected on a massive commercial scale and be sold for profits. There are fewer and fewer reef fish every year and this is just adding more unnecessary pressure on the ecosystem.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: eric@svsarana.com

From: [Kerri Ballard](mailto:Kerri.Ballard@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:40:24 PM

Aloha Mr. Sakoda,

My name is Kerri Ballard and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made. Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: Our reefs are being impacted primarily by climate change and also often from runoff exacerbated by construction and from chemical fertilizers. Other effects from collecting, sunscreens, and e-Coli are also contributors. It only makes sense to do everything we possibly can, however large or small the impact, to protect these reefs which protect us, feed us and are a vital asset to our tourism industry. Collecting benefits only a few while impacting many. I have true compassion for those who have been making their livings from this practice. I would like to see some discussion about providing funding for training for these members of our community in other areas. Their knowledge of the animals and the areas could be put to better uses.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kerri.ballard@hawaii.rr.com

From: [Bonnie Bator](mailto:Bonnie.Bator)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 2:11:14 PM

Aloha Mr. Sakoda,

My name is Bonnie Bator and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Uhu

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Puna
South Kohala

My additional comment: La'aloa (Magic Sands) In the early 1980's Reef Fish were teaming... Now, AUWE (barely)

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: recallbherenow@hotmail.com

From: [Jerome Bautista](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 3, 2019 12:00:36 PM

Aloha Mr. Sakoda,

My name is Jerome Bautista and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Our reefs cannot protect themselves. The protections we have afforded our natural resources are one of the best things we can do to allow the marine life to flourish to what we imagine a healthy reef to look like. Allowing the aquarium trade to almost freely take can severely disrupt the process we've made. Our reefs and marine life are already fighting pollution, run-off, climate change, invasive species, etc. Why add another pressure and make it nearly impossible for them to thrive? Please consider doing the pono thing for the future of our oceans so generations to come can know what a healthy and thriving natural environment in Hawaii is.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Vanx131@gmail.com

From: [Malia Becklund](mailto:Malia.Becklund)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:59:46 PM

Aloha Mr. Sakoda,

My name is Malia Becklund and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

All herbivores

Eels, octopus, shrimp, starfish, anemone, coral, shrimp, seahorses

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: These reef rapers are here in Hawaii only to make money. They do not care about conservation or Hawaii. They are greedy and wasteful. They are known for dumping fish like garbage. They are evil and no amount of pity should be shown to them. They do not deserve to live here or make their living here. They are parasites and their industry is toxic to our islands. Furthermore, the life the animals lead in aquariums is

extremely cruel and short. They are easily disposable. The animals bleach out under artificial lights, get sick and die and are instantly replaced by another. They are forever lost from their school to live the remainder of their short life in a glass prison. This is cruel and wrong. Fish collectors are monsters and I am against their presence in Hawaii. As a native Hawaiian I say Aole to all Trop divers!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: maliolas@yahoo.com

From: [Lynn Beittel](mailto:Lynn.Beittel)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 6:43:47 PM

Aloha Mr. Sakoda,

My name is Lynn Beittel and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: The Big Island has the best snorkeling in Hawaii. Fish should be protected for current and future generations. Thank you for listening, Lynn Beittel

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Lynnb1234@icloud.com

From: [Richard Belas](mailto:Richard.Belas)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 12:03:14 AM

Aloha Mr. Sakoda,

My name is Richard Belas and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: This is an abomination. We rely more on tourists who dive or snorkel more than people who buy fish for aquariums. I know on the east coast where I spend my time, offices that had salt water aquariums have switched to fresh water. Do we really need to have more stories about fish dumped for lack of a market?

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Belas.richard@gmail.com

From: [Gillian Bell](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 6:08:28 PM

Aloha Mr. Sakoda,

My name is Gillian Bell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Gillian Bell

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: steveandgillianbell@gmail.com

From: [Mona Bell](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:51:52 PM

Aloha Mr. Sakoda,

My name is Mona Bell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Monabell91@gmail.com

From: [Josephine Bertram](mailto:Josephine.Bertram@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 5:28:34 PM

Aloha Mr. Sakoda,

My name is Josephine Bertram and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:
All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: bertram@wtechlink.us

From: [Rebecca Bicker](mailto:Rebecca.Bicker)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:00:10 PM

Aloha Mr. Sakoda,

My name is Rebecca Bicker and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I am a resident of Maui and frequent diver. Aquarium trade has NO PLACE WHATSOEVER taking fish from our waters . This disrupts the already precarious balance of wildlife in our waters. Climate change, coral damage and now aquarium trade- no just No.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: RebeccaSBicker@yahoo.com

From: [Glenn Billaber](mailto:Glenn_Billaber)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle_Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 12:54:03 PM

Aloha Mr. Sakoda,

My name is Glenn Billaber and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: These species play a major part in the reefs and in the community with all fish, tell them to stop letting greed ruin this world. Go find somewhere else to ruin but

Hawai'i will not have it!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Billaber14@gmail.com

From: [Christopher Biltoft](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 5:59:28 PM

Aloha Mr. Sakoda,

My name is Christopher Biltoft and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Bandit Angelfish
Angelfishes
Achilles tang (paku ikui)

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala
Puna
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: biltoftc@yahoo.com

From: [Mary Binder](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 7:39:46 PM

Aloha Mr. Sakoda,

My name is Mary Binder and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mauimarybeth@gmail.com

From: shaunara.bitanga
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 7:21:40 PM

Aloha Mr. Sakoda,

My name is shaunara bitanga and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I believe within the past 3 decades since I have been alive a lot of people come to Hawaii and try to steal, exploit, and swindle our beautiful Hawaii home. At the least we are sad to call home anymore because people are not being respectful of the natural resources/beauty or taking care of it by any means at all. Since our state was annexed aka stolen over 200 years ago our natural resources have dwindled and our state is looking more and more like the mainland each year it is so sad to say and see. The natural inhabitants of Hawaii's land and sea should all be protected because they are very important in having a different role in helping and naturally caring for our local as well as global ecosystem. If we do not put more strict rules on people overfishing and fishing at all for our indigenous fish for aquariums or whether it be for sale or for so called museums it will not stop. People need to learn to leave things the way they found it because you never know how important it could be for the local environment regardless if it be for research or anything else. Our natural environment will be no so natural the more we mess with it so we should leave mother nature alone as it was originally intended. Thank you a local loving resident of OAHU.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jmax4ska@gmail.com

From: [Todd Black](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 1:09:21 PM

Aloha Mr. Sakoda,

My name is Todd Black and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
North Kohala
South Kohala

My additional comment: Our family has lived at Puako for over 60 years. During the past 30 years there has been a significant decline in the local fish population due to overfishing, aquarium fish taking, and pollution. Do not allow the fish takers to return, in any capacity, to these shores.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tblack410@gmail.com

From: [Kieba Blacklidge](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:02:57 PM

Aloha Mr. Sakoda,

My name is Kieba Blacklidge and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna
Hilo

My additional comment: I used to swim and snorkel often around Kapoho area and Pohoiki and have noticed big changes over the last 15 years with fewer tropical fish and a dying reef. Please keep our sea life plentiful and allow it to naturally flourish and grow.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kiebablacklidge@gmail.com

From: [Kaikea Kaleikini Blakemore Blakemore](mailto:Kaikea.Kaleikini.Blakemore.Blakemore)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:21:41 AM

Aloha Mr. Sakoda,

My name is Kaikea Kaleikini Blakemore Blakemore and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Commodification of nature and climate collapse

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: Please stop poaching our islands. We're in the middle of a climate collapse. Things that are alive should not be sold as commodities anymore. You're stealing from Hawaii's people and our future letting people profit off disruption to our ecosystems.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kaikeablakemore@gmail.com

From: [Kalena Blakemore](mailto:Kalena.Blakemore)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 9:50:34 PM

Aloha Mr. Sakoda,

My name is Kalena Blakemore and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Unfamiliar with these reefs, but still concerned.

My additional comment: As a Native Hawaiian I am opposed to commercial aquarium collection! The EIS has disregarded 45 opinions out of 5 claiming there will be no natural & cultural impacts! This is illogical, repulsive & acutely disrespectful to me & our Island. My aumakua is in the ocean as is Kanaloa, our ocean deity! The practice of extracting fish for beauty in a fish tank is vulgar & offensive. I OBJECT to this EIS! Please listen to the voices of

the people not corruption & payoffs to sell our natural & cultural resources!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kalena.Blakemore@gmail.com

From: [Marjorie Bonar](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 11:19:43 AM

Aloha Mr. Sakoda,

My name is Marjorie Bonar and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kohala

My additional comment: Decimation on South Maui reefs is an example of how slowly recovery happens. Do not undo the progress made on Hawaii. Restrict the aquarium trade to non-wild caught populations.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: margebonar@gmail.com

From: [Andrew Boorman](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 5:14:25 PM

Aloha Mr. Sakoda,

My name is Andrew Boorman and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Fish for salt water aquariums should be captive bred, not taken from the wild.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: andrewboorman@me.com

From: [Mary Brady](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 9:19:15 PM

Aloha Mr. Sakoda,

My name is Mary Brady and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hilo

My additional comment: The young people are mad and insisting that we to save the planet for their generation. The world leaders agree on the need to save our planet....this includes the oceans, reefs, and marine life. Why then is Hawaii even thinking about lifting the aquarium fishing ban? This runs opposite these efforts. Aquarium fishing is no different than the poaching of African wildlife....beautiful animals, but still illegal and immoral to hunt these

merely for their economic value.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mail4mab@yahoo.com

From: [Antonia Brandle](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 11:05:42 PM

Aloha Mr. Sakoda,

My name is Antonia Brandle and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: My avider, Dr. Gail, at Chaminade has shown us her photos as well as photos from her students of the reefs in O'ahu over the past few years. It is obvious that these reefs are unhealthy considering the lack of fish and biodiversity. Aquarium collecting is one of the ways reefs are damaged. Collectors take vital species in large numbers out of the ecosystem with little management and they can use very harmful ways of collecting these fish (chemical or physical bombs for example). Herbivores are especially important for reef health since they eat the algae off of the reef making the reef habitable for all species that inhabit it. Healthy reefs are far more valuable than sales from the aquarium trade since reefs provide safety for the island, medicine as well as food. Short term economic growth is not a viable reason for opening up the reefs for aquarium fishing since there cannot be unlimited economic growth dependent on finite resources.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: antoniabrandle@yahoo.com

From: [Aaron Braud](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:32:04 PM

Aloha Mr. Sakoda,

My name is Aaron Braud and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: Though recovering, the amount of tang and other fish in Mahukona are still below expectations. Aquarium fishing is wasteful of important prey fish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: aaronbraud@gmail.com

From: [Elizabeth Bridygham](mailto:Elizabeth.Bridygham@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 1:39:13 PM

Aloha Mr. Sakoda,

My name is Elizabeth Bridygham and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hilo
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Holistibeth@yahoo.com

From: [Carol Broadley](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 10:13:54 PM

Aloha Mr. Sakoda,

My name is Carol Broadley and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I believe the ocean should be left alone. It is in danger and needs all species to stay right where they are.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: carolbroadley@hotmail.com

From: [Jennifer Broadley](mailto:jennifer.broadley@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 17, 2019 6:23:14 AM

Aloha Mr. Sakoda,

My name is Jennifer Broadley and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Leave the fish where they are!!! Let them be seen by the world in their natural setting rather than in a tank at a home or business. Your tourism depends on it took.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jbfishy9@hotmail.com

From: [Linda Brooks](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:21:03 AM

Aloha Mr. Sakoda,

My name is Linda Brooks and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Our reefs are suffering now with the temperatures. We must protect them

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Nhawaii@live.com

From: [Jesse Brown-Clay](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 1:18:08 PM

Aloha Mr. Sakoda,

My name is Jesse Brown-Clay and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: The ruling by Hawaii's Supreme Court to halt aquarium collecting was valid and should be upheld. The Supreme Court that day made a choice to protect Hawaii's ecosystems for future generations to come. Please consider the needs of these marine ecosystems and of the residents of Hawaii over industry demands (aquarium collecting).

Please help us to limit extractive practices such as aquarium collecting. It's time for us to conserve and protect our biodiversity and natural resources. Thank you for all of your hard work.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: brojes19@gmail.com

From: [Mackenzie Buckner](mailto:Mackenzie.Buckner)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:44:01 PM

Aloha Mr. Sakoda,

My name is Mackenzie Buckner and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Hamakua

My additional comment: The country council on the Big Island of Hawai'i once listened to the woes of our keiki and proceeded to ban all tobacco products at Kahalu'u State Park. These same keiki proved that where there were more tobacco products and cigarette chemicals there were less sand crabs. I am one of those children who stood up for our precious marine life that day, over 12 years ago now. Please, follow suit and protect our land and people.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Macbuckner@gmail.com

From: [Lori Burgoon](mailto:Lori_Burgoon)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:07:25 PM

Aloha Mr. Sakoda,

My name is Lori Burgoon and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Bandit Angelfish
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hilo
South Kohala

My additional comment: I have lived in Kona for eight years. On the big island for 15 years. In this time frame I have seen our reefs overfished and ignored. When DLNR places the ban on aquarium fishing I was so happy. This is a business that only takes from Hawaii. Nothing is given back. We need to enforce the ban and keep it intact.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Loriburgoon@gmail.com

From: [Dolores Burke](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 3, 2019 11:48:46 AM

Aloha Mr. Sakoda,

My name is Dolores Burke and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Most of the fish die within days of being collected! When the fish do make it to an aquarium store and are sold 90% die this makes for a never ending demand for

more fish. It's an unsustainable industry.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lola96761@gmail.com

From: [Eric Burkhardt](mailto:Eric.Burkhardt@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 3:59:50 PM

Aloha Mr. Sakoda,

My name is Eric Burkhardt and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

North Kohala

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Baddobro@gmail.com

From: [Danielle Burnside](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:18:20 AM

Aloha Mr. Sakoda,

My name is Danielle Burnside and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

South Kohala

My additional comment: I have lived in Hawaii for three years. Within those three years, I have swam over the same reef many times. And can pinpoint where it is dying, and which fish don't show up anymore. The reefs are in such delicate conditions in this point and time, that I strongly urge you to please allow them time and space and a chance to recover. They already have so many extra stressors, that anything we can do to prevent harm will not only allow our reefs to prosper in better health, but ourselves.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Danielleburnside@live.com

From: [Donna Burrows](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 10:04:35 AM

Aloha Mr. Sakoda,

My name is Donna Burrows and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: herder@flash.net

From: [Emily Burt Burt](mailto:Emily.Burt.Burt)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 10:35:57 PM

Aloha Mr. Sakoda,

My name is Emily Burt Burt and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: As an outrigger canoe paddler, I have been witness to the aquarium trade's practice of throwing away fish that have died during capture or in boats. I have witnessed drifting dead fish along the South Kona coast in direct relation to the aquarium collectors. This type of waste is inexcusable. Without the waste, though, I do believe that aquarium fish collecting is not an ethical use of our nearshore waters. Please do not allow this practice to continue.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ainabella@yahoo.com

From: [Kate Butler](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:52:47 PM

Aloha Mr. Sakoda,

My name is Kate Butler and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Harlequin Shrimps

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: As avid scuba divers, my husband and I moved to Kona because we fell in love with, not only the incredible diving that the Kona reef system has to offer, but the incredible amount of marine life that we see here, some endemic, some just plain amazing. We dive every weekend, and you never know what you are going to see. I want it to stay that way. It would be heartbreaking to know that aquarium fishermen would be allowed to take these

fish from their home, purely for the aquarium trade. I cannot understand why anybody would want to take these beautiful creatures away from the only world they know, completely stressing them out in the process and possibly doing permanent damage, or even worse, death. Some of these species of fish are already rare to see. This reinstatement would make it virtually impossible to see them. We need to turn our focus on ocean conservation now more than ever, rather than being selfish and ripping these innocent creatures from their home. They cannot voice their own opinion, so we need to do it for them, and for our future generations to come.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mermaid.kate@hotmail.com

From: [Tom Butterworth](mailto:Tom.Butterworth@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 3, 2019 10:12:44 AM

Aloha Mr. Sakoda,

My name is Tom Butterworth and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All critters

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I've been diving and snorkeling around Maui and Kauai for over 15 years now and saw first hand the fish disappear as I saw the collectors boats on water and at the boat ramps. The damage they are doing is unacceptable.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tbtorol@aim.com

From: [Patricia Cadiz](mailto:Patricia.Cadiz)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:14:59 PM

Aloha Mr. Sakoda,

My name is Patricia Cadiz and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The reef fish are part of the reef ecosystem which is already under stresses from warming waters, run off, anchors, and other anthropogenic affects. This proposal is irresponsible and needs to be voted down please.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pbcs5@mac.com

From: [Carmen Calderon](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:51:24 PM

Aloha Mr. Sakoda,

My name is Carmen Calderon and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: iriacarmen808@gmail.com

From: [Brooke Caldwell](mailto:Brooke.Caldwell)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:56:11 PM

Aloha Mr. Sakoda,

My name is Brooke Caldwell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hamakua

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Brookecaldwell2015@gmail.com

From: [Matt Caldwell](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:45:52 PM

Aloha Mr. Sakoda,

My name is Matt Caldwell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I regularly scuba and free dive off the coasts of the big island, primarily off the reefs from Puako to Two-step/Honaunau. I have seen the reefs and fish population diminish dramatically over the last 6 years. Our tourism industry relies on our waters as well and the fish population is important to our economy, as well as the ecology of the reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mbcaldwell10@gmail.com

From: [Miranda Camp](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 5:03:28 PM

Aloha Mr. Sakoda,

My name is Miranda Camp and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mauimiranda@hotmail.com

From: [Tom Campbell](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 4:31:47 PM

Aloha Mr. Sakoda,

My name is Tom Campbell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tom_campbell56@yahoo.com

From: [Sara Carl](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 6:43:33 AM

Aloha Mr. Sakoda,

My name is Sara Carl and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

All herbivores

Taking any species from the ocean affects other species as well.

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: When I am on island I spend as much time as possible underwater and it breaks my heart to see how empty the ocean is becoming. Most particularly affecting I believe, is Honaunau Bay. The waters at 2 step are so empty and the coral is almost all bleached. Collecting fish will only hurt the ocean more, not only the species being collected, but the other species who are effected but their removal. Please, do not lift this ban. All life

depends on the ocean and we need to keep her healthy.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sarajoy.carl@gmail.com

From: [Nancy Cassel](mailto:Nancy.Cassel)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:30:37 PM

Aloha Mr. Sakoda,

My name is Nancy Cassel and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: I am a swimmer in Kona bay, the last few years have seen a decline in all species of fish. This is a grave concern.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Ncass112@gmail.com

From: [Nicolyn Charlot](mailto:Nicolyn.Charlot)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 7:51:01 PM

Aloha Mr. Sakoda,

My name is Nicolyn Charlot and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Please protect our reefs and do not take any more fish. Our oceans are more important than our aquariums.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: nhcharlot@gmail.com

From: [Marjorie Chase](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 9:38:07 PM

Aloha Mr. Sakoda,

My name is Marjorie Chase and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I have lived on the island since 1984 and have snorkeled and scuba dived on the reefs on the west side many hundreds of time. The recent bleaching has been sad but the loss of fish and diversity has also been especially bad. After the moratorium went into place it was noticeable when the fish population rebounded. I strongly feel the benefit for the reefs, especially considering the likelihood of warmer and more acidic oceans, outweighs the

desires of the few collectors who have the potential to do much harm. Mahalo.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Feldchase@aol.com

From: ryan_christopher
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:33:02 AM

Aloha Mr. Sakoda,

My name is ryan christopher and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: I have personally watched the reefs around Maui and Big Island decline over the last 20 years. They will continue to do so. Collecting and exporting marine animals will only make this problem worse. I have been involved with the aquarium trade for decades and (aquacultured) or captive breeding of marine fishes has become a very viable

option. If Hawaii wants to support "business" the instead of supporting people robbing the ocean and selling their plunder they should support a large scale captive breeding program and let Hawaii supply the aquarium market with those fish. Aloha, Ryan Christopher Honokaa HI

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rchristo808@gmail.com

From: [Kane Clawson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:12:33 PM

Aloha Mr. Sakoda,

My name is Kane Clawson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

My additional comment: The world works BECAUSE of biodiversity, every time we annihilate a species it is like taking a piece out of the puzzle, or even better, a piece of machinery out of the machine... without ALL their pieces machines don't work! Let the Cod fishery in Canada be a huge example to you. It was overfished and has NEVER come back to anywhere NEAR the levels it existed at only 50 years ago... fish should be fished sustainably for food IF possible and captured for scientific purposes only in small numbers. Rampant collection for private sea tanks is NOT sustainable or WISE!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: clawsonkane@yahoo.com

From: [Orange Cleghorn](mailto:Orange.Cleghorn)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 12:33:14 PM

Aloha Mr. Sakoda,

My name is Orange Cleghorn and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala

Puna

My additional comment: I've been swimming in the Kona Coast for 19 years. Both fish & coral are significantly healthier where there is less human traffic! Leave the fish in the ocean! Fewer fish, fewer tourism. why ruin the beauty of what we have?

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Orangehi@outlook.com

From: [Brittney Coates](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 2:52:31 AM

Aloha Mr. Sakoda,

My name is Brittney Coates and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: We live on Maui. We depend on the the tourist, it's big income for the islands. People come to see the fish we have. This would deeply hurt all the incomes of the people who depend on any trade such as snorkeling trips, dive trips. Fishing would be affected. Fish come to hunt small fish and grab bait on their way through. This will affect life so much deeper then it appears!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kbcoates10@gmail.com

From: [Michael Cooling](mailto:Michael.Cooling)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:27:03 PM

Aloha Mr. Sakoda,

My name is Michael Cooling and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: As a diver I have seen a decline in Hawaiian reefs first hand, from Molokini and Lanai, to Kawaii and Kona. Cozumel has already had to close some of their reefs to diving due to new resorts polluting their waters. Whether it's pollution or over fishing, don't destroy Hawaii's reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: coolingmt@gmail.com

From: [Jeanne Cooper](mailto:Jeanne.Cooper@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 4:18:13 AM

Aloha Mr. Sakoda,

My name is Jeanne Cooper and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: I'm a travel writer and guidebook author as well as a full-time resident on Hawaii Island, and I believe the importance of an abundance of reef fish to the visitor industry as well as to the ecosystem itself cannot be overstated. It is already hard to recommend some areas for snorkeling or diving, knowing how smaller the schools of fish or fewer the number of individuals are compared to when I first started visiting Hawaii Island some 15 years ago. But seeing yellow tang and others starting to increase along the shoreline near old Kona Village on the Hualalai resort or Kamakahonu Cove in Kailua-Kona has given me hope for Puako, Anaehoomalu, Mauna Lani Resort beaches and other Kohala reefs near where I live. Please, please don't turn back the clock for short-sighted gains for one small group that would inflict lasting financial and ecological consequences on a much larger community.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Hawaii.insider@gmail.com

From: [Stevie Cooper](mailto:Stevie.Cooper)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 10:05:34 AM

Aloha Mr. Sakoda,

My name is Stevie Cooper and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sncooper0593@gmail.com

From: [Colin Cornforth](mailto:Colin.Cornforth)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 5:08:49 PM

Aloha Mr. Sakoda,

My name is Colin Cornforth and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.
Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.
Marine life is threatened with local extinction
The real possibility that future generations may not encounter these species
70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.
Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.
Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: The fish on are reefs is one of the most important resources for our community. People travel the world to see the diversity of our ocean environment. A handful of collectors send our fish abroad and don't necessarily give back to the community they are taking and profiting from.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Colincornforth@yahoo.com

From: [Tristan Cortez](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 8:20:12 AM

Aloha Mr. Sakoda,

My name is Tristan Cortez and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All aquatic species in Hawai'i

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: It's been 5 years since I last visited Kona, and the amount of aquatic life at that time had obviously diminished since I would visit as a child. If we do not care for our fish, the oceans will die and that will lead to the destruction of our land. Nature is a gentle balance, tip the scales, and all will crumble.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mstris76@gmail.com

From: [Warren Costa](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:41:53 AM

Aloha Mr. Sakoda,

My name is Warren Costa and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Ka`u

Puna

Hilo

Hamakua

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: nativeguidehawaii@gmail.com

From: [Chris Crosby](mailto:Chris.Crosby@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 1:09:40 PM

Aloha Mr. Sakoda,

My name is Chris Crosby and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Ccrosby@hawaii.edu

From: [Jason Crowder](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 9:22:01 AM

Aloha Mr. Sakoda,

My name is Jason Crowder and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Tinkers butterfly, longfin Anthias, dragon moray

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: J_cro1@yahoo.com

From: Lois Crozer Crozer
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 2:07:27 PM

Aloha Mr. Sakoda,

My name is Lois Crozer Crozer and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I live on Oahu and I snorkel 2x a week except in the winter months. I

have noticed over the two years I have been snorkeling a drastic decline in coral health in the reefs I swim. There is major coral bleaching, and the coral that dies is eventually covered with algae. There are so few herbivore fish left that this just turns into wasteland if left unchecked.

It's gotten so bad I now only go to Hanauma Bay reserve to snorkel because there are FISH.

There is NO excuse to take fish from OUR reefs for people to display in their homes and offices.

The mortality rate is high and the reefs suffer as well as the fish populations. The collectors say there is an over abundance of fish and their collecting will have no impact.

Anybody with any sense would recognize this as false. You who make the laws should be protecting the reef and not the interests of people who can't see past their own self interests.

Anybody with any sense would recognize this as false. You who make the laws should be protecting the reef and not the interests of people who can't see past their own self interests.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lbc@hawaiiantel.net

From: [Joe Culbertson](mailto:Joe.Culbertson)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 11:46:40 PM

Aloha Mr. Sakoda,

My name is Joe Culbertson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

South Kohala

My additional comment: As a regular visitor for many decades the highlight of snorkeling on the Kona Coast has been greatly diminished in my experience. I am simply astounded that the theft of natural resources such as reef fish for profit by aquarium collectors is in any way sanctioned by the state of Hawaii. This needs to stop as of yesterday!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Progreenery@gmail.com

From: [Millicent Cummings Cummings](mailto:Millicent.Cummings.Cummings)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 11:30:55 PM

Aloha Mr. Sakoda,

My name is Millicent Cummings Cummings and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All Marine Life here in the Capitol of Endangered Species!

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: Enough Already. Aloha.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: millicentium@hotmail.com

From: [Jason Cunefare](mailto:Jason.Cunefare)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:32:05 PM

Aloha Mr. Sakoda,

My name is Jason Cunefare and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment: I work in tourism and am in Kealahou bay. It should be teeming with fish as it is a marine sanctuary but it is not. This is an indicator of the health the populations.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jasolow@sbcglobal.net

From: [Carol Curran](mailto:Carol.Curran@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 12:32:02 AM

Aloha Mr. Sakoda,

My name is Carol Curran and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: If DLNR reopens West Hawaii reefs to the aquarium collectors, fish populations will plunge and all the gains over the last 2 years since the ban will be lost.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: carol@carolcurran.com

From: [Sharron Cushman](mailto:Sharron.Cushman)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:10:01 PM

Aloha Mr. Sakoda,

My name is Sharron Cushman and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna

Hilo

My additional comment: Please make sure that the reef fish and ecosystems are here for future generations to be able to enjoy and flourish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: reikimastertaichichih@gmail.com

From: [Krista L Cutter Cutter](mailto:Krista.L.Cutter.Cutter)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 1:30:36 PM

Aloha Mr. Sakoda,

My name is Krista L Cutter Cutter and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I've been snorkeling the whole west side of the big island of Hawaii for 20 years. I live in North Kohala(Kapaau). Over the years the dramatic decline in reef fish in general should be a priority concern for all of us. My favorite place to have observed this loss is at Mahukona Beach Park. Many local people swim there regularly. There is a general mindfulness of the reef and its inhabitants. We don't wear sunscreen in the water, and fishermen seldom take more than their share. The listed fish, all fish, have to contend with radioactivity, plastic and other pollutants. and climate change. Please don't add to their

struggle by allowing aquarium pet trade. Thank you for your attention to this matter. Krista Cutter

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: krista_c2000@yahoo.com

From: [Thalia Davis](mailto:Thalia.Davis@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 10:41:08 AM

Aloha Mr. Sakoda,

My name is Thalia Davis and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: Kahaluu, Kuamoo, Kailua/Kamakahonu are some favorite places to swim and snorkel. Three years ago these reefs were looking depleted and colorless. Today they are getting healthy once again. Please do not allow the aquarium trade to rape our reefs!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: thaliadavis@me.com

From: [Michelle Deal](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:15:48 AM

Aloha Mr. Sakoda,

My name is Michelle Deal and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: shellie0009@aim.com

From: [Anne Dignam](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 10:03:40 AM

Aloha Mr. Sakoda,

My name is Anne Dignam and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: Anne Dignam

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: seaandski@optonline.net

From: [Suzanne Dmytrenko](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 9:50:25 AM

Aloha Mr. Sakoda,

My name is Suzanne Dmytrenko and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: Please continue the restriction of fish collection from Hawaii reefs.
Mahalo nui loa

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sdmytrenko1@gmail.com

From: [Michael Dudenhoeffer](mailto:Michael.Dudenhoeffer@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 11:27:38 PM

Aloha Mr. Sakoda,

My name is Michael Dudenhoeffer and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: As a dive professional here, I feel this would deplete current and future fish stocks and have a big impact on tourism for our area

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Capnvinny@yahoo.com

From: [Walter Dudley](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 10:46:57 PM

Aloha Mr. Sakoda,

My name is Walter Dudley and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

Puna

Hilo

South Kohala

My additional comment: As an oceanographer who has monitored coral reefs in Hawaii for over 30 years, I have witnessed the decline in reef fishes taken by the aquarium trade.

Furthermore, visitors who wish to observe these fishes in their native habitat bring far more money in to the islands than does the aquarium fish trade.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dudley@hawaii.edu

From: [Clarissa Dunlap](mailto:Clarissa.Dunlap)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 3:18:54 AM

Aloha Mr. Sakoda,

My name is Clarissa Dunlap and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: Aquarium fish should be born and raised in aquariums and our corals and free ocean fish should be protected and left alone not captured and sold as merchandise.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Ninikeahawaii@gmail.com

From: [Laura Dvorak](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 7:05:40 PM

Aloha Mr. Sakoda,

My name is Laura Dvorak and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lauradvorak@hotmail.com

From: [Bidi Dworkin](mailto:Bidi.Dworkin)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 6:51:11 AM

Aloha Mr. Sakoda,

My name is Bidi Dworkin and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: bd.dworkin@gmail.com

From: kate.earman
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 8:42:27 AM

Aloha Mr. Sakoda,

My name is kate earman and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:
all the fish who need a voice

My specific concerns about those species include:

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):
Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: chinabge@gmail.com

From: [Greg Edwards](mailto:Greg.Edwards)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 11:38:41 PM

Aloha Mr. Sakoda,

My name is Greg Edwards and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

All 40 White List species

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I Have been Snorkeling around the big Island for many years and noticed a decline in schools of small fishes especially yellow tangs in Kona N. & S. beaches . i believe from what i have observed is the result of the taking of species of fish taken for Aquariums.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: greglobos@gmail.com

From: [Mary-Loue Edwards](mailto:Mary-Loue.Edwards)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 4:15:21 PM

Aloha Mr. Sakoda,

My name is Mary-Loue Edwards and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Stands_Alone_Wolf@yahoo.com

From: [Suzanne Egan](mailto:Suzanne.Egan@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 12:44:08 AM

Aloha Mr. Sakoda,

My name is Suzanne Egan and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I live on Oahu. I witness our south east reefs dying where I live.

Much due to illegal fishing practices (using chemical bleach bombs) by the Micronesia population. Used to be about 2 times a month. Also, Hanauma Bay needs to be completely shut down for a while. Plz, not just this ban, which of course is a no brainer to continue. Do EVERYTHING you can to protect, preserve, regenerate. Hello, global warming. Jeeze, do we really have to give testimony. This should be known by EVERY person on the planet already.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Segan808@gmail.com

From: [BJ Elessar](mailto:BJ.Elessar@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 9:23:12 PM

Aloha Mr. Sakoda,

My name is BJ Elessar and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: These "collectors" have been doing just fine for the last two years.

There is no good reason to reopen this business enterprise now or ever. Our reef fish are too important to the environment and our local tourist trade to waste them for short term profit.

The process is horribly wasteful and kills most of the fish taken.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: elesb@yahoo.com

From: [Jim Ellism](mailto:Jim.Ellism)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 12:51:50 AM

Aloha Mr. Sakoda,

My name is Jim Ellism and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

South Kohala

My additional comment: The fish in the Kona area are seriously depleted.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jimonthebeach@gmail.com

From: [Darylwin Emmsley](mailto:Darylwin.Emmsley)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:29:47 AM

Aloha Mr. Sakoda,

My name is Darylwin Emmsley and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Stop this trade NOW!!! We must protect our recovery of the OCEANS Ecosystem. It is our right to practice our cultural Rights.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: darylwinemmsley@yahoo.com

From: [Melissa Emond](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 5:00:48 PM

Aloha Mr. Sakoda,

My name is Melissa Emond and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All reef life, unless invasive

My specific concerns about those species include:

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: I was raised here and am currently 36. I have seen and incredible decrease in the number of fish on reefs in Kona. We are losing the diversity and beauty of our coral reefs. There are a number of factors involved in this including climate change, pollution/chemical, overuse and collection and sale of species for profit. I am also concerned that if limits were to be set on fish collection numbers as a compromise to a no collection law that the law would easily get broken and collectors could take more than allowed with little consequence. The more rare these creatures become the more valuable to these collectors they become. Stop reef fish collection, at this point every individual has a roll to play. Mahalo

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Gardensutionskona@gmail.com

From: [Erika Empey](mailto:Erika.Empey)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 12:19:50 PM

Aloha Mr. Sakoda,

My name is Erika Empey and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All marine life

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I'm in the ocean everyday, and it's disheartening to see how much fish diversity and population numbers have seriously declined over the years. It would be grossly negligent to allow more degradation and removal of fish from this environment.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Erikacempey@yahoo.com

From: [Neil Erickson](mailto:Neil.Erickson@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 1:52:04 AM

Aloha Mr. Sakoda,

My name is Neil Erickson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Hilo

My additional comment: The harvesting of our aina should be stopped and protected from fishing for sale or sport. Areas should be set aside for our future generations.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: neil.erickson@hawaiicounty.gov

From: [Marjorie Erway](mailto:Marjorie.Erway)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 2:04:43 AM

Aloha Mr. Sakoda,

My name is Marjorie Erway and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

My additional comment: Why is this now coming up again? It was stopped a few years ago, and the fish population dramatically improved; with the yellow tang, because they are so visible, the most obvious in Kahalu'u, Two Step, and in the bay by the Kona Tiki Hotel on Ali'i Dr., as well as the Waikoloa beach. Please do NOT allow this travesty to happen.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: merway@hawaii.rr.com

From: [Michael Essner](mailto:Michael.Essner@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 5:47:47 PM

Aloha Mr. Sakoda,

My name is Michael Essner and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

Puna

Hamakua

South Kohala

My additional comment: Fish are a reward they clean the algae off the reef. Without the fish algae overtakes the reef and the reef dies the fish will not return it is called habitat collapse it

is happening right now in Hawaii!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: m.essner@yahoo.com

From: [Dale Evans](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 3:47:05 PM

Aloha Mr. Sakoda,

My name is Dale Evans and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: We are not doing enough to protect Hawaii's wildlife, and authorizing these harvests is a step in the wrong direction. I stand for aloha 'aina and against the prostitution of precious natural resources.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: evans@hawaii.edu

From: [Cindy Fallis](mailto:Cindy.Fallis)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:59:02 PM

Aloha Mr. Sakoda,

My name is Cindy Fallis and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: cynthiafallis@yahoo.com

From: [Leslie Farnel](mailto:Leslie.Farnel)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 1:38:17 AM

Aloha Mr. Sakoda,

My name is Leslie Farnel and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I grew up on Maui and have seen it go from living corals with schools of fish to a wasteland. This can't continue. If the oceans die so do we. Stop it now.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: shyaura@hotmail.com

From: [Heraldo Farrington](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 12:03:46 AM

Aloha Mr. Sakoda,

My name is Heraldo Farrington and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: Given the numerous, varied, and increasing threats to our coral reef systems brought on by global climate change, we must do all we can to protect and enhance all reef ecosystem components -- especially herbivorous reef fish, given their critical role in consuming and controlling algae. The aquarium trade wastes too many fish and incentivizes the physical stressing and outright destruction of corals, and it must be tightly controlled and regulated.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: heraldof@stanford.edu

From: [MKim Ferris](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 3:45:49 PM

Aloha Mr. Sakoda,

My name is MKim Ferris and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Molokini Kapalua bay Reefs are dying, not enough fish. Very noticeable

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: bluesky122355@yahoo.com

From: [Mary Finley](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 8:17:32 PM

Aloha Mr. Sakoda,

My name is Mary Finley and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Sea horses

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna

Hilo

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Maryefinley@gmail.com

From: [Peter Fitch](mailto:Peter.Fitch)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 3:15:31 AM

Aloha Mr. Sakoda,

My name is Peter Fitch and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u

My additional comment: Aloha, I would like to extend my concern over the continuation of the depletion of our fish stocks, in particular, those collected by aquarium harvesters. I reside in South Kona and recreate (swim,snorkel,kayak) frequently along the North and South Kona coast and parts of the Kau coast. I do this year round and have done so for many years. One area, in particular, Papa Bay has seen its coral trampled and the diversity of fish significantly impacted from overfishing by aquarium gatherers. The mature older/larger fish were reduced easily to 25-50% of their normal population. The recent ban on the aquarium trade has seen many of the threatened fish bounce back significantly. Its encouraging to see the yellow tang,

Moorish idols, butterfly, and other species regain their place in the ecosystem. But we all know that's only because other areas further from the public eye are suffering the impacts due to no real enforcement of the laws on the books. DLNR enforcement is a joke as has been evidenced by past infractions and lack of prosecution. On an island dependent on tourism for a large percentage of its employment, its hard to fathom how destroying the fish and coral ecosystem for the aquarium trade (which only benefits a miniscule workforce island wide) really serves the greater population. Mahalo, Pete Fitch

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pandpmilolii@gmail.com

From: [Sara Flake](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:23:22 PM

Aloha Mr. Sakoda,

My name is Sara Flake and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Sleach18@gmail.com

From: [Judy Forehand](mailto:Judy.Forehand@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:16:59 PM

Aloha Mr. Sakoda,

My name is Judy Forehand and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hamakua
South Kohala

My additional comment: These fish should be raised in captivity for captivity. Not collected in

the wild. If some are collected for the purpose of propagation strict limits should be set.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: 4handfarm@gmail.com

From: [Ralph Fred](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 10:22:46 PM

Aloha Mr. Sakoda,

My name is Ralph Fred and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Hilo

South Kohala

My additional comment: I think the problem is when there is profit involved not all but some will get greedy and take more then they should.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Ndn808@hotmail.ca

From: [Sharde Freitas](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:54:09 PM

Aloha Mr. Sakoda,

My name is Sharde Freitas and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The real possibility that future generations may not encounter these species

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Ka`u

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Skmfreitas@gmail.com

From: [William Fritz](mailto:William.Fritz@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:21:00 PM

Aloha Mr. Sakoda,

My name is William Fritz and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I swim in Kailua Bay five days a week. Certain Butterfly and Wrasse fish have diminished to almost non-existence. The Yellow Tangs and Moorish Idols are just starting to come back but are not plentiful. In addition to the ban on taking fish for aquarium

purposes, I would like to see a fishing ban in Kailua Bay in alternating years.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: wsfritzz22@gmail.com

From: [Taylor Fukumitsu](mailto:taylor.fukumitsu@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 11:58:45 AM

Aloha Mr. Sakoda,

My name is Taylor Fukumitsu and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Any fish shouldn't be taken.

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.
The real possibility that future generations may not encounter these species
DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.
Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.
70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.
Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.
Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Fukumitsutaylor@yahoo.com

From: [Dee Fulton](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:07:27 AM

Aloha Mr. Sakoda,

My name is Dee Fulton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I am concerned about the veto of the use of glyphosphate/Roundup on public lands, and especially around children. Given that the herbicide is recognized as carcinogenic, I think it best that we keep it out of the coastal waters as well.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dee.fulton.wv@gmail.com

From: [Sheila Gage](mailto:Sheila.Gage)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 3:47:29 PM

Aloha Mr. Sakoda,

My name is Sheila Gage and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The reefs on Oahu waters are protected in certain areas. There is an abundance of fish now that as a kid I've never witnessed before. Born and raised in Hawaii it is important to protect the younger fish. To fish to eat a larger fish is reasonable, however to catch these for aquarium use for profit should not be done. If they "need" aquarium fish, they should "farm" them themselves and produce their own. That would be the logical way to do it. Leave the ocean reefs alone. Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Isdrose@aol.com

From: [Len Gambla](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 10:55:27 PM

Aloha Mr. Sakoda,

My name is Len Gambla and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Puna

Hilo

Hamakua

My additional comment: Aloha, I realize this may be a challenging and difficult decision yet believe from having worked, lived and/or traveled to more than 40 countries, that an area's natural resources be they living such as the fish or be it a natural beauty, are the foundation for a thriving community. Applying this to the Big Island, please uphold the ban on this unsustainable practice.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lengambla@yahoo.com

From: [Emily Garland](mailto:Emily.Garland@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 1:01:06 PM

Aloha Mr. Sakoda,

My name is Emily Garland and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Snorkeling is one of my favorite activities. Snorkeling and diving are also huge tourist draws. To maintain snorkeling and diving, the fish that live on the Hawaiian Islands' reefs must be protected.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: emilygarland@gmail.com

From: [Kevin Gavagan](mailto:Kevin.Gavagan)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 11:28:52 AM

Aloha Mr. Sakoda,

My name is Kevin Gavagan and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

Hamakua

My additional comment: Stop take take taking. Stop colonization mentality. Give back

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kevin.gavagan@fourseasons.com

From: [Koch Gérard](mailto:Koch.Gérard)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 4:07:24 PM

Aloha Mr. Sakoda,

My name is Koch Gérard and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores
all fish and coralls

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: In the early 1900s, indigenous people were collected, which were put on display and demonstrated in the cage and circus. Have we learned nothing from this or are we still living in those years? Why do you do this with animals? That's the same! Just so few people earn a lot of money with it? I'm really tired of the fact that only the economy and money counts, but not the protection of the ocean. Where is our and our descendants the future? The fish belong in their ocean. I am against fishing for aquariums. This is not Hawai'i and your Aloha !!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: gerard.koch@bluewin.ch

From: [Karen and Craig Goard](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 17, 2019 6:18:42 PM

Aloha Mr. Sakoda,

My name is Karen and Craig Goard and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hamakua
South Kohala

My additional comment: Please understand the reef fish are threatened by aquarium collection. Please help save the habitat of the reef fish. Over the past 30 years I have seen the reef fish depleted by aquarium hunters, and believe this must stop.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: karen.spachner@gmail.com

From: [Catherine Goeggel Goeggel](mailto:Catherine.Goeggel.Goeggel)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 8:46:45 PM

Aloha Mr. Sakoda,

My name is Catherine Goeggel Goeggel and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The aquarium trade is raping our reefs; Hawai'i needs to stop the collection of our beautiful reef fish- We demand that state agencies that purport to protect our fishes DO THEIR JOB TO STOP THIS !!!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: cathyg@animalrightshawaii.org

From: [Jenny Gordon](mailto:Jenny.Gordon@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 9:37:22 PM

Aloha Mr. Sakoda,

My name is Jenny Gordon and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hilo

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jglass.5full@gmail.com

From: [Sue Green](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 8:12:31 PM

Aloha Mr. Sakoda,

My name is Sue Green and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I remember very clearly going snorkeling at Honaunau 20 years ago and being nearly overwhelmed at the beauty, diversity, and numbers of fish. I went back to Honaunau in 2018 and was shocked and saddened by what I did NOT see.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: su3.gr33n@gmail.com

From: [Michael Greenspan](mailto:Michael.Greenspan)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 2:26:29 PM

Aloha Mr. Sakoda,

My name is Michael Greenspan and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I have been coming to Hawaii since 1982 and have noticed the decline of all fish populations in the ocean here. There is now about 70% less fish in the ocean than there was when I first started coming to Hawaii. I have talked to people that have been here since 1949 and they tell me there were many more fish than in 1982 than there was in 1949. How long do we think the fish will last if we keep taking them?? I was in the mexican rivera around Akumal this year after not being there since the 1980s and almost all the fish are gone now because of over fishing and the corals are all dead in huge piles of what looks like bones. IS THAT WHAT WE WANT TO HAPPEN IN HAWAII???????

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: vcarmg@gmail.com

From: [Jo Greenwald](mailto:Jo.Greenwald@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:21:22 PM

Aloha Mr. Sakoda,

My name is Jo Greenwald and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
any endangered fish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Jo Greenwald. As a resident of Hawaii, and of our endangered planet, I urge you to protect all endangered species. To allow these species to be exploited, captured and 'kidnapped' just for the economic benefit of non essential industry is madness. Our planet is under so much stress and damage that we need to do whatever we can to protect and restore the balance of nature. Our waters and reefs are essential to maintaining and restoring our oceans to health. This impacts all of us. The greater good and common sense demand that this is not a time to be further raping our reefs for some minor, very select profits.

I implore you to consider the health of our oceans, reefs and planet. This is not hyperbole.
Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jogreenwaldhi@gmail.com

From: [Pat Griffith](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 12:32:36 PM

Aloha Mr. Sakoda,

My name is Pat Griffith and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: To Whom it May Concern, I am a resident of Kauai. Over the years, I have seen fish populations and coral populations fluctuate. I am not a Marine Biologist or professional diver but I do swim the Anini Reef several times a week. It is obvious that our fish are an important and integral part of the Hawaiian ecosystem. Removing them for decoration is unconscionable. During these fragile times we need to protect our oceans at all costs. Please do not allow commercial collectors to harvest our precious resources. We need them to keep our reefs and our 'aina healthy for generations to follow. Mahalo nui loa, Pat

Griffith Kauai

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: 4195kauai@gmail.com

From: [Gwyn Griffiths](mailto:Gwyn.Griffiths)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 9:55:11 PM

Aloha Mr. Sakoda,

My name is Gwyn Griffiths and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: I have seen the decline of the coral reefs in south kona over the last 4-5 years. Sometimes I avoid swimming because it is so sad to see the state they are in. We should be working to revive the reef, not destroy it further.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: gwyngriffiths24@gmail.com

From: [Ilene Grossman](mailto:ilene.grossman@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 11:35:19 AM

Aloha Mr. Sakoda,

My name is Ilene Grossman and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I work for The Kohala Center and used to work at Kahaluu Bay Education Center. Our island communities depend on the health, beauty, and diversity of our coral reefs for our livelihoods, enjoyment, food, and tourism. We have had so many impacts to our reefs coming from so many sources. If we can control any of those impacts than we should in order to protect our valuable natural resource that we all depend on. The aquarium trade is

not a necessary use of coral reef species. It is a luxury use and one we cannot afford. There are alternatives to wild fish collecting-fish farms/aquaculture can provide sustainably raised fish for the aquarium trade. This is an excellent viable alternative to wild fish collection. Given the current poor state of much of our near shore coral reefs, it is imperative that we protect as much as we can of the species that maintain our reef health. The coral reef ecology is a delicately balanced mix of species that we are still learning about. Please don't gamble with our precious, fragile, unique, and beautiful coral reef animals. Please keep the aquarium trade ban in place. Mahalo for your consideration. - Ilene Grossman

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ilene.doppmann@gmail.com

From: [Gregg Gruwell](mailto:Gregg.Gruwell)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 9:01:45 PM

Aloha Mr. Sakoda,

My name is Gregg Gruwell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Angelfishes

Forcepsfish/Longnose butterflyfish

Achilles tang (paku ikui)

Spotted Boxfish, Hawaiian cleaner wrasse and the Hawaii Pufferfish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: I first started snorkeling Kona as a tourist in the mid-80's and moved to Kona in 1999, then to Oahu in 2002. In that time, I have regularly snorkeled from North Kohala to Honaunau, as well as numerous spots on Oahu. (I am also scuba certified and a retired Naval Officer.) Most recently I spent six days snorkeling in North Kohala in April 2019. 1. From the mid-80s to 2001, you could walk downtown on Ali'i Drive to the old Kona Hilton in Kona Town and see thousands of Yellow Tang in the water with your naked eye. ALL those fish are gone. Collected. 2. Based on my personal observation since the mid 1980's, I'd estimate that over 75% of the reef fish are gone. Some fish, (Pufferfish and Boxfish) I don't

see anymore anywhere on the Kona Coast. 3. Collectors continue to push a false narrative that there are plenty of fish. The fact is DLNR has never counted fish populations and has no real idea what % of fish has been taken. 4. DLNR has aided and abetted the fish collection industry at every turn. A fish collector was even appointed as Director of DLNR. A DLNR scientist, Alton Miyasaka, even published a guide, "Hawaii's Aquarium Fish Industry: A Business Profile", to assist Aquarium Collectors. 5. DLNR's role is to protect Hawaii's natural resources! Instead, their partnership with the collection industry has gone from a glaring conflict of interest to outright corruption. It is finally time for DLNR to do the right thing and stop all aquarium collection! At the present rate, aquarium collection along with climate change and pollution will wipe out this huge draw of tourist revenue and there will be no turning back the clock.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: starriderhi@hotmail.com

From: [Matthew Gurewitsch](mailto:Matthew.Gurewitsch@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 7:57:16 PM

Aloha Mr. Sakoda,

My name is Matthew Gurewitsch and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

All herbivores

Frogfish, scorpionfish, pennant butterflyfish, parrotfish, lined butterflyfish, Christmas wrasse, rover mover wrasse....

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Puna

Hamakua

South Kohala

My additional comment: Mostly, I snorkel on my home reefs in South Maui. But I do get over to the Big Island from time to time, and it breaks my heart to see the declining biodiversity. The comeback of the yellow tang is encouraging, but by no means encouraging enough. It is obscene that our wildlife is being treated as a commodity for the enrichment of traders. At

best, we are stewards of the creatures in the aina. At best, we can protect them. At worst, we should at least coexist with them. None of us "owns" them. They must not be trafficked. I use this word advisedly--what's going on here (or what will go on here if the 2018 ban is lifted) is the moral equivalent of trafficking human beings. It has to stop, and stay stopped.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: matthew@alohaheights.com

From: [Gerald Gushiken](mailto:Gerald.Gushiken)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 11:33:38 PM

Aloha Mr. Sakoda,

My name is Gerald Gushiken and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hilo
Hamakua
South Kohala

My additional comment: I am a local fisherman and diver in my 60's. I have personally seen the steady decline of all small "aquarium" species especially on the west side. The reefs off

Napopo, Keauhou Bay, Kealakekua Bay and Honokohau Harbor have all been impacted. This is a exploitative industry that robs the general public of this priceless resource. The local sea life belongs to everyone and no one. Will our children be able to enjoy this resource? Why should a small segment of the population [mostly non-locals] benefit financially? This is a unfair and unsustainable industry that destroys the local ocean life. STOP THE EXPLOITATION!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: gothtar@yahoo.com

From: [Geoffrey Hajim](mailto:Geoffrey.Hajim)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 10:08:56 AM

Aloha Mr. Sakoda,

My name is Geoffrey Hajim and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: The reefs are doing far worse than the DLNR reports. I've been an active free diver in these waters for over 25 years and the reefs are over 70% dead now. The first are a life line for the restoration of these ecosystems. Taking them is a death sentence for the reef.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: hajim@hawaiiantel.net

From: [Lisa Hallett](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:08:04 PM

Aloha Mr. Sakoda,

My name is Lisa Hallett and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Clown, domino, wrasses

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala
South Kohala

My additional comment: I was raised on Oahu and have seen what the aquarium fish trade has done to Reefs there. It is so sad how Hawaii island is being so negatively impacted by aquarium fish trade also. No way to 14 new permits being issued to collectors. The reef environments of Hawaii island are far from stable. Malama the Reefs now!!! Climate change and coral bleaching are going to be doing enough damage as it is all results of human actions. Enough is enough.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lisa.andrews851@gmail.com

From: [christian.hamilton](mailto:christian.hamilton@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:43:09 PM

Aloha Mr. Sakoda,

My name is christian hamilton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: its illegal to take sand from our beaches but these people are somehow allowed to rape our reefs for profit people don't just come to Hawaii for the warm weather and sandy beaches but also schools of exotic fish please do not allow these people to take what does not belong to them

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: christian.hamilton17@gmail.com

From: [Ida Hanohano](mailto:Ida.Hanohano)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:04:48 PM

Aloha Mr. Sakoda,

My name is Ida Hanohano and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kohala

My additional comment: Balance is the key for life. Our unique location in the center of the largest ocean on the planet allows great biological diversity with species found in nowhere else. Native Hawaiians gathered according to guidelines that benefitted the earth, sky & sea. Because of this lifestyle, when Captain Cook arrived in the late 1700's, the population of Hawaii was 400,000 - 1,000,000 & was entirely self sufficient on the environment. Their goal was a vision to provide for community now & for future generations. Having worked in Kona for 9+ years and visiting for over 50 years, I have seen the changes just by observing from the shoreline. Creating special rules for a special interest groups that can severely impact an environment is NOT supportive of the whole community. Don't let commercial enterprises tip the scales beyond repair.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Ida53hanohano@gmail.com

From: [Diane Harmony](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 8:32:12 PM

Aloha Mr. Sakoda,

My name is Diane Harmony and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

All 40 White List species

Bandit Angelfish

Angelfishes

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: West Hawaii Reef is to be protected from aquarium collectors as was determined in the 2018 ban!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Alohadi2u@gmail.com

From: [Caleb Harper](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 8:34:53 PM

Aloha Mr. Sakoda,

My name is Caleb Harper and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Natural beauty is becoming limited as population of humans increases. Consequently, we have already seen massive eradication of a lot of animal species, whether on land, air, or sea. This would only expedite the horrendous dilemmas we now face as we watch creatures quickly disappear from this planet. Leave the fish alone.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: caleb.harper@protonmail.ch

From: [Gary Harrold](mailto:gary.harrold@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 12:22:21 PM

Aloha Mr. Sakoda,

My name is Gary Harrold and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
coral dead and alive + lava rocks for decor

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: As a 75 y o long time visitor, SCUBA diver and snorkeler, now a full time resident of Hilo, I am *extremely concerned* about the unhealthy imbalance of our coral reef ecosystems. I have seen a tremendous decline over the years at the following locales: Richardsons's, Carlsmith, Onekahakaha, Kealakakua Bay and heavily impacted reef section along Ali'i Dr in Kailua Kona. Kindly enforce 'no taking' of any organisms in the entire state, beginning ASAP. Climate Chaos is gobbling up species rapidly. This is an emergency situation. Max Mahalos. Gary (a lifetime member of The Sierra Club)

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: garysgab@gmail.com

From: [Fawn Hatch](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:36:49 AM

Aloha Mr. Sakoda,

My name is Fawn Hatch and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: We have been coming to the island and snorkeling for 26 years, and have noticed a marked decline in the variety and abundance of fish. Kids and doctors offices don't need the fish as much as the reefs do. We are seriously concerned about the potential kickbacks and corruption involved in allowing these collectors to start decimating the populations again. It's bad enough they are still ILLEGALLY taking them - please don't give

them free reign. I know because I have snorkeled 2 days in a row in bays where they have been plentiful one day, and almost non-existent the next....after their boat was seen in the bay.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Fawnhatch@yahoo.com

From: [Lisa Hauptmann](mailto:Lisa.Hauptmann@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 12:50:09 PM

Aloha Mr. Sakoda,

My name is Lisa Hauptmann and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Moorish idols

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I swim just about everyday on west side Oahu. I see the impact of the aquarium collectors with their nets. We will go months and months with no fish. They slowly come back and then they'll be wiped out. It's devastating.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Hptmnn@aol.com

From: [Grant Heidrich](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 6:19:14 PM

Aloha Mr. Sakoda,

My name is Grant Heidrich and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.
Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.
The real possibility that future generations may not encounter these species
Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.
Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
North Kohala

My additional comment: I adhere to the wisdom of the State Supreme Court. This practice does no benefit to Hawaii, is subsidized by out of state pet industry beneficiaries like the pet trade, and equipment manufacturers. All at the expense of the native Hawaiian reefs and aquatic life. It is time to wake up and end these diliterious practices and preserve our natural resource for subsequent generations.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: grant@gheidrich.com

From: [Jeannette Heidrich](mailto:Jeannette.Heidrich@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 4:37:13 PM

Aloha Mr. Sakoda,

My name is Jeannette Heidrich and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I live on in West Hawaii. I have noticed the decline in all species of reef fish. Do not let the aquarium collectors begin to collect again.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: jheidrich@mac.com

From: [R. Hermann Heimgartner](mailto:R.Hermann.Heimgartner)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:10:04 AM

Aloha Mr. Sakoda,

My name is R. Hermann Heimgartner and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Bandit Angelfish
Angelfishes

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: Aloha, I have been surfing on the West Hawaii coast for the last 20 years. I have seen a noticeable reduction of reef fish in the waters, especially Yellow Tang. Yellow Tang are easy to notice as they are bright yellow and can be seen when paddling on my surfboard. I have taught both of my young sons to surf. At the start, before they could really surf, they would look down and see the yellow fish in the water in swarms and would be delighted. I still remember large swarms of the yellow tang at several of the surf spots. I have noticed that there are less of these yellow swarms of yellow tang. The reef fish are not a resource to be exploited for the benefit of some large mainland associations and collectors. Our reefs should not be pillaged for the benefit of a few. The DEIS is obviously very skewed in favor of the collectors. Mainland associations, mainland law firms, mainland lobbyists, and mainland "scientists" with an obvious bias. The aquarium trade should be banned State wide. Hawaii's reef and reef fish need to be protected, not opened up for pillaging. Our reefs and reef fish are a fragile gift to the people of Hawaii and the world. We all marvel and are fascinated by Hawaii's kaleidoscopic reefs and reef fish. The more...the better. The DLNR should lead the way in protecting Hawaii's reef and reef fish. In doing so, the first step is to ban aquarium collecting. Mahalo, R. Hermann Heimgartner PO Box 1839 Kailua-Kona, HI 96745 808-756-7022 www.kona.attorney

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: hermann@kona.attorney

From: [Lauren Helgeson](mailto:Lauren.Helgeson)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 8:02:29 PM

Aloha Mr. Sakoda,

My name is Lauren Helgeson and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I love on north shore Oahu and you don't see much of a variety of fish where there's reef. It's really sad :(

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Laurenhelgeson@yahoo.com

From: [Jeanne Herbert](mailto:Jeanne.Herbert)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 11:31:04 PM

Aloha Mr. Sakoda,

My name is Jeanne Herbert and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Puna

My additional comment: The increase of numbers of fish during the no take time period on the Kona coast is a stunning example of how we can restore and protect our marine life and coral reefs. Why are we even considering bowing to the aquarium trade.? Are we interested in supporting the aquarium trade or protecting our precious marine life? It is long past time to say no to the aquarium trade. Aloha

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jeanneherbert@gmail.com

From: [Jeffrey Hill](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 10:17:35 AM

Aloha Mr. Sakoda,

My name is Jeffrey Hill and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I have been a resident of Hawaii Island for thirty years. During this time I have made careful observations of fish populations using bird watching techniques.

There is no doubt that our fish populations are in danger. To allow aquarium collecting, which benefits only a handful of Hawaii residents and quite clearly hurts everyone else, is unconscionable. Definitely not pono. I recognize that the mandate of DNLR is not to protect

the environment but to utilize it for personal gain. Even so, is killing off our fishes a good thing? tourism is one of our main sources of employment. We need our fish on the reef to promote tourism. Not in some dentist office in West Orange, New Jersey. Try to do the right thing. Malama the fishes. DO NOT ALLOW Aquarium Collecting on Hawaii Island. Mahalo, jeff

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: shadowfax302@gmail.com

From: [Laurie Hillyard](mailto:Laurie.Hillyard)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 10:00:51 PM

Aloha Mr. Sakoda,

My name is Laurie Hillyard and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: There is no reason to permit a few people to kill Hawaiian fish for the profit of the rich. Our ecosystem is already over stressed from ocean warming and pollution. And there is no adequate way to enforce the "industry". Until our ecosystem is sustainable this aquarium business can not be sustainable. Instead they should use aquarium raised fish only.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lauriehillyard@gmail.com

From: [Heidi Hofelich](mailto:Heidi.Hofelich)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 4:50:58 AM

Aloha Mr. Sakoda,

My name is Heidi Hofelich and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I grew up in Kona snorkeling and scuba diving as a child. My family

owned a dive shop in the 90s and the oceans were thriving then. When I returned home to get engaged in kona, I cried in the water while snorkeling. There were no fish at any of the usual reefs outside of the state parks. I saw under 10 fish at each reef and this is concerning. Kona's tourism and destination will plunge when we see these reefs die, this is the biggest asset to the island. Please consider halting all tropical fish collecting forever on Hawaii.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Coronadocrown@gmail.com

From: [Kathleen Hori](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 5:22:24 PM

Aloha Mr. Sakoda,

My name is Kathleen Hori and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Katerose2@charter.net

From: [Laurie Hrdlicka](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:13:09 PM

Aloha Mr. Sakoda,

My name is Laurie Hrdlicka and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Over the past 15 years I have witnessed a dramatic decline of Flora and fauna off of Hawaii Island, especially in Kealakekua Bay and additional reefs north and south of the bay. Going backwards is not an option. Capturing any species for the pet industry in the world that we live in today is just unacceptable. This shouldn't even be considered.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jpod727@gmail.com

From: [Alice Hughes](mailto:Alice.Hughes)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 2:04:20 AM

Aloha Mr. Sakoda,

My name is Alice Hughes and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: The reefs a I am concerned about are off the west coast of hawaii I am concerned about the lifting of the moratorium on aquarium fish collection on the west coast of the big island. This area is a rare and beautiful pristine place, one of the few places in the world that people can see the beautiful tropical fish that exist and grow here. I have experienced with my own eyes in my many years of snorkeling that when the moratorium was

put in place slowly we began to see a few more fish. Especially schooling yellow tang. Also the tang are getting larger , it is very very rare to see a fully grown yellow tang. Numbers are getting better since the moratorium. Please please do not lift it, we owe future generations the right to be able to see this sea life in our waters.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Aliceinhawaii@gmail.com

From: [Marc Hughes](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 8:33:36 PM

Aloha Mr. Sakoda,

My name is Marc Hughes and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
All herbivores

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I have been scuba diving on the reefs of Hawaii for the last 25 years and have seen the difference it has made in closing areas to aquarium collecting. The reefs will suffer incredible consequences from this ban reversal especially because of the coral depletion due to increasing local water temperatures and 2 coral bleaching events over the last two years. I have a marine science degree from UH Hilo and study the reefs on Kona coast and teach Marine conservation (voluntarily) in the local school system. I have given several presentations showing video proof of both massive coral die offs and fluctuating fish populations due to collecting in Hawaii.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: marchughes479@yahoo.com

From: [Heather Huitt](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 4:56:33 PM

Aloha Mr. Sakoda,

My name is Heather Huitt and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: My family has owned a property directly across from Kahalu'u Bay. I have snorkeled there since my childhood days in the 60's. I have seen the decline and the rise in fish populations there. They are only recently rebounding. From what I see Kahalu'u is not even protected now, so to allow any increase in collection could only result in a new decline. I hope the people that are placed with the well-being of an entire ecosystem will err on the side of caution. Mahalo, Heather Huitt

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Dashcapt@hawaii.rr.com

From: [Nicholas Hurd](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:53:50 PM

Aloha Mr. Sakoda,

My name is Nicholas Hurd and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Why should we be the aquarium for collectors? Let them build their own ecologies

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: nick@mauinick.com

From: [Autumn Isaacson](mailto:Autumn.Isaacson)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:52:19 PM

Aloha Mr. Sakoda,

My name is Autumn Isaacson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua

My additional comment: I was born and raised in Hawaii and over the 25 years I've lived here,

I've seen a major decline in our fish and coral reefs. Please help protect our precious oceans and marine wildlife. Thank you

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Autumn2@hawaii.edu

From: [Bianca Isaki](mailto:bianca@kahea.org)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 5:29:54 PM

Aloha Mr. Sakoda,

My name is Bianca Isaki and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: bianca@kahea.org

From: Michael Ishii
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:00:11 PM

Aloha Mr. Sakoda,

My name is Michael Ishii and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I have family in Hawai'i and have visited a number of times. As a

life-long lover of the outdoors and the ocean I have been an avid tourist/snorkeler in Hawai'i. I have observed the decline of reef fish over the decades and it's deeply alarming.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mikeishii@gmail.com

From: [Stephanie Ishii](mailto:Stephanie_Ishii)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 5:26:14 AM

Aloha Mr. Sakoda,

My name is Stephanie Ishii and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Yayashere@yahoo.com

From: [Kyoto Isobe](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 12:03:21 PM

Aloha Mr. Sakoda,

My name is Kyoto Isobe and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kyotovisobe@gmail.com

From: Gail Jackson
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 6:45:16 PM

Aloha Mr. Sakoda,

My name is Gail Jackson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kohala

My additional comment: Until I broke my right femur my husband and I used to snorkel regularly. Really enjoyed watching the fish. I have been an environmentalist since I was in my early 20s. I'm now 80. This administration is accelerating our race to extinction. Anything we can do to save life on earth we should do.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: billgail.hi@gmail.com

From: R.Jankowski
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:45:27 PM

Aloha Mr. Sakoda,

My name is R Jankowski and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

North Kohala

South Kohala

My additional comment: In North Kohala at Mahukona, plentiful schools of yellow tang have not returned after aquarium fishers took so many. Please continue to ban this type of fishing.

Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jankowskiandbuck@gmail.com

From: [Renee Janton](mailto:Renee.Janton@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@DLNR.hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 2:26:12 AM

Aloha Mr. Sakoda,

My name is Renee Janton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jantonrenee@gmail.com

From: [John Jarve](mailto:John.Jarve)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 2:02:28 PM

Aloha Mr. Sakoda,

My name is John Jarve and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: Please preserve the reef fish for future generations. Mahalo,

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: john@jarve.com

From: [Kersten Johnson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:55:29 AM

Aloha Mr. Sakoda,

My name is Kersten Johnson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kekoaseed@hawaii.rr.com

From: [Amanda Johnson](mailto:Amanda.Johnson)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 7:22:18 PM

Aloha Mr. Sakoda,

My name is Amanda Johnson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

South Kohala

My additional comment: It is ludicrous to think this is acceptable. Our reefs, not only valuable in their own right but also one of our main economic tourism draws, are already under extreme pressure, this is absolutely unacceptable. Do NOT grant these permits.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mandyjohnson2@yahoo.com

From: [Mary Johnson](mailto:Mary.Johnson@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:58:50 PM

Aloha Mr. Sakoda,

My name is Mary Johnson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Ka`u

Puna

My additional comment: I have noticed a drastic change in the Hawaii reefs due to the impacts of aquarium trade. Please change and enforce laws protecting these animals.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mlj626@att.net

From: [Bradley Jones](mailto:Bradley.Jones@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:27:24 PM

Aloha Mr. Sakoda,

My name is Bradley Jones and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna

My additional comment: I have lived in Hawaii and been visiting for 40 years. In that time I have noticed the disappearance of fish on the reefs of Kauai, Maui, Oahu, and the Big Island, as well as disease of the coral itself. The fish and animals of the reef are a resource of Hawaii

that is extremely important not only to the health of the reef, which protects our islands from erosion and hurricanes and storms but also to the tourism industry. People want to see these fish in the wild, and the aquarium trade has absolutely no right to harvest them for profit. The fact that resumption of harvesting is even being considered is outrageous. This business model isn't sustainable for Hawaii or anywhere else in the world. The aquarium trade must learn to breed species that are adaptable in captivity and leave all others in the wild. Period. No exceptions. Concerned citizens like me and investigative journalists are looking into campaign donations and undue political influence by the aquarium trade in Hawaii and local civil servants and politicians should be very aware that if they are accepting donations or bribes from the aquarium trade to influence their votes and decision making they will be exposed publicly in Hawaii and nationwide. Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: bjesquire@gmail.com

From: [Jeremy Jones](mailto:Jeremy.Jones@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 10:39:26 AM

Aloha Mr. Sakoda,

My name is Jeremy Jones and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Eagleswingdj.jj@gmail.com

From: [Jordy Jones](mailto:Jordy.Jones)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 7:50:05 PM

Aloha Mr. Sakoda,

My name is Jordy Jones and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: Reef fish belong in reefs. You know this. Collectors know this.

Everyone knows this. Human greed is consuming the world. This is a chance to change. Do it. Now. Stop the collecting. For the fishes.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: drjordyjones@gmail.com

From: [Tracy Jones](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:21:49 PM

Aloha Mr. Sakoda,

My name is Tracy Jones and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

I am also concerned about the fact that this is an unregulated activity. Collection of tropical fish from our waters should be a band activity. Tropical fish collection disrupts the natural cycle of the reef. The coral reefs are the oldest most complex diverse ecosystems on our planet.

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Puna
Hilo

Hamakua
South Kohala

My additional comment: I am a marine biologist by education and a practicing attorney on Maui. The practice of tropical fish collecting for the aquarium trade should be a band activity. Unless there is sufficient oversight, regulation, reporting and study, we as a community should oppose the harvest. The trade is for profit and export and serves no important purpose to society. Please excuse any typos I'm submitting this on the phone. Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tracytimluke@aol.com

From: [Karmen Jones-Cox](mailto:Karmen.Jones-Cox)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:06:34 PM

Aloha Mr. Sakoda,

My name is Karmen Jones-Cox and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pobugbrew@gmail.com

From: [Dana Jones-Viering](mailto:Dana.Jones-Viering)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:58:40 PM

Aloha Mr. Sakoda,

My name is Dana Jones-Viering and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The islands are a special place. If we keep removing natural species a downward spiral will continue. We are losing too many species of animals in the world to allow taking of inhabitants from their homes. This is absolutely, without question not acceptable.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: cozyhouse2@aol.com

From: [Rhea Jose](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 9:23:43 PM

Aloha Mr. Sakoda,

My name is Rhea Jose and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

Forcepsfish/Longnose butterflyfish

Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: We should protect our reefs because if we continue to damage or negatively impact them, nature loses its pristine aspect. If we remove these species, we are disrupting the ecosystem. Us humans are also a part of the ecosystem meaning that it could be detrimental to us as well. There are so many efforts to preserve our environment and we should keep persisting on. This is just another problem added that we do not need.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rhea.jose@student.chaminade.edu

From: [Al Jubitz](mailto:AlJubitz)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 9:06:57 AM

Aloha Mr. Sakoda,

My name is Al Jubitz and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made. Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: As the world changes we must respect nature more and change our behaviors to support all species in all places. Man's hostility to habitats must change.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: aljubitz@comcast.net

From: [Douglas Junkins](mailto:Douglas.Junkins@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:46:01 PM

Aloha Mr. Sakoda,

My name is Douglas Junkins and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:
All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kohala

My additional comment: I travel to Hawaii at least once per year to snorkel and scuba dive.

There has been a noticeable improvement on the number of reef fish seen in the last couple years, especially in Puako where I have been snorkeling for many year, but the reefs are still

under stress from coral bleaching and climate change. It seems incredibly short-sighted to

remove the ban on collection of reef fish at this time. Removing the ban will likely impact my desire to return to Hawaii and enjoy the fish in their native habitat.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: junkins@foghead.com

From: [Joy Kaaz](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 1:55:17 PM

Aloha Mr. Sakoda,

My name is Joy Kaaz and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: Our oceans and reefs are in serious danger from climate, including but not limited to warming ocean waters, acidification, coral bleaching, toxic pesticides, fertilizer and human and animal waste runoff and discharge, the impact of tourism. These fish are an important part of the web of life necessary to maintain the health of our reefs and ocean, and ultimately human survival. In light of all the current environmental threats to the safety and wellbeing of our oceans and planet, allowing the resumption of fish harvesting for personal aquariums is foolish and contributes to the continued degradation of our planet.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rbjyz@gmail.com

From: [Margaret Kahoilua](mailto:Margaret.Kahoilua)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 8:07:16 PM

Aloha Mr. Sakoda,

My name is Margaret Kahoilua and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: I am a Native Hawaiian, past Expedia Local Expert, member of The Coral Reef Alliance, Bail Bondsman, and a current participant on the Vibrant Hawaii Leadership Team. I am concerned w/the condition of our coral reefs. In September of 2019, I joined some guests on a snorkeling tour to Kealekekua Bay. My heart was broken by the vast difference/depletion of diversity among our reef fish. Given the fact that this area is a conservation area, it was surprising to observed the devastation. There are many factors already impacting the health of our local reefs. Allowing the collection/removal of our reef fish only exacerbates an existing crisis & may lead to the depletion of essential reef species.

Please ensure any decisions made regarding permits to collect fish are made with the sustainability of our coral reef ecosystems as TOP PRIORITY. Mahalo...

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: maggiekahoilua@gmail.com

From: [Ana Kahoopii](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:37:15 AM

Aloha Mr. Sakoda,

My name is Ana Kahoopii and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: This severely impacts cultural practices. The aumakaua of my ohana reside with the reefs of Hawai'i. You can expect massive resistance should you decide to move forward with this. Don't you ever learn your lesson?

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: savehawaiidogs@gmail.com

From: [Shelly Kaiyala](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 2:05:13 AM

Aloha Mr. Sakoda,

My name is Shelly Kaiyala and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Any and all

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kaiyala@hotmail.com

From: [Keoki Kamaka](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 12:14:01 PM

Aloha Mr. Sakoda,

My name is Keoki Kamaka and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Angelfishes
kole

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: Do you remember why the Kailua-Kona area was called the "Gold Coast"? It was because when the Yellow Tang would feed on the reefs, they would lay on their sides thus turning the reefs "golden". Need I say more?

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: keok1h151@gmail.com

From: [Kathleen Kane](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 1:59:40 AM

Aloha Mr. Sakoda,

My name is Kathleen Kane and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I am a life long snorkler. My first time Snorkeling in Hawaii was 1960, and it was wondrous. Since then I have watched the horrendous ruin of the magical

underwater world I remember from my teens. Please do what you can to save what is left.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kkane@aol.com

From: [Rebekah Kaufmann](mailto:Rebekah.Kaufmann@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:37:02 PM

Aloha Mr. Sakoda,

My name is Rebekah Kaufmann and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala

South Kohala

My additional comment: I have been diving the Kohala coast weekly for 20 years. The decline in healthy coral seen in the last few years is devastating and the only chance of recovery is to limit taking any unnecessary resources. The reefs need our herbivore fish more than ever to try to recover from coral loss caused by rising temperatures. Even exporting one reef fish is too many to spare!! While there are many factors in the reefs declining the taking of reef fish to export is one major contributor that could be easily stopped.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: godiving@kohaladivers.com

From: [Kaimi Kaupiko](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 4:18:47 AM

Aloha Mr. Sakoda,

My name is Kaimi Kaupiko and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.
Marine life is threatened with local extinction
The real possibility that future generations may not encounter these species
DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.
70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.
Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.
Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: As a Native Hawaiian, we have fought long and hard to stop the trade in HAWAII. As we continue to fight for justice, we have stayed on the right side of and we continue to say that the cultural impacts are significant to us and our way of life. We worked hard that an EIS be done when the supreme court decision was made, and now with

this report we continue to stand in defiance of our claim and the lackluster work of DLNR to do their job within our community. Furthermore, PIJAC is a lobbying group for the commercial pet trade. PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. This sneak attack on Hawaii reefs has a comment period that spans Thanksgiving, Christmas and New Years. When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, aquarium collector. When the Intermediate Court of Appeals ruled for the aquarium trade, DLNR Director/Nature Conservancy Director Suzanne Case said, "It's been litigated!" She scoffed the Supreme Court ruling. She met with aquarium collectors to advise on speech and behavior in the legislative season. These meetings are in the public record. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, Case prevailed again on Governor Ige to veto the bill. Ige knows nothing of ocean species or habitat. The Hawaii Supreme Court ruled that no further permits should be issued until Environmental Assessment, with injunctive relief to SHUT IT DOWN NOW! DLNR Director Suzanne Case trumped that ruling with permits are no longer required, for aquarium collecting. It takes only a commercial fishing license. Many Kona aquarium collectors never stopped collecting, with tacit support from Kona DAR and Hawaii DLNR. When an aq collector attacked a woman with a GoPro camera at Keawaiki, DLNR visited Kona to comfort the aquarium collectors. Now DLNR Director/TNC Director Emeritus Suzanne Case promotes the TNC agenda, deferring to Big Fishing. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes nearshore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater. Spirit and intent in the Supreme Court ruling are clear. The PIJAC PROMO piece claims a surge in recovery to justify a new wave of reef carnage. The PIJAC PROMO piece notes a catch limit on Achilles tangs of 5 per collector per day, down from 10 per day. Few people have seen 5 Achillies tangs in a single day in many years. This PIJAC Promo piece is not an environmental review but a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people of iconic, endemic and economic treasures, to support a mainland amusement industry, to condemn reef wildlife in a vicious cycle of replacement. THAT is what the aquarium trade calls "sustainable." Enough! mahalo Kaimi N Kaupiko and Wilfred Kaupiko

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kkaupiko@gmail.com

From: [Bernadette Keeling](mailto:Bernadette.Keeling@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 11:44:53 AM

Aloha Mr. Sakoda,

My name is Bernadette Keeling and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: This is unnatural to our ecosystem and to our culture this needs to stop!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Keelingc001@hawaii.rr.com

From: [Phaethon Keeney](mailto:Phaethon.Keeney)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 6:17:53 PM

Aloha Mr. Sakoda,

My name is Phaethon Keeney and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All reef species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Hilo

South Kohala

My additional comment: Aloha, please, our reefs are stressed enough due to climate change, water pollution, golf course and construction runoff and so many other reasons, the 2 year break was a welcome change (it was so nice as yellow tang and others returned to our shores!) but we cannot afford to let the profit of a few individuals damage healthy reef ecosystems, the impact is greater than just the fish themselves, the web of life on these reefs is immensely complex and just a few factors can tip these systems into other states. Just this year the "heat blob" took a toll on West Hawaii reefs again, and there's more sure to follow, we need to do everything we can to protect these beautiful creatures which make Hawaii so unique and amazing and ensure a more abundant future for everyone. Hawaii's residents and visitors love those fish dearly and like "Finding Nemo" impacted us all, taking these beautiful creatures impacts us all. It's just awful trying to explain to the keiki how in the face of Climate Change

and so much environmental injustice that the decision-makers in Hawaii could possibly put the profit of a few over everyone else, please help us have a more inspirational conversation by deciding to continue the ban the aquarium trade on West Hawaii's reefs... big mahalos! :)

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: honokaapeople@yahoo.com

From: [Anita Kelleher](mailto:Anita.Kelleher@me.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 9:49:28 AM

Aloha Mr. Sakoda,

My name is Anita Kelleher and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: The gold coast is no longer Gold!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: anitakelleher@me.com

From: [James Kelleher](mailto:James.Kelleher@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:08:50 AM

Aloha Mr. Sakoda,

My name is James Kelleher and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: We dive and snorkel then reefs from Keahou to the Kohala Coast. We need to STOP aquarium collecting so the fish and the environment can recover.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: reprieve@bellsouth.net

From: [William Kelly](mailto:William.Kelly)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:19:36 PM

Aloha Mr. Sakoda,

My name is William Kelly and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: williamkelly25id@gmail.com

From: [Laura Kempen](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:49:13 PM

Aloha Mr. Sakoda,

My name is Laura Kempen and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: We need to protect our reefs. They face enough danger from climate change without adding unnecessary dangers.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sculpturemama@gmail.com

From: [Wayne Kendall](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 10:34:08 AM

Aloha Mr. Sakoda,

My name is Wayne Kendall and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I am a saltwater aquarium owner, all fish that I purchase are tank raised, I will not purchase a fish that I know has been harvested from the sea. I hear to many times that people buy a marine fish ,and just let it die because of neglect to there aquarium or because there tired of taking care of them. I believe our Ocean's and reefs are in danger, because of the pollution, and over harvesting.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ewk@peoplescom.net

From: [Andrew Kennedy](mailto:Andrew.Kennedy@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 6:24:13 PM

Aloha Mr. Sakoda,

My name is Andrew Kennedy and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Surgeonfishes
All 40 White List species
Bandit Angelfish
Forcepsfish/Longnose butterflyfish
kole
All herbivores
Save the reefs!

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: Save the reefs!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kennedyandrewm@aol.com

From: [Dennis Kent](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 7:13:59 PM

Aloha Mr. Sakoda,

My name is Dennis Kent and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

Bandit Angelfish

Angelfishes

Achilles tang (paku ikui)

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment: As an employee of the airlines in the 70's, I saw the shipments of tropical fish coming in from Hawaii to the West Coast. The half starved, half dead fish that arrived were often rejected by the tropical fish dealers due to die off. They would leave them with the airlines to dispose of as no one wanted to pay to fly them back and they would most likely be dead by the time they arrived back in the islands. The Tropical Fish Industry pays nothing for the fish and as a result they have no respect for them alive or dead. This industry should be outlawed in Hawaii as they have shown themselves to be corrupt and without any concern for our treasured fish populations or the health of our reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: denniskent@gmail.com

From: [Kathryne Kent](mailto:kathryne.kent@pvthawaii.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 11:21:08 PM

Aloha Mr. Sakoda,

My name is Kathryne Kent and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: Don't be so stupid DLNR!!!!!! Come on - pay attention. The environment needs protection not exploitation for stupid aquariums.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kathryne@pvthawaii.com

From: [Shana Kent](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 10:24:43 AM

Aloha Mr. Sakoda,

My name is Shana Kent and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I am a scuba instructor and diving the reefs daily. Within the last few

months we have begun to see a few of the above list species in small numbers but consistently. In previous years we were lucky to ever see any of the species. Aquarian fishing is selfish and benefits only a few. We should preserve the reefs, fish species, and the environment for all of society as well as our planet.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Srk4online@gmail.com

From: swarn_khalsa
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 11:06:35 AM

Aloha Mr. Sakoda,

My name is swarn khalsa and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
all of them

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: I think it would be better for the aquarium trade to breed the fish they want to sell instead of robbing the protected Hawaiian reefs. Thank you

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: khalsas001@hawaii.rr.com

From: [Jeanie Kilgour](mailto:Jeanie.Kilgour@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@DLNR.hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 1:57:35 PM

Aloha Mr. Sakoda,

My name is Jeanie Kilgour and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: aloha@snominx.com

From: [Kwi Kim](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 11:48:19 AM

Aloha Mr. Sakoda,

My name is Kwi Kim and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Forcepsfish/Longnose butterflyfish

Achilles tang (paku ikui)

My specific concerns about those species include:

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Obbazzang123@gmail.com

From: [Brandon Kloth](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:25:19 PM

Aloha Mr. Sakoda,

My name is Brandon Kloth and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: The value of our environment is much more valuable than the value of the dollar.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: email4bsk@yahoo.com

From: [Loren Knappenberger](mailto:Loren.Knappenberger)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 10:22:34 PM

Aloha Mr. Sakoda,

My name is Loren Knappenberger and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

Achilles tang (paku ikui)

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Ka`u

My additional comment: The pakuikui is Kapu for my family to eat as it is reserved for Pele, our Aumakua(ancestor). Sad to see that they are being exploited for sale to tanks.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kailuaboy4369@aol.com

From: [Lorraine Kohn](mailto:Lorraine.Kohn)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:41:42 PM

Aloha Mr. Sakoda,

My name is Lorraine Kohn and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kohala

My additional comment: It's crazy to stress the Reef with all the coral bleaching going on. Don't let the benefit to a few people trump the good of the majority. Save the reefs!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lorrainekohn@gmail.com

From: [Cynthia Kruger](mailto:Cynthia.Kruger@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 8:06:47 PM

Aloha Mr. Sakoda,

My name is Cynthia Kruger and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Confining living beings for the entertainment of humans is cruel and wrong.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ckruger@persephone.org

From: [Risa Kuroda](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 10:23:02 PM

Aloha Mr. Sakoda,

My name is Risa Kuroda and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The DEIS and the final EIS needs to fully address alternatives and explain why those alternatives are inadequate. It should also make clear why their proposed action is appropriate at the present time given that it has been ruled inappropriate previously. Failure to disclose the aforementioned points adequately for public review opens the DLNR to public citizen suits. Separately, DLNR should be more prudent in assessing long term financial and political impact to the State. Being transparent with the cost benefit analysis would mitigate public backlash. As a Hawaii resident, disappointment is an understatement

when our leaders sell out our natural resources. Its beauty is the one thing that keeps our economy going and gives physical dimension to our culture. To sell that so that richer people can put it in boxes to look at is shameful.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kurodar@bc.edu

From: C.Lam
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 12:59:01 AM

Aloha Mr. Sakoda,

My name is C Lam and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I was born and raised in the islands. Through I reside on the mainland, the preservation of this sea life is important to me and my family. Hawaii is such a unique place with unique wildlife both on land, sea and in the sky. Do NOT put profits before the preservation of this wildlife that could result in irreversible damage of the delicate balance of the environment. Think of the future generations and not short-term financial gain.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: C_lam1977@yahoo.com

From: [Sally Lambert](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:26:43 PM

Aloha Mr. Sakoda,

My name is Sally Lambert and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: It is important to note that anything that can be done to save our reefs will help minimize the onshore impacts of climate change. All properties within a minimum of 10 feet above sea level will and are now being impacted by climate changes. Not only are we better off for all the fish species we preserve in their native habitat, we also preserve the beauty of our islands for our own pleasure and Hawaii remains a place tourists visit and provides a good deal of our economy. It's almost a virtuous cycle. The tropical fish aquarium

trade really needs to come to an end. Giving up aquariums in a home or office is a small sacrifice for people to pay in order to preserve our reefs, our ocean environment, and the many ocean side homes and businesses that are at risk. Mahalo for your kokua and understanding.
Sally J. Lambert

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sjlambert@hawaiiantel.net

From: [Joan Lander](mailto:Joan.Lander)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 6:12:20 PM

Aloha Mr. Sakoda,

My name is Joan Lander and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: namaka@interpac.net

From: [Teresa Landreau](mailto:Teresa.Landreau)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 10:27:11 PM

Aloha Mr. Sakoda,

My name is Teresa Landreau and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: My snorkeling experience back in the 1970s compared to now makes clear to me the diversity and numbers of reef fish has plummeted. Strongly support ending private collection of wild fish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Terlandreau@gmail.com

From: [Sandy Lane](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 10:42:34 PM

Aloha Mr. Sakoda,

My name is Sandy Lane and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: Only 10 yrs ago, the reef fish populations were noticeably more robust. It is not common to find the large schools of fish that once existed. It is a sad day for reef populations. Keep them all protected now.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Moscowlane@gmail.com

From: [Maureen Langberg](mailto:Maureen.Langberg)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:58:14 PM

Aloha Mr. Sakoda,

My name is Maureen Langberg and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hilo
Hamakua
South Kohala

My additional comment: Dear Hawaii Dept. of Land and Natural Resources DLNR: We are asking your support to help reduce the declines, missing species, and diminished beauty we have personally experienced while snorkeling, out on small boats and reefs. We have noticed a

significant decline in numbers. Please help ensure the return to abundance necessary to keep Hawaii's fishes and reefs in their best possible condition for today, tomorrow, and future generations. Thank you, Mr. and Mrs. Fredrick Langberg North Kohala

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Maureenlangberg@gmail.com

From: [Barbara Lasich](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 6:57:57 AM

Aloha Mr. Sakoda,

My name is Barbara Lasich and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I notice way fewer fish and variety of fish than 30 years ago. Fish collecting has impacted the reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: beejaylk@gmail.com

From: [Richard Layton](mailto:Richard.Layton@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 5:13:21 PM

Aloha Mr. Sakoda,

My name is Richard Layton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: Kapoho tide pools, kona reefs, kohala reefs... each year there is less and less fish overfishing and now aquarium fish? There cannot be added distress on our oceans reef/marinelife systems. Its sad and heartbreaking to see the ocean slowly dying because of things like this, people who want to make money taking animals that dont belong in aquariums... This is one of thw many many things that makes hawaii unique... if you want to see fish go swimming in the ocean. Period

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Masonmix23@gmail.com

From: [Sandra Lee](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:09:56 PM

Aloha Mr. Sakoda,

My name is Sandra Lee and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sandyswings73@gmail.com

From: [Katherine Lees](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 6:42:45 PM

Aloha Mr. Sakoda,

My name is Katherine Lees and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I snorkel several times a week in local Hawaii Waters and I am very concerned about the Marine life. a few collectors should not have the right to destroy the environment against the enjoyment of the rest of us. Kahaluu and other popular snorkel sites should be off limit for all types of collecting and fishing.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Leeschung@yahoo.com

From: [Sandi Legacy](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 11:22:21 AM

Aloha Mr. Sakoda,

My name is Sandi Legacy and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Hamakua

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sandilegacy23@gmail.com

From: [Senna Leith](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 18, 2019 3:36:45 AM

Aloha Mr. Sakoda,

My name is Senna Leith and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sennaleith@gmail.com

From: [Francesca Leonetti](mailto:Francesca.Leonetti@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 11:43:25 PM

Aloha Mr. Sakoda,

My name is Francesca Leonetti and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

Ka`u

North Kohala

South Kohala

My additional comment: As a long time visitor to Hawaii's Islands, I believe fish should be left in their home in the ocean, not taken by humans to live in small tanks, often to the detriment of their health and lives. How would you like it if someone took you out of your natural environment and put you in a glass box for others to stare at? Stop the aquarium trade now.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Fernhoff@hotmail.com

From: [Kristen Lesley](mailto:Kristen.Lesley@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:44:23 PM

Aloha Mr. Sakoda,

My name is Kristen Lesley and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Ka`u

Hilo

Hamakua

My additional comment: I am not familiar with what reefs are being used to harvest aquarium fish, but should that matter? My concern is we are exploiting these species for the entertainment of a handful of people. The reef ecosystem is so delicate, and should not be tampered with in any way.. at the very least we should NOT have a government that allows it, or profits from it. Couldn't we find other ways? Maybe sell mongoose as pets, or pigeons. Send them off to the mainland. Mainlanders are fascinated by all things Hawaii. I went to a pet shop in California that were buying Anoles from Hawaii and selling them as pets. Anoles are abundant, and their decline wouldn't have so much of an effect on our ecosystem as the reefs would. Please reconsider allowing fishermen to harvest reef fish. I hear that they use chemicals to stun the fish being harvested, and that ruins the coral. Fish should only be harvested for consumption, and for no other purpose.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kristenlesley@gmail.com

From: [Martha Levick](mailto:Martha.Levick)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, January 1, 2020 6:29:38 PM

Aloha Mr. Sakoda,

My name is Martha Levick and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Marthalevick@gmail.com

From: [Lenley Lewis](mailto:Lenley.Lewis)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 2:10:28 AM

Aloha Mr. Sakoda,

My name is Lenley Lewis and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hilo
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: lenleyl@gmail.com

From: [Lisa Lim](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 3:40:02 AM

Aloha Mr. Sakoda,

My name is Lisa Lim and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Puna
Hilo
Hamakua

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lisa_lim03@hotmail.com

From: [James Little](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 8:02:13 PM

Aloha Mr. Sakoda,

My name is James Little and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Any type of reef creature.

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: There are plenty of Hawaiian reef fish in the pet trade already. More

real efforts should be on captive breeding of what's already in the pet trade, this disposable fish attitude is the real problem. I visited Hawaii with my wife and was very excited to see the reefs, I was very depressed by how terrible the reef conditions were in Hawaii, they looked barren, so barren in fact that I decided to not return to Hawaii again unless they take their ecosystems more seriously. The main driver of the Hawaiian economy is the eco tourism, once you destroy what makes Hawaii beautiful for such a short sighted financial gain, you will pay the price in lost tourism and revenue. Hawaii should look to Palau when it comes to their eco tourism mgmt. That's where I went for my next vacation instead of returning to Hawaii and they have the best reefs in the world, they know what they are doing and it shows.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: hkspowers@gmail.com

From: [John Little](mailto:John.Little)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 7:34:29 PM

Aloha Mr. Sakoda,

My name is John Little and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: All the creatures removed from the ocean will die in captivity...

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Johnandmonica@mac.com

From: [Sue Little](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 11:50:12 AM

Aloha Mr. Sakoda,

My name is Sue Little and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

South Kohala

My additional comment: I snorkel swims several days per week. The loss of fish was tragically apparent after the aquarium collectors visited the bay, usually at night it seems. The populations are finally starting to improve but many types are still very limited. I want the personal collection numbers to be severely restricted too. Most fish taken die and it's a horrible business. Breed in captivity should be encouraged instead.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Little2251@gmail.com

From: craig.Lomnicki
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 10:21:22 PM

Aloha Mr. Sakoda,

My name is craig Lomnicki and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Reef fish need to be reef fish not aquarium fish. Man should not disrupt the natural ecosystem just for his self pleasure. Many reef fish die in the collection,transport and display. We must remind ourselves as "Hawaiians" (Hawaiian is a state of mind that must be spread with our Aloha) that we are the stewards of our environment. If we can not show that responsibility here in Hawaii an island ecosystem how can we expect others to respect in the world that the natural world is important.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: craiglom@yahoo.com

From: [Bruce Lowrey](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 17, 2019 3:56:11 PM

Aloha Mr. Sakoda,

My name is Bruce Lowrey and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Mostly, I snorkel on my home reefs in South Maui. But I do get over to the Big Island from time to time, and it breaks my heart to see the declining biodiversity. The comeback of the yellow tang is encouraging, but by no means encouraging enough. It is obscene that our wildlife is being treated as a commodity for the enrichment of traders. At best, we are stewards of the creatures in the aina. We must protect them. At worst, we should at least coexist with them. None of us "owns" them. They must not be trafficked. I use this word advisedly--what's going on here (or what will go on here if the 2018 ban is lifted) is the moral equivalent of trafficking human beings. It has to stop, and stay stopped.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: brucelowrey4117@comcast.net

From: [Natalie Lum](mailto:Natalie.Lum)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 1:45:39 AM

Aloha Mr. Sakoda,

My name is Natalie Lum and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Any marine life

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: When I was young the colorful fish were abundant nearby the shoreline as I snorkled on the shallow reefs. Now there is hardly anything in the shallow reef area. Since I am not a strong swimmer going into deeper water is not an option.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: natlum@hawaii.edu

From: [Jolene Lushine](mailto:Jolene.Lushine@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@DLNR.hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 8:19:58 AM

Aloha Mr. Sakoda,

My name is Jolene Lushine and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Please just leave things how they are in their natural habitat. This is unnecessary disruption to the ecosystem. We may never know the long term repercussions of our actions such as this in our own lifetimes. I used to live in Maui and thoroughly enjoyed everything the beautiful ocean had to offer.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jolenelushine@gmail.com

From: [Patty Machado](mailto:Patty.Machado)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:45:25 PM

Aloha Mr. Sakoda,

My name is Patty Machado and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
Hilo
Hamakua
South Kohala

My additional comment: We snorkel on a regular basis. We also bring our guests to the reefs. We are careful not to touch the coral and use sunscreen that doesn't harm the reefs. If we are taking care the DNLN should back us up! We had noticed that the fish in the reefs near the shore had really thinned out. During the last couple years they might have been increasing but we only really noticed it in the last 6 months. It is imperative that we protect the reefs. The global warming that is coming will stress the populations and it doesn't make sense to have a less robust start! It is also really wrong to put in a ban for local fishermen that the aquarium industry isn't subject to. I would hope that they could breed the fish on the mainland so that they don't ruin the wonderful reefs we have here.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: patty@machadofam.com

From: [Maria Macias](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 2:02:18 AM

Aloha Mr. Sakoda,

My name is Maria Macias and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Hilo

My additional comment: We need to do whatever we can to preserve our reefs & the fish that make it their home.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: hilomaria@hotmail.com

From: [Pamela Madden](mailto:Pamela.Madden)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:30:15 PM

Aloha Mr. Sakoda,

My name is Pamela Madden and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Forcepsfish/Longnose butterflyfish
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I think without drastically improving DLNR's enforcement capabilities of the aquarium trade, resuming aquarium collection should not occur.

Realistically, there is zero enforcement of this industry. In my years of shore diving all along the Kona-Kohala coast (200+ dives) I have never seen an enforcement officer either on land or a boat, checking fish collectors catch (either aquarium collectors or spearfishermen). Plus, the volunteer reporting system so collectors only have to "self-report" how many fish they captured is woefully inadequate and ripe for corruption. A 2004 Division of Aquatic Resources (DAR) report has even acknowledged that there is no way to verify the accuracy of the data submitted. This same report also states that there are indications of underreporting. An effective DOCARE enforcement presence on the water and along the coastal areas is essential for long term sustainability of our marine resources. And since, enforcement officers can't open an aquarium collector's cooler to check what species, how many, and what size were obtained, currently there is no practical way to currently enforce this industry with our status quo enforcement procedures. At the 22nd Annual Hawaii Conservation Conference, a DLNR enforcement officer even publicly stated that his department did not have the financial ability to do its job properly since there are only 3-4 enforcement officers for all the West Hawaii

coastline, and they are supposed to take care of both land and sea issues. Furthermore, in another DLNR “State of the Reefs” report, it was noted that “removal of significant numbers of these aquarium collection species could result in an increase in algal growth due to a lack of grazers to keep the algae in check and a corresponding decrease in coral cover.” With all of the stressors that our reefs are currently experiencing (i.e. warming temperatures/bleaching, pollution, cesspools, increased visitor use, sunscreen chemicals etc.) stopping aquarium collection has an immediate and impactful preservation of the reefs. Another recommendation from the DLNR “Report of the Findings and Recommendations of Effectiveness of the West Hawaii Regional Fishery Management Area” is that DLNR should prioritize the adoption of the Hawaii Administrative Rule requiring a marine dealer report. This would allow for comprehensive verification of the aquarium dealer and collector catch reports to determine reporting accuracy. So until the State of Hawaii allocates more financial resources and personnel to properly regulate and enforce the aquarium trade, reopening the reefs to aquarium collection is premature and should not occur! Malama Aina.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pammadden13@gmail.com

From: [Deb Mader](mailto:Deb.Mader)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:45:02 PM

Aloha Mr. Sakoda,

My name is Deb Mader and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Orchid6128@aol.com

From: [Megan Magdalene](mailto:Megan.Magdalene@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:39:17 PM

Aloha Mr. Sakoda,

My name is Megan Magdalene and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: Aloha, In Africa and Asia it has become unthinkable and illegal to trade in either the following (live or dead) wildlife: Elephants, Tigers, Primates Rhinos ...AND MANY OTHER SPECIES. The international community has intervened and declared this practice of killing or extracting wildlife illegal. This kind of extraction is known by its common name: POACHING. Marine habitats are in jeopardy. The trade in aquarium species of fish is for a luxury market and in no way is connected to a traditional food source and is fundamentally unjustifiable. Now in 2020 is a time where it is critical for people and government officials everywhere in the world to act to protect creatures everywhere. This is not a time to make short term profit a higher consideration that the preservation of wild places and wild habitats. I regularly snorkel in Hawaii and have seen plenty of evidence of depleted marine environments. I'm aware of the coral death that is occurring and other signs that our marine environments are in distress. Further, my livelihood and the livelihood of many others in my community in East Hawaii relies upon the high value that visitors place on the beauty and eco-diversity of Hawaii and plentiful, healthy marine life. Any compromises to the health of our coastlines, reefs and beaches will come at a huge cost to our communities and our economy. Please do MORE to protect our reefs, not less. Genuine measures of protection would further include banning the sale of all non reef-safe sunscreen, introducing more measures to prevent run-off from golf courses and remediating marine pollution from septic tanks and industry. Please end all POACHING of marine life now and please act now to do more to protect marine habitats.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lotusgardenhilo@gmail.com

From: [Tisha Mallon](mailto:Tisha.Mallon)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 9:30:02 PM

Aloha Mr. Sakoda,

My name is Tisha Mallon and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I am a part time resident of Kona, Hawaii and swim regularly at the City of Refuge in Honaunau for over 35 years. I cannot understand the overwhelming changes in the coral, fish and nature the dolphins resting place, especially over the past five plus years.
Tisha Mallon

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tshmallon@yahoo.com

From: [Wendy Manley](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 5:34:18 PM

Aloha Mr. Sakoda,

My name is Wendy Manley and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All of them

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Puna
Hilo

My additional comment: Most fish die in aquariums anyways. There is just no real need for the collection of the fish. Please leave them on the reef.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: wendyherring@msn.com

From: [Megan Mant](mailto:Megan.Mant)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 7:52:34 PM

Aloha Mr. Sakoda,

My name is Megan Mant and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Hilo
Hamakua

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: meganfire8@aol.com

From: [Michelle Marsh](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, January 1, 2020 11:53:30 AM

Aloha Mr. Sakoda,

My name is Michelle Marsh and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Michellekauai@gmail.com

From: [David Marshall](mailto:David.Marshall@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 1:59:55 PM

Aloha Mr. Sakoda,

My name is David Marshall and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Hamakua

South Kohala

My additional comment: The reefs need a healthy balance of stable proper water temp., & fish, shellfish etc. to survive into the future! Any disruption of the natural balance of these extremely valuable reefs during this critical time of stress with widespread bleaching and other assaults on this ecosystem is not proper and DOES NOT support the science for overall reef health. The taking of reef fish for profit does not help, but instead hurts the Hawaiian people in the long term. The decline of the reefs and reef species will have a major negative effect on tourism & tourism dollars. I believe it is morally and ethically wrong to ignore the negative impacts and to try to extract VERY SHORT TERM PROFIT from the major long term disruption and damage of these harvesting activities, ignoring such things as success of reef fishing & subsistence gathering activities of the Native Hawaiian people & all Hawaiians & visitors. These aquarium fish harvesting activities will hurt ALL Hawaiian Residents and also people from all over the world who travel here to see the amazing and unique beauty of

Hawaii. They book charter boats, dive & glass bottom boats to see Healthy Reefs with an abundance of sea life! Hawaii visitors also support dive shops, snorkel gear and beach equip. rental stores, hotels & essentially all businesses across the islands! This proposed DLNR harvest plan is designed for short term greed & profit, while ignoring court decisions and the wishes of (DLNR's!!!) Hawaiian residents. I STRONGLY request that you abandon this damaging Aquarium Harvest Plan and follow the will of the courts and people of Hawaii!
Respectfully, Dave Marshall

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: davemarshall@hush.com

From: [Karen Martinez Martinez](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:05:08 PM

Aloha Mr. Sakoda,

My name is Karen Martinez Martinez and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: hello_karen@rocketmail.com

From: [Marty Martins](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:57:44 PM

Aloha Mr. Sakoda,

My name is Marty Martins and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

Angelfishes

Forcepsfish/Longnose butterflyfish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I snorkel almost every day and have seen the effect of fish trapping over the years.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mauihakuaina@gmail.com

From: [Rita Massey](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 18, 2019 7:28:02 PM

Aloha Mr. Sakoda,

My name is Rita Massey and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I live in South Maui and paddle and swim and snorkel in the area.

Over the years I have seen a great deal of degradation of the reef and major decline in the

number of fish. 20 years ago I would snorkel at Ulua reef in Wailea and see fish everywhere, such that they were all around and couldn't be avoided. Angel fish, tangs, parrot fish etc. Now

I see one or two fish here and there. Seldom do I see yellow tangs. Tourists spend a lot of money to come here and now there are so few fish for them to enjoy. How long can we keep

the tourists coming if the reefs are no longer viable? There is widespread bleaching of the reefs so I know all the animals are stressed as it is and they should not have any more. I say

NO taking of fish off the reefs. It is bad for the reefs and it is cruel to the fish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ritahands@yahoo.com

From: [Willa Mathison](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:32:41 PM

Aloha Mr. Sakoda,

My name is Willa Mathison and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hilo

Unfamiliar with these reefs, but still concerned.

My additional comment: We are an elderly couple who have had the pleasure of observing Hawaii's fishes through snorkeling extensively on Oahu, Hawaii, Kauai and Molokai. We would like future generations to enjoy them as well. Through the years, we have watched the populations decline, which we believe to be the result of the aquarium collectors. Please don't let them continue to decimate populations. Even Hanauma Bay has been impacted, and that is a fish reserve.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: fredwillakubasta@yahoo.com

From: [Joel Matsunaga](mailto:Joel.Matsunaga)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 11:55:40 PM

Aloha Mr. Sakoda,

My name is Joel Matsunaga and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

Puna

Hilo

Hamakua

South Kohala

My additional comment: Kawaihae/South kohala stretch from kapakahi to the harbor has deteriorated so much in the last 10 years. Fish are far rarer!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: 10050798@k12.hi.us

From: [Nancy Maupin](mailto:Nancy.Maupin@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 9:13:30 PM

Aloha Mr. Sakoda,

My name is Nancy Maupin and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kohala

My additional comment: I snorkel frequently at Puako, Mauna Lani Beach Club, & 69. The bleaching events have stressed the reef and that puts strain on the ecosystem. There are definitely less fish at these reefs now than when I snorkeled them several years ago. Taking fish out of the ecosystem will further harm it. Our state is very dependent on tourism and much of that tourism takes place in the ocean. People visit here to see our beautiful reefs and the fish who populate them. Why risk the tourism that benefits so many for the few who benefit from the aquarium trade?

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Nancy.maupin@yahoo.com

From: jacqueline_may
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:25:25 PM

Aloha Mr. Sakoda,

My name is jacqueline may and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I used to keep an aquarium, until I woke up to the damage the trade is causing to nature. There is no need for it. We can live without this. It creates so much damage and suffering.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: oakmoss2@gmail.com

From: [Theresa McCargar](mailto:Theresa.McCargar)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 1:59:52 PM

Aloha Mr. Sakoda,

My name is Theresa McCargar and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Tjmccarg@pacbell.net

From: [Jeff McKnight](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 5:50:59 PM

Aloha Mr. Sakoda,

My name is Jeff McKnight and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala

Hamakua

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: JMCKNIGHT0@GMAIL.COM

From: Lokelani McMichael
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:25:36 AM

Aloha Mr. Sakoda,

My name is Lokelani McMichael and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: Tourist come to Hawai'i to see fish in the Ocean, that's good for our

economy . Why should the wild fish go to personal aquariums for profit. Growing up in Kona, I've noticed less and less fish! I don't see nearly as much fish as 30 years ago. I used to work next door to a Scuba Dive Shop. They told me that in the 1970's the Big Island had a yellow ring around it showing in pictures, taken from space. The Yellow ring was the tang fish. Please leave our wild fishes in the Ocean, for everyone to enjoy. Mahalo

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lokemcmichael@hawaii.rr.com

From: [James McNabb](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 8:06:21 AM

Aloha Mr. Sakoda,

My name is James McNabb and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I think there should be a band for 10 years so that the numbers can

get back and fill a reef with colorful fish then the population will be more sustainable

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: fairwayvillas@hawaii.com

From: [Jolene Mears](mailto:Jolene.Mears)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 7:31:05 PM

Aloha Mr. Sakoda,

My name is Jolene Mears and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Konajolene@gmail.com

From: [Denise Meechan](mailto:Denise.Meechan)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 6:40:12 PM

Aloha Mr. Sakoda,

My name is Denise Meechan and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

All 40 White List species

Bandit Angelfish

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: I live in Captain Cook and spend a lot of time scuba diving at local spots like Two Steps, Kealakekua Bay, Ka'ei Beach and other spots. I have been diving for 15 years and have just recently seen improved populations of the above fish and especially the yellow tang. To remove these fish from the endangered list and to allow them to be taken for aquariums will greatly harm the advances the species has made. They are important to the coral and to the other fish and plant life in the bays. Please consider keeping them protected!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: denisepapas@yahoo.com

From: [Peter Meechan](mailto:Peter.Meechan)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 6:26:56 PM

Aloha Mr. Sakoda,

My name is Peter Meechan and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: I have been an avid diver and snorkeler in West Hawaii since first visiting there in 2004. I have lived there now for three years. When I first visited, I wondered why there were abundant yellow tang in Kealekakua Bay but not elsewhere. I found out it was due in large part to the aquarium trade. I was once an aquarium hobbyist but after learning the destruction that live catching had, gave up my hobby. Allowing any live catching will mean open season. It will be extremely difficult, if not impossible to limit how much people catch and when they do this. Every day, I see people fishing in areas that are supposedly protected, with throw nets. In recent months, the numbers of Yellow Tang (and many other species) have increased along the coast and this is obviously due to the catching ban. While the conditions of the coral are still of grave concern, the fish count looks like it is bouncing back. Please do not reverse this gain. I have experience at many reefs, including Two Steps, Miloli'i, Kona Paradise, Mahukona Beach Park, Puako and many more.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: emailpetermeechan@yahoo.co.uk

From: [Matt Meier](mailto:Matt.Meier@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@hawaii.gov; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:17:05 PM

Aloha Mr. Sakoda,

My name is Matt Meier and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: meiermatthew@hotmail.com

From: [Sherie Messier](mailto:Sherie.Messier)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 11:41:08 AM

Aloha Mr. Sakoda,

My name is Sherie Messier and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Puna
Hilo

My additional comment: When I visited my sister on the Big Island last year, I was dumbfounded but the significant decreased amounts of wildlife we saw! In the difference of 4 years, the same oceans my sister swam in and documented the amount of marine life all

around her. In any direction she was surrounded by vibrant fish of multiple species, sea turtles that would swim up to her, healthy full coral, and clear crystal waters. During whale season the beaches were covered. Now locals and tourists are concerned if the whales will come at all. I'm afraid that if we keep taking from the oceans, they're be nothing left to repopulate. Hawaii is a melting pot where multiple species come and thrive. For the benefits of education, beauty, and preserving the bountiful gift that has been given to the Hawaiian islands. We need to protect the marine life that's left. Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sherie.l.messier@gmail.com

From: [Mary Metcalf](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 9:41:02 AM

Aloha Mr. Sakoda,

My name is Mary Metcalf and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I have been snorkeling the West Hawaii reefs since the late 1980's and have seen first hand the destruction of these reefs and the huge decline in fish population. It is a travesty that the aquarium collecting has been allowed and this harmful practice must not resume. The pace and extent of anthropogenic climate change is accelerating and aquarium fish collecting is just compounding the harmful effects to West Hawaii reefs. Our reefs must

be saved at all costs due to the enormous benefits they provide and reef fish are integral to their health.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Meametcalf@yahoo.com

From: [Heather Metzler](mailto:Heather.Metzler)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 11:45:42 AM

Aloha Mr. Sakoda,

My name is Heather Metzler and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: I am an avid snorkeler. I have seen the extreme depletion of all types of marine life. The Aquarium trade doesn't need to add to the depletion.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: heddaj@yahoo.com

From: d.miller
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 1:50:11 PM

Aloha Mr. Sakoda,

My name is d miller and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Angelfishes

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment: The very survival of Hawaii's coral reefs is at stake. For years studies documented impacts to species taken for the aquarium pet trade. The most impacted species, including yellow tangs, certain butterflyfishes, and other rare native fishes, saw population declines ranging from 60% to 99% in the areas where they were taken

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: d.miller.dealings@gmail.com

From: [Kurtis Minnick](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 9:42:19 AM

Aloha Mr. Sakoda,

My name is Kurtis Minnick and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kurtisminnick1980@gmail.com

From: [Jennifer Mitchell](mailto:jennifer.mitchell@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 9:45:57 PM

Aloha Mr. Sakoda,

My name is Jennifer Mitchell and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Please tske the Roi for the aquariums

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: The fudh belong in the ocean not in an aquarium

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: gethawn@yahoo.com

From: [Colleen Miyose-Wallis](mailto:Colleen.Miyose-Wallis)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 3:58:17 PM

Aloha Mr. Sakoda,

My name is Colleen Miyose-Wallis and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: Since 2010 I have been a volunteer Reef teacher at Kahalu'u beach and have spoken to countless number of visitors about our fragile reef and the wonderful sea creatures living on and around it. The Aquarium fish industry care nothing about our coral reef or the marine life that it sustains. All they care about is filling their wallets with money and nothing about our economy and our environment. The Aquarium fish industry should be permanently banned from all Hawaiian water. Sincerely, Colleen Miyose-Wallis

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ceewallis@gmail.com

From: [Colleen Miyose-Wallis](mailto:Colleen.Miyose-Wallis)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:13:48 PM

Aloha Mr. Sakoda,

My name is Colleen Miyose-Wallis and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: I forgot to mention one more thing in my comment earlier and that is the health of our coral depends on the fish sounds around it in addition to other factors and that is also why no fish should be taken from our waters at all. please add this to my previous comment. Sincerely, Colleen Miyose-Wallis

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ceewallis@gmail.com

From: [David Monasevitch](mailto:David.Monasevitch@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 10:00:25 PM

Aloha Mr. Sakoda,

My name is David Monasevitch and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: davidmonasevitch@hawaiiantel.net

From: [Nina Monasevitch](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 8:13:41 PM

Aloha Mr. Sakoda,

My name is Nina Monasevitch and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Unfamiliar with these reefs, but still concerned.

My additional comment: Our oceans are in serious peril. I have witnessed first hand the decimation of marine life and ocean ecosystems in the past 42 years of living, diving and open ocean swimming on Kauai and most of the other main Hawaiian Islands. All science is documenting that over extraction (i.e. fishing) is one of the top causes of degradation to reefs, and ocean health. It is time to wake up from the spell of greed and protect our ocean home--

the ocean is literally our life support system. The extraction of ocean wildlife for aquariums is inhumane, unsustainable and not pono! To help Hawaii's coral reefs recover from bleaching, we need to protect and maintain a healthy population of the herbivorous fish that are essential to reef ecosystems. A Coral Bleaching Recovery Plan prepared for the Department of Land and Natural Resources identified herbivore management as "critical to post-bleaching coral recovery in Hawaii." These fish are valuable in the wild because they keep algae from overgrowing recovering corals. Parrotfishes and surgeonfishes, in particular, are widely acknowledged for their importance in reef resilience and recovery. The report identified a prohibition on the take of herbivorous reef fish as one effective action to help in reef recovery. Please care for and protect marine life, ocean ecosystems and the future of our planet by banning aquarium fish collecting. "First live a compassionate life, then you will know" - Buddha

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: oceanmana@hawaiiintel.net

From: [Carol Mone](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 12:23:04 AM

Aloha Mr. Sakoda,

My name is Carol Mone and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Carol Mone

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: carolmone@me.com

From: [Kristina Montoya](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 10:30:21 PM

Aloha Mr. Sakoda,

My name is Kristina Montoya and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna

Hilo

My additional comment: The aquarium fish trade has proven to be detrimental to Hawaiian reefs. With increased threats from ocean acidification and temperature rise, it is our duty to protect an already vulnerable asset. Do not let the greed and interests of a few dictate the future of the our reefs for future generations.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kmm3@hawaii.edu

From: [Mike Moody](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 8:26:54 PM

Aloha Mr. Sakoda,

My name is Mike Moody and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.
Marine life is threatened with local extinction
The real possibility that future generations may not encounter these species
Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.
Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: In my lifetime I have seen the amount of reef fish drop a staggering amount. Seeing this makes me sad for future generations! Please do not let this out of date practice go on any longer!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kaikanemike@gmail.com

From: [Blake Moore](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 1:31:34 AM

Aloha Mr. Sakoda,

My name is Blake Moore and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I have personally witnessed the decline of fish since arriving in Hawaii 18 years ago. You don't need to be a scientist to see the depletion of reef fish in Hawaii. Our fish are worth far more to visitors and residents alike than the economic gain by allowing fish collection. Please don't allow this incredibly destructive practice to return to Hawaii's coastlines

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Blake@pacificwhale.org

From: [Melody Moore](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 12:47:31 AM

Aloha Mr. Sakoda,

My name is Melody Moore and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I swim at Mahukona. North Kohala. Many fisherman on land in boats and spear fishing are out there taking fish and other water life. We don't need one more

unnecessary loss stressing the survival of the underwater community.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: melodymooreart@gmail.com

From: [Jackie MooreAndresen](mailto:Jackie.MooreAndresen)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:29:23 PM

Aloha Mr. Sakoda,

My name is Jackie MooreAndresen and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Hamakua

South Kohala

My additional comment: I think the the "proof is in the pudding" as the saying goes. Statistics show fish collection has a significant impact to the the decline of several species and is on opposition of the states objectives in the 30/30 goals. Let's save the reefs, the marine life, and the beauty of our island by continuing to disallow the collection of any all fish for aquariums.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jackiekm@aol.com

From: [Mike Moran](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:44:18 PM

Aloha Mr. Sakoda,

My name is Mike Moran and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: How long will Hawaii allow commercial interests to destroy our environment? No more

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mmmmahalo2000@aol.com

From: [Anna Moreno](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 9:13:32 AM

Aloha Mr. Sakoda,

My name is Anna Moreno and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

My specific concerns about those species include:

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Hilo

My additional comment: Please save the eco systems on these reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Annamorenobosketti@gmail.com

From: [MARY MORRIS](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 8:32:47 PM

Aloha Mr. Sakoda,

My name is MARY MORRIS and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kohala

My additional comment: I have snorkeled the Puako reef for forty years now. There has been such a decline in fish population. There were hardly any yellow tang a few years ago and this year we all noticed that there were finally some large schools of yellow tang once again. (20 to 30 in a school). Please don't let the aquarium trade back into South Kohala. I recall seeing several men collecting at Paniau in years gone by, and there is no-one to enforce the limit, so they take as many as they can get and hope not too many of them die. So sad, so wasteful. I am also concerned about the decline in Hawaiian day octopus, there were a number of them last year, now we see certain people coming every day up and down the reef and removing the octopus. I am not sure what they do with them, if they eat them or use them as bait, but there need to be restrictions on the number of octopus that can be taken per day. They are going to decimate that population!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: konaswim@gmail.com

From: [BRIAN Morton](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 6:51:08 PM

Aloha Mr. Sakoda,

My name is BRIAN Morton and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.
Marine life is threatened with local extinction
The real possibility that future generations may not encounter these species
Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Bdmorton5074@gmail.com

From: [Rebecca Morton](mailto:Rebecca.Morton@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, January 1, 2020 2:24:29 AM

Aloha Mr. Sakoda,

My name is Rebecca Morton and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: beccahlmorton@icloud.com

From: [Shelley Muneoka](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:40:54 PM

Aloha Mr. Sakoda,

My name is Shelley Muneoka and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: The aquarium trade is a frivolous use when compared to the cultural significance ecological services these fish provide to the reef. It is inexcusable that future generations may not know these animals or what a thriving reef system looks like for someone's hobby or profit. These fish, particularly pakukui and kole are eaten at special occasions and are important to the social/cultural fabric of Hawai'i communities. In a moment where our planet is facing catastrophic changes on the land and in the sea, we can't afford to remove animals en masse for the simple pleasure of collectors. The proof is in just one year of

ban -- stopping the aquarium trade take of these species will lead to improved fishstocks, a safety net for food security and self-sufficiency that Hawai'i desperately needs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: shelley@kahea.org

From: [Ryan Murphy](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:19:40 PM

Aloha Mr. Sakoda,

My name is Ryan Murphy and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Ryan.d.murphy@outlook.com

From: [Jason Murray](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 11:38:39 PM

Aloha Mr. Sakoda,

My name is Jason Murray and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Puna

Hilo

My additional comment: Aloha, I am an avid snorkeler, underwater photographer and I snorkels every chance I get. Over the last 6 years I have watched many coral populations along the Kona coast die due to climate change and a warming ocean. These corals that are stressed need every fish they can to help keep them clean of the onslaught of ever growing algae. It does not make any sense to sell these fish for novelty pets so a few people can make a buck. These islands make money from tourist dollars, people come here to see these essential, beautiful, native fish. Last night I read the passage below on an underwater photography guide for travelers to Kona and it made me very sad. "Hawaiian Fish Life Some people report that the aquarium trade has taken its toll on the fish life here, and the reef fish around Kona do tend to be on the smaller side. However, there are still plenty of fish to see, especially on the less-dived sites south of Kona." The word is out. Fish collection takes it's toll. Please leave the aquarium collection ban in place and move to stop the collection of reef fish in all of Hawaii.

This does not line up with the pono practices of caring for the 'aina in Hawaii. You would never sell a I'iwi or Nene to a pet store, these fish are our native wildlife as well, and they deserve protection. Mahalo Jason Murray Small business owner and Kailua Kona Resident

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jason@jasonswatergardens.com

From: [Ronn Murray Murray](mailto:Ronn.Murray.Murray)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:00:05 PM

Aloha Mr. Sakoda,

My name is Ronn Murray Murray and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rmurray25@gmail.com

From: [Sean Nagamatsu](mailto:Sean.Nagamatsu)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 5:09:58 AM

Aloha Mr. Sakoda,

My name is Sean Nagamatsu and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I live on O‘ahu and don‘t know the ocean as well as I would like. However, I remember growing up and snorkeling all the time with my dad; the water was so clear. It’s not like that anymore, at least in Honolulu. Whatever we can do to protect our reefs, I hope we do. Thank you.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: snagamat@gmail.com

From: [Helen Nahoopii](mailto:Helen_Nahoopii)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:31:22 AM

Aloha Mr. Sakoda,

My name is Helen Nahoopii and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I am concerned about the safety and sustainability of our native marine species

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Hlnahoopii@gmail.com

From: [Buffy Nakachi](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:14:31 AM

Aloha Mr. Sakoda,

My name is Buffy Nakachi and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Hamakua
South Kohala

My additional comment: I have been snorkeling and diving on the Big Island since 1986. I have seen first hand the depletion of reef fish and the affects on the coral during these 30+

years. Taking reef fish for aquariums is not helping our reefs. We need to do everything we can to protect our reefs. Stop tropical fish collection now.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: buffynakachi@hawaii.rr.com

From: [Kaikea Nakachi](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 7:41:46 PM

Aloha Mr. Sakoda,

My name is Kaikea Nakachi and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
No Hawaiian fish should be taken for aquariums

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: The aquarium trade goes against every practice Hawaiians have done for centuries. The fish are fellow Hawaiians, and they have been allowed to be stabbed, starved, and shipped off to foreign lands where the few surviving fish are used for decoration. How disrespectful and wasteful. Protect our resources, protect our identity as a healthy Hawaii. We need our reefs to be as healthy as possible if we are going to weather the effects of climate change in the coming years. This extractive practice has NO place in Hawaii.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kaikean@hawaii.edu

From: [Awai Nalu](mailto:Awai.Nalu)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 11:30:28 AM

Aloha Mr. Sakoda,

My name is Awai Nalu and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Many spots I've dove over the years I've seen huge depletion of all species of fish. Puako if we'd like to get into specifics.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: nalu_awai@hotmail.com

From: [Jeff Nance](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 5:35:36 PM

Aloha Mr. Sakoda,

My name is Jeff Nance and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

Bandit Angelfish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

My additional comment: My wife and I are both Master Scuba Instructors as well as teaching Technical diving here on Oahu for just over 20years. We have worked all sides of Oahu and the other islands too. We have seen the decline of several species, (Bandits, Reticulated Butterflies, Harlequin Shrimp and many others. This was more than a full time job for us. In addition I was the Dive Master for the Nature Conservancy on Palmyra and worked with several top marine scientists and my wife has BS in Marine Bio. We have a keen understanding of the marine habitat here. We have also witnessed the practices of the Aquarium trade. In short it is not sustainable, however eco tourism can be sustainable and depends on maintaining the health and diversity of the reefs. Please don't buckle under pressure from the aquarium trade, we cannot get the fish back once gone. Mahalo, Jeff & Melanie Nance

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jeffnance86@gmail.com

From: [Birgit Neher](mailto:birgit.neher@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 12:36:57 AM

Aloha Mr. Sakoda,

My name is Birgit Neher and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Nap14@gmx.de

From: [Derek Nelson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 8:23:44 PM

Aloha Mr. Sakoda,

My name is Derek Nelson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala

My additional comment: Unreal that this is even being considered again. Our reefs are being damaged by so many other influences. We can not allow fish to be taken, further damaging this fragile ecosystem.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Dsurfgod1@yahoo.com

From: [Pamela Neswald](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 11:40:44 PM

Aloha Mr. Sakoda,

My name is Pamela Neswald and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species abundance is significantly reduced by aquarium collecting.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: It's illogical to think that such a small area can afford to supply a vast industry. The fish, as a resource, belong to their natural area. And as a creation of God, they require respect in and of themselves.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pamelaneswald@gmail.com

From: [Anthony Nguyen](mailto:Anthony.Nguyen@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 5:26:38 PM

Aloha Mr. Sakoda,

My name is Anthony Nguyen and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: This has to stop

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: txrph38500@gmail.com

From: [Wally Nicholas](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 2:19:14 PM

Aloha Mr. Sakoda,

My name is Wally Nicholas and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

My additional comment: Even if you do not care about the reef system or the fish you should care that the waters of Hawaii are part of what brings in tourists and tourists dollars. Why would they want to explore a dead reef systems with a scarcity of life.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: deewally@hotmail.com

From: [Kim Nichols](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 11:57:52 AM

Aloha Mr. Sakoda,

My name is Kim Nichols and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hilo

Unfamiliar with these reefs, but still concerned.

My additional comment: I was born and raised in Kona and have lived here over 30 years. In my lifetime I have seen significantly less fish and drastic, irreparable damage to our coral reefs that the reduction of herbivorous fish greatly exacerbates. No Hawaiian reef fish should be taken to supply the mainland pet trade. This is wildlife trafficking.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: knichols@hawaii-forest.com

From: [Elmar Niewerth](mailto:Elmar.Niewerth)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 12:01:43 PM

Aloha Mr. Sakoda,

My name is Elmar Niewerth and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: elmar@ececonsult.us

From: [Tammy Noeske](mailto:Tammy.Noeske)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 2:35:44 PM

Aloha Mr. Sakoda,

My name is Tammy Noeske and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Please do not allow the aquarium collecting in any way, shape, or

form in Hawaii. It is nothing but human greed. No one needs or should have wild fish swimming in their aquariums. Shame on this even being an issue.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kenny_n_tammy@msn.com

From: [Jesse Nordwall](mailto:Jesse.Nordwall)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 7:50:11 AM

Aloha Mr. Sakoda,

My name is Jesse Nordwall and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: I have noticed a rapid decline in the marine life especially the Yellow Tang as I snorkel at Richardson's Beach in Hilo, as well as Two Step in Kona, and the

Honokohau Harbor. In the wild, yellow tang travel alone or in loose schools, and spawn around the time of the full moon. Yellow tang are group spawners, so it is extremely difficult to breed them in captivity. Only since 2015 have researchers managed to keep a group of juvenile yellow tang alive past the larval stage. Yellow tang are also the cleaners and help sea turtles keep their shells clean, allowing the turtles to glide through the water better. With the continual removal of such species from the reefs, this not only poses a risk of the decline of Tang population in the area, but also pose serious danger to other marine life and the health of the coral reef as well. I believe enforcing stricter rules and regulations will not only benefit the local marine life and coral reefs, but also will also put Hawaii in the forefront of environmental preservation and rejuvenation. Environmental preservation and rejuvenation is still a sunrise market. Lets show the world that Hawaii stands for the land and the sea.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jesse.nordwall@gmail.com

From: [Dorothy Norris](mailto:Dorothy.Norris@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 7:48:17 PM

Aloha Mr. Sakoda,

My name is Dorothy Norris and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I am an avid diver and marine biologist. I am delighted to see recruitment of the smaller herbivore fish when I explore the local reefs. If we allow the reduction of these species we may never see the recovery of the reefs that every Hawaiian wants to see. Please help the recovery and do not allow these fish to be removed from their

natural habitat.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dotnorris1@gmail.com

From: [Lauren Northrop](mailto:Lauren.Northrop)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 3, 2019 10:59:44 AM

Aloha Mr. Sakoda,

My name is Lauren Northrop and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I see these fish for sale in tiny tanks in Michigan pet stores.

Unbelievable that Hawaii would allow its beautiful natural native species to suffer and die in tanks. The success of this ban means that protections absolutely must continue. There are enough threats facing marine life. Hawaii is my dream destination but I absolutely will not travel there if marine life is exploited.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: L.north24@gmail.com

From: [Larry O'Brien](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:53:35 PM

Aloha Mr. Sakoda,

My name is Larry O'Brien and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I'm a frequent diver on the reefs from North Kona to Miloli'i.

Anyone who has been in the water over the past several years can attest to the devastating damage of the 2015 bleaching event. This year's event was not as dramatic, but set back the recovery. It is established that herbivore populations are a critical part of the recovery from bleaching. (For instance,

<https://www.frontiersin.org/articles/10.3389/fmars.2019.00557/full#h6>). The health of our reefs, and their economic impact, will only face greater stress in the coming years and decades. The cost of climate change is real, and that includes having to make management decisions that impact extraction and exploitation. That is the reality we face and that our elected officials and public servants must act upon.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lobrien@knowing.net

From: [Eri Okada](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 8:27:23 PM

Aloha Mr. Sakoda,

My name is Eri Okada and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: we need to preserve all the native tropical fish population for maintaining biodiversity in its natural state so we, our children and their children will continue enjoying them and their beauty in their natural environment, not in aquarium tanks.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: animalover@mac.com

From: [Michael Olson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:46:37 PM

Aloha Mr. Sakoda,

My name is Michael Olson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

Marine life is threatened with local extinction

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: We can't spare any fish for pets. We can't spare any for any reason. Our reefs are at risk of death. Not now.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: archticat@gmail.com

From: [Perry Olson](mailto:Perry.Olson)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:30:02 PM

Aloha Mr. Sakoda,

My name is Perry Olson and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: With the current West Hawaii ban now in place, it is very apparent that the fish populations are returning and the reefs environment is improving. These fish are a treasures of the Hawaiian ocean, and there is absolutely no reason why Aquarium harvesting should ever be permitted. All marine biologists that we have spoken with adamantly agree.

The DLNR is not watching out for Hawaii in any way by allowing reef fish to be taken commercially.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Perry@pvolsonfamily.com

From: Ty Onuma
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 2:50:45 PM

Aloha Mr. Sakoda,

My name is Ty Onuma and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

My additional comment: Whenever I go shoreline fishing, I have not been seeing much local species in and around hilo bay.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tyonuma02@gmail.com

From: [Kirah Orian](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 5:22:23 AM

Aloha Mr. Sakoda,

My name is Kirah Orian and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna

Hilo

Hamakua

My additional comment: Some members of my family are fishermen and divers. Over the past 20 years, we have noticed a steady decline of fish. Reefs that once thrived are now almost bare. Some reefs are now over grown with invasive algae. "Aquarium fish" play an essential role in the marine life ecosystem. This balance must not be compromised. Scientists predict (and have noticed) that with a decline in fish populations: (1) coral bleaching will continue to

drastically rise, (2) complex food chains will continue to remain imbalanced, (3) by 2048 almost all our fish will be driven to extinction/over harvested, and (4) our oceans will be infested with jellyfish. We must unite and fight for healthy reefs and high biodiversity. We must fight for the principles of “aloha ‘aina,” which sustains life on Earth. We have the power to bring about a positive change- we need to use it!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kwaimeorian@hotmail.com

From: [Sunny Page](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 12:11:41 AM

Aloha Mr. Sakoda,

My name is Sunny Page and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Huelosunny@gmail.com

From: [Koohan Paik](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 10:05:40 AM

Aloha Mr. Sakoda,

My name is Koohan Paik and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: kosherkimchee@yahoo.com

From: [Stephanie Panzarino](mailto:Stephanie.Panzarino@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 5:37:15 PM

Aloha Mr. Sakoda,

My name is Stephanie Panzarino and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: The fish belong in our ocean. Please consider the big picture & the environmental impact to our water & reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mattmikemom@gmail.com

From: [Jamie Pardau](mailto:Jamie.Pardau@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@DLNR.hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 3:41:47 PM

Aloha Mr. Sakoda,

My name is Jamie Pardau and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

South Kohala

My additional comment: According to an article in West Hawaii Today (Dec 31,2019) the USGS stated that Hawaiian coral reefs are valued at \$863 million dollars per year. Removing the fish from our reefs that help maintain a healthy balance is short-sighted. Pawai is an area that demonstrates the deterioration of our reef system due to multiple stressors. Without the herbivores to keep a check on the alga, this would be even worse than it is.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jpardau@gmail.com

From: [Maya Parish](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 5:58:53 PM

Aloha Mr. Sakoda,

My name is Maya Parish and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

Hilo

Hamakua

South Kohala

My additional comment: I've lived here 6 years and have seen the reefs on the west side of the island on worse and worse shape.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Msyaparish@gmail.com

From: [Laura Parks](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:05:04 PM

Aloha Mr. Sakoda,

My name is Laura Parks and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

My specific concerns about those species include:

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made. Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

My additional comment: I am an ocean and sea-life advocate and built a business around my advocacy. My late husband and I went to HI every year. I live in CA and have special feelings for HI.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: oceanrespectcampaign@gmail.com

From: [Natalie Parra](mailto:Natalie.Parra)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:36:26 AM

Aloha Mr. Sakoda,

My name is Natalie Parra and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I'm greatly concerned by the impact the aquarium trade has had on Hawaii's reefs. I'm baffled that the state of Hawaii would risk so much for the short term profit of a handful of aquarium collectors.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: natalie@opsociety.org

From: [Darby Partner](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 10:16:15 PM

Aloha Mr. Sakoda,

My name is Darby Partner and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: Do not allow fish to be taken from the reef!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Midwife108@gmail.com

From: [Bal Patterson](mailto:Bal.Patterson)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:48:46 PM

Aloha Mr. Sakoda,

My name is Bal Patterson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: In the past 6 decades that I have fished, picked limu, gone squidding and snorkeling around the various reefs of our pae aina the decimation of our reefs and fish population is truly appalling. The aquarium trade no longer has a legitimate place when it comes to Hawaiian waters and should have no legitimate standing. Hawaiian fish belong in Hawaiian waters and should not be kidnapped for profit in order to be sold to rich collectors. The earth and the oceans and all the creatures that reside within are already in great peril. No changes should even be considered regarding opening West Hawaii reefs for such a repugnant purpose, and certainly not for another 15-20 years. Allowing the interests of business to rule over our collective responsibility to protect our unique environment and all the creatures within is wrong.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Balpattersonaloha@gmail.com

From: [Monica Patterson](mailto:Monica.Patterson@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:16:46 AM

Aloha Mr. Sakoda,

My name is Monica Patterson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

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Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: As an avid fish/aquarium keeper, I will say that the same joys of saltwater aquariums can be found in the freshwater hobby. There is no reason to take from our precious oceans. The reefs of Maui I've swam amongst as a child, that once held hues of vibrant orange corals and schools of adorable yellow tang and gorgeous angelfish plucking food from the rocks have been reduced to an empty wasteland of white and brown death. The changes are drastic, and occurred so quickly. We need our fish and we need our reefs; what we don't need are aquariums in our home, and this is coming from someone who has many

freshwater tanks and absolutely loves them.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: 4.patterson.monica@gmail.com

From: [Robert Pecoraro](mailto:Robert.Pecoraro)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 2:15:28 PM

Aloha Mr. Sakoda,

My name is Robert Pecoraro and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Hilo

South Kohala

My additional comment: I have been diving Hawaii's reefs for over 20 years. First as a visitor, and now as a full time resident. One of the reasons that I chose Hawaii Island as tourist, and now as my home, is the beautiful reefs and abundant fish life. As a diver, I have personally seen the impact of tropical fish collecting over those 20 plus years. I have seen destroyed coral heads, where Harlequin Shrimp once lived. I have seen dwindling numbers of "high priced" fish, such as Flame Angelfish and Dragon Morays. I have seen the decline in the number of herbivores, such as Yellow Tangs and Achilles Tangs. On the flip side, I have also seen the increase in fish species in those areas that have been protected from tropical fish collection. The no take zones along the Kona Coast have had significant increases in fish mass, since the protections went into place. I have also noticed increases in reef fish since the ban on fish

collection went into affect last year. I dive mostly along the Kona Coast, from Kawaihae down to Kona Paradise, but I occasionally get one to the Hilo side. I think that collection of tropical fish for personal aquariums is selfish and wasteful. Many fish die in transport and their lifespans are severely decreased due to stress. They belong on the reefs where they live for the enjoyment of all visitors and residents. I have nothing against tropical fish aquariums, but fish should be bred in captivity for those purposes. Captive breeding produces less stressed and healthier fish. I am aware that some fish do not breed or are difficult to breed in captivity, but aquarium keepers should just do without those particular fish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: nyfrogman@gmail.com

From: [Alisha Pekor](mailto:Alisha.Pekor)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 7:52:05 AM

Aloha Mr. Sakoda,

My name is Alisha Pekor and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

All herbivores

Really, any species at this point that is not already being bred in captivity

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

Ka`u

Puna

Hilo

My additional comment: My family has been traveling to Hawaii for years, we practice leave no trace and only take pictures and memories. I think it is important for future visits / locals to be able to enjoy nature and get the same feeling of awe that I have. However, more importantly, I think it is vital that we let creatures live where they are meant to live - zoos and

aquariums have their time and place however I cannot see a real reason to disrupt nature and an animals freedom just because someone wants to look at a pretty fish in their home.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: alisha.cargill@gmail.com

From: peri.re
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:36:52 PM

Aloha Mr. Sakoda,

My name is peri re and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

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Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Puna
Hamakua

My additional comment: We have been diving in Kona for years and you can really tell the impact on the reefs in the last years. They need all the help they can get

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pr97@aol.com

From: [Patty Peters](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 12:16:32 PM

Aloha Mr. Sakoda,

My name is Patty Peters and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: This cannot be allowed. The reefs are barely hanging on and until there are more preserves put into place to ensure specie biodiversity (at least 30% of each island) the recovery will be incredibly hard. The recovery I am speaking of is the fact that Managment and reinforcement of laws and regulation for offshore operation specific to the DLNR are NOT enforced. It may as well be 200 collectors out there because once the flood

gates are open our state Management does not manage. We are already seeing endangered species of shark offshore being shot, tortured, dismembered and killed. Specific to the Oceanic White Tip shark. But never not once have we seen a single DLNR or other Management boats/eyes out to check on fishing operations. It is ignorant to think they would even show up in the daily to ensure aquarium trade was being respectful to ensure the health of a future reef. Kona specifically is losing it's draw and it could be one of the most beautiful calm places for tourists to interact with the ocean and it's inhabitants. While only "14" aquarium trade companies exploit and take the reef for personal profit the whole state could make much more money on our tour industry if we maintain and build a better reason to come here.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Pelagicpatty@outlook.com

From: kirsten.peterson
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 7:07:59 AM

Aloha Mr. Sakoda,

My name is kirsten peterson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:
All 40 White List species

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: As a former resident of Hawaii, I believe that it is unnecessary to harvest the fish for aquarium collecting. These fish are important to the ecosystem of Hawaii. Please ban all collecting.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: scubak@comcast.net

From: [Erin Pinto](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:35:20 PM

Aloha Mr. Sakoda,

My name is Erin Pinto and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I am extremely disappointed that this issue is coming up again. It was already determined that the aquarium industry is decimating reef fish and needs to be stopped.

It is hypocritical for DLNR to go around killing land animals that they say harm the reef ecosystem, only to propose another harm to the reef ecosystem.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: muirbean@gmail.com

From: [Elisa Plauche](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 5:14:02 PM

Aloha Mr. Sakoda,

My name is Elisa Plauche and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: The aquarium trade does not care about the future of our coral reef's

fish populations, only the money they will make.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: elisa8094@aol.com

From: [Matthew Playter](mailto:Matthew.Playter@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@DLNR.hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 11:51:44 PM

Aloha Mr. Sakoda,

My name is Matthew Playter and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Bandit Angelfish
Angelfishes
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona
Ka`u

My additional comment: I have been diving and snorkeling for 30 years in Hawaii Protect what is left

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mattplayter@gmail.com

From: [Sheldon Plentovich](mailto:Sheldon.Plentovich)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 17, 2019 1:53:42 AM

Aloha Mr. Sakoda,

My name is Sheldon Plentovich and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: Given the current threats to the ocean, including increased temperature and acidification and decreased oxygen content, it is not pono to allow people to collect reef fishes which our final components of healthy reefs, for personal financial benefit.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: splentovich@hotmail.com

From: [Ryan Plunkett](mailto:ryan.plunkett@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 10:25:23 AM

Aloha Mr. Sakoda,

My name is Ryan Plunkett and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Captryanplunkett@gmail.com

From: [Mahinamalamalama Poepoe](mailto:Mahinamalamalama.Poepoe)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:46:00 PM

Aloha Mr. Sakoda,

My name is Mahinamalamalama Poepoe and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mahinal@hawaii.edu

From: [Anne Pontius](mailto:Anne.Pontius)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 3:13:01 PM

Aloha Mr. Sakoda,

My name is Anne Pontius and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
North Kohala
South Kohala

My additional comment: I've lived and snorkeled mainly in West Hawaii 42 years and am concerned for the general decrease in aquatic life. Please prevent more depletion by protecting our precious ocean life. Thank you. Anne Pontius Hawi, Hawaii

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: note2anne@gmail.com

From: [Nicklaus Porter](mailto:Nicklaus.Porter@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@gmail.com)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 2:57:02 PM

Aloha Mr. Sakoda,

My name is Nicklaus Porter and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made. Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: The reefs are in danger I see them dying everyday

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: nicklausporter123@gmail.com

From: [Louise Priest](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:27:08 PM

Aloha Mr. Sakoda,

My name is Louise Priest and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I am a scuba diver instructor. I have seen the adverse effects of fish collection. I have seen attacks on fish monitors by the collectors. The beneficial effect of the ban will be reversed if you allow collecting. Scuba divers will only come if the fish are there. You risk losing a huge revenue stream for the benefit of a few suspect collectors. This makes no economic sense. You'll get more revenue from divers if you keep the ban

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Bazwez@aol.com

From: [Mary Quinn](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:40:06 PM

Aloha Mr. Sakoda,

My name is Mary Quinn and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Thirty years ago I began diving on Maui. I remember thinking that diving off the shores of Makena was like diving in an aquarium. I moved away from the islands for a while and when I returned and again began diving on Maui, I was shocked at the lack of fish, and especially at the lack of brightly colored fish. This was due to incredible overfishing by the aquarium trade. I think it is a travesty that we allowed this to happen, and having seen this decimation, that our DLNR would even consider allowing aquarium collecting again. It is almost unthinkable.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: maryquinn2@mac.com

From: [Erica Rainhart](mailto:Erica.Rainhart@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 22, 2019 8:58:18 PM

Aloha Mr. Sakoda,

My name is Erica Rainhart and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Hilo
South Kohala

My additional comment: Lanikai & Kailua easily accessible to snorkelers & divers show sparse inner reef fishes; coral communities depletion is obvious! Including the proximity to urban chemicals/toxins - stream & river deposited onto all coastlines!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: erica@hawaiiantel.net

From: [Dawn Reed](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 9:56:48 AM

Aloha Mr. Sakoda,

My name is Dawn Reed and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dawnreed25@gmail.com

From: [Julie Reinholtson](mailto:Julie.Reinholtson@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:32:43 PM

Aloha Mr. Sakoda,

My name is Julie Reinholtson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

Puna

Hilo

My additional comment: Bring people to the fish tourism

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Julieannreinholtson@gmail.com

From: [ANNIE REISEWITZ](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:03:26 AM

Aloha Mr. Sakoda,

My name is ANNIE REISEWITZ and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: If DLNR reopens West Hawaii reefs to the aquarium trade, nothing in the DEIS would prevent them from collecting every day and taking even more. Hawaii can't afford to waste these fish! Experts predict that climate change will cause 70% of Hawaii's coral reefs to die by 2050 without major policy changes. This summer DLNR asked the public to stop taking the algae-eating fish necessary for Hawaii's coral reefs to survive. But the pet trade wants DLNR to allow their aquarium collectors to take unlimited numbers of those same important species. Stantec, the company responsible for this DEIS has a long history of ignoring environmental risks and disrespecting citizen voices. Take for example the Keystone Pipeline, a project greenlit by Stantec as "environmentally sound" that has since been plagued with large oil spills, including one last month that leaked 383,000 gallons of oil into wetlands.

Their 490 page DEIS similarly concludes aquarium collecting causes no significant impact to Hawaii's unique natural, socioeconomic or cultural resources. They do so by claiming that aquarium trade operations would take just 1% - 2% of the entire island-wide populations of the species they target (see page 2 of the DEIS Executive Summary), though nothing would prevent the trade from taking every last one of the species they want from any of the reefs that would reopen to them along the majority of West Hawaii's coastline.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: AREISEWITZ@GMAIL.COM

From: [James Resor](mailto:James.Resor)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:36:24 PM

Aloha Mr. Sakoda,

My name is James Resor and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Reefs

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jcresor@yahoo.com

From: [Rhiannon Rhiannon](mailto:Rhiannon.Rhiannon)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 6:52:57 PM

Aloha Mr. Sakoda,

My name is Rhiannon Rhiannon and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Puna
Hilo
Hamakua

My additional comment: All fishes taken for aquariums are wasteful and harmful. No more. Time and past time to leave the fishes where they live.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rhiannonmusic@gmail.com

From: [Neysa Ricciardi](mailto:Neysa.Ricciardi@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:31:08 PM

Aloha Mr. Sakoda,

My name is Neysa Ricciardi and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Neysa

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Neysari@aol.com

From: [Jean Riley](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 3:32:18 PM

Aloha Mr. Sakoda,

My name is Jean Riley and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment: When we first came to the Big Island of Hawaii as visitors, about 10 years ago, we were so impressed by the variety of fish we saw in various places on the island. We were surprised to find out that these numbers were significantly smaller than Hawaii had experienced before harvesting of fish for the aquarium trade was allowed. We moved to the island a few years later. Over the last couple of years, in particular, we've noticed a distinct downturn in the amount of fish--particularly yellow tangs--visible in the waters around the Big Island. And this was WITH protections in place. We need to take care of the fish we have, before it gets any worse. The aquarium trade needs to find another place to vandalize...or better yet, stop the aquarium trade altogether.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: polynesianparalysis2001@yahoo.com

From: [Vicky Robbins](mailto:Vicky.Robbins)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 3:49:12 AM

Aloha Mr. Sakoda,

My name is Vicky Robbins and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Vkrobbins@gmail.com

From: [Greg Roberts](mailto:Greg.Roberts)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 9:55:46 PM

Aloha Mr. Sakoda,

My name is Greg Roberts and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Wrasse

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala

My additional comment: Aquarium Fish collection in Hawaii should stop! There used to be Yellow Tang in Waikiki even but collection reports show they were taken annually until there weren't any left. Maunalua Bay has an algae problem but no Yellow Tang left to eat it.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Summitt72002@yahoo.com

From: [Richard Roberts](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 9:01:31 PM

Aloha Mr. Sakoda,

My name is Richard Roberts and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: We are barely seeing the return of the reef fish in the Keauhou area where I paddle. No way should there be collection allowed, especially with unlimited numbers.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: delynncowles@gmail.com

From: [Susan Roberts](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 8:59:27 PM

Aloha Mr. Sakoda,

My name is Susan Roberts and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: There is only just barely a return of the reef fish in the Keauhou area where I paddle. No way should there be collection allowed, especially with unlimited numbers.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: rsrwoodwrights@gmail.com

From: [P.K. Roberts-Lindauer](mailto:P.K.Roberts-Lindauer)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:42:46 PM

Aloha Mr. Sakoda,

My name is P.K. Roberts-Lindauer and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pkindauer@sbcglobal.net

From: [Terry Robinson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 9:27:56 AM

Aloha Mr. Sakoda,

My name is Terry Robinson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Terryrobin72@gmail.com

From: [Francine Roby](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 7:32:59 AM

Aloha Mr. Sakoda,

My name is Francine Roby and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Progress was being made-- I don't understand undoing that.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: francineroby@gmail.com

From: [James Rodriguez](mailto:James.Rodriguez@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 1:38:07 PM

Aloha Mr. Sakoda,

My name is James Rodriguez and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
ALL Hawaiian near shore species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Hamakua

South Kohala

My additional comment: For our reef to thrive all evolved species are a vital contribution to it

health. Over abundance of a type means an imbalance needing to be normalized. Removal of a single fish or organism prevents balance. NO TAKE is best plan. KAPU entire reef system for healthy recovery.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sparkyrodrigues@gmail.com

From: [James Rodrigues](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 9:41:33 PM

Aloha Mr. Sakoda,

My name is James Rodrigues and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Haunauma bay is a prime example of protecting reef near shore

resources. Hawaii's reef and marine resources need protection to insure reef health as the ecosystem is dependent on each species living in balance. NO Reef Resources exploitation

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sparkyrodrigues@gmail.com

From: [Georgia Rogers](mailto:Georgia.Rogers@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 9:47:56 PM

Aloha Mr. Sakoda,

My name is Georgia Rogers and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All others

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Puna
Hilo
South Kohala

My additional comment: Two step used to be proclaimed the world's best ay for snorkeling and scuba diving because of the biodiversity found on the reefs. People used to come from all

over the world to see it. We need to keep our fish here in the oceans where they belong, so residents can enjoy them and where they attract more visitors to boost the local economy. Letting aquarium dealers take them to line their own pockets with profits

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Msdenteth@hotmail.com

From: [Dominic Romer Romer](mailto:dominic.romer@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 7:28:04 PM

Aloha Mr. Sakoda,

My name is Dominic Romer Romer and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hilo
South Kohala

My additional comment: The ornamental fish trade has no place in Hawaii. It is no different than trophy hunting. The health of the reef depends on these fish. Once they are gone there is no coming back. The fish and the reefs in Hawaii are for the people of Hawaii. Not a fishtank

in Ohio. Money should be spent on breeding captive fish, not stealing from Hawaii's ecosystem.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dominic.romer@gmail.com

From: [Mike Rude](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:32:27 PM

Aloha Mr. Sakoda,

My name is Mike Rude and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All reef fish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I'm a scuba instructor, I work in the ocean every day. People come to Hawaii to enjoy the ocean and see beautiful tropical fish. Eco-tourism is ever growing, but with no bright and beautiful reef fish (such as Tangs and all other herbivores) the reef will be

dead, which means less people will travel to Hawaii to enjoy it. Commercial aquarium fishing will bring irreversible damage to already harmed reef and its habitants. The riches of Hawai'i are in the ocean, please don't let them to be taken away. Especially knowing that about 80% of collected reef fish dies during the process and never makes it to aquarium.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mauispeardiver@gmail.com

From: [Shannon Rudolph](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 9:17:15 PM

Aloha Mr. Sakoda,

My name is Shannon Rudolph and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Hilo

South Kohala

My additional comment: Aloha, There is NO reason in the world we should be allowing private companies to exploit Hawai'i's natural resources! Virtual aquariums are all the rage now and you can't even tell the difference between real or cyber. Too many real fish die in transit. Save our fish for residents and for our visitors, to view in the wild. I have lived on the Kona Coast for 32 years - and it seems every year, our reef fish are fewer & fewer. The aquarium industry must end. I am a 37 year resident of Hawai'i Island. Mahalo, Shannon Rudolph - Holualoa

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: shannonkona@gmail.com

From: [Steve Sakala](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 11:53:05 AM

Aloha Mr. Sakoda,

My name is Steve Sakala and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: Aloha, Thank you for taking the time to review these comments. We are in unprecedented times on this planet. Why has the opportunity to be a model of recovery and restoration. We look to our government agencies to protect our limited resources. I hope in this instance the corporate interests do not win over the interest of the majority of Hawaii's population that wants to see a healthy marine Ecology protected.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Honaunafarm@gmail.com

From: [David Sansone](mailto:David.Sansone@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 3:23:34 AM

Aloha Mr. Sakoda,

My name is David Sansone and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Aloha kakou, the changes occurring in the ocean due to continued fossil fuel burning pose a major threat to our reefs and the life that depend on it. Now more than ever, we need to focus on promoting healthy fish stocks who can clean the coral. The increasing coral die offs and subsequent overwhelming by invasive algae have been shown to be worse where there were lower numbers of herbivores. Areas that had more herbivores had healthy reefs. As it stands now, it is projected that we will lose 70-90% of our coral if we reach the Paris Climate Accord goals by 2100 (1.5 degree Celcius increase). It appears we will

not reach that goal, so face the potential of 99% coral dieoff by 2100 with 2.0 degree Celcius increase. We are on track to reach 3-14 degree Celcius increase by 2100 according to various sources. At 6 degree Celcius increase marine photosynthesis becomes jeopardized threatening to cut off the world's main oxygen supply. Considering the imminent threats we face, it is imperative we protect the remaining fish to clean the reefs and keep them healthy as well as increase the gene pool for nature to select survivors. Abundant fish and coral are also vital to continuing the tourist economy which comes here to see beautiful nature, not a robbed and depleted landscape. Mahalo for your consideration.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: daves@agroforestrydesign.net

From: [Shawn Sato](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 8:50:54 AM

Aloha Mr. Sakoda,

My name is Shawn Sato and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u

My additional comment: I grew up in Kona fishing with my grandpa. Back then there was a lot of beautiful reef fish. After a while I started to notice that there were less and less yellow tangs and other fishes. Since the ban they have come back.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Shawn@Jetvacationdestinations.com

From: [Ryan Scalf](mailto:ryan.scalf@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 3:25:03 AM

Aloha Mr. Sakoda,

My name is Ryan Scalf and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Protecting what is left of the reefs is extremely important. People travel here to see marine life. When you allow it to be taken.... You lose money from tourism too

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rjscalf@gmail.com

From: [Siena Schaar](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:09:41 AM

Aloha Mr. Sakoda,

My name is Siena Schaar and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Hamakua

My additional comment: As a Hawai'i based biologist and environmental manager, I have become increasingly concerned and disturbed by the decreasing reef fish populations across the Main Hawaiian Islands, especially on the Kona coast of Hawai'i Island. I have watched as this trade has decimated reefs and left them desolate, all for huge profit margins that are

leaving the State. I am concerned that very little cultural assessment was utilized in this DEIS, and believe that more effort should be made to include pertinent cultural importance of herbivorous reef species that are common in this trade, especially Kole. The unequal social equity aspect of this fishery is also extremely disturbing...Hawai'i is essentially allowing our resources to be depleted all for the profit of a handful of collectors - this is not an environmentally or economically sustainable fishery and I will continue to oppose this fishery and the proposed measures of this DEIS. From an economists perspective, there are many more costs to this fishery than there are benefits. I encourage the State to conserve and protect, rather than continue to allow the exploitation of our very fragile nearshore reef environments that will become even more depleted in coming years due to global climate change and associated effects.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sienaschaar@gmail.com

From: [Mark Schacht](mailto:Mark.Schacht)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 17, 2019 12:23:25 PM

Aloha Mr. Sakoda,

My name is Mark Schacht and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: The 490 page DEIS by the aquarium trade industry concludes that aquarium collecting causes no significant impact to Hawaii's unique natural, socioeconomic or cultural resources. It does so by claiming that aquarium trade operations would take just 1% - 2% of the entire island-wide populations of the species they target (see page 2 of the DEIS Executive Summary), though nothing would prevent the trade from taking every last one of the species they want from any of the reefs that would reopen to them along the majority of

West Hawaii's coastline.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: markschacht1@gmail.com

From: [Lisa Schattenburg-Raymond](mailto:Lisa.Schattenburg-Raymond)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 10:42:24 AM

Aloha Mr. Sakoda,

My name is Lisa Schattenburg-Raymond and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Our ocean and reefs are in such a fragile state, they cannot withstand further degradation. On Maui the coral bleaching is shocking. We must to our utmost to protect all these species and keep their habitats balanced.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lschattenburg@gmail.com

From: [Gaby Schmidt](mailto:Gaby_Schmidt)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 1:49:18 AM

Aloha Mr. Sakoda,

My name is Gaby Schmidt and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I am concerned about our reef on all Hawaiian islands. In the past 30 years they have been dying. We need to stop this now.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Gaby_gschmidt@yahoo.com

From: [Henri Etta Schmitz](mailto:henrietta@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 12:50:38 AM

Aloha Mr. Sakoda,

My name is Henri Etta Schmitz and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kohala

Hilo

Hamakua

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: henrietta@hawaii.gov

From: [Victoria Schroeder](mailto:Victoria.Schroeder)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 8:50:32 PM

Aloha Mr. Sakoda,

My name is Victoria Schroeder and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I'm gonna be honest, I don't like the ocean that much, it makes me nervous but I respect it. And the fish are important, and honestly everything in the oceans. For the economy, it provides a gain with the tourist industry who come to see the fish. It keeps balance in the oceans that rely on these fish for food and control the populations of whatever they eat. These fish are beautiful and colorful and shouldn't be trapped in cages just for people to show off. I'm worried because the world needs beautiful fish for a hopeful future, and watching these animals disappear and die because of humans leaves me feeling hopeless that the world is doomed to become a wasteland. Also I'm doing this instead of studying for my

exam and am thus feeling reckless. Fuck rich people who're just going to kill the fish anyway because they don't know anything except that they can get away with anything.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Victoriakschroeder@gmail.com

From: [Angel Seery](mailto:angel.seery@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:14:14 PM

Aloha Mr. Sakoda,

My name is Angel Seery and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Morays, inverts, anything stolen off of the reef

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: When you have to start going deeper and deeper to find beautiful endemic fish species, it's incredibly disheartening. You know that anything that tries to settle and grow up in the shallows will be picked off the reef never to see home again. Everything that was once there is now gone. Flame angels are some of the most striking fish. Knowing that a small fish has had such bad experiences with divers that it cowers in between crevices is

like watching someone with post dramatic stress syndrome. Please put an end to this.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Seery.angel22@gmail.com

From: [Shereen Seibert](mailto:Shereen.Seibert@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 8:24:32 PM

Aloha Mr. Sakoda,

My name is Shereen Seibert and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I have been scuba diving throughout the islands since 1999 as a dive master. The number of fish has significantly decreased since I began. Please do not allow collection again.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Shereenseibert01@gmail.com

From: jill_shidler
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 2:48:11 PM

Aloha Mr. Sakoda,

My name is jill shidler and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Puna

Hilo

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: partyjill@gmail.com

From: [Deb Shields](mailto:Deb_Shields)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 5:06:00 PM

Aloha Mr. Sakoda,

My name is Deb Shields and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I travel yearly to dive Hawaiian reefs and have done so for 18 years. During this time I have noticed a big drop in fish species, particularly yellow tang. Last summer I was diving on the Aggressor and failed to see a single school of yellow tang in all of my 22 dives all along the north and south kona coasts...it was so sad. Please stop this aquarium trade madness!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: debshields@comcast.net

From: [Lisa Sigler](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 12:08:44 AM

Aloha Mr. Sakoda,

My name is Lisa Sigler and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: We have been visiting Hawaii island for 27 years. The livelihood of this island is dependent on tourism and tourists want to see fish. We have snorkeled and Kahalu'u Bay for years and have seen fish populations reduce and recover. This is due to more education about caring for the coral and the reduction of pet fishing. We implore regulators to protect his ocean and its wildlife over commercial interests.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lisa@siglerinc.com

From: [Rachel Silverman](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 1:00:18 AM

Aloha Mr. Sakoda,

My name is Rachel Silverman and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Many species are taken and not reported

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Puna

Hilo

South Kohala

My additional comment: I have been swimming and snorkeling with my husband and daughter on our beautiful coral reefs, in the last six years we have seen two major bleaching events in Hawaii. More than 80% of cauliflower coral colonies have died due to warmer temperatures caused by climate change. The White List fish species are all dependent on the health of the

reef as it is their birthplace, nursery, and home. Just as the fish depend on the coral, the coral depends on the fish to help fight off the ever encroaching algae. We have seen the reef habitat for the fish, that this DEIS proposes we start collecting again, shrink and contract. The reef needs a healthy balance and right now there are so many factors that are impacting it that it would be harmful to the continued efforts to protect these vital habitats in West Hawaii. Our main industry is tourism, and harming this potential revenue stream for the benefit of a small number of people actually in Hawaii is inappropriate and reckless. Please leave the aquarium fish collection ban in place and protect these vulnerable resources for our communities and keiki! Mahalo, Rachel

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: RachelSilverman@verizon.net

From: [Jeffrey Simao](mailto:Jeffrey.Simao)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 10:11:01 PM

Aloha Mr. Sakoda,

My name is Jeffrey Simao and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Surgeonfishes

All 40 White List species

kole

Achilles tang (paku ikui)

All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kohala

My additional comment: I learned to dive off the reefs of Hau'ula. My first dive off Hawai'i was off Kapoho. I was amazed at the abundance compared to O'ahu. It was off the shores of Mahukona that I learned to feed myself from our kai, and removing ANY reef fish for commercial use goes against every precept of Aloha 'Aina, and 'Aina momoa.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jmks1980@gmail.com

From: [Lisa J Sims](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 3:26:52 PM

Aloha Mr. Sakoda,

My name is Lisa J Sims and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Stop taking our fish. Protect our oceans and reefs

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: dragongal@hawaii.rr.com

From: [Pamela Small](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 4:25:42 PM

Aloha Mr. Sakoda,

My name is Pamela Small and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Dragon Wrasse, wrasse, Gobies,

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: Dear Councilmembers: I want to be very clear that I oppose ANY and ALL aquarium collection in the state of Hawaii, not just the Big Island (which is where I live). I scuba dive extensively and know what the reefs looked like when I was young (beautiful and abundant), as I aged (so depleted that I stopped diving Hawaii waters), and the past year (on the road to recovery with keiki fish finally making an appearance). If you were to allow collecting in West Hawaii waters to begin again, it would be devastating to our reefs and underwater ecosystem. I would also like to point out that since the laws changed to stop collecting in West Hawaii the collectors have NOT STOPPED collecting. They just moved

their operations to the EAST SIDE of Hawaii Island where they take unlimited amounts with NO PERMITS. They then truck their takes to the west side to ship to the mainland. I have watched this happen in a local industrial area. The ban needs to be island wide. As the collectors cry and claim that their livelihoods have been effected by the West side laws, they strip the east side of its fish. This aquarium collection is an embarrassment to Hawaii. The biggest appeal of the island is the ocean and the activities of the ocean. Once the fish are gone and reefs are dead, Hawaii will have very little to offer tourists and ocean lovers alike. Stop this abysmal aquarium collection trade. It's time to shut them down for good. Sincerely,
Pamela Small Kamuela

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pamelabigisland@gmail.com

From: [Linda Smisko](mailto:Linda.Smisko)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 11:58:18 AM

Aloha Mr. Sakoda,

My name is Linda Smisko and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: I have been in the water at Kahalulu and Two Step for the past 20 years as a annual visitor to Hawaii. This past September I noticed a decline in fish at both sites as well a Captain Cooks. I assumed it had to do with the warm waters and bleaching of the coral. I can't imagine that removing more fish would be advantageous to our already deteriorating ecosystem that is so vital and beautiful to the island. Please don't let more fish be removed. Leave them where they belong and are needed.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: smisko6@gmail.com

From: [Robert Smith](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 1:50:43 AM

Aloha Mr. Sakoda,

My name is Robert Smith and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

Hamakua

My additional comment: I have been snorkeling for 20 year in Hawaii, mostly on the North Shore of Oahu and South Kihei. And I go most every day. It's absurd to think that we have excess fish for someone to harvest and sell at a profit. You really have to hunt around to find fish and rarely do you see large schools of fish. I live in Hawaii and pay the taxes so I don't like what is natural here to be taken from me for someone to sell. Who ever entertained this notion should be removed from their position and leave the state.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: northshoreroadxxx@gmail.com

From: [Tanya Smith](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 5, 2019 12:35:20 AM

Aloha Mr. Sakoda,

My name is Tanya Smith and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I believe all wildlife should be left untouched and we should respect all living beings. We should notice our connection in observation and scientific study only. Wildlife is not there to be taken for our visual enjoyment as home decor

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: j.tulk@rogers.com

From: [Gloria Snyder](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 10:40:55 PM

Aloha Mr. Sakoda,

My name is Gloria Snyder and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Surgeonfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mauiglo@yahoo.com

From: [Lorraine Sonoda](mailto:Lorraine.Sonoda)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 9:06:16 PM

Aloha Mr. Sakoda,

My name is Lorraine Sonoda and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

North Kohala

Hilo

South Kohala

My additional comment: Stop fish collecting trade!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lsfogel1@gmail.com

From: [Donita Sparks](mailto:Donita.Sparks)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 2:49:24 PM

Aloha Mr. Sakoda,

My name is Donita Sparks and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Puna
Hilo

My additional comment: With all due respect, what in the world are you thinking? Please protect the reefs and their inhabitants from the aquarium trade - a selfish, ego based business. I am a frequent tourist to the Big Island and the reef fish are less bountiful every time I visit. Wildlife belongs in the wild. PROTECT OUR REEFS! Thank you, but why is this issue still

coming up? Do the right thing or I'll SPEND MY VACATION DOLLARS ELSEWHERE.
Donita Sparks

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sparksfly1@gmail.com

From: [Sandy Sshimmon](mailto:Sandy.Sshimmon)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:22:51 PM

Aloha Mr. Sakoda,

My name is Sandy Sshimmon and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
kole
Achilles tang (paku ikui)
All herbivores
Parrot fish

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: East side Oahu especially Lanikai reefs unhealthy because of fish depletion.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Sshimmon@aol.com

From: [Jennifer Stabrylla](mailto:Jennifer.Stabrylla)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 1:07:07 AM

Aloha Mr. Sakoda,

My name is Jennifer Stabrylla and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I am an ocean swimmer, and personally witnessed aquarium collectors literally vacuuming up reef fish. The reefs were nearly barren, and it was such a relief when the taking of fish for aquariums was banned, and the populations started building back up. Let's not destroy this again! Also, there is little or no "official" presence to monitor these takers, and they have proven themselves not trustworthy. Keep the ban.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jlstab@gmail.com

From: [Linda Stahmer](mailto:Linda.Stahmer)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 10:28:22 AM

Aloha Mr. Sakoda,

My name is Linda Stahmer and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

All 40 White List species

Angelfishes

Forcepsfish/Longnose butterflyfish

Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: linstahr1@gmail.com

From: [Lynne Stanker](mailto:Lynne.Stanker)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 11:22:59 AM

Aloha Mr. Sakoda,

My name is Lynne Stanker and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Konadreamer2@yahoo.com

From: [Erik Stein](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 8:52:12 PM

Aloha Mr. Sakoda,

My name is Erik Stein and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala

My additional comment: Please do not create a double standard where in the local population is asked to not take herbivores but taking herbivores for mainland customers is allowed

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: accounting@extendedhorizons.com

From: [Ava Stettler](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 16, 2019 2:12:13 PM

Aloha Mr. Sakoda,

My name is Ava Stettler and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I reside on Kauai, and am a avid snorkler. I have noticed a steady decline of fish on our reefs in the past few years. Between coral deaths and over fishing, our reefs are in great danger. Please don't let even more fish be removed from an already weakened ecosystem.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Avastettler@outlook.com

From: [LaVonne Stewart](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 1:06:31 PM

Aloha Mr. Sakoda,

My name is LaVonne Stewart and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

Puna

Hilo

Hamakua

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lavonstew2444@yahoo.com

From: [William Stockton](mailto:William.Stockton)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 5:28:58 PM

Aloha Mr. Sakoda,

My name is William Stockton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: Ban aquarium reef fish collection. Permanently.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mantaentgc@gmail.com

From: [Peter Strandjord](mailto:Peter.Strandjord)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 14, 2019 6:35:27 PM

Aloha Mr. Sakoda,

My name is Peter Strandjord and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pstrandjord@earthlink.net

From: [Rick Switzar](mailto:rickswitzar@hotmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:21:35 PM

Aloha Mr. Sakoda,

My name is Rick Switzar and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: rickswitzar@hotmail.com

From: [Michael Tada](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 6:40:40 PM

Aloha Mr. Sakoda,

My name is Michael Tada and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

Unfamiliar with these reefs, but still concerned.

My additional comment: I worry about our coral reefs in and around Waikiki Beach.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mtada347@gmail.com

From: [Kimberly Ann Takata](mailto:KimberlyAnnTakata@gmail.com)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 1:30:58 PM

Aloha Mr. Sakoda,

My name is Kimberly Ann Takata and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Bandit Angelfish

My specific concerns about those species include:

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: Taking fishes for aquarium use is causing harm to our reef, and water. Fishes are meant to be in the ocean/fresh water because that's where their habitat is. Hawaii was one of the best places to be until state started turning our Island into a more tourist attraction. I believe tourists would like to see the natural beauty of this state, it has so much more to offer than expensive hotels and stores. Let's keep our fishes where they belong.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ktakata6@hawaii.edu

From: [Arthur Tarsa](mailto:Arthur.Tarsa)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 8:31:59 PM

Aloha Mr. Sakoda,

My name is Arthur Tarsa and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: artdiver@att.net

From: [Jack Taylor](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 8:38:53 PM

Aloha Mr. Sakoda,

My name is Jack Taylor and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: These fish are a natural resource for all of us, not just aquarium owners. It is criminal to allow a few to profit at the expense of the thousands who view our reefs without damaging or exploiting them.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jackndeбра@msn.com

From: [Diane Taylor-Thompson](mailto:Diane.Taylor-Thompson@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynnch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 10:13:32 AM

Aloha Mr. Sakoda,

My name is Diane Taylor-Thompson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I am a saltwater reef owner. But I am more concerned about the health of the wild species. You must remember that fish in aquariums are in a more balanced and healthy environment than the wild with the state of our oceans these days. That being said, if wild caught fish are harder to get and therefore more expensive the chances of encouraging captive breeding are greatly increased. Then of course as the "pet" fish become more expensive, the amount of poaching will increase. I think that you need to put a limit on the folks who can take pet fish and also need a limit on the number of fish they can take. There are other reefs in the world that could follow the example that you set.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dthompson5971@gmail.com

From: [Victoria Teague](mailto:Victoria.Teague@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 6:47:44 PM

Aloha Mr. Sakoda,

My name is Victoria Teague and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: toriteague1414@gmail.com

From: [Tammy Teige](mailto:Tammy.Teige)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 11:49:50 PM

Aloha Mr. Sakoda,

My name is Tammy Teige and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
South Kohala

My additional comment: Coral reefs around the world are dying, beyond the damage taking

reef fish does to the reef communities, we have no right to remove ANY species from its natural habitat, and put it on display, we need to do better, be better, before there is nothing left

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Doqtaj@mac.com

From: [Sherri Thal](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:10:14 AM

Aloha Mr. Sakoda,

My name is Sherri Thal and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
Puna
Hilo
South Kohala

My additional comment: This is a no brainer! Our planet is dying because of Capitalism. We, as humans, need to stop trading our ecosystems for money! My solace, temple, peace is found whilst communing with our underwater friends that live in the reefs. Snorkeling and ocean activities are a huge reason why I make my home in Hawaii. Global Climate Change has wreaked havoc on our reefs; the least we can do is leave the fish in their natural habitat so that

they have a chance to continue creating healthy ecosystems in our oceans. The planet's survival depends upon our interrelationships of species--flora, fish, and fauna. PLEASE CHOOSE LIFE OVER THE AQUARIUM TRADE!! PLEASE KEEP THE BAN ON CAPTURING OUR TROPICAL REEF FISH. Aloha, and Mahalo for your time

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: sherrithal@gmail.com

From: [Alice Thompson](mailto:Alice.Thompson)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:05:09 AM

Aloha Mr. Sakoda,

My name is Alice Thompson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: We own a timeshare in Kona & love snorkeling & diving. We can to Hawaii for two weeks every Christmas for 18 years and come as often as possible now. The lovely ocean & its beautiful wonderful marine life is a huge part of the reason we love Hawaii.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ahthompson@frontierney.net

From: [Terry Thompson](mailto:Terry.Thompson)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 6:03:26 PM

Aloha Mr. Sakoda,

My name is Terry Thompson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:
All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Puna

Hamakua

South Kohala

My additional comment: We had this solved. Why are you undoing it?

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: terrynt9@gmail.com

From: [Corine Tilson](mailto:Corine.Tilson)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 11:54:26 AM

Aloha Mr. Sakoda,

My name is Corine Tilson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Coral

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Puna
Hilo
Hamakua
South Kohala
Unfamiliar with these reefs, but still concerned.

My additional comment: Aquarium trade has no business in Hawaii. Aloha Aina will prevail. The reef is already being raped by toxic golf course run off, navy sonar blasts, etc. STEALING these fish from their environment is a disgusting crime, and should not be allowed or profited from!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: hawaiianmojo@gmail.com

From: [Richard Tilton](mailto:Richard.Tilton@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 6:32:46 PM

Aloha Mr. Sakoda,

My name is Richard Tilton and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: To have the DLNR ignore the need to preserve our reef fish populations is to ignore their principle reason for being. I want to see hard data, scientifically gathered, to show the long term effects of the aquarium trade. If collecting is ever re-instituted, meaningful regulations need to be implemented, with collecting allowed at certain times and places. I'm also curious: What's in it for Hawaii when collectors sell to the aquarium trade? Seems like it's pretty easy money, with no benefit to us.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dickilton@gmail.com

From: [Vivian Toellner](mailto:Vivian.Toellner)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:24:58 PM

Aloha Mr. Sakoda,

My name is Vivian Toellner and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
Puffer Fish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

Puna

Hilo

South Kohala

My additional comment: Aloha, I have snorkeled all around the Big Island of Hawai'i and am saddened to see NO Puffer fish. Just now a google of Puffer fish Hawaii, brought the first choice of selling for \$50.99 <https://www.saltwaterfish.com/product-hawaiian-spotted-puffer>. So Sad selling off Hawaii's natural resources is the main concern of our DLNR government.

Conservation is the wise use of our natural resources. We should only sell what we have a great overabundance of....and we DO NOT have an overabundance of reef fish. DLNR should be in the job of PROTECTION, not exploitation of Hawaii. Most sincerely. Vivian Toellner, Animal Advocate, Voter, Land Owner, Taxpayer.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: viviansuet@hotmail.com

From: [Tlaloc Tokuda](mailto:Tlaloc.Tokuda)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 4:00:33 PM

Aloha Mr. Sakoda,

My name is Tlaloc Tokuda and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: Before the 2018 ban, the aquarium trade in West Hawaii took nearly two times more fish than were taken by all food fishers, combined. The 14 aquarium collectors who want the reefs reopened, accounted for nearly of 80% of that take according to the DEIS, though they engaged in fish collecting just three days per week. If they get their way, and DLNR accepts this DEIS, nothing will prevent them from taking even more fish, and causing even more harm to Hawaii's threatened coral reefs. Since the 2018 ban, there are more fish on

West Hawaii reefs than there have been in decades. Don't cave into the aquarium trade!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tlalocct@hotmail.com

From: [Mikal Torgerson](mailto:Mikal.Torgerson)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 10:19:54 PM

Aloha Mr. Sakoda,

My name is Mikal Torgerson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

Achilles tang (paku ikui)

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hilo

My additional comment: I am a professional SCUBA diver and an aquarium enthusiast.

Aquariums should rely on captive breeding programs for their stock given the delicate balance of the marine ecosystem.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Mikal@architex.com

From: [Claire Trester](mailto:Claire.Trester)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 31, 2019 6:07:27 PM

Aloha Mr. Sakoda,

My name is Claire Trester and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

My additional comment: I'm a distance swimmer. I live in North Kohala, my swims include the coast North of Kawaihae to the old Coast Guard Station, in N. Kohala. I've been a Big Island resident for 35 years. I have personally seen the impacts of Aquarium Collectors and climate change on the reefs I swim over. The massive coral bleaching events the past 5 to 7 years have been stunningly noticeable with the die back of what was once healthy coral with an abundance of reef inhabitants. It's unconscionable to allow 14 Aquarium Collectors to restart

their efforts to take from OUR REEFS, fish that are OUR STATE TREASURES. Especially at a time when OUR Reefs are under major stress loads from over fishing, rising Ocean temperature, Ocean Acidification. This is not Pono. OUR REEFS AND REEF FISH ARE NOT FOR SALE. THEY BELONG TO THE PEOPLE OF HAWAII, AND ARE A Natural MARINE STATE TREASURE. more revenue can be created keeping these delicate ecosystems intact for future generations. Now is the time to think about the "Long Game Plan". For way too many years The State of Hawaii has made decisions based on short term gain. THIS IS OUR LAST CHANCE TO SAVE OUR REEFS AND THEIR INHABITANTS. Malama Pono.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: clairetrester@gmail.com

From: [Terry Trinidad](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 10:59:09 PM

Aloha Mr. Sakoda,

My name is Terry Trinidad and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

All 40 White List species

Angelfishes

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ttrin73132@gmail.com

From: [Mary True](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 1:00:43 AM

Aloha Mr. Sakoda,

My name is Mary True and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
Hilo
South Kohala

My additional comment: I have lived in Hawaii for 15 years and don't find the snorkeling that good here due to the lack of fish and varieties of fish, but I still do it frequently and enjoy every minute of it. The fact that aquarium collecting is even allowed on the island of Hawaii is

shocking. The fish populations and varieties are barely acceptable at this point. Why on Earth would you allow the tropical fish population to be further decimated? It feels like a few people making money destroying the natural beauty for all the rest of all. That is the black heart of capitalism. I used to snorkel at the BioReserve, but now I mostly snorkel at Richardsons, Ho`okena Two Step, Ka`alu`u, 69, and Mahukona where I am told by the kapuna that the waters were once yellow with tangs. Not any more. Please save the fish and recreational snorkeling on the islands.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: streamgirl11@yahoo.com

From: [Carrie Trujillo](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:50:05 AM

Aloha Mr. Sakoda,

My name is Carrie Trujillo and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs

Butterflyfishes

Surgeonfishes

All 40 White List species

Bandit Angelfish

Angelfishes

Forcepsfish/Longnose butterflyfish

kole

Achilles tang (paku ikui)

All herbivores

Losing the grazers and herbivores create a domino effect that also lessens the prevalence of other species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: As a marine naturalist, I don't understand how hard data can be ignored. You can't dispute facts and the fact is that taking these fish off the reef destroyed the ecosystem's entire balance, threatening the longevity of the reefs, and potentially causing catastrophic, irreversible effects.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Tru.carrie@live.com

From: [Ma'ata Tukuafu](mailto:Ma'ata.Tukuafu)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 7:09:30 PM

Aloha Mr. Sakoda,

My name is Ma'ata Tukuafu and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

North Kohala

South Kohala

My additional comment: Please don't reverse the ban

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: maatadano@gmail.com

From: [Lisen Twigg-Smith](mailto:Lisen.Twigg-Smith)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 1:28:38 PM

Aloha Mr. Sakoda,

My name is Lisen Twigg-Smith and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I am an ocean swimmer--have been swimming for over thirty years along the Kona coast. I've tragically witnessed diminishing populations of our reef fish and have been relieved that action was taken to protect the fish. I'm now horrified to learn that protections could be removed. To sacrifice such an important resource, so special to our

islands, to a handful of greedy, heartless fish collectors is unimaginable. Please, let's be wiser than this.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lisents@gmail.com

From: [Laura Umpierre](mailto:Laura.Umpierre)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 9:20:37 AM

Aloha Mr. Sakoda,

My name is Laura Umpierre and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Bandit Angelfish
Angelfishes

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: The beaches I frequent are Magic's, Kahalu'u, Kua Bay, Honokohau Harbor, O'oma, Manini, and Two Step. I am concerned over fishing will ruin the ecology of our reefs. And thus ruin the naturally self sustained system of our island.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Reachlaura@yahoo.com

From: [Jules Ung](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:42:50 AM

Aloha Mr. Sakoda,

My name is Jules Ung and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Any Hawaiian reef fish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Puna
Hilo

My additional comment: Growing up on the East side I've witnessed serious decline in Hawaii's reefs over the past couple of decades. We need to take action to reverse the adverse effects of tourism, global warming, pollution and over-fishing. Selling reef fish for aquarium

collecting is not a sustainable industry that we should support.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Maicojules@gmail.com

From: [Ke'ala Upchurch](mailto:Ke'ala.Upchurch)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 1:02:49 AM

Aloha Mr. Sakoda,

My name is Ke'ala Upchurch and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Aloha808@gmail.com

From: [Ruth van der Weijde](mailto:Ruth.van.der.Weijde)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 11:48:22 PM

Aloha Mr. Sakoda,

My name is Ruth van der Weijde and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: ruthvanderweijde@gmail.com

From: [Kathy Vance](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 3:37:57 PM

Aloha Mr. Sakoda,

My name is Kathy Vance and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: Leave the fish to enjoy their natural habitat so we can all enjoy them IN that habitat.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: katgvance@gmail.com

From: Andrea.VanEpps
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 2:03:43 PM

Aloha Mr. Sakoda,

My name is Andrea VanEpps and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: The ocean needs the fish, people don't

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: andrealynnvanepps@gmail.com

From: RMomi.Ventura
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 3:50:53 PM

Aloha Mr. Sakoda,

My name is RMomi Ventura and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: What's Happening Now With The Unnatural Decline Of Hawai'I's Fishes, They Keep Our Oceans Alive And The Coral Depletion Is Also Another Scary Fact. Please Keep Hawai'I's Fishes Life In Hawai'I Their Home.!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: momiv808@gmail.com

From: [Antonitaa Villa](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 5:18:19 PM

Aloha Mr. Sakoda,

My name is Antonitaa Villa and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: AntonitaVilla@gmail.com

From: [Suzanne Villeneuve](mailto:Suzanne.Villeneuve)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 1:33:55 AM

Aloha Mr. Sakoda,

My name is Suzanne Villeneuve and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
North Kohala
Hilo
South Kohala

My additional comment: I swim every day at Mahukona and I really enjoy watching all the different species of fish. It is cruel and unnatural to take the fish for pets in aquarium. Leave the fish in their natural habitat, where they belong, please.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: oceandauphin@gmail.com

From: [Doreen Virtue](mailto:Doreen.Virtue)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 1:45:18 PM

Aloha Mr. Sakoda,

My name is Doreen Virtue and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Flame Angel Fish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

South Kohala

My additional comment: As a long time scuba diver in Hawaii, I hear the scuba divers on the boats always talk about the diminishing fish in Hawaii, and how they will take vacations in

Mexico and Asia instead because they want to see fish while scuba diving on vacation.
Allowing the aquarium collectors will affect tourism to Hawaii.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: doreenvirtue444@aol.com

From: [Keo Von Gogh](mailto:Keo.Von.Gogh)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 5:30:19 PM

Aloha Mr. Sakoda,

My name is Keo Von Gogh and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

My additional comment: 5 out of 95 individual said there would not be any negative impact on cultural resources made by the aquarium trade industry. That is ludacris! This looks like another rubber stamp project like so many others in our beloved Hawaii nei including most recent Mauna Kea. If this passes it will be another tax payer funded court process. A'ole!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Makiaweli2012@gmail.com

From: John and Fran von Schlegell
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 6:58:09 PM

Aloha Mr. Sakoda,

My name is John and Fran von Schlegell and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.
Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
South Kohala

My additional comment: It would be tragic if we lost more of these fish, and collecting is almost impossible to police. The value in eco-tourism to Hawaii's economy and tax base far outweighs any benefit to fish collecting. Mahalo Nui, John and Fran von Schlegell

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jevs@endeavourcapital.com

From: [Tamra Vonblankenburg](mailto:Tamra.Vonblankenburg)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 12:03:45 PM

Aloha Mr. Sakoda,

My name is Tamra Vonblankenburg and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores
All fish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Protect the fish and the reefs!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: tavo808@yahoo.com

From: [Marty Wakat](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 5:58:30 PM

Aloha Mr. Sakoda,

My name is Marty Wakat and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona

My additional comment: I've noticed dramatic reduction in marine life since 2007 when I moved here and I spent much of my time as an underwater photographer.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Martywakat@yahoo.com

From: [Karie Wakat](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 7:09:58 PM

Aloha Mr. Sakoda,

My name is Karie Wakat and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: It is up to us to save our reefs and oceans. Do the right thing here, and ban aquarium fishing for good. Make our shoreline and oceans a marine park.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kariesmart@hotmail.com

From: [Karie Wakat](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:00:33 PM

Aloha Mr. Sakoda,

My name is Karie Wakat and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: Mile marker 4 off Ali'I in Kona has no fish anymore. Compared to ten years ago when there were plenty of tang and other reef fishes. I recently dove this site for the first time in 2 years and was pleasantly surprised at the amount of juvenile fish. I can see the positive impact on all of our Kona side reefs of the ban on aquarium fishing. We now have juvenile fish on our reefs again. To continue to allow aquarium fishing is to allow the genocide of the tang reef fish. Don't be that legislator that allows the extension of our endemic fish for profit!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kariesmart@icloud.com

From: mildred_walsh
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, January 2, 2020 8:49:58 PM

Aloha Mr. Sakoda,

My name is mildred walsh and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I have snorkeled regularly for the last 35 years and see the fish population decrease. They have not come back to the population of 35 years ago. Fish collecting is a crime against us all.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: cindywalsh@hawaii.rr.com

From: [Annie Walton-Teter](mailto:Annie.Walton-Teter)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 10:44:46 AM

Aloha Mr. Sakoda,

My name is Annie Walton-Teter and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:
All 40 White List species

My specific concerns about those species include:
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.
Marine life is threatened with local extinction

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):
Unfamiliar with these reefs, but still concerned.

My additional comment: Mostly, I snorkel When visiting my family in South Maui. But I do get over to the Big Island from time to time, and it breaks my heart to see the declining biodiversity. The comeback of the yellow tang is encouraging, but by no means encouraging enough. It is obscene that our wildlife is being treated as a commodity for the enrichment of traders. At best, we are stewards of the creatures in the aina. At best, we can protect them. At worst, we should at least coexist with them. None of us "owns" them. They must not be trafficked. I use this word advisedly--what's going on here (or what will go on here if the 2018 ban is lifted) is the moral equivalent of trafficking human beings. It has to stop, and stay stopped. A huge mahalo from California .

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: awt@me.com

From: [James Ward](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 2:07:04 PM

Aloha Mr. Sakoda,

My name is James Ward and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u

My additional comment: I have been Scuba diving the reefs in west Hawaii for over 10 years. In that time I've seen significant decline in reef fish (yellow tang, clown fish, butterfly etc). When the ban went into effect the hope was that some of these species could recover. It's just recently that I've noticed an increase in their numbers. To issue these licenses now would end whatever repopulation is currently taking place. As a recently retired concierge at a Kona resort I have seen over the years what snorkeling means to the visitors to Hawaii island. The damage to our local economy as the fish populations decline are hard to measure. The decline I've experienced over the last 10 years has been dramatic. Understanding that this is due to multiple factors (water temperatures rising, pollution) we need to protect the area we can control such as allowing the reef fish to recover. I would welcome the chance to give testimony in person as I have first hand knowledge of the situation particularly on the reefs surrounding Milolii where a large collection operation stopped operations 2 years ago. Mahalo James Ward 808-895-9656

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jimward56@gmail.com

From: [Jan Watson Watson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 1:17:25 PM

Aloha Mr. Sakoda,

My name is Jan Watson Watson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Marine life is threatened with local extinction

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment: The Oceans are dying-with them go US!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jannevision@gmail.com

From: [Sherrell Watson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 5:32:23 PM

Aloha Mr. Sakoda,

My name is Sherrell Watson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: In this day and age, with coral reefs and the marine life that inhabit them in danger due to climate change, proposing to open up the collection for the pet trade is absolutely ludicrous and short sighted!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: svsarana1@gmail.com

From: [Nickolas Weatherwax](mailto:Nickolas.Weatherwax)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, January 4, 2020 9:12:34 PM

Aloha Mr. Sakoda,

My name is Nickolas Weatherwax and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: The fact that this is even being considered is sickening and I will be voting against anyone who tries to push this through.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: niweatherwax@gmail.com

From: [Sheryl Weinstein](mailto:Sheryl.Weinstein@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 11, 2019 7:18:03 PM

Aloha Mr. Sakoda,

My name is Sheryl Weinstein and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: Please, please ban the Reef Rapers from collecting fish in Big Island waters!!! As a scuba diver & ocean conservationist I have witnessed the fish collector's work—and certain species are permanently depleted from the reef. Please maintain the ban!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: mermaids_miracles@yahoo.com

From: [Madolin Wells](mailto:Madolin.Wells)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 15, 2019 8:29:28 PM

Aloha Mr. Sakoda,

My name is Madolin Wells and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona

My additional comment: This is wrong. It is a crime against nature. The resurgence of fish populations after the 2018 ban is cause for celebration - but NOT for taking the abundance of nature for granted and going back to business as usual. It is also a crime against Hawai'i's DLNR regulations that shockingly flouts Hawai'i Supreme Court ruling. I urge the DLNR to withdraw consideration of reopening the reefs to outside exploitation, or the highest bidder - whatever the case may be. No amount of money can buy back species that have gone extinct. One million species overall are currently under dire threat of extinction, the consequences of

which are incomprehensible - unknown until it's too late. Thank you for your consideration.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: wellsmadolin@gmail.com

From: [Crystal West](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 2:58:00 PM

Aloha Mr. Sakoda,

My name is Crystal West and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: crystalinx@yahoo.com

From: [Jeanne Wheeler](mailto:Jeanne.Wheeler)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 12:22:34 PM

Aloha Mr. Sakoda,

My name is Jeanne Wheeler and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Unfamiliar with these reefs, but still concerned.

My additional comment: I'm most familiar with the fish in waters in/around Kealahou Bay & Punalu'u Beach Park areas.... I feel it's extremely important to protect our reefs & fishes for local enjoyment & for tourists who pay substantial \$ to come marvel at - when they are diminished, it'll be just yet another disappointment in their expensive trip/vacation. Word gets out fast these days re such situations! A far better idea would be to foster a captive fish & live-coral breeding industry - along the lines of the Kona seahorse farm.... It's safer for all the species involved - including humans who are reluctant to swim/snorkel, but would love to visit such a facility!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: aiannanoa@yahoo.com

From: [James Whillck](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 12:54:44 AM

Aloha Mr. Sakoda,

My name is James Whillck and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

South Kohala

My additional comment: As a diver I am starting to see animals that haven't been seen in many years (dragon eels as an example). The value to Hawaii far exceeds the small value of taking these animals for display.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jwhillck@hawaiiintel.net

From: [James Whillock](mailto:James.Whillock)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 11:22:51 AM

Aloha Mr. Sakoda,

My name is James Whillock and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Frog fish, Dragon Eels

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: As a diver with 40 years experience diving the Kona Coast I have seen a significant reduction in life on our reef system. Things are just starting to improve since the ban was put in place. Please let our reef system continue to improve.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jwhillock@hawaiiantel.net

From: [Laurel Whillock](mailto:Laurel.Whillock)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Saturday, December 7, 2019 12:40:17 PM

Aloha Mr. Sakoda,

My name is Laurel Whillock and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Dart fishes, esp. Fire Dartfish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: I'm an avid recreational SCUBA diver. My first dive in Hawaii was in 1990 off the Kona Coast. In the ensuing 30 years I have been dismayed and disappointed to see the once vibrant tropical reef fish populations of the West side of the Big Island slowly diminish. Where I once saw large schools of yellow tang, only small, isolated populations

remained. Then, in the last two years, since aquarium fish collecting has been illegal, I've seen the yellow tang, and many other species collected for the aquarium trade, begin to replenish themselves. This replenishment is especially critical now as the coral reefs are in dire need of any, and all, assistance to return to a semblance of the health that is essential to the marine life of Hawaii. Allowing fish collecting for the aquarium industry to resume at this critical point in the midst of the ecological disaster the Hawaiian islands have recently experienced with coral bleaching and increasing water temperatures is not just short sighted, it can set a course for a bleak future. The greed of a few cannot be allowed to jeopardize the health and well being of Hawaii's fragile marine ecosystem. Please do not allow aquarium fish collecting to resume!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lwhillock@hawaiiantel.net

From: [Helen White](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, December 10, 2019 1:25:58 PM

Aloha Mr. Sakoda,

My name is Helen White and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
South Kohala

My additional comment: I snorkel most days of the week up and down the Kohala coast and have done for the past 5 years. I am so familiar with Mahukona I have created a fish map of where certain fish can be regularly found. I have not witnessed any major increase in fish numbers since the ban. It would be a very sad day for all of us who enjoy the presence of the

many varieties to have them depleted or made extinct. The aquarium industry needs to invest in their own breeding programs rather than limitlessly raiding our reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: P4studios@hotmail.com

From: [Carole Wiedmeyer](mailto:Carole.Wiedmeyer)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 6:33:49 PM

Aloha Mr. Sakoda,

My name is Carole Wiedmeyer and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
South Kohala

My additional comment: Wild animals should not be pets. The reefs are under tremendous stress from climate change, overfishing and pollution, and we should do everything we can to ease the situation, not worsen it.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Seaweede@yahoo.com

From: linda_willaby
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 2:31:12 PM

Aloha Mr. Sakoda,

My name is linda willaby and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Puna
Hilo
South Kohala

My additional comment: I snorkel regularly off the Puna coast, not just right at the shoreline, but further out too. I have seen fewer and fewer fish in my 11 years of living here. We must do all we can to protect our reef fish from greedy aquarium collectors. I am pretty much against private aquariums. People can watch a digital display of pretty reef fish without contributing to their demise and future extinction.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: lwparisfrance@hotmail.com

From: [Liz Wilson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 7:52:17 PM

Aloha Mr. Sakoda,

My name is Liz Wilson and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Octopus

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u

My additional comment: Fish belong in the ocean!!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Lizzardwilson@aol.com

From: [Susan Wilson](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 9:44:25 PM

Aloha Mr. Sakoda,

My name is Susan Wilson and I am a Visitor/non-resident/concerned citizen. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I have been diving along the Kona Coast for over 20 years, was a full-time resident for 12 years and had noticed a dramatic decline in fish over the years, especially those targeted by fish collectors. In my opinion, fish collecting ranks right up there with sport hunting for elephants and giraffes. If the DNLNR is considering reopening Hawaii reefs to fish collecting again, someone needs to take a look at whose hand is in whose pocket!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: susanwils@yahoo.com

From: [Erik Winkler](mailto:Erik.Winkler@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 8:30:38 AM

Aloha Mr. Sakoda,

My name is Erik Winkler and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: winklere001@hawaii.rr.com

From: [Tami Winston](mailto:Tami.Winston)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 1:20:03 AM

Aloha Mr. Sakoda,

My name is Tami Winston and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

North Kohala

Hilo

Hamakua

Unfamiliar with these reefs, but still concerned.

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Kauakeaw@yahoo.com

From: Mark Winters
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; VanDeWalle, Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 13, 2019 2:25:20 AM

Aloha Mr. Sakoda,

My name is Mark Winters and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Angelfishes
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

Hilo

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Pandaloki@hotmail.com

From: [Anita Wintner](mailto:Anita.Wintner@hawaii.gov)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry@hawaii.gov)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 7:53:03 PM

Aloha Mr. Sakoda,

My name is Anita Wintner and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All endemic species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

South Kohala

My additional comment: I am extremely concerned that even after the Hawaii Supreme Court ruled against new licenses sold and the shutdown of AQ collecting that the head of DLNR and the Attorney General failed to enforce the law and help AQ collectors get around the law.

Why do we make laws that are not enforced?!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: anitabanana@hawaiiantel.net

From: jeff.walters
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; VanDeWalle.Terry
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, December 9, 2019 3:41:39 PM

Aloha Mr. Sakoda,

My name is jeff walters and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.
Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

My additional comment: It is just common plain old common sense that you cannot take millions of fish out of an environment without causing a unbalanced problems. STOP the aquarium trade from destroying Hawaii's shoreline!!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: texrev@att.net

From: [Linda Wright](mailto:Linda.Wright)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, December 8, 2019 3:16:38 PM

Aloha Mr. Sakoda,

My name is Linda Wright and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
Bandit Angelfish
Forcepsfish/Longnose butterflyfish

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala

My additional comment: In the thirty years I have been snorkeling and SCUBA diving in Hawaii I have seen an abrupt decline in marine life in the waters of Hawaii. In the past I was so entranced by the bounty of life as I stepped into the water. Now I find myself struggling to find fish on any given reef. This crisis is accelerated by the dangerous policy of blindly allowing the aquarium trade to be their own watchdog. More human greed is driving our own extinction. When the oceans die, we die. Sincerely, Linda Wright

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: thatswright1@gmail.com

From: [Jim Wyban](mailto:Jim.Wyban)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Sunday, January 5, 2020 12:45:13 AM

Aloha Mr. Sakoda,

My name is Jim Wyban and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
Yellow tangs

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
North Kohala
Puna
Hilo

My additional comment: I have swam in Kailua Bay for 35 years and have seen devastation of collectors. Barely any Yellow Tangs when I used to see huge schools. I say aquarium trade

collecting wild fish from our reefs is not sustainable and should be stopped. They should only use Aquaculture fish for mainland aquaria. That would stimulate an industry. Instead they do the easy thing - steal from the commons. Not cool.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Jim.wyban@gmail.com

From: [Lacy Yaegle](mailto:Lacy.Yaegle)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 12:57:35 PM

Aloha Mr. Sakoda,

My name is Lacy Yaegle and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
North Kohala
South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Lacy005@hotmail.com

From: [Violet Yates](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:43:02 PM

Aloha Mr. Sakoda,

My name is Violet Yates and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

My additional comment: I remember going on a glass bottom boat cruise in 2009 from the kona pier to kahuluu beach and seeing so few reef fish, it shocked me. They're starting to come back now, don't allow the aquarium fishing to start again, they need more time.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA

review, regardless of the method of take used.

I can be reached at: Violetyates2@gmail.com

From: [Bessie Young](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Tuesday, January 7, 2020 4:20:52 PM

Aloha Mr. Sakoda,

My name is Bessie Young and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: please let the reefs rejuvenate. Look what is happening in Australia- not just the devastating fires, but the death of the barrier reefs. We don't want to suffer the same fate here. Protect our wildlife!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: bessieyoungmusic@gmail.com

From: [Leslie Young](mailto:Leslie.Young)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Thursday, December 12, 2019 9:04:09 PM

Aloha Mr. Sakoda,

My name is Leslie Young and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores
All reef fish,

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

South Kona
North Kohala
Puna
Hilo

My additional comment: I am deeply concerned about the health of the reefs. We need a healthy amount of fish to have a healthy reef. The aquarium trade can't be allowed to take the fish.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Alohalyoung@gmail.com

From: [Sean Robert Young](mailto:Sean.Robert.Young)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Wednesday, December 4, 2019 3:46:34 PM

Aloha Mr. Sakoda,

My name is Sean Robert Young and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: Living in Oahu's, as a resident for over 30 years I've seen yellow tangs populations decrease significantly not to mention other fish that I just don't get to see much now days! Not only fish are being depleted it's also cause more species to come around because of it. The more they take the more it destroys our natural living shores that was once abundant but due to the hobby had now killed most of our shore around. It's looking more and more like a deserted reef out there as I see this as I dive and spear fish on a weekly basis. So I'm always in the water!

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: Seanyoung2001@yahoo.com

From: [Trish Young](mailto:Trish.Young)
To: david.sakoda@hawaii.gov
Cc: jim.lynych@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 2:50:49 PM

Aloha Mr. Sakoda,

My name is Trish Young and I am a Part time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Ka`u

North Kohala

Puna

Hilo

Hamakua

South Kohala

My additional comment:

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: pkyc@harter.net

From: [Nathan Yuen](mailto:Nathan.Yuen)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Monday, January 6, 2020 8:49:48 AM

Aloha Mr. Sakoda,

My name is Nathan Yuen and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona
South Kona
Ka`u
North Kohala
Puna
Hilo
Hamakua
South Kohala

My additional comment: The aquarium trade kills many of the fish it catches in Hawaiian waters. Even when fish make it to their ultimate destination the mortality rate is high. This is an extremely wasteful trade that should be regulated by the State of Hawaii. Strict limits needs to be placed on fish catchers and they trade must be regulated.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No

Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: 808nateyuen@gmail.com

From: [Dawn Zierk](mailto:Dawn.Zierk)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@klgates.com; [VanDeWalle, Terry](mailto:VanDeWalle.Terry)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, December 6, 2019 9:18:32 PM

Aloha Mr. Sakoda,

My name is Dawn Zierk and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

Yellow tangs
Butterflyfishes
Surgeonfishes
All 40 White List species
Bandit Angelfish
Angelfishes
Forcepsfish/Longnose butterflyfish
kole
Achilles tang (paku ikui)
All herbivores

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

DLNR estimated the time to assess populations/set take limits for 40 species taken by the aquarium trade at 10-15 years. The DEIS proposes zero limits.

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

My additional comment: For the past 30 years, I've been swimming and snorkeling at Makalawena, Kua Bay, Kukio beach, Kaupulehu, Anaeho'omalua Bay, 49 Black Sand, Waialea, Hapuna, and Mauna Kea. There used to be so many more fish... Since the "Try Wait" period began, I've definitely noticed more baby fish, more octopus, and a healthier looking reef overall. Please, protect the reefs of Hawaii and allow them to thrive with a diverse fish population. The tourist industry will suffer if we have hardly any fish left on our reefs, but more importantly the world will suffer, since there are potentially many cures for human

ailments in the biodiversity found in coral reefs.

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: dawnzierk@yahoo.com

From: [Jack Zimmerman](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynn@kigates.com; [VanDeWalle, Terry](#)
Subject: Comments on Draft Environmental Impact Statement for Commercial Aquarium Collecting in West Hawaii
Date: Friday, January 3, 2020 11:57:40 PM

Aloha Mr. Sakoda,

My name is Jack Zimmerman and I am a Full time HI resident. I am concerned about the impacts of the aquarium trade on the following species:

All 40 White List species

My specific concerns about those species include:

The natural beauty of coral reefs is diminished by aquarium collecting.

Species once depleted by the trade are now returning. We should continue, not reverse, this trend.

Species abundance is significantly reduced by aquarium collecting.

Communities of reef species are disrupted by aquarium collecting.

Marine life is threatened with local extinction

The real possibility that future generations may not encounter these species

Scientists and DLNR have urged Hawaii residents to stop taking herbivores. Making an exception for aquarium collectors is wrong.

70% of Hawaii's reefs are projected to die within 20 years unless major changes are made.

Hawaii will pay a terrible price for shipping out these fish as disposable "pets" for the luxury saltwater aquarium hobby.

Hawaii needs these fish more than ever before. Taking them for personal aquariums outside Hawaii is wasteful.

I believe some or all of the species identified above have been impacted on reefs I am familiar with in the following Hawaii Island district(s):

North Kona

South Kona

Hamakua

My additional comment: The marine preserve at Kealakekua Bay is familiar to me and I have snorkeled there many times over a period of 25 years...I have also explored the reefs at other locations along the Kona coast...It is essential that these reefs are preserved. The aquarium trade is destructive to reefs and harmful for the fish so captured. Let's be real about our reefs and stop that trade...

I urge DLNR to reject the Limited Permit Issuance (preferred) alternative, to select the No Action alternative and to require all aquarium collecting, statewide, to undergo proper HEPA review, regardless of the method of take used.

I can be reached at: jackmzimmerman@gmail.com

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	5. The proposed action is an overall reduction in take over the pre-ban alternative.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery	n/a	n/a	7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".	Your comment has been forwarded to the decision makers.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Survey Template; each commenter could select any or all of these items				
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.	Your comment has been forwarded to the decision makers.
West Hawaii Aquarium Fishery Survey Template; each commenter could select any or all of these items	n/a	n/a	9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.	Your comment has been forwarded to the decision makers.
Joshua Ables	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keala Acol	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eric Adams	SC	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Katy Adams	OK	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nicole Ah Mow	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Amanda Alaffa	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tylee Albrecht	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Roger Alcain	NY	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dustin Amaral	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Patrick Amaral	HI	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Charlene Anderson	CA	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Charlene Anderson	CA	12/31/2019	Let them go back to work	Your comment has been forwarded to the decision makers.
Cody Anderson	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Theresa ANDREAE	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Darcie Asakura	HI	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lee Ashford	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Maile Ashford	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Maxwell Ashford	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Badach	Canada	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Wylie Ball	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rose Banez	Thailand	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sean Barnett	TX	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bertha Basabe	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Pete Basabe	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Susan Basabe	Arlington (State TBD)	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rush Battle	NC	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Joshua Bauder	Canada	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Curtis Bearden	NC	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Cherish Bells	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Beamus Bennett	NV	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lisa Benton	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tony Berry	HI	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Art Berube	WA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Birch	Canada	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Hayden Bishop	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Makena Bishop	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Chris Blair	WA	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Boe	IN	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Boe	IN	12/16/2019	Listen to the scientists!	Your comment has been forwarded to the decision makers.
Brenda Boling	OK	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Btad Bollinger	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brian Bowen	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brian Bowen	HI	12/14/2019	I am a practicing marine biologist with 40 years of experience in marine conservation. All the scientific evidence indicates that this fishery is benign, sustainable, healthy, and has a positive impact on Hawaii's economy.	Your comment has been forwarded to the decision makers.
Larry Bowens Jr	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jessica Brandstaetter	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Maria Brandstaetter	HI	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mario. K Brandstaetter	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jack Briggs	HI	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jack Briggs	HI	12/28/2019	Aquarium fish collecting is doing way less impact on the reef than what I have seen in the Past I have been to many graduation parties birthdays luaus and funerals and have seen what a handful of local boys with three prongs can do it's terrifying DLNR should not be able to pick and choose what is deemed right or wrong fishing is fishing	Your comment has been forwarded to the decision makers.
Natasha Brooks	HI	12/25/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
G L Brown	MI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
G L Brown	MI	1/7/2020	A great piece of work	Your comment has been forwarded to the decision makers.
Nicole Brown	AZ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kevin Brunsen	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
George Brushett	CT	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Chris Buerner	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Chris Buerner	CA	1/7/2020	This fishery, managed, studied, and proven sustainable for decades is one of the best models of ornamental fisheries worldwide. The State of Hawaii should be proud to manage fisheries, whether food or ornamental, successfully. It seems that increasing animal rights activism has created an environment where policy is being shaped not by good science, but rather as a result of sensationalism, and unfortunately as a result of the dissemination of misinformation and outright falsehoods. It was determined that a comprehensive Environmental Impact Study be produced, it seems that has been done in good faith, and it appears that the data and conclusions contained therein point to the fact that fish populations of the key target species are healthy and stable, and that the fishery, as has been determined repeatedly over a long period of time, continues to be very sustainable.	Your comment has been forwarded to the decision makers.
Tiffany Bui	TX	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tim Camodeca	WI	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Chris Camp	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Denise Cannon	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Carberry	TN	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Levi Cardoza	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bruce Carlson	HI	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bruce Carlson	HI	12/20/2019	As stated above, this fishery is the most thoroughly researched inshore coral reef fishery in the world. Excellent life history data on the prime species are available in the scientific literature and demonstrate why these species, with high fecundity and year-long spawning periods, can continue to replenish themselves under the current levels of fishing. This is a demonstrably sustainable fishery and has been so for decades.	Your comment has been forwarded to the decision makers.
Ulla Carmiencke	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ulla Carmiencke	HI	12/26/2019	Aloha, I would hope the decision on the DEIS will be based on the letters, data, and information provided by fish scientists from recognized institutions that have studied Hawaii Aquarium fish such as Bishop Museum, Universities, or DLNR.	Your comment has been forwarded to the decision makers.
Scott Carr	BALA CYNWYD	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

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Jason Cartagena	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nick Caswell	IN	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Yankumi Centino	Canada	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sergio Chan	FL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sergio Chan	FL	1/6/2020	Fish are the most beautiful creatures of the planet.. hawaii has a lot of unique ones to share with the world.. sustainable fish collection is the best for everybody. The hobbyist love the quality and colors of fish that comes from hawaii. There are lots of farm raised fish but lot of species do not reproduce in captivity... until them .. share your treasures!!	Your comment has been forwarded to the decision makers.
William Chang	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Riley Charles	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Riley Charles	HI	12/13/2019	Open the fishery to the 14 fisherman.	Your comment has been forwarded to the decision makers.
Esequiel Chavez	TX	1/8/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nikol Childs	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Clifford Ching	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Cindy Christians	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brandon Clow	MN	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tim Cobb	TX	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tim Cobb	TX	1/5/2020	As a regular visitor to Big Island, I have love snorkeling the West Side. The reef fish are always plentiful and on full display.	Your comment has been forwarded to the decision makers.
Patrick Colin	Koror, PALAU	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Patrick Colin	Koror, PALAU	1/7/2020	I hold a Ph.D in marine science specializing in coral reef fish studies. I find the studies done in advance of reopening the limited fishery to be well done and thoroughly indicate the minimal impact of this limited fishery will have on marine life on Hawaiian shorelines.	Your comment has been forwarded to the decision makers.
Dennis Collier	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Pierson Connors	CO	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Kim Copeland	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Corbett	IL	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Edward Cord	TX	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Julia Costa	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Daniel Cottrell	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Isaac Croas	OH	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Isaac Croas	OH	12/16/2019	Commercial harvesting in a sustained manner is critical. Bringing these fish to other parts of the world and showing their majestic nature allows for everyone to be aware of how vital and potentially fragile these ecosystems can be. By allowing these fish to travel the world, you allow us to bring Hawaii and it's customs and cultures into our homes. This is an important part of any education process and is vitally important in maintaining, nurturing, and cultivating vibrant reef systems.	Your comment has been forwarded to the decision makers.
Philip D'Agostino	NY	12/16/2019	See above comments (template format)	
Philip D'Agostino	NY	12/16/2019	The only way to help protect our environment is to allow people to become involved hands on.	Your comment has been forwarded to the decision makers.
Jason Daks	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eli David	HI	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Patrick Davies	FL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Chris Davis	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Vandetta Davis	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dan Dean	MT	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dan Dean	MT	1/7/2020	A managed fisheries is a healthy fisheries.	Your comment has been forwarded to the decision makers.
Tiki Defever	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tiki Defever	HI	12/16/2019	It's time to listen to science, not deliberate misinformation!	Your comment has been forwarded to the decision makers.
Donenick Denora	HI	1/8/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tom Dhans	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Michael Domeier	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Domeier	HI	12/16/2019	As an active researcher with a Ph.D. in coral reef fish ecology, I can say with 100% certainty that the aquarium fishery proposed for West Hawaii is sustainable, while also allowing people a means to make a living. The fishery is targeting very recently recruited juveniles that have a very high natural mortality rate; in other words, a majority of the individuals collected would not survive the next 3-months in any event. The state's own data, collected by DLNR, demonstrate that this fishery is healthy and viable.	Your comment has been forwarded to the decision makers.
Audrey Dunleavy	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brian Dunleavy	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Duren	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Duren	FL	1/7/2020	Ornamental fish collection in Hawaii has been shown to be sustainable based on fish population trends being nearly identical in fished areas vs non. Providing too few areas for responsible fishing in Hawaii will cause a black market for the aquarium industry, including more fish being collected in ways that are significantly less environmentally friendly in other parts of the world, including collection by cyanide.	Your comment has been forwarded to the decision makers.
Andrea Ehlers	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Ekbohm	CA	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Ekbohm	CA	12/29/2019	they met the requirements, provided the EIR, now it is time to ALLOW them to return to their chosen career, and time for the government to quit selective enforcement of its laws.	Your comment has been forwarded to the decision makers.
Mark England	CO	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Randy Esguerra	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Timothy Ewing	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lois Ezell	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Robert Familton	Grayson (KY?)	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Randy Frnley	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Veronia Ferrer	Philippines	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Barry Finkenberg	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Martin Finn	WA	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Justin Fisk	CA	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rachel Florentino	Canada	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Cy Forell	WA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Cy Forell	WA	1/6/2020	Please support sustainable fishery. With respect, Cy Forell	Your comment has been forwarded to the decision makers.
Ken Fortino	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Shawna Fraser-McConnell	GA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Malachi Fry	PA	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Arnold Fujioka	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alisa Funke	VA	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alisa Funke	VA	12/20/2019	I have had the opportunity to see these fisherman in action. The impact on the environment is substantially less than any other industry.	Your comment has been forwarded to the decision makers.
Joyce Galapon	CA	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alex Garcia	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alex Garcia	HI	1/6/2020	Emotional and political issues have no place in resource management issues. Science has proven again and again, that the aquarium fishery does not threaten the populations of reef dogs in West Hawaii.	Your comment has been forwarded to the decision makers.
Scott Gardner	AL	12/20/2019	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
Scott Gardner	AL	12/20/2019	I don't support fish collection unless it's going toward captive breeding efforts.	Your comment has been forwarded to the decision makers.
Tyler Garrett	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alex Gawura	IL	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alex Gawura	IL	12/20/2019	I believe that a sustainable well managed fishery not only benefits the economy but also helps to build environmental awareness of our coral reefs. Artificial reefs maintained in aquariums today might be looked at as simply a hobby but it has also fostered an economy and demand for	Your comment has been forwarded to the decision makers.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
			more research into captive breeding programs. The ability to maintain a sustainable fishery will fuel captive breeding programs that can help repopulate other reefs while also supplying the aquarium industry. I do believe that worldwide our reefs are in trouble and that we should do everything we can to raise awareness about reef environments while also learning how to maintain these organisms artificially so they can be preserved for future generations. When people see the beauty of ornamental fish for aquariums it brings them closer to the cause of preserving this natural wonder with sustainable practices that are responsibly managed.	
Joseph Genero	VA	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Joseph Genero	VA	12/16/2019	Please allow collection of fish in Hawaii again. The fisherman really respect the waters and the fish and will collect responsibly. Thank you	Your comment has been forwarded to the decision makers.
Robert Gibbens	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Troy Goldberg	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Hector Gomez	NJ	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Amy Grace	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Amy Grace	HI	12/16/2019	The fishery was already sustainable before the closure. With this greatly reduced number of active permits, this is a no-brainer. Reinstate the fishery in West Hawaii.	Your comment has been forwarded to the decision makers.
Brent Grandidier	IN	1/8/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Peter Gravis	UT	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Frank m Greco	NY	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Yorgos Gregory	MA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christopher Gries	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christopher Gries	FL	1/7/2020	Sustainable fishery allows for economic growth and allows for the potential movement to cultivate captive raised fish. It also increases awareness and appreciation for our reefs.	Your comment has been forwarded to the decision makers.
Nakai Griffey	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tommaso Guarino	NJ	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Josh Haber	Canada	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Josh Haber	Canada	12/19/2019	I think the fishery needs to reopen, it's been proven time and time again that it's sustainable. Funny that these fish can be taken out of the ocean for food and that's no issue, but aquarium owners who can provide a fish with a happy habitat for decades and put a fish in a position to actually out live the average lifespan in the wild are a danger to the environment.	Your comment has been forwarded to the decision makers.
Karl Halmstad	GA	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karl Halmstad	GA	12/16/2019	What people can learn about the fishes of Hawai'i is beyond measurement both in homes & in the class rooms where Teachers are allowed to have aquariums.	Your comment has been forwarded to the decision makers.
Erika Halpin	IN	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Halpin	IN	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sherry Halpin	IN	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jason Hamilton	AZ	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Leann Hamilton	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Hanson	OH	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Hanson	OH	1/7/2020	We own an aquarium maintenance company in Columbus, OH & our clients who love their saltwater fish are more aware and active in protecting the ocean because of their fish. As well as anyone who see's their set-up. So banning Hawaiian fish will only make them unaware of the beauty that you are trying to protect.	Your comment has been forwarded to the decision makers.
Jeffrey Hargis	TX	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dan Harmony	AZ	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Barbara Hernandez	VA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jason Hew	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bob Hinton	OK	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mayumi Hirata	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Grant Holtfrerich	KS	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Debra Holtz	FL	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Debra Holtz	FL	12/26/2019	I own a Home in Captain Cook/Milolii, and am taxed as a part-time Resident.	Your comment has been forwarded to the decision makers.
Gabe Hoover	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Hokulea Hoover	HI	12/14/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Daniel Hosmer	RI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Howerton	TX	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Katelyn Hoyt	MA	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Frank Huynh	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Jacinto	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Randy Jahier	CT	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Justin Johnston	WI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kacie Johnston	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christian Kahahawai	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Elizabeth Kahahawai	HI	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kapono Kahele-bishop	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kapono Kaluhiokalani	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kapono Kaluhiokalani	HI	1/6/2020	The data is proof that the aquarium fishery is sustainable. With continuous careful monitoring and reasonable regulation, the fishery can thrive and continue to provide.	Your comment has been forwarded to the decision makers.
Ashley Kanahale	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Joseph Kaplan	CA	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Joseph Kaplan	CA	12/19/2019	Thank you for giving us a voice to comment	Your comment has been forwarded to the decision makers.
C Kato	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Carrie Kato	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Leighton Kato	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Les Kaufman	MA	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Les Kaufman	MA	12/20/2019	<p>I am a marine conservation biologist, expert on coral reef fishes, who has worked extensively in the Pacific, including the main islands of Hawaii. As the PI of a large research grant on marine managed areas, I funded a study of the Fish Replenishment Areas along the Kona coast that provided a portion of the evidence that the aquarium industry can be and indeed had been a sustainable fishery. Therefore, on the basis of this and much other evidence, I support the reopening of the fishery. I am familiar with the opposition to the fishery and find the arguments supporting this position to be inconsistent with the body of evidence. In addition, as an admirer of the native Hawaiian culture and relationship with the sea, opposition to the aquarium fishery on the grounds that it is disrespectful to Hawaii or dangerous to the future of Hawaiian coral reefs strikes me as both false and offensive, a position endorsed by friends of mine who are active in the resurgence of interest in the Hawaiian culture and way of life. Given the immense pressures bearing down on Hawaiian ecosystems from anthropogenic climate change, poorly regulated fishing, and coastal development- all clearly unsustainable in their current manifestations- closely regulated aquarium fish collecting is an activity whose ultimate impacts are likely to be positive, not negative. It supports livelihoods, celebrates and shares Hawaii's environmental legacy, and when properly managed is not at all in conflict with the enjoyment of Hawaii's marine life in their natural context through snorkeling and diving. Meanwhile the abovementioned factors pose looming existential threats. A plan for the aquarium industry in Hawaii should be crafted that explores the ideal way for this kind of enterprise to develop and mature, with a goal of achieving the highest truly sustainable volume commensurate with demand. It is important to underscore that "sustainable" in this context does not mean the traditional definition in antiquated fisheries science where one half the population or biomass is exploited. Rather, the sustainability of collecting for the aquarium trade should leave enough fishes and other organisms still on the reef to ensure that the system as a whole is self-sustaining and able to deliver the full suite of ecosystem services of which it is capable and on which people depend. Doing so is entirely consistent with a carefully and closely managed aquarium trade at the level proposed for the reopening fo this fishery. In addition, in order to assure that Hawaii's coral reefs survive, Hawaii must support, with every fiber of its being, efforts to battle climate change and to keep the global average temperature from rising</p>	Your comment has been forwarded to the decision makers.

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			more than two degrees Celsius. The majesty of this task dwarfs concerns about the aquarium fishery, and failure in this regard entirely moots debate as to the pluses and minuses of allowing the collection of reef dwelling creatures for home aquaria.	
Ellen Kevis	HI	12/28/2019	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
Ray Kevis	HI	12/27/2019	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
Stephen Kiefer	NV	1/1/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Diana Kiefer	MO	12/23/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Janelle Kiefer	NV	12/23/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Janelle Kiefer	NV	12/23/2019	These permits need to be reinstated ASAP.	Your comment has been forwarded to the decision makers.
Susan Kikumoto	HI	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Susan Kikumoto	HI	12/28/2019	I support the people who are collecting the fish.	Your comment has been forwarded to the decision makers.
Paul Kimsel	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sheree Knopf	KY	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kai Koch	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kai Koch	HI	12/13/2019	Open the fishery for these 14 fisherman.	Your comment has been forwarded to the decision makers.
Kim Koch	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mike Koch	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sharon Koch	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kevin Konieczny	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mike Kono	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Janice Kopff	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Janice Kopff	HI	1/7/2020	Lived on Big Island for over 25 years. The fish on the reef now are just as plentiful as they were in 1979. It is a crying shame that dive charters are under no control to protect the reefs. Have personally observed large oil slicks surrounding dive boats due to lotions on people. They have been	Your comment has been forwarded to the decision makers.

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			seen harassing turtles and monk seals and disposing of waste into the ocean. Tropical fish collectors take extreme care to protect the reefs, their source of income.	
Jan Kopff	MO	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jim Kopff	MO	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Glenn Kosaki	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Chris Kose	AZ	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Annette Kozak	NY	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Stephen Krajewski	MA	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keynin Kretz	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keynin Kretz	HI	12/15/2019	I have seen the research and evidence for both sides of this environmental issue. DLNR with fish catch reports have shown that this industry of fishing is sustainable Both sides need to work together and keep it sustainable. Environmentalists, fishermen and DNLR need to have meetings and keep all fishing sustainable for all future generations!	Your comment has been forwarded to the decision makers.
Jeni Kurashige	HI	12/24/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nathan Kurashige	HI	12/23/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ryan Kurashige	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Kurtz	CO	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jon Kusano	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Andrew Kwon	Canada	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bob Lake	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Thomas Lang	CA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Thomas Lang	CA	1/6/2020	The science is clear that a well-regulated aquarium fishery is sustainable at this time.	Your comment has been forwarded to the decision makers.
Christopher Lanman	IN	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Christopher Lanman	IN	1/7/2020	Please dont let the actions of a few, punish the rest who want to have a sustainable way to collect and research marine life!	Your comment has been forwarded to the decision makers.
Lee Larson	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lee Larson	TX	1/7/2020	Believe if done correctly can be very successful.	Your comment has been forwarded to the decision makers.
Rian Lau	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Keith Laurie	New Zealand	1/8/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Alsworth Lee	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Austin Lefevre	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Juan Lehmann	Mexico	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lloyd Leong	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sarah Leung	Canada	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brad Lewis	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Lewis	MI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Liemohn	MN	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Lovell	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jay Lovell	MT	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jay Lovell	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jay Lovell	HI	12/17/2019	Fishing is NOT a crime!!	Your comment has been forwarded to the decision makers.
Kristi Lovell	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Staci Lovell	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Lovewell	HI	1/6/2020	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
John Lovewell	HI	1/6/2020	The Aquarium Industry is nothing more than a scam killing life for money. Please stop causing Extinction for fun! Most fish don't live a month.	Your comment has been forwarded to the decision makers.
Anthony Lucchini	NY	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Anthony Lucchini	NY	1/7/2020	Let us not forget that the fishermen are people with families and they need to be allowed to make their living like everybody else.	Your comment has been forwarded to the decision makers.
Auden Lujan	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tatao Luo	CA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Roger Ma	CA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Maloney	FL	1/6/2020	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
John Maloney	FL	1/6/2020	Limiting it to 14 licenses isn't about sustainability, it is probably about creating a cartel around those license holders. Bag limits would address sustainability concerns. Ask those 14 give up their licenses to 14 other fisherman and you will see what I mean.	Your comment has been forwarded to the decision makers.
Ronald Mamaril	Canada	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Britney Manago	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Whitney Manas	AZ	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tom Mars	FL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Martin	AR	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Martin	AR	12/16/2019	The ban never made any ecological sense. The live/aquarium harvest is insignificant and even this measure is over regulation.	Your comment has been forwarded to the decision makers.
Paul Masterjohn	HI	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ryan McConnell	GA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Garrett McMillan	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Timothy McRae	MI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Blake Meadows	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Elena Mello-waiwaiole	HI	1/2/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matt Messer	NC	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eddie Miller	FL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Robert Miller	CA	12/16/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Wendy Minor	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Wendy Minor	HI	1/7/2020	This appears to be a very well managed plan to sustain our local fishery.	Your comment has been forwarded to the decision makers.
Ted Minyard	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Craig Mitchell	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eric Moennich	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Patrick Monck	FL	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Vilma Morgado	Philippines	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sally Myers	MT	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dayton Nacis	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rene Nacis	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anthony Nahacky	HI	12/26/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anthony Nahacky	HI	12/26/2019	Aloha, Essentially this is a choice of; 1. Accepting the 20 year Hawaii State studies of the Aquarium fishery, their monitoring, and professional scientific interpretation of the data which shows the sustainability of the Aquarium Fishery; Or 2. Alternately accepting layman opinions that oppose the aquarium fishery and their untrained interpretation of the data over and above the scientific community.	Your comment has been forwarded to the decision makers.
Mari Naito	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ronda Navalta	Philippines	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
James Naylon	HI	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Teri Nelson	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christan Nguyen	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Minh Nguyen	TX	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Emiliano Niell	NY	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Jaren Niimi	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ali Noorany	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Malcolm O'Brien	NY	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Malcolm O'Brien	NY	12/18/2019	I was An Aquarium Curator and Had concerns of where and how the animals where being captured. I feel confident with this new act it will benefit both the natural habitat and help the fisherman do what they do best	Your comment has been forwarded to the decision makers.
Karen Oconnor	RI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karen Oconnor	RI	1/7/2020	Since the data indicates the fishery is sustainable, I believe it should be reopened.	Your comment has been forwarded to the decision makers.
Fred Ong	CA	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
John Oosthuizen	FL	12/30/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Karen Oosthuizen	FL	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Precy Ordinario	Canada	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Travis Ota	HI	1/5/2020	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
Matt Pedersen	MN	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matt Pedersen	MN	1/7/2020	The subject of Hawaii's aquarium fishery has been something I've followed for over a decade now. I have submitted public commentary most every time attempts have been made to shutter the fishery. I was asked to personally weigh in once again, otherwise, I would have likely remained silent as the data and science alone should be all that is needed to settle this matter in favor of the fishery. My background as an aquarist of over 37 years, a globally-recognized award-winning aquarist and marine fish breeder, and active leader in the advancement of the art and science of aquarium keeping and captive propagation, gives me a unique perspective from which to comment. As a sportfisherman, I'm well aware of the role that state agencies play when tasked with the mandate to manage natural resources, whether a tiny trout stream a mile from my house, or the delicate balance of salmon and alewife populations in the Great Lakes. Given my understanding of these practices, I firmly believe Hawaii's marine aquarium fishery, managed by DAR / DLNR, was already an unparalleled example of excellent fisheries management. However, well-	Your comment has been forwarded to the decision makers.

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			<p>funded antiaquarium activists have used emotional arguments and outright misinformation to urge the state of Hawaii to close this fishery for over a decade, and yet their attempts have been consistently rejected on the basis of data and science. In this regard, the very fact that we are here, today, jumping through endless hurdles to reopen a legal and successful fishery, is an utter waste of resources and capital, all because of a single court ruling that flew in the face of common sense, however well-intentioned or reasoned the judge may have felt when overturning lower court rulings. No thought was given to the data, no respect given to the state agencies charged with collecting and managing the data, only a capitulation to anti-aquarium activists who sought any and every manner possible to shut down this legal, well-managed fishery, on emotional grounds. The fact remains today that a relatively small industry had been shuttered for 2 years now all, with untold economic losses, and great expense incurred to defend already well-proven science and data. As an aquarist and scientist, the statements and arguments made by those whom oppose this fishery are without merit, and often are actually outright lies used to incite people into blindly accepting, and then regurgitating, baseless allegations and concerns. I find it rather ironic that those who oppose the harvest of Acanthurus achilles, the Achilles Tang, for aquarium purposes (where it will generate up to \$300 per fish at the end retail level), will gladly turn a blind eye to spearfishing that same fish and selling it for \$4.99/lb in a local food market. Such a disconnect cuts to the very core of their mission; this isn't about concern over whether the aquarium fishery was sustainable (it IS and was already demonstrated to be prior), this battle has been purely about people keeping fish in aquariums. In terms of coral reef management and any fishery there, what happens to a fish after it is harvested is irrelevant. The fish is no longer in the ecosystem. All that matters, from a fishery standpoint, is how that removal impacts the system. The decades of data overwhelmingly supported that Hawaii's fishery was responsive, wellmanaged, and sustainable, long before any environmental assessment or impact statement was prepared. The state is not tasked with legislating the morality of aquarium keeping. No, the state and its agencies are tasked with oversight of the state's natural resources. While I am aware that current proposals proffer limited access to the fishery with just 14 permits, given the historic data collected by the nonpartisan state agency tasked with managing this resource, I don't believe this recommendation is even necessary...I think it's just one of many "capitulations" and "compromises" that Hawaii's aquarium fishermen have felt pressured to make when in fact that data never suggested that they even need to make these sacrifices. I think it's time the state stood up for the fishermen, and the management agencies who made this fishery what it was....until it was shuttered. I believe the decision</p>	

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			regarding the number of permits, and the management of the fishery, be returned expressly to the qualified biologists who were asked to manage the fishery successfully and did just that. Given the never-ending attacks on this fishery, and the repeated data that removes any doubts, that the fishermen and the DLNR be granted a reprieve from future attacks. As we have seen, that debate over the past decade has been far from fair. The fishermen and the DLNR had to defend themselves successfully each and every time they were attacked with a bevy of emotional arguments and misinformation...it only took one "win" for those opposed to shut down an entire industry. As such, the debate was incredibly stacked in favor of those who wished to impose their personal morality and ethics upon everyone else through the government. I am aware that there has been an active campaign to collect as many anti-aquarium trade comments as possible by those behind these and other past attempts to shutter the trade. The aquarium hobby, and trade, has effectively avoided flooding the government with such superfluous commentary. I ask that those reviewing all the submitted commentary, charged with rendering a decision, understand that it is the QUALITY of the commentary, and not the quantity, that matter. The decision to reopen Hawaii's marine aquarium fishery is not a high school student body election, where whomever rabble rouses the most mindless followers wins. No, this is 100% a question of sound science and fisheries management practices. I believe, based on historical data, that to shutter this fishery was a mistake and an insult to the fisheries managers, and that it should be reopened without further delay.	
Fidel Perez	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Fidel Perez	FL	1/7/2020	The Hawaii tropical fish is a big part of the salt aquarium business trade. This business properly manage is sustainable and feeds and supports a lot of families all over the world.	Your comment has been forwarded to the decision makers.
Judith Perino	HI	12/24/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Luciano Perino	HI	12/24/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bernardo Piereck	VA	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Greg Pifer	Canada	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ben Potter	CA	12/20/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Preble	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Jeff Preble	HI	1/7/2020	comments from people around the world triggered by aquarium opponents are different than comments from people involved with ocean issues in Hawaii.	Your comment has been forwarded to the decision makers.
Sam Price	LA	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sam Price	LA	1/5/2020	This is important work, thank you.	Your comment has been forwarded to the decision makers.
Bella S Price	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lucianne Price	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Benjamin Quales	AZ	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Branden Rakita	CO	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ashley Raleigh	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Nicholas Ramirez	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Genevive Ramos	Philippines	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dustin Rath	OH	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Giovanni Recchia	FL	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sally Recchia	FL	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Terrance Reek	WA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dana Riddle	GA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Rizkalla	TN	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Justin Roelfs	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Justin Roelfs	IL	12/17/2019	Jay's dad should not lose his job	Your comment has been forwarded to the decision makers.
Warren Rose	ID	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jesse Rosen	WA	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jesse Rosen	WA	1/6/2020	Hawaii is the best managed fishery in the world. Let's set the example of showing everyone how to manage ornamental and food fisheries.	Your comment has been forwarded to the decision makers.
Ryan Rothwell	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Robin Roy	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mike Ruggiero	NJ	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Chris Runnells	HI	1/1/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Runo	CA	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthew Runo	CA	12/16/2019	While protecting the Hawaiian reefs is of the utmost importance, one way that can be done is by gathering money and promoting the aquarium hobby - which brings Hawaiian species to people around the world where children and adults alike can learn to appreciate and value the natural resources of the reefs. Having this fishery under regulation and allowing this limited number of collectors access is a great way to both protect the species that inhabit the waters and also promote the Hawaiian reefs to the world.	Your comment has been forwarded to the decision makers.
Oscar Saavedra	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jonah Sakata	HI	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Stephaine Sakata	HI	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kayla Salo	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carlos Santiago	OK	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jonathon Santiago	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anchor Sarslow	MN	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Anchor Sarslow	MN	12/19/2019	It is really a good idea to manage resources rather than ban their use. There are many examples nationally as well as worldwide. Not only are the animals better served being managed, but also against the effects of non-management. Examples include runaway populations and loss of other unintended populations due to lack of a management system. Banning has served almost nobody, including the incomes of people on the economic side of this.	Your comment has been forwarded to the decision makers.
Bill Schlumz	IL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bill Schlunz	IL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Erin Schwartz	TX	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Michael Schwartz	TX	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Robert Seigneurie	MI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Serfass	MI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Serfass	MI	1/7/2020	being involved not only in the pet industry but also in the forestry industry in michigan I applaud hawaii's action to protect the ocean enviroment. i also realize that as long as the fisheries industry proceeds in a sustainable manner we should be able to coexist with other groups who are trying to protect the enviroment. Thank you for the opportunity to express our opinions.	Your comment has been forwarded to the decision makers.
Phil Shane	CA	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Phil Shane	CA	12/15/2019	have been a buyer for 35 years. Repeat studies show there is no impact on the environment.	Your comment has been forwarded to the decision makers.
Dan Sheets	ID	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dan Sheets	ID	12/16/2019	Not only is this sustainable, but opening the fishery encourages more people to get educated and involved with protecting these types of resources. By encouraging this industry, greater awareness will develop and side markets will grow that could address other issues that plague different aspects of sustainable fishing.	Your comment has been forwarded to the decision makers.
Helio Shin	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Caelly Shiraki	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Noreen M Shiraki	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Todd Shiraki	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Cathleen Shiroma	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brad Shook	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brad Shook	TX	1/7/2020	Sustainable collection leads to new hobbyist and increased interest in conservation of our oceans.	Your comment has been forwarded to the decision makers.
Barnett Shutman	NY	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Barnett Shutman	NY	1/6/2020	We always support sustainable development & that give a sustainable livelihood for the coastal community's great work	Your comment has been forwarded to the decision makers.
Dominick Siconolfi	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

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Pawel Siemion	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Marc Silverman	NY	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rowan Slattery	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Robert Sledzinski	FL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jeff Slep	OR	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brandon Smith	SC	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Darrel Smith	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Penny Smith	HI	1/5/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Adam Snodgrass	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Sommers	HI	12/19/2019	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
David Sommers	HI	12/19/2019	This questionnaire is such a sham. It only has a I support this sham. This is my second answer because all the info is after the questions. Which tricked me. I support the industry but not the DIES as it is written apparently by one of the 14. I will let my statements in my previous response and This one stand. You sor are being scammed by the author of this scam. If I was you I would be quite angry	Your comment has been forwarded to the decision makers.
Vincent Sonnenberg	FL	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Julian Sprung	FL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Julian Sprung	FL	1/7/2020	The science supports the conclusion that the West Hawaii Aquarium Fishery is sustainable. I support re-opening the fishery.	Your comment has been forwarded to the decision makers.
Tosca Stabler	HI	12/27/2019	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
Bill Stockly	HI	12/27/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bill Stockly	HI	12/27/2019	My experience with the West Hawaii Fishery is over 40 years as a fishery biologist and dealer.	Your comment has been forwarded to the decision makers.
Emily Stout	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

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Carina Sugiyama	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Wayne Sugiyama	HI	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Melissa Sulejmani	TX	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sharon Sullivan	CO	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sharon Sullivan	CO	1/7/2020	I am an avid scuba diver as well as an experienced aquarist, and believe fishes are a sustainable product when managed as well as they are in Hawaii! Thank you	Your comment has been forwarded to the decision makers.
Clay Tam	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Clay Tam	HI	12/18/2019	If limited to only 14 permits languages should added to allow new entries if the total number of permittees drops below 14 in the event a permittee exists the fishery.	Your comment has been forwarded to the decision makers.
Heidi Taylor	NV	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Leonard Taylor	NV	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Antoine Teitelbaum	CA	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Annette Terazono	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christine Terazono	HI	12/25/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kacie Terazono	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Milton Terazono	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Milton Terazono	HI	12/13/2019	It is my opinion that the DLNR's adoption of the Draft Environmental Impact Statement (DEIS) analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area is justified and warranted. The reasons why the fishery should be re-opened in West Hawai'i are that current data, current fish populations and historical catch information collected for the DEIS indicate that the fishery is indeed sustainable. Further more, the two shut down period has affected several aquarium fishery businesses in West Hawaii in a negative way by putting people out of work. Thank you for allowing me to offer my comments on this matter.	Your comment has been forwarded to the decision makers.
Sean Terazono	HI	12/25/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

Comments and Applicant Responses to Website Template – West Hawaii Aquarium Fishery Survey

Commenter	State/ Location	Date Received	Comment	Response
Tiani Terazono	HI	12/25/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Trevor Terazono	HI	12/25/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tristin Terazono	HI	12/25/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tyron Terazono	HI	12/13/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Terrell	PA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Terrell	PA	1/7/2020	As a marine biologist who had visited the beautiful Hawaiian Islands I share the desire top piece and project the unique biodiversity of their waters. But sustainable use creates more incentive to do so for the fishermen and their families as the environment is their livelihood.	Your comment has been forwarded to the decision makers.
Isabelle Thielman	NV	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Madi Thielman	NV	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mike Thielman	NV	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Twila Thielman	NV	12/29/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
William Thompson	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jerrold Tieder	FL	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Evelyn Tiong	Canada	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Andre Tiongco	Philippines	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Christopher Tiongco	Philippines	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Gilbert Tiongco	Philippines	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Sam Tiongco	HI	12/15/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kealani Tirona	CA	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Lawrence Tirona	HI	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Matthias Tirona	CA	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Tina Tirona	CA	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Vince Tirona	CA	12/28/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Tou Zer Cha	MI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Townsend	IL	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Richard Townsend	IL	1/7/2020	I believe that more permits could be issued without a significant impact to the health of the fisheries. Most aquarium fishers understand and know the importance of a healthy fish population.	Your comment has been forwarded to the decision makers.
Paul Trevithick	HI	12/30/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Tubbs	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Mary Tubbs	HI	1/7/2020	Reopen the fishery it is the right thing to do, they keep the fish alive which is the best fishery to have.	Your comment has been forwarded to the decision makers.
Ron Tubbs	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Ron Tubbs	HI	1/7/2020	Fishery should be open to all and continue as it has in the past to work with Dlnr to maintain an already sustainable fishery.	Your comment has been forwarded to the decision makers.
Josef Tucek	Czech Republic	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Eric Tydingco	Guam	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carla Venable	HI	12/19/2019	I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).	Your comment has been forwarded to the decision makers.
Avery Vess	CA	12/31/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Vitousek	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Colette Wabnitz	Canada	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Colette Wabnitz	Canada	1/7/2020	There is only one clear evidence-based choice : to accept DEIS, which is based upon a rigorous data collection and monitoring protocol spanning several decades. The alternative is emotionally driven and motivated and does not have any supporting scientific basis.	Your comment has been forwarded to the decision makers.
Sarah Wachtl	WI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dorothy Waiwaiole	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Doug Wald	NJ	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Wand	CA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Michael Wand	CA	1/7/2020	UH Manoa Alumni, Microbiology, 2009. Have scuba dived every island in Hawai'i, along with much of the world, with great love for our oceans and fish. Hawaii has always had best practices and the most sustainable fisheries, and I support reopening these sites for aquatic collection use. Safe, sustainable, and responsible collection and later care and keep of just a sliver of our oceans and reefs inspire children, our next generation, and people, and I believe have a strong positive net effect towards educating and demonstrating the importance and beauty of these animals to the world, and help to bring environmental concerns such as climate change and its effects on the reef into more people that may not otherwise have as much perspective.	Your comment has been forwarded to the decision makers.
Eric Warren	WA	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Rodney Watanabe	HI	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bill Weaver	TX	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Jacob Weber	IL	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bob Wedeman	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Bob Wedeman	HI	1/7/2020	I support the Fishing.	Your comment has been forwarded to the decision makers.
James Wente	OH	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Angela Wermes	HI	12/30/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Arthur Westwood	MT	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Arthur Westwood	MT	12/16/2019	I would also like people given a way to catch a few fish for their own aquarium or for their school.	Your comment has been forwarded to the decision makers.
Charles Westwood	MT	David Woodham	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Charles Westwood	MT	12/17/2019	People should also be aloud to take fish home to put in their own aquarium.	Your comment has been forwarded to the decision makers.
Tom Wiatr	IL	12/19/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Brenton Wickramasekera	IL	12/17/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

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Andrew Willmott	Canada	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Thomas Wood	Philippines	1/6/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Thomas Wood	Philippines	1/6/2020	This is ridiculous. Check your food fisheries first!	Your comment has been forwarded to the decision makers.
David Woodham JR	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
David Woodham	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Kristi Woodham	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Dennis Yamaguchi	HI	1/7/2020	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carli Yamamoto	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Carol Yamamoto	HI	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Neivbea Zane	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Todd Zane	HI	12/16/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.
Megan Zarate	IL	12/18/2019	See Appendix C for a copy of this comment. Relevant template comments are provided at the beginning of this table.	Responses are provided to template comments at the beginning of this table.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:49:28 PM

This survey was submitted at 1:48:20am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Joshua Ables and I am a resident of Dallas, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at joshua_ables@hotmail.com

Electronic Privacy Notice: This e-mail, and any attachments, contains information that is, or may be, covered by electronic communications privacy laws, and is also confidential and proprietary in nature. If you are not the intended recipient, please be advised that you are legally prohibited from retaining, using, copying, distributing, or otherwise disclosing this information in any manner. Instead, please reply to the sender that you have received this communication in error, and then immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:05:57 PM

This survey was submitted at 5:04:51am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Keala Acol and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kealaacol@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 5:28:58 PM

This survey was submitted at 11:27:48pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Eric Adams and I am a resident of New Zion, SC.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at eea60@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:06:10 PM

This survey was submitted at 8:05:04pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Katy Adams and I am a resident of Tulsa, OKLAHOMA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at katyaadams@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 11:30:41 PM

This survey was submitted at 5:29am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Nicole Ah Mow and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Nahmow@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:26:38 AM

This survey was submitted at 5:25:27pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Amanda Alaffa and I am a resident of Fort Worth, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at a.alaffa90@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:44:16 AM

This survey was submitted at 7:43:04am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Tylee Albrecht and I am a resident of Loomis, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Tyler@sublimeAC.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:33:09 PM

This survey was submitted at 12:31:52am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Roger Alcain and I am a resident of Brooklyn, NY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at rogerjalcain@icloud.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 9:25:02 PM

This survey was submitted at 3:23:46am GMT on 12/19/2019

Aloha Mr. Sakoda,

My name is Dustin Amaral and I am a resident of Hilo, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at pokey616@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 2:48:40 AM

This survey was submitted at 8:47:30am GMT on 12/19/2019

Aloha Mr. Sakoda,

My name is Patrick Amaral and I am a resident of Hilo, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at P.amaral.m@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 31, 2019 11:50:17 PM

This survey was submitted at 5:49:06am GMT on 01/01/2020

Aloha Mr. Sakoda,

My name is Charlene Anderson and I am a resident of Arroyo Grande, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Let them go back to work

I can be reached at charlene2184@sbcglobal.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 9:57:08 AM

This survey was submitted at 3:55:50pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Cody Anderson and I am a resident of Arroyo grande, CALIFORNIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Andersoncody78@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:35:38 AM

This survey was submitted at 5:34:22pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Theresa ANDREAE and I am a resident of KAILUA KONA, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at theresaandreae@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 1:16:03 AM

This survey was submitted at 7:14:34am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Darcie Asakura and I am a resident of 96704, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Dasea13@me.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:45:55 PM

This survey was submitted at 1:44am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Lee Ashford and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at leeatpass@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:50:56 PM

This survey was submitted at 4:49:49am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Maile Ashford and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mash.c1822@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:37:58 PM

This survey was submitted at 4:36:51am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Maxwell Ashford and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Maxwellashford@outlook.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:35:05 PM

This survey was submitted at 4:33:53am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Lisa Badach and I am a resident of Vernon, BC.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ajpet@shaw.ca

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 3:24:55 PM

This survey was submitted at 9:23:25pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Wylie Ball and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ballindustries@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:51:38 PM

This survey was submitted at 1:50am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Rose Banez and I am a resident of Bangkok, Thailand, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at memzenab2579@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 12:39:23 PM

This survey was submitted at 6:37:57pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Sean Barnett and I am a resident of Houston, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sean.barnett97@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 5:24:24 PM

This survey was submitted at 11:23:12pm GMT on 12/26/2019

Aloha Mr. Sakoda,

My name is Bertha Basabe and I am a resident of Na'alehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bert.basabe@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 5:23:45 PM

This survey was submitted at 11:22:32pm GMT on 12/26/2019

Aloha Mr. Sakoda,

My name is Pete Basabe and I am a resident of Naalehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at pbasabe@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:33:59 AM

This survey was submitted at 6:32:50am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Susan Basabe and I am a resident of Arlington, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sbasabe69@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 9:11:40 PM

This survey was submitted at 3:10:09am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Rush Battle and I am a resident of Asheville, NC.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at prb@rushbattle.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:20:35 PM

This survey was submitted at 5:19:29am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Joshua Bauder and I am a resident of Red Deer, ALBERTA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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I can be reached at bauder1986@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 12:25:30 PM

This survey was submitted at 6:24:09pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Curtis Bearden and I am a resident of Tarboro, NC.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Curtis@reeftastic.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:39:39 PM

This survey was submitted at 9:38:27pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Cherish Bells and I am a resident of Holualoa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at Lullibells@icloud.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:38:23 AM

This survey was submitted at 4:36:57pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Beamus Bennett and I am a resident of Elko, NV.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
3. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.

I can be reached at reefermadness775@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:02:36 AM

This survey was submitted at 5:01:26pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Lisa Benton and I am a resident of Marshall, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at momandmitch@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 10:03:26 PM

This survey was submitted at 4:02:19am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Tony Berry and I am a resident of SHEBOYGAN, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tbdamon740@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 3:56:45 PM

This survey was submitted at 9:55:22pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Art Berube and I am a resident of Lake Tapps, WASHINGTON.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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6. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at lbdgumby@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:42:07 PM

This survey was submitted at 7:40:52pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Jeff Birch and I am a resident of Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jbirch130@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 4:31:47 PM

This survey was submitted at 10:30:34pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Hayden Bishop and I am a resident of Milolii, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at elena.mellowaiwaiole@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 4:32:14 PM

This survey was submitted at 10:31:06pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Makena Bishop and I am a resident of Milolii, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at elena.mellowaiwaiole@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:56:58 PM

This survey was submitted at 5:55:52am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Chris Blair and I am a resident of Northport, WASHINGTON.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ceblair50@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 8:50:11 PM

This survey was submitted at 2:49:00am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is John Boe and I am a resident of Noblesville, IN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Listen to the scientists!

I can be reached at johnmboe@me.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:28:48 PM

This survey was submitted at 7:27:36pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Brenda Boling and I am a resident of Broken Arrow, OKLAHOMA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bolings4god@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 9:33:58 PM

This survey was submitted at 3:32:43am GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Btad Bollinger and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at btbollinger@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 14, 2019 5:50:35 PM

This survey was submitted at 11:49pm GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Brian Bowen and I am a resident of Kailua, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I am a practicing marine biologist with 40 years of experience in marine conservation. All the scientific evidence indicates that this fishery is benign, sustainable, healthy, and has a positive impact on Hawaii's economy.

I can be reached at brwbowen@gmail.com

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:51:05 AM

This survey was submitted at 5:49:32pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Larry Bowens Jr and I am a resident of Morris Plains, NEW JERSEY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Bowens900@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 12:09:11 PM

This survey was submitted at 6:08:05pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Jessica Brandstaetter and I am a resident of Lahaina, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Jessimarie808@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 7:22:46 PM

This survey was submitted at 1:21:35am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Maria Brandstaetter and I am a resident of Lahaina, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mariatinoco06@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 8:05:06 PM

This survey was submitted at 2:03:53am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Mario. K Brandstaetter and I am a resident of Lahaina, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mariophx02@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 1:35:59 PM

This survey was submitted at 7:34:48pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Jack Briggs and I am a resident of Oceanview Hawaii, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Aquarium fish collecting is doing way less impact on the reef than what I have seen in the Past I have been to many graduation parties birthdays luaus and funerals and have seen what a handful of local boys with three prongs can do it's terrifying DLNR should not be able to pick and choose what is deemed right or wrong fishing is fishing

I can be reached at Surfjahlove @yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 25, 2019 12:24:16 AM

This survey was submitted at 6:23:04am GMT on 12/25/2019

Aloha Mr. Sakoda,

My name is Natasha Brooks and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at toshterazono@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 3:36:32 PM

This survey was submitted at 9:35:16pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is G L Brown and I am a resident of Ada, MICHIGAN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

A great piece of work

I can be reached at Glbrown@grar.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 3:40:51 AM

This survey was submitted at 9:39:37am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Nicole Brown and I am a resident of Glendale, AZ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at accentaquarium@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 1:26:01 PM

This survey was submitted at 5:01:18pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Kevin Brunsen and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kbrun1@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:30:29 PM

This survey was submitted at 10:29:19pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is George Brushett and I am a resident of Newtown, CONNECTICUT.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Reeftank211@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:05:30 PM

This survey was submitted at 2:04:17am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Chris Buerner and I am a resident of California, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

This fishery, managed, studied, and proven sustainable for decades is one of the best models of ornamental fisheries worldwide. The State of Hawaii should be proud to manage fisheries, whether food or ornamental, successfully. It seems that increasing animal rights activism has created an environment where policy is being shaped not by good science, but rather as a result of sensationalism, and unfortunately as a result of the dissemination of misinformation and outright falsehoods. It was determined that a comprehensive Environmental Impact Study be produced, it seems that has been done in good faith, and it appears that the data and conclusions contained therein point to the fact that fish populations of the key target species are healthy and stable, and that the fishery, as has been determined repeatedly over a

long period of time, continues to be very sustainable.

I can be reached at CHRIS.BUERNER@QUALITYMARINE.COM

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 11:27:44 PM

This survey was submitted at 5:26:24am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Tiffany Bui and I am a resident of Houston, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at allaboutfishtx@icloud.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 11:22:59 AM

This survey was submitted at 5:21:47pm GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Tim Camodeca and I am a resident of Whitewater, WI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Nhltc99@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:45:49 PM

This survey was submitted at 6:44:37pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Chris Camp and I am a resident of El Cajon, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Vetspets66@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:13:44 PM

This survey was submitted at 12:12:36am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Denise Cannon and I am a resident of Bradley, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Cannon1217@sbcglobal.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:36:41 PM

This survey was submitted at 7:35:14pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is John Carberry and I am a resident of Jefferson Clty, TN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at johnc@mosseycreekenterprises.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 10:47:36 AM

This survey was submitted at 4:46:23pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Levi Cardoza and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Levicardoza8@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 12:37:21 AM

This survey was submitted at 6:36:06am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Bruce Carlson and I am a resident of Ewa Beach, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

As stated above, this fishery is the most thoroughly researched inshore coral reef fishery in the world. Excellent life history data on the prime species are available in the scientific literature and demonstrate why these species, with high fecundity and year-long spawning periods, can continue to replenish themselves under the current levels of fishing. This is a demonstrably sustainable fishery and has been so for decades.

I can be reached at exallias2@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 8:14:45 PM

This survey was submitted at 2:13:21am GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Ulla Carmiencke and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Aloha, I would hope the decision on the DEIS will be based on the letters, data, and information provided by fish scientists from recognized institutions that have studied Hawaii Aquarium fish such as Bishop Museum, Universities, or DLNR.

I can be reached at uscarmiencke@gmail.com

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:19:23 AM

This survey was submitted at 4:18:06pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Scott Carr and I am a resident of BALA CYNWYD, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at caquariumsmail@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:33:49 PM

This survey was submitted at 12:32:38am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Jason Cartagena and I am a resident of Chicago, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ranma627@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:54:20 PM

This survey was submitted at 4:53:11am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Nick Caswell and I am a resident of Fort Wayne, INDIANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.

I can be reached at nick.caswell4@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:29:12 PM

This survey was submitted at 9:27:59pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Yankumi Centino and I am a resident of Surrey, CANADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sweet.centino@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:26:57 PM

This survey was submitted at 2:25:46am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Sergio Chan and I am a resident of Coral springs, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Fish are the most beautiful creatures of the planet.. hawaii has a lot of unique ones to share with the world.. sustainable fish collection is the best for everybody. The hobbyist love the quality and colors of fish that comes from hawaii. There are lots of farm raised fish but lot of species do not reproduce in captivity... until them .. share your treasures!!

I can be reached at Sergio.realtor@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 14, 2019 9:03:33 PM

This survey was submitted at 3:02am GMT on 12/15/2019

Aloha Mr. Sakoda,

My name is William Chang and I am a resident of Mililani, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bcsc@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 6:56:48 PM

This survey was submitted at 12:55am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Riley Charles and I am a resident of Naalehu, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
Open the fishery to the 14 fisherman.

I can be reached at showtimepuyallup@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, January 8, 2020 12:19:44 AM

This survey was submitted at 6:18:19am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Esequiel Chavez and I am a resident of Arlington, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at esequielchavez@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:58:40 PM

This survey was submitted at 7:57:35pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Nikol Childs and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at knblazek@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 10:40:20 PM

This survey was submitted at 4:39:09am GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Clifford Ching and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at c_ching@hawaiiantel.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:18:53 PM

This survey was submitted at 12:17:39am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Cindy Christians and I am a resident of Fox Lake, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at cindyc124@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 8:53:57 PM

This survey was submitted at 2:52:51am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is BRANDON CLOW and I am a resident of Minnesota, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at brandonclow13@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 12:47:42 PM

This survey was submitted at 6:46:31pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Tim Cobb and I am a resident of Houston, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

As a regular visitor to Big Island, I have love snorkeling the West Side. The reef fish are always plentiful and on full display.

I can be reached at Huntinghabitat@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 9:28:59 PM

This survey was submitted at 3:27:52am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Patrick Colin and I am a resident of Koror, PALAU.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I hold a Ph.D in marine science specializing in coral reef fish studies. I find the studies done in advance of reopening the limited fishery to be well done and thoroughly indicate the minimal impact of this limited fishery will have on marine life on Hawaiian shorelines.

I can be reached at crrfpalau@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:50:15 AM

This survey was submitted at 1:49:07pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Dennis Collier and I am a resident of Clearwater, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Dennis1co@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 5:45:50 PM

This survey was submitted at 11:44:44pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Pierson Connors and I am a resident of Boulder, COLORADO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The proposed action is an overall reduction in take over the pre-ban alternative.
5. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.

I can be reached at pierson.connors@colorado.edu

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 5:30:22 PM

This survey was submitted at 11:29:11pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Kim Copeland and I am a resident of WATAUGA, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kimmycopeland@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 7:42:58 AM

This survey was submitted at 1:41:49pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Mary Corbett and I am a resident of Chicago, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Corbett012@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:44:04 PM

This survey was submitted at 2:42:54am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Edward Cord and I am a resident of Houston, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Edpecord@netzero.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 12:06:39 PM

This survey was submitted at 6:05:29pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Julia Costa and I am a resident of Kailua-kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Juc_717@live.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 10:33:36 PM

This survey was submitted at 4:32:25am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Daniel Cottrell and I am a resident of Waianae, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Dcottell33@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:25:30 PM

This survey was submitted at 10:24:19pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Isaac Croas and I am a resident of Olmsted Falls, OH.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Commercial harvesting in a sustained manner is critical. Bringing these fish to other parts of the world and showing their majestic nature allows for everyone to be aware of how vital and potentially fragile these ecosystems can be. By allowing these fish to travel the world, you allow us to bring Hawaii and it's customs and cultures into our homes. This is an important part of any education process and is vitally important in maintaining, nurturing, and cultivating vibrant reef systems.

I can be reached at incroas@hotmail.com

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nature. If you are not the intended recipient, please be advised that you are legally prohibited from retaining, using, copying, distributing, or otherwise disclosing this information in any manner. Instead, please reply to the sender that you have received this communication in error, and then immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 5:42:34 PM

This survey was submitted at 11:41:27pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Philip D'Agostino and I am a resident of Broad Channel, NEW YORK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The only way to help protect our environment is to allow people to become involved hands on.

I can be reached at phildago55@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:33:40 AM

This survey was submitted at 1:32:32pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Jason Daks and I am a resident of Toms River, NJ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Aquariummanagementnj@comcast.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 11:47:38 PM

This survey was submitted at 5:46:28am GMT on 12/21/2019

Aloha Mr. Sakoda,

My name is Eli David and I am a resident of Hilo, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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I can be reached at Hunta4ulua@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:45:03 PM

This survey was submitted at 2:43:56am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Patrick Davies and I am a resident of Dania Beach, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Reefworld@bellsouth.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 2:08:10 PM

This survey was submitted at 8:07:01pm GMT on 12/26/2019

Aloha Mr. Sakoda,

My name is Chris Davis and I am a resident of Naalehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at idigbigfish@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:53:35 PM

This survey was submitted at 8:52:23pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Vandetta Davis and I am a resident of Pukalani, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Vandetta@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:48:10 AM

This survey was submitted at 2:46:52pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Dan Dean and I am a resident of Missoula, MT.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
A managed fisheries is a healthy fisheries.

I can be reached at Reefmissoula@live.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 6:50:21 PM

This survey was submitted at 12:49:14am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Tiki Defever and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
It's time to listen to science, not deliberate misinformation!

I can be reached at tikidee09@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, January 8, 2020 6:56:47 AM

This survey was submitted at 12:55:39pm GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Donenick Denora and I am a resident of Maui, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Ddfenora@Hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 9:36:57 AM

This survey was submitted at 3:35:43pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Tom Dhans and I am a resident of Brooksville, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tdhans@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:13:53 PM

This survey was submitted at 7:12:31pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Michael Domeier and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

As an active researcher with a Ph.D. in coral reef fish ecology, I can say with 100% certainty that the aquarium fishery proposed for West Hawaii is sustainable, while also allowing people a means to make a living. The fishery is targeting very recently recruited juveniles that have a very high natural mortality rate; in other words, a majority of the individuals collected would not survive the next 3-months in any event. The state's own data, collected by DLNR, demonstrate that this fishery is healthy and viable.

I can be reached at ml.domeier@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:26:36 AM

This survey was submitted at 5:25:23pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Audrey Dunleavy and I am a resident of Bound Brook, NJ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Ajlaine4@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 9:40:26 AM

This survey was submitted at 3:39:16pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Brian Dunleavy and I am a resident of Bound Brook, NEW JERSEY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bridun22@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:20:50 AM

This survey was submitted at 1:19:38pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Matthew Duren and I am a resident of Tampa, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Ornamental fish collection in Hawaii has been shown to be sustainable based on fish population trends being nearly identical in fished areas vs non. Providing too few areas for responsible fishing in Hawaii will cause a black market for the aquarium industry, including more fish being collected in ways that are significantly less environmentally friendly in other parts of the world, including collection by cyanide.

I can be reached at matthewduren@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:20:09 PM

This survey was submitted at 4:19:02am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Andrea Ehlers and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at andreaehlr@aim.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 8:24:13 PM

This survey was submitted at 2:22:59am GMT on 12/30/2019

Aloha Mr. Sakoda,

My name is David Ekbon and I am a resident of Grover beach, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

they met the requirements, provided the EIR, now it is time to ALLOW them to return to their chosen career, and time for the government to quit selective enforcement of its laws.

I can be reached at ekbon2@aol.com

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 4:15:13 PM

This survey was submitted at 10:14:06pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Mark England and I am a resident of Colorado Springs, COLORADO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at London5150@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 12:02:20 AM

This survey was submitted at 6:01:06am GMT on 12/26/2019

Aloha Mr. Sakoda,

My name is Randy Esguerra and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at konareefers@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 9:16:24 PM

This survey was submitted at 3:15:17am GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Timothy Ewing and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at time2dive@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:37:36 AM

This survey was submitted at 1:36:26pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Lois Ezell and I am a resident of Clearwater, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at loisezell@msn.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:23:24 PM

This survey was submitted at 3:22:11am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Robert Familton and I am a resident of Grayson, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at rfamilton@windstream.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:45:39 PM

This survey was submitted at 3:44:30am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Randy Frnley and I am a resident of Aiea,Hi 96701, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Coralfish@hawaiiantel.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:30:41 PM

This survey was submitted at 4:29:27am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Veronia Ferrer and I am a resident of Cavite, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Veroniadiazferrer@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 7:04:36 PM

This survey was submitted at 1:03:11am GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Barry Finkenberg and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bfinkenberg@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 8:19:43 PM

This survey was submitted at 2:18:36am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Martin Finn and I am a resident of OLYMPIA, WASHINGTON.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ml.finn@comcast.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 9:07:39 PM

This survey was submitted at 3:06:28am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Justin Fisk and I am a resident of Moorpark, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bigboy7828@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:27:31 PM

This survey was submitted at 4:26:19am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Rachel Florentino and I am a resident of Burnaby, Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Rachelflorentino@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 12:34:09 PM

This survey was submitted at 6:32:36pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Cy Forell and I am a resident of Renton, WASHINGTON.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Please support sustainable fishery. With respect, Cy Forell

I can be reached at cyforell@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:43:44 PM

This survey was submitted at 1:42:35am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Ken Fortino and I am a resident of Brick, NJ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kfortino417@comcast.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:27:13 PM

This survey was submitted at 2:26:07am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Shawna Fraser-McConnell and I am a resident of Tyrone, GEORGIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at shnr20@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:19:02 PM

This survey was submitted at 10:17:49pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Malachi Fry and I am a resident of Duncannon, PENNSYLVANIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.

I can be reached at trojans1221754@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 3:33:40 PM

This survey was submitted at 8:20:21pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Arnold Fujioka and I am a resident of Waipahu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at pyro5876@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 1:27:06 PM

This survey was submitted at 7:25:52pm GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Alisa Funke and I am a resident of Lynchburg, VA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I have had the opportunity to see these fisherman in action. The impact on the environment is substantially less than any other industry.

I can be reached at Alisa.funke25@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:56:50 PM

This survey was submitted at 1:55am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Joyce Galapon and I am a resident of Vancouver, Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at joyce_galapon@yahoo.ca

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 10:02:07 PM

This survey was submitted at 4:00:56am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Alex Garcia and I am a resident of Waipahu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
3. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
7. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Emotional and political issues have no place in resource management issues.

Science has proven again and again, that the aquarium fishery does not threaten the populations of reef dogs in West Hawaii.

I can be reached at Alikatoes@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 7:22:54 AM

This survey was submitted at 1:21:42pm GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Scott Gardner and I am a resident of Birmingham, AL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

Additionally, I would like to state the following:

I don't support fish collection unless it's going toward captive breeding efforts.

I can be reached at tuffy22222@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:18:05 AM

This survey was submitted at 5:16:53pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Tyler Garrett and I am a resident of Cottonwood, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tylergarrett70@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 9:08:00 AM

This survey was submitted at 3:06:51pm GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Alex Gawura and I am a resident of North Aurora, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I believe that a sustainable well managed fishery not only benefits the economy but also helps to build environmental awareness of our coral reefs. Artificial reefs maintained in aquariums today might be looked at as simply a hobby but it has also fostered an economy and demand for more research into captive breeding programs. The ability to maintain a sustainable fishery will fuel captive breeding programs that can help repopulate other reefs while also supplying the aquarium industry. I do believe that worldwide our reefs are in trouble and that we should do everything we can to raise awareness about reef environments while also learning how to maintain these organisms artificially so they can be preserved for future generations. When people see the beauty of ornamental fish for aquariums it brings them closer to the

cause of preserving this natural wonder with sustainable practices that are responsibly managed.

I can be reached at algawura@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 9:38:42 PM

This survey was submitted at 3:37:30am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Joseph Genero and I am a resident of North Chesterfield, VA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Please allow collection of fish in Hawaii again. The fisherman really respect the waters and the fish and will collect responsibly. Thank you

I can be reached at fishworld1@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: [NOT SCANNED] - Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 2:37:33 PM

This survey was submitted at 6:09:06pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Robert Gibbens and I am a resident of Kula, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Rmgmaui@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:08:51 PM

This survey was submitted at 8:07:45pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Troy Goldberg and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at haikuality@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 14, 2019 10:08:01 AM

This survey was submitted at 4:06pm GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Hector Gomez and I am a resident of Clifton , NEW JERSEY .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at reefgofish@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:09:40 PM

This survey was submitted at 7:08:29pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Amy Grace and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The fishery was already sustainable before the closure. With this greatly reduced number of active permits, this is a no-brainer. Reinstate the fishery in West Hawaii.

I can be reached at alohaamygrace@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, January 8, 2020 8:22:59 AM

This survey was submitted at 2:21:49pm GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Brent Grandidier and I am a resident of Fishers, IN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at brentgrandidier@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:38:32 PM

This survey was submitted at 10:37:20pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Peter Gravis and I am a resident of Ogden, UT.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at pjgravis@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 10:59:55 PM

This survey was submitted at 4:58:43am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Frank m Greco and I am a resident of Lindenhurst, NEW YORK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at phrankg@optonline.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:22:20 PM

This survey was submitted at 2:21:09am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Yorgos Gregory and I am a resident of Wilmington, MASSACHUSETTS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at yorgos@lovethereef.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:54:42 AM

This survey was submitted at 1:53:27pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Christopher Gries and I am a resident of Tampa, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Sustainable fishery allows for economic growth and allows for the potential movement to cultivate captive raised fish. It also increases awareness and appreciation for our reefs.

I can be reached at chgries@verizon.net

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 8:10:38 PM

This survey was submitted at 2:09am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Nakai Griffey and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Nakaigriffey@icloud.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 10:16:09 PM

This survey was submitted at 4:15:02am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Tommaso Guarino and I am a resident of Jamesburg, NEW JERSEY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at guarinot@kean.edu

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 8:52:44 PM

This survey was submitted at 2:51:34am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Josh Haber and I am a resident of Calgary, ALBERTA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I think the fishery needs to reopen, it's been proven time and time again that it's sustainable. Funny that these fish can be taken out of the ocean for food and that's no issue, but aquarium owners who can provide a fish with a happy habitat for decades and put a fish in a position to actually out live the average lifespan in the wild are a danger to the environment.

I can be reached at jah-65@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:01:55 PM

This survey was submitted at 10:00:43pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Karl Halmstad and I am a resident of Evans, GA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

What people can learn about the fishes of Hawai'i is beyond measurement both in homes & in the class rooms where Teachers are allowed to have aquariums.

I can be reached at Solo24@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:10:21 PM

This survey was submitted at 12:09:02am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Erika Halpin and I am a resident of Valparaiso, INDIANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at erika.halpin1@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:11:02 PM

This survey was submitted at 12:09:51am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is James Halpin and I am a resident of Valparaiso, INDIANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Halpjam1@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:11:39 PM

This survey was submitted at 12:10:32am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Sherry Halpin and I am a resident of Valparaiso, IN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Halpjam1@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:40:39 PM

This survey was submitted at 10:39:22pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Jason Hamilton and I am a resident of Phoenix, AZ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jham@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 3:22:24 PM

This survey was submitted at 7:09:43pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Leann Hamilton and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Leannshamilton@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 6:07:28 AM

This survey was submitted at 12:06:17pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Jeff Hanson and I am a resident of Columbus, OH.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

We own an aquarium maintenance company in Columbus, OH & our clients who love their saltwater fish are more aware and active in protecting the ocean because of their fish. As well as anyone who see's their set-up. So banning Hawaiian fish will only make them unaware of the beauty that you are trying to protect.

I can be reached at Jeff@AccentOnAquariums.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 9:17:21 PM

This survey was submitted at 3:16:10am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Jeffrey Hargis and I am a resident of Grapevine, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at hargis.jeff@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 1:28:14 PM

This survey was submitted at 7:27:00pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Dan Harmony and I am a resident of Tucson, AZ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Harmony1133@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:25:22 PM

This survey was submitted at 2:24:13am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Barbara Hernandez and I am a resident of Chesapeake, VA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at barbara.legendary@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:11:46 PM

This survey was submitted at 8:10:34pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Jason Hew and I am a resident of Kula, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Piiholoheadrush@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:21:04 PM

This survey was submitted at 7:19:45pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Bob Hinton and I am a resident of Tulsa, OK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at bob.hinton@tornadoalleyreefexpo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 2:24:04 PM

This survey was submitted at 8:21:54pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Mayumi Hirata and I am a resident of Waipahu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mayumi910@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:34:12 AM

This survey was submitted at 7:32:37am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Grant Holtfrerich and I am a resident of Leawood, KANSAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at holtfrerich1997@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 6:30:15 PM

This survey was submitted at 12:29:07am GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Debra Holtz and I am a resident of Dunedin, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I own a Home in Captain Cook/Milolii, and am taxed as a part-time Resident.

I can be reached at divenuff@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 5:20:54 PM

This survey was submitted at 11:19:46pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Gabe Hoover and I am a resident of Kailua kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Shadedlamb@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 14, 2019 4:22:19 PM

This survey was submitted at 10:21pm GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Hokulea Hoover and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Hooverkai@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:22:56 PM

This survey was submitted at 7:21:42pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Daniel Hosmer and I am a resident of Providence, RI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at dbhosmer@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 7:40:32 PM

This survey was submitted at 1:39:22am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is John Howerton and I am a resident of Austin, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kingfishjohn@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:41:07 PM

This survey was submitted at 12:40:00am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Katelyn Hoyt and I am a resident of Somerville, MA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kate.hoyt@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 6:10:26 PM

This survey was submitted at 12:09:19am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Frank Huynh and I am a resident of Grand prairie, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Thurley102079@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:01:40 PM

This survey was submitted at 1:00:08am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Jeff Jacinto and I am a resident of San Jose, CALIFORNIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jeff@sealife-aquarium.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:52:42 AM

This survey was submitted at 4:51:33pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Randy Jahier and I am a resident of NEW CANAAN, CT.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at randy@life-aquatic.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:07:53 PM

This survey was submitted at 12:06:45am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Justin Johnston and I am a resident of Milwaukee, WISCONSIN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at J.J.Johnston72@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:12:00 PM

This survey was submitted at 12:10:53am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Kacie Johnston and I am a resident of Hawaii, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kaciejohnston72@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 31, 2019 2:05:19 PM

This survey was submitted at 8:04:07pm GMT on 12/31/2019

Aloha Mr. Sakoda,

My name is Christian Kahahawai and I am a resident of Lihue, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at kahakauai@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 3:13:52 PM

This survey was submitted at 9:12:43pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Elizabeth Kahahawai and I am a resident of Kapaa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ek@imuaeak

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 4:31:17 PM

This survey was submitted at 10:30:06pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Kapono Kahele-bishop and I am a resident of Milolii, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at elena.mellowaiwaiole@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 10:53:19 PM

This survey was submitted at 4:52:12am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Kapono Kaluhiokalani and I am a resident of Laie, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The data is proof that the aquarium fishery is sustainable. With continuous careful monitoring and reasonable regulation, the fishery can thrive and continue to provide.

I can be reached at alkaponze@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:37:02 PM

This survey was submitted at 9:35:55pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Ashley Kanahale and I am a resident of Naalehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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I can be reached at Akanahale@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:06:43 PM

This survey was submitted at 5:05:33am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Joseph Kaplan and I am a resident of Riverside, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
Thank you for giving us a voice to comment

I can be reached at timjim211@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:01:26 PM

This survey was submitted at 5:00:15am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is C Kato and I am a resident of Pearl City, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Ckato@hickamfcu.org

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:00:43 PM

This survey was submitted at 4:59:37am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Carrie Kato and I am a resident of Mililani, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at carrie_kato@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:02:00 PM

This survey was submitted at 5:00:49am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Leighton Kato and I am a resident of Mililani, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at lei_49@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 7:57:32 PM

This survey was submitted at 1:56:23am GMT on 12/21/2019

Aloha Mr. Sakoda,

My name is Les Kaufman and I am a resident of Massachusetts, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
3. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
4. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I am a marine conservation biologist, expert on coral reef fishes, who has worked extensively in the Pacific, including the main islands of Hawaii. As the PI of a large research grant on marine managed areas, I funded a study of the Fish Replenishment Areas along the Kona coast that provided a portion of the evidence that the aquarium industry can be and indeed had been a sustainable fishery. Therefore, on the basis of this and much other evidence, I support the reopening of the fishery. I am familiar with the opposition to the fishery and find the arguments supporting this position to be inconsistent with the body of evidence. In addition, as an admirer of the native Hawaiian culture and relationship with the sea, opposition to the aquarium fishery on the grounds that it is disrespectful to Hawaii or dangerous to the future of Hawaiian coral reefs strikes me as both false and offensive, a position endorsed by friends of mine who are active in the resurgence of interest in the Hawaiian culture and way of life. Given the immense pressures bearing down on Hawaiian ecosystems from anthropogenic climate change, poorly regulated fishing, and coastal development- all clearly unsustainable in their current manifestations- closely regulated aquarium fish collecting is an activity whose ultimate impacts are likely to be positive, not negative. It supports livelihoods, celebrates and shares Hawaii's environmental legacy, and when properly managed is not at all in conflict with the enjoyment of Hawaii's marine life in their natural context through snorkeling and diving. Meanwhile the above-mentioned factors pose looming existential threats. A plan for the aquarium industry in Hawaii should be crafted that explores the ideal way for this kind of enterprise to

develop and mature, with a goal of achieving the highest truly sustainable volume commensurate with demand. It is important to underscore that "sustainable" in this context does not mean the traditional definition in antiquated fisheries science where one half the population or biomass is exploited. Rather, the sustainability of collecting for the aquarium trade should leave enough fishes and other organisms still on the reef to ensure that the system as a whole is self-sustaining and able to deliver the full suite of ecosystem services of which it is capable and on which people depend. Doing so is entirely consistent with a carefully and closely managed aquarium trade at the level proposed for the reopening fo this fishery. In addition, in order to assure that Hawaii's coral reefs survive, Hawaii must support, with every fiber of its being, efforts to battle climate change and to keep the global average temperature from rising more than two degrees Celsius. The majesty of this task dwarfs concerns about the aquarium fishery, and failure in this regard entirely moots debate as to the pluses and minuses of allowing the collection of reef dwelling creatures for home aquaria.

I can be reached at lesk@bu.edu

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 1:37:32 AM

This survey was submitted at 7:36:20am GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Ellen Kevis and I am a resident of Capt cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

I can be reached at Kevisr001@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 7:37:47 PM

This survey was submitted at 1:36:21am GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Ray Kevis and I am a resident of Captain cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

I can be reached at Kevisr001@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, January 1, 2020 5:29:55 PM

This survey was submitted at 11:28:39pm GMT on 01/01/2020

Aloha Mr. Sakoda,

My name is Stephen Kiefer and I am a resident of Henderson, NV.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at spakiefer@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 23, 2019 5:42:32 PM

This survey was submitted at 11:41:21pm GMT on 12/23/2019

Aloha Mr. Sakoda,

My name is Diana Kiefer and I am a resident of Saint Albans, MO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at DKiefer@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 23, 2019 2:01:44 PM

This survey was submitted at 8:00:26pm GMT on 12/23/2019

Aloha Mr. Sakoda,

My name is Janelle Kiefer and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
These permits need to be reinstated ASAP.

I can be reached at janellekiefer13@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 6:48:56 PM

This survey was submitted at 12:47:43am GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Susan Kikumoto and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I support the people who are collecting the fish.

I can be reached at sluvall@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:21:12 AM

This survey was submitted at 6:20:02am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Paul Kimsel and I am a resident of Waianae, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kimselpaul@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 4:11:22 PM

This survey was submitted at 10:10:02pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Sheree Knopf and I am a resident of Pendleton, KY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at shereek3b@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 6:55:17 PM

This survey was submitted at 12:54am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Kai Koch and I am a resident of Kona, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
Open the fishery for these 14 fisherman.

I can be reached at kaifromkona@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 5:05:43 PM

This survey was submitted at 11:04:32pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Kim Koch and I am a resident of Naalehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kimfromkona@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:34:37 PM

This survey was submitted at 6:33:31pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Mike Koch and I am a resident of Sugar land, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mkoch@komakmfg.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 5:34:18 PM

This survey was submitted at 11:33:05pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Sharon Koch and I am a resident of Sugar Land, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mkoch003@comcast.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:22:22 PM

This survey was submitted at 12:21:14am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Kevin Konieczny and I am a resident of Chicago, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Mobassman89@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 7:50:45 PM

This survey was submitted at 1:49:32am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Mike Kono and I am a resident of Chicago, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mikekono@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:47:20 PM

This survey was submitted at 2:46:13am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Janice Kopff and I am a resident of Winfield, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Lived on Big Island for over 25 years. The fish on the reef now are just as plentiful as they were in 1979. It is a crying shame that dive charters are under no control to protect the reefs. Have personally observed large oil slicks surrounding dive boats due to lotions on people. They have been seen harassing turtles and monk seals and disposing of waste into the ocean. Tropical fish collectors take extreme care to protect the reefs, their source of income.

I can be reached at Jkopff79@gmail.com

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nature. If you are not the intended recipient, please be advised that you are legally prohibited from retaining, using, copying, distributing, or otherwise disclosing this information in any manner. Instead, please reply to the sender that you have received this communication in error, and then immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:46:09 PM

This survey was submitted at 7:44:43pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Jan Kopff and I am a resident of Winfield, MO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jdltk@icloud.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:44:16 PM

This survey was submitted at 7:42:58pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Jim Kopff and I am a resident of Winfield, MO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jkopff79@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 4:48:53 PM

This survey was submitted at 6:02:59pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Glenn Kosaki and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at gkosaki@twc.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 1:42:30 PM

This survey was submitted at 7:41:21pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Chris Kose and I am a resident of Tucson, AZ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at chriskose@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:03:07 PM

This survey was submitted at 6:01:53pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Annette Kozak and I am a resident of North tonawanda, NEW YORK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Joeannettekozak@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:43:09 PM

This survey was submitted at 12:42:02am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Stephen Krajeski and I am a resident of Bridgewater, MA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at SKrajeski@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 8:34:09 PM

This survey was submitted at 2:32am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Keynin Kretz and I am a resident of 96816, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I have seen the research and evidence for both sides of this environmental issue. DLNR with fish catch reports have shown that this industry of fishing is sustainable. Both sides need to work together and keep it sustainable. Environmentalists, fishermen and DNLR need to have meetings and keep all fishing sustainable for all future generations!

I can be reached at kkretz@hawaii.edu

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 24, 2019 12:46:59 AM

This survey was submitted at 6:45:45am GMT on 12/24/2019

Aloha Mr. Sakoda,

My name is Jeni Kurashige and I am a resident of Holualoa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jfuchigami@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 23, 2019 1:17:21 AM

This survey was submitted at 7:16:08am GMT on 12/23/2019

Aloha Mr. Sakoda,

My name is Nathan Kurashige and I am a resident of Holualoa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kurashige808@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 3:19:42 AM

This survey was submitted at 9:18:28am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Ryan Kurashige and I am a resident of Holualoa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Ryankurashige@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 7:17:11 PM

This survey was submitted at 1:16:01am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Matthew Kurtz and I am a resident of Fort Collins, CO, USA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at matt@fishcrew.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 12:04:21 PM

This survey was submitted at 6:03:14pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Jon Kusano and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kusanoj002@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 5:27:07 PM

This survey was submitted at 11:26:01pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Andrew Kwon and I am a resident of Mississauga, ONTARIO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at corpuse@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:29:44 PM

This survey was submitted at 9:28:14pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Bob Lake and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Boblake@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 2:41:05 PM

This survey was submitted at 8:39:52pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Thomas Lang and I am a resident of Fresno, CALIFORNIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The science is clear that a well-regulated aquarium fishery is sustainable at this time.

I can be reached at tlang@aquariusaquarium.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:59:27 AM

This survey was submitted at 5:58:19pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Christopher Lanman and I am a resident of Indianapolis, INDIANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Please dont let the actions of a few, punish the rest who want to have a sustainable way to collect and research marine life!

I can be reached at TheReefLivestock@Gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:01:11 AM

This survey was submitted at 4:59:43pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Lee Larson and I am a resident of Dallas, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
Believe if done correctly can be very successful.

I can be reached at Office@schooloffish.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:56:05 PM

This survey was submitted at 11:54:56pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Rian Lau and I am a resident of Hilo, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at rian.lau@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, January 8, 2020 3:25:41 AM

This survey was submitted at 9:24:33am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Keith Laurie and I am a resident of Auckland, NEW ZEALAND.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Keith.laurie@me.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 2:46:12 PM

This survey was submitted at 8:28:12pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Alsworth Lee and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at alsworthlee@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:55:43 AM

This survey was submitted at 5:54:36pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Austin Lefevre and I am a resident of Monterey, CALIFORNIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at austinlefevre@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:51:33 AM

This survey was submitted at 2:50:21pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Juan Lehmann and I am a resident of Guadalajara, MÉXICO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at juancarlos@acuariomichin.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:31:08 PM

This survey was submitted at 9:29:43pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Lloyd Leong and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Lloydleong@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:48:47 PM

This survey was submitted at 1:47am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Sarah Leung and I am a resident of Burnaby, Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sleungbc@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:08:36 PM

This survey was submitted at 6:07:29pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Brad Lewis and I am a resident of Ormond Beach, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at aquascapesdb@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 3:32:29 PM

This survey was submitted at 9:31:03pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is John Lewis and I am a resident of Brighton, MI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at dodgemanrt03@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 12:21:49 PM

This survey was submitted at 6:20:31pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is David Liemohn and I am a resident of Savage, MN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at daveliemohn@northstaraquatics.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:22:45 PM

This survey was submitted at 7:21:35pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is James Lovell and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jim@jtltiming.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:47:05 PM

This survey was submitted at 11:45:54pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Jay Lovell and I am a resident of Bozeman, MONTANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Jaylovelsr@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:38:28 PM

This survey was submitted at 11:37:22pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Jay Lovell and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
Fishing is NOT a crime!!

I can be reached at j2k.lovell@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:12:04 PM

This survey was submitted at 6:10:32pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Kristi Lovell and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Lovellk@sou.edu

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: [NOT SCANNED] - Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 2:37:07 PM

This survey was submitted at 6:02:00pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Staci Lovell and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.

I can be reached at Stacilovetri@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 1:41:00 PM

This survey was submitted at 7:39:37pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is John Lovewell and I am a resident of Cape Girardeau, MO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

Additionally, I would like to state the following:

The Aquarium Industry is nothing more than a scam killing life for money. Please stop causing Extinction for fun! Most fish don't live a month.

I can be reached at seasaveemail@msn.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:12:56 AM

This survey was submitted at 5:11:50pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Anthony Lucchini and I am a resident of Bay Shore, NEW YORK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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7. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
8. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Let us not forget that the fishermen are people with families and they need to be allowed to make their living like everybody else.

I can be reached at caribbeanblueaquatics@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:00:04 PM

This survey was submitted at 6:58:40pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Auden Lujan and I am a resident of Odessa, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at audenlujan@ymail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 10:52:11 PM

This survey was submitted at 4:51:00am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Tatao Luo and I am a resident of Brentwoodl, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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6. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at aafish666@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:58:16 PM

This survey was submitted at 3:57:05am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Roger Ma and I am a resident of San Diego, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at roger@petzonesd.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 3:45:30 PM

This survey was submitted at 9:44:19pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is John Maloney and I am a resident of Port Saint Lucie, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

Additionally, I would like to state the following:

Limiting it to 14 licenses isn't about sustainability, it is probably about creating a cartel around those license holders. Bag limits would address sustainability concerns. Ask those 14 give up their licenses to 14 other fisherman and you will see what I mean.

I can be reached at admin@reefcleaners.org

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:57:42 PM

This survey was submitted at 1:56am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Ronald Mamaril and I am a resident of Vancouver, Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mamaril_ronald@yahoo.ca

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 8:44:36 PM

This survey was submitted at 2:43:25am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Britney Manago and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at britmanago@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 4:09:09 PM

This survey was submitted at 10:07:58pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Whitney Manas and I am a resident of Phoenix, ARIZONA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at whitney.manas@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 2:28:47 PM

This survey was submitted at 8:27:34pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Tom Mars and I am a resident of Tampa, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at creativeaquariums@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 8:41:14 PM

This survey was submitted at 2:40:05am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is David Martin and I am a resident of Conway, AR.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The ban never made any ecological sense. The live/aquarium harvest is insignificant and even this measure is over regulation.

I can be reached at huntindoc@conwaycorp.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 31, 2019 12:21:57 PM

This survey was submitted at 6:20:44pm GMT on 12/31/2019

Aloha Mr. Sakoda,

My name is Paul Masterjohn and I am a resident of Naalehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at oceanfishhi@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:29:58 PM

This survey was submitted at 2:28:47am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Ryan McConnell and I am a resident of Tyrone, GA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Rmcon20@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:36:35 PM

This survey was submitted at 8:34:50pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Garrett McMillan and I am a resident of Kula, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at aquaponicsbydesign@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 3:04:06 PM

This survey was submitted at 9:02:57pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Timothy McRae and I am a resident of Macomb, MI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at tmcrae@me.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:08:35 PM

This survey was submitted at 5:07:28am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Blake Meadows and I am a resident of Dallas, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at Blakeslinkedinmail@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, January 2, 2020 1:44:45 AM

This survey was submitted at 7:43:32am GMT on 01/02/2020

Aloha Mr. Sakoda,

My name is Elena Mello-waiwaiole and I am a resident of Miloli'i, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at elena.mellowaiwaiole@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 7:21:49 PM

This survey was submitted at 1:20:38am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Matt Messer and I am a resident of Gastonia, NORTH CAROLINA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at messer.matt@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 12:05:29 PM

This survey was submitted at 6:04:18pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Eddie Miller and I am a resident of Jacksonville, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bioreef1@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 9:35:51 PM

This survey was submitted at 3:34:39am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Robert Miller and I am a resident of CALABASAS, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at erifish@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:43:44 AM

This survey was submitted at 5:42:34pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Wendy Minor and I am a resident of Kamuela, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

This appears to be a very well managed plan to sustain our local fishery.

I can be reached at wendyminor@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:19:23 AM

This survey was submitted at 5:18:15pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Ted Minyard and I am a resident of Waxahachie, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tminyard4@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 4:07:21 PM

This survey was submitted at 10:06:14pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Craig Mitchell and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at cmitch@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:23:29 AM

This survey was submitted at 4:22:21pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Eric Moennich and I am a resident of Waianae, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at eric.moennich@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 8:41:37 PM

This survey was submitted at 2:40:27am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Patrick Monck and I am a resident of Gainesville, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Pjmonck1290@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:55:52 PM

This survey was submitted at 1:54am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Vilma Morgado and I am a resident of Dupax del Sur, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at vilma.morgado@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 7:28:27 PM

This survey was submitted at 1:27:15am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Sally Myers and I am a resident of Bozeman, MONTANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Lilbamboo2@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:51:23 PM

This survey was submitted at 4:50:13am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Dayton Nacis and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Dnacis@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:50:26 PM

This survey was submitted at 4:49:14am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Rene Nacis and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Renenacis@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 26, 2019 8:01:55 PM

This survey was submitted at 2:00:29am GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Anthony Nahacky and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Aloha, Essentially this is a choice of; 1. Accepting the 20 year Hawaii State studies of the Aquarium fishery, their monitoring, and professional scientific interpretation of the data which shows the sustainability of the Aquarium Fishery; Or 2. Alternately accepting layman opinions that oppose the aquarium fishery and their untrained interpretation of the data over and above the scientific community.

I can be reached at nahacky@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 10:32:47 PM

This survey was submitted at 4:31:39am GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Mari Naito and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mari@naitofinc.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:53:44 PM

This survey was submitted at 1:52am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Ronda Navalta and I am a resident of Nueva Vizcaya, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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I can be reached at ronda_navalta@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 1:02:14 PM

This survey was submitted at 7:01:04pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is James Naylon and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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I can be reached at Knaylon@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:19:34 AM

This survey was submitted at 2:18:22pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Teri Nelson and I am a resident of Corpus Christi, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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I can be reached at teri@aquariaservicesinc.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:59:21 AM

This survey was submitted at 4:58:10pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Christan Nguyen and I am a resident of Arlington, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at nguyenta4486@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 10:46:49 PM

This survey was submitted at 4:45:38am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Minh Nguyen and I am a resident of Corpus Christi, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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I can be reached at mnguyen77566@att.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 7:23:46 PM

This survey was submitted at 1:22:39am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Emiliano Niell and I am a resident of New York, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at aquariumsolutions80@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:13:49 PM

This survey was submitted at 10:12:36pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Jaren Niimi and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at jjsniimi@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:05:38 AM

This survey was submitted at 5:04:32pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Ali Noorany and I am a resident of Grand prairie, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ali.noorany@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 3:19:45 PM

This survey was submitted at 9:18:35pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Malcolm O'Brien and I am a resident of New Rochelle, NY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I was An Aquarium Curator and Had concerns of where and how the animals where being captured. I feel confident with this new act it will benefit both the natural habitat and help the fisherman do what they do best

I can be reached at ajiki2@gmail.com

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 6:49:01 AM

This survey was submitted at 12:47:55pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Karen OConnor and I am a resident of North Kingstown, RI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Since the data indicates the fishery is sustainable, I believe it should be reopened.

I can be reached at karenoconnorremax@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 8:41:08 PM

This survey was submitted at 2:39am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Fred Ong and I am a resident of Los angeles, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Fred@uwwe.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 30, 2019 8:23:30 PM

This survey was submitted at 2:22:17am GMT on 12/31/2019

Aloha Mr. Sakoda,

My name is John Oosthuizen and I am a resident of Naples, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at karen.johnnieo@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 30, 2019 8:23:59 PM

This survey was submitted at 2:22:52am GMT on 12/31/2019

Aloha Mr. Sakoda,

My name is Karen Oosthuizen and I am a resident of Naples, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at karen.johnnieo@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:52:41 PM

This survey was submitted at 1:51am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Precy Ordinario and I am a resident of Vancouver, Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at precyordinario@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:27:58 PM

This survey was submitted at 9:26:47pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Travis Ota and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

I can be reached at Fishingfromthebeachhawaii@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:32:30 AM

This survey was submitted at 7:31:19am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Matt Pedersen and I am a resident of Duluth, MINNESOTA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.

Additionally, I would like to state the following:

The subject of Hawaii's aquarium fishery has been something I've followed for over a decade now. I have submitted public commentary most every time attempts have been made to shutter the fishery. I was asked to personally weigh in once again, otherwise, I would have likely remained silent as the data and science alone should be all that is needed to settle this matter in favor of the fishery. My background as an aquarist of over 37 years, a globally-recognized award-winning aquarist and marine fish breeder, and active leader in the advancement of the art and science of aquarium keeping and captive propagation, gives me a unique perspective from which to comment. As a sportfisherman, I'm well aware of the role that state agencies play when tasked with the mandate to manage natural resources, whether a tiny trout stream a mile from my house, or the delicate balance of salmon and alewife populations in the Great Lakes. Given my understanding of these practices, I firmly believe Hawaii's marine aquarium fishery, managed by DAR / DLNR, was already an unparalleled example of excellent fisheries management. However, well-funded anti-aquarium activists have used emotional arguments and outright misinformation to urge the state of Hawaii to close this fishery for over a decade, and yet their attempts have been consistently rejected on the basis of data and science. In this regard, the very fact that we are here, today, jumping through endless hurdles to reopen a legal and successful fishery, is an utter waste of resources and capital, all because of a single court ruling that flew in the face of common sense, however well-intentioned or reasoned the judge may have felt when overturning lower court rulings. No thought was given to the data, no respect given to the state agencies charged with collecting

and managing the data, only a capitulation to anti-aquarium activists who sought any and every manner possible to shut down this legal, well-managed fishery, on emotional grounds. The fact remains today that a relatively small industry had been shuttered for 2 years now all, with untold economic losses, and great expense incurred to defend already well-proven science and data. As an aquarist and scientist, the statements and arguments made by those whom oppose this fishery are without merit, and often are actually outright lies used to incite people into blindly accepting, and then regurgitating, baseless allegations and concerns. I find it rather ironic that those who oppose the harvest of *Acanthurus achilles*, the Achilles Tang, for aquarium purposes (where it will generate up to \$300 per fish at the end retail level), will gladly turn a blind eye to spearfishing that same fish and selling it for \$4.99/lb in a local food market. Such a disconnect cuts to the very core of their mission; this isn't about concern over whether the aquarium fishery was sustainable (it IS and was already demonstrated to be prior), this battle has been purely about people keeping fish in aquariums. In terms of coral reef management and any fishery there, what happens to a fish after it is harvested is irrelevant. The fish is no longer in the ecosystem. All that matters, from a fishery standpoint, is how that removal impacts the system. The decades of data overwhelmingly supported that Hawaii's fishery was responsive, well-managed, and sustainable, long before any environmental assessment or impact statement was prepared. The state is not tasked with legislating the morality of aquarium keeping. No, the state and its agencies are tasked with oversight of the state's natural resources. While I am aware that current proposals proffer limited access to the fishery with just 14 permits, given the historic data collected by the nonpartisan state agency tasked with managing this resource, I don't believe this recommendation is even necessary...I think it's just one of many "capitulations" and "compromises" that Hawaii's aquarium fishermen have felt pressured to make when in fact that data never suggested that they even need to make these sacrifices. I think it's time the state stood up for the fishermen, and the management agencies who made this fishery what it was....until it was shuttered. I believe the decision regarding the number of permits, and the management of the fishery, be returned expressly to the qualified biologists who were asked to manage the fishery successfully and did just that. Given the never-ending attacks on this fishery, and the repeated data that removes any doubts, that the fishermen and the DLNR be granted a reprieve from future attacks. As we have seen, that debate over the past decade has been far from fair. The fishermen and the DLNR had to defend themselves successfully each and every time they were attacked with a bevy of emotional arguments and misinformation...it only took one "win" for those opposed to shut down an entire industry. As such, the debate was incredibly stacked in favor of those who wished to impose their personal morality and ethics upon everyone else through the government. I am aware that there has been an active campaign to collect as many anti-aquarium trade comments as possible by those behind these and other past attempts to shutter the trade. The aquarium hobby, and trade, has effectively avoided flooding the government with such superfluous commentary. I ask that those reviewing all the submitted commentary, charged with rendering a decision, understand that it is the QUALITY of the commentary, and not the quantity, that matter. The decision to reopen Hawaii's marine aquarium fishery is not a high school student body election, where whomever rabble rouses the most mindless followers wins. No, this is 100% a question of sound science and fisheries management

practices. I believe, based on historical data, that to shutter this fishery was a mistake and an insult to the fisheries managers, and that it should be reopened without further delay.

I can be reached at matt@miniwaters.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:00:40 AM

This survey was submitted at 1:59:23pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is FIDEL PEREZ and I am a resident of Miami Beach, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The Hawaii tropical fish is a big part of the salt aquarium business trade. This business properly manage is sustainable and feeds and supports a lot of families all over the world.

I can be reached at perezffl@aol.com

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 24, 2019 2:23:53 PM

This survey was submitted at 8:22:42pm GMT on 12/24/2019

Aloha Mr. Sakoda,

My name is Judith Perino and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at perino@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 24, 2019 2:24:43 PM

This survey was submitted at 8:23:33pm GMT on 12/24/2019

Aloha Mr. Sakoda,

My name is Luciano Perino and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at lucianomarineoceania@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:15:55 PM

This survey was submitted at 5:14:48am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Bernardo Piereck and I am a resident of Alexandria, VIRGINIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at R

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:15:03 PM

This survey was submitted at 5:13:51am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Greg Pifer and I am a resident of Canada, BRITISH COLUMBIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at gpifer@telus.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 20, 2019 9:15:09 AM

This survey was submitted at 3:13:44pm GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Ben Potter and I am a resident of San Luis Obispo, CALIFORNIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at potter.benjamin@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:08:57 PM

This survey was submitted at 7:07:45pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Jeff Preble and I am a resident of Kaneohe, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
comments from people around the world triggered by aquarium opponents are different than comments from people involved with ocean issues in Hawaii.

I can be reached at piscespac@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 3:35:38 PM

This survey was submitted at 9:34:28pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Sam Price and I am a resident of New Orleans, LOUISIANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

This is important work, thank you.

I can be reached at nolabassist@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:43:50 PM

This survey was submitted at 4:42:38am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Bella S Price and I am a resident of Ocean View, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at bellaprice939@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:43:55 PM

This survey was submitted at 1:42am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Lucianne Price and I am a resident of Ocean View, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at oceanwindows2@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:46:41 PM

This survey was submitted at 2:45:33am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Benjamin Quales and I am a resident of Phoenix, ARIZONA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Sales@bennystropicalfish.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 8:09:56 PM

This survey was submitted at 2:08:49am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Branden Rakita and I am a resident of Colorado Springs, COLORADO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tribtrakita@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:59:23 PM

This survey was submitted at 11:58:14pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Ashley Raleigh and I am a resident of Kailua kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ashleydawnjuan@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 12:44:12 AM

This survey was submitted at 6:43:03am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Nicholas Ramirez and I am a resident of Kailua-Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at happypagoda@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:33:20 PM

This survey was submitted at 4:31:55am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Genevive Ramos and I am a resident of Manila, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Myhevenn@yahoo.com.ph

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 7:09:53 PM

This survey was submitted at 1:08:45am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Dustin Rath and I am a resident of Ohio, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at gw2kpro@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 7:23:17 AM

This survey was submitted at 1:21:08pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Giovanni Recchia and I am a resident of CLEARWATER, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at grecchia@tampabay.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: [NOT SCANNED] - Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 3:00:54 PM

This survey was submitted at 6:40:12pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Sally Recchia and I am a resident of Clearwater, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sallyrec@tampabay.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:45:39 PM

This survey was submitted at 4:44:31am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Terrance Reek and I am a resident of Mercer Island, WASHINGTON.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at terryreek@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:47:07 AM

This survey was submitted at 4:45:57pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Dana Riddle and I am a resident of Dallas, GEORGIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Riddlelabs@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:15:17 PM

This survey was submitted at 3:14:04am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is David Rizkalla and I am a resident of Gallatin, TN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at david@thereefdr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:44:44 PM

This survey was submitted at 11:43:31pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Justin Roelfs and I am a resident of Alsip, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:
Jay's dad should not lose his job

I can be reached at justinroelfs@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 9:54:03 PM

This survey was submitted at 3:52:56am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Warren Rose and I am a resident of Meridian, ID.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at futureal777us@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 1:09:14 PM

This survey was submitted at 7:07:55pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Jesse Rosen and I am a resident of Renton, WA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Hawaii is the best managed fishery in the world. Let's set the example of showing everyone how to manage ornamental and food fisheries.

I can be reached at Jrcoralfarmer@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 3:51:59 PM

This survey was submitted at 9:50:50pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Ryan Rothwell and I am a resident of Kaneohe, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ryanr5789@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:59:05 PM

This survey was submitted at 6:57:59pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Robin Roy and I am a resident of Lewisville, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Robin316us@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:54:05 PM

This survey was submitted at 10:52:53pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Mike Ruggiero and I am a resident of FORKED RIVER, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Sco.ruggiero@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, January 1, 2020 8:33:57 PM

This survey was submitted at 2:32:44am GMT on 01/02/2020

Aloha Mr. Sakoda,

My name is Chris Runnells and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at me@chrisrunnells.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:26:07 PM

This survey was submitted at 4:25:00am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Matthew Runo and I am a resident of Whittier, CALIFORNIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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7. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

While protecting the Hawaiian reefs is of the utmost importance, one way that can be done is by gathering money and promoting the aquarium hobby - which brings Hawaiian species to people around the world where children and adults alike can learn to appreciate and value the natural resources of the reefs. Having this fishery under regulation and allowing this limited number of collectors access is a great way to both protect the species that inhabit the waters and also promote the Hawaiian reefs to the world.

I can be reached at matthew.runo@gmail.com

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immediately delete it. Thank you in advance for your cooperation.

From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:33:14 PM

This survey was submitted at 7:32:08pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Oscar Saavedra and I am a resident of Mesquite, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at oskar.saavedra@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 2:02:31 AM

This survey was submitted at 8:01:23am GMT on 12/19/2019

Aloha Mr. Sakoda,

My name is Jonah Sakata and I am a resident of Holualoa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Hoytlegend1@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 1:54:58 AM

This survey was submitted at 7:53:49am GMT on 12/19/2019

Aloha Mr. Sakoda,

My name is Stephaine Sakata and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Keithsakatas@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:56:35 PM

This survey was submitted at 7:55:12pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Kayla Salo and I am a resident of Naalehu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at knsalo15@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:48:07 PM

This survey was submitted at 11:46:57pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Carlos Santiago and I am a resident of Shawnee, OK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at carlissantiago53@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 5:46:01 PM

This survey was submitted at 11:44:53pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Jonathon Santiago and I am a resident of Rockford, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Digitaljuno@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:00:38 PM

This survey was submitted at 4:59:30am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Anchor Sarslow and I am a resident of Zimmerman, MINNESOTA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

It is really a good idea to manage resources rather than ban their use. There are many examples nationally as well as worldwide. Not only are the animals better served being managed, but also against the effects of non-management. Examples include runaway populations and loss of other unintended populations due to lack of a management system. Banning has served almost nobody, including the incomes of people on the economic side of this.

I can be reached at anxsar@outlook.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 11:28:11 AM

This survey was submitted at 5:27:01pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Bill Schlumz and I am a resident of Wood Dale, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Bill@globalaquaticimporters.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 1:27:56 PM

This survey was submitted at 7:26:40pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Bill Schlunz and I am a resident of Bartlett, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Schlunz@USA.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 4:13:28 PM

This survey was submitted at 10:12:16pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Erin Schwartz and I am a resident of Roanoke, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at E.cheyenne3@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 4:14:25 PM

This survey was submitted at 10:13:16pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Michael Schwartz and I am a resident of Roanoke, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Michael.schwartz202@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:47:02 PM

This survey was submitted at 10:45:50pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Robert Seigneurie and I am a resident of Chesterfield, MICHIGAN.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Rseigneurie@comcast.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:50:37 PM

This survey was submitted at 7:49:28pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Richard Serfass and I am a resident of Davison, MI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

being involved not only in the pet industry but also in the forestry industry in michigan I applaud hawaii's action to protect the ocean enviroment. i also realize that as long as the fisheries industry proceeds in a sustainable manner we should be able to coexist with other groups who are trying to protect the enviroment. Thank you for the opportunity to express our opinions.

I can be reached at info@mobydickpets.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 5:31:42 PM

This survey was submitted at 11:30pm GMT on 12/15/2019

Aloha Mr. Sakoda,

My name is PHIL SHANE and I am a resident of MENIFEE, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

have been a buyer for 35 years. Repeat studies show there is no impact on the environment.

I can be reached at philshane@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:12:48 PM

This survey was submitted at 10:11:40pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Dan Sheets and I am a resident of Ammon, ID.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Not only is this sustainable, but opening the fishery encourages more people to get educated and involved with protecting these types of resources. By encouraging this industry, greater awareness will develop and side markets will grow that could address other issues that plague different aspects of sustainable fishing.

I can be reached at dabrits@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:39:36 PM

This survey was submitted at 7:38:29pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Helio Shin and I am a resident of Plano, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Helioshin@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 2:16:55 PM

This survey was submitted at 8:15pm GMT on 12/15/2019

Aloha Mr. Sakoda,

My name is Caelly Shiraki and I am a resident of KEALAKEKUA, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at caellyshiraki@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 11:39:23 PM

This survey was submitted at 5:38am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Noreen M Shiraki and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at barneys696@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 8:58:45 PM

This survey was submitted at 2:57:36am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Todd Shiraki and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Hawaiitropicalfishco@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 3:38:11 PM

This survey was submitted at 9:37pm GMT on 12/15/2019

Aloha Mr. Sakoda,

My name is Cathleen Shiroma and I am a resident of KEALAKEKUA, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Catjaynm@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:03:39 PM

This survey was submitted at 8:02:32pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Brad Shook and I am a resident of Odessa, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

Sustainable collection leads to new hobbyist and increased interest in conservation of our oceans.

I can be reached at shookbrad@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 2:25:02 PM

This survey was submitted at 8:23:56pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Barnett Shutman and I am a resident of Monroe, NEW YORK.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

We always support sustainable development & that give a sustainable livelihood for the coastal community's great work

I can be reached at Barnett.rvsfishworld@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:35:21 AM

This survey was submitted at 4:34:14pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Dominick Siconolfi and I am a resident of Clementon, NJ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at gotfish@aquariumcenter.biz

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:01:19 PM

This survey was submitted at 12:00:10am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Pawel Siemion and I am a resident of Channahon, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Siemionpawel@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 7:24:56 PM

This survey was submitted at 1:23:50am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Marc Silverman and I am a resident of Merrick, NY.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at marc@545fish.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 12:31:37 PM

This survey was submitted at 6:07:54pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Rowan Slattery and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at surfergirllidub@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 11:24:47 AM

This survey was submitted at 5:23:40pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Robert Sledzinski and I am a resident of Tampa, FLORIDA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Sniffersinc@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:11:50 AM

This survey was submitted at 5:10:32pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Jeff Slemp and I am a resident of Portland, OREGON.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Jeffslemp@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:40:47 PM

This survey was submitted at 10:39:37pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Brandon Smith and I am a resident of Greenville, SC.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at smitty1280@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:01:46 PM

This survey was submitted at 7:00:35pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Darrel Smith and I am a resident of Kihei, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mauireefencounters@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, January 5, 2020 5:03:42 PM

This survey was submitted at 11:02:32pm GMT on 01/05/2020

Aloha Mr. Sakoda,

My name is Penny Smith and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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I can be reached at Pennylanekona@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 8:17:41 PM

This survey was submitted at 2:16:25am GMT on 12/19/2019

Aloha Mr. Sakoda,

My name is Adam Snodgrass and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at makaha666@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:44:47 PM

This survey was submitted at 5:43:40am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is David Sommers and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

Additionally, I would like to state the following:

This questionnaire is such a sham. It only has a I support this sham. This is my second answer because all the info is after the questions. Which tricked me. I support the industry but not the DIES as it is written apparently by one of the 14. I will let my statements in my previous response and This one stand. You sor are being scammed by the author of this scam. If I was you I would be quite angry

I can be reached at daveinkona@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 8:20:31 PM

This survey was submitted at 2:19:24am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Vincent Sonnenberg and I am a resident of Pompano Beach, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at vinsonn62@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:21:29 PM

This survey was submitted at 4:20:19am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Julian Sprung and I am a resident of Miami Gardens, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

The science supports the conclusion that the West Hawaii Aquarium Fishery is sustainable. I support re-opening the fishery.

I can be reached at julian@twolittlefishies.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 2:14:53 PM

This survey was submitted at 6:09:11pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Tosca Stabler and I am a resident of Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

I can be reached at toscastabler17@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 27, 2019 4:50:04 PM

This survey was submitted at 10:48:54pm GMT on 12/27/2019

Aloha Mr. Sakoda,

My name is Bill Stockly and I am a resident of Holualoa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
3. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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5. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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7. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
8. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

My experience with the West Hawaii Fishery is over 40 years as a fishery biologist and dealer.

I can be reached at Bstockly@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 12:19:55 PM

This survey was submitted at 6:18:44pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Emily Stout and I am a resident of Ennis, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Emkay1532@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:53:56 PM

This survey was submitted at 3:52:48am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Carina Sugiyama and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at wowhawaii@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:52:45 PM

This survey was submitted at 3:51:34am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Wayne Sugiyama and I am a resident of Honolulu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at wowhawaii@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 7:49:21 PM

This survey was submitted at 1:48:13am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Melissa Sulejmani and I am a resident of Arlington, TX.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at cstmissy@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:51:41 AM

This survey was submitted at 5:50:35pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Sharon Sullivan and I am a resident of Highlands Ranch, COLORADO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I am an avid scuba diver as well as an experienced aquarist, and believe fishes are a sustainable product when managed as well as they are in Hawaii! Thank you

I can be reached at sharon@neptunestropical.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 4:28:05 PM

This survey was submitted at 10:26:55pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Clay Tam m and I am a resident of Kailual, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.

Additionally, I would like to state the following:

If limited to only 14 permits languages should added to allow new entries if the total number of permittees drops below 14 in the event a permittee exists the fishery.

I can be reached at Fish_onhi@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 3:16:38 PM

This survey was submitted at 9:15:30pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Heidi Taylor and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Taylorgirls4ever@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 3:15:24 PM

This survey was submitted at 9:14:13pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Leonard Taylor and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at TaylorSellshenderson@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 7:30:51 PM

This survey was submitted at 1:29:36am GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is ANTOINE TEITELBAUM and I am a resident of NOUMEA, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ANTOINETEITEL@YAHOO.FR

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 8:17:13 PM

This survey was submitted at 2:16am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Annette Terazono and I am a resident of Captain Cook , Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at Cululani@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 25, 2019 12:25:50 AM

This survey was submitted at 6:24:42am GMT on 12/25/2019

Aloha Mr. Sakoda,

My name is Christine Terazono and I am a resident of Waipahu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at crivera096@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 8:08:38 PM

This survey was submitted at 2:07am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Kacie Terazono and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kacie_akeo54@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 11:47:49 PM

This survey was submitted at 5:46am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Milton Terazono and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

It is my opinion that the DLNR's adoption of the Draft Environmental Impact Statement (DEIS) analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area is justified and warranted. The reasons why the fishery should be re-opened in West Hawai'i are that current data, current fish populations and historical catch information collected for the DEIS indicate that the fishery is indeed sustainable. Further more, the two shut down period has affected several aquarium fishery businesses in West Hawaii in a negative way by putting people out of work. Thank you for allowing me to offer my comments on this matter.

I can be reached at Myteraz@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 25, 2019 12:22:29 AM

This survey was submitted at 6:21:19am GMT on 12/25/2019

Aloha Mr. Sakoda,

My name is Sean Terazono and I am a resident of Waipahu, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sterazono808@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 25, 2019 12:27:26 AM

This survey was submitted at 6:26:19am GMT on 12/25/2019

Aloha Mr. Sakoda,

My name is Tiani Terazono and I am a resident of Captain Cook, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tianiterazono+fish@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 25, 2019 12:31:38 AM

This survey was submitted at 6:30:15am GMT on 12/25/2019

Aloha Mr. Sakoda,

My name is Trevor Terazono and I am a resident of 96704, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Trevoryoshioterazono

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 25, 2019 12:33:24 AM

This survey was submitted at 6:32:13am GMT on 12/25/2019

Aloha Mr. Sakoda,

My name is Tristin Terazono and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Tristintaigaterazono@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Friday, December 13, 2019 8:07:10 PM

This survey was submitted at 2:05am GMT on 12/14/2019

Aloha Mr. Sakoda,

My name is Tyron Terazono and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tyronterazono@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 5:46:14 AM

This survey was submitted at 11:45:03am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is RICHARD TERRELL and I am a resident of Monroeville, PENNSYLVANIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
3. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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6. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
7. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

As a marine biologist who had visited the beautiful Hawaiian Islands I share the desire top piece and project the unique biodiversity of their waters. But sustainable use creates more incentive to do so for the fishermen and their families as the environment is their livelihood.

I can be reached at rpterrell@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 3:36:02 PM

This survey was submitted at 9:34:53pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Isabelle Thielman and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Isabellethielman@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 3:06:46 PM

This survey was submitted at 9:05:15pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Madi Thielman and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at thielmangirl@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 3:19:35 PM

This survey was submitted at 9:18:26pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Mike Thielman and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Mike@i3so.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 29, 2019 3:18:12 PM

This survey was submitted at 9:17:01pm GMT on 12/29/2019

Aloha Mr. Sakoda,

My name is Twila Thielman and I am a resident of Henderson, NEVADA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Thielman5@cox.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:18:44 PM

This survey was submitted at 8:17:37pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is William Thompson and I am a resident of Hilo, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Westont21@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 12:27:40 PM

This survey was submitted at 6:26:28pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Jerrold Tieder and I am a resident of Dania beach, FL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tropicalfish2@bellsouth.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:50:10 PM

This survey was submitted at 1:49am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Evelyn Tiong and I am a resident of Burnaby, Canada, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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I can be reached at evilynt@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 10:25:16 PM

This survey was submitted at 4:24:05am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Andre Tiongco and I am a resident of Cavite, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Andretiongco13@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:54:41 PM

This survey was submitted at 1:53am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Christopher Tiongco and I am a resident of Manila, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at cvtiongco@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:58:48 PM

This survey was submitted at 1:57am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Gilbert Tiongco and I am a resident of Manila, Philippines, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at gvtiongco@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Sunday, December 15, 2019 7:45:02 PM

This survey was submitted at 1:43am GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Sam Tiongco and I am a resident of Ocean View, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at ina_dimples@yahoo.ca

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 9:52:00 AM

This survey was submitted at 3:50:52pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Kealani Tirona and I am a resident of OCEANSIDE, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at krtirona@att.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 3:15:09 PM

This survey was submitted at 9:14:02pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Lawrence Tirona and I am a resident of Kapaa, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at lftirona@aol.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 9:53:23 AM

This survey was submitted at 3:51:56pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Matthias Tirona and I am a resident of OCEANSIDE, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at mvtirona@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 9:54:02 AM

This survey was submitted at 3:52:57pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Tina Tirona and I am a resident of OCEANSIDE, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tinatirona6@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Saturday, December 28, 2019 9:50:07 AM

This survey was submitted at 3:48:54pm GMT on 12/28/2019

Aloha Mr. Sakoda,

My name is Vince Tirona and I am a resident of OCEANSIDE, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tirohana@att.net

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 4:06:48 PM

This survey was submitted at 10:05:38pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Tou Zer Cha and I am a resident of Warren, MI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Ichiro_elway@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:40:48 AM

This survey was submitted at 8:39:41am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Richard Townsend and I am a resident of Arlington Heights, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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7. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I believe that more permits could be issued without a significant impact to the health of the fisheries. Most aquarium fishers understand and know the importance of a healthy fish population.

I can be reached at richptown@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 30, 2019 1:26:42 AM

This survey was submitted at 7:25:21am GMT on 12/30/2019

Aloha Mr. Sakoda,

My name is Paul Trevithick and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at pmtrevithick@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 3:20:07 AM

This survey was submitted at 9:18:55am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Mary Tubbs and I am a resident of Waimanalo,hi, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.

Additionally, I would like to state the following:

Reopen the fishery it is the right thing to do, they keep the fish alive which isvthe best fishery to have.

I can be reached at Rtlivefish@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 2:16:45 AM

This survey was submitted at 8:15:16am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Ron Tubbs and I am a resident of Waimanalo,hi, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.

Additionally, I would like to state the following:

Fishery should be open to all and continue as it has in the psst to work with dlnr to maintain an already sustainable fishery.

I can be reached at Rtubbs@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 5:16:49 AM

This survey was submitted at 11:15:36am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Josef Tucek and I am a resident of Kutná Hora, CZECH REPUBLIC.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tucek@pepinuvutes.cz

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 4:34:51 PM

This survey was submitted at 10:33:43pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Eric Tydingco and I am a resident of Tamuning, GUAM.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at erictydingco@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 11:17:56 PM

This survey was submitted at 5:16:46am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Carla Venable and I am a resident of Mt. View, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

I can be reached at carlavenable@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 31, 2019 11:53:41 PM

This survey was submitted at 5:52:30am GMT on 01/01/2020

Aloha Mr. Sakoda,

My name is Avery Vess and I am a resident of Arroyo Grande, CA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at vessavery@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 8:46:39 PM

This survey was submitted at 2:45:27am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Michael Vitousek and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Mvitouse@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 6:34:18 PM

This survey was submitted at 12:33:11am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Colette Wabnitz and I am a resident of Vancouver, BRITISH COLUMBIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

There is only one clear evidence-based choice : to accept DEIS, which is based upon a rigorous data collection and monitoring protocol spanning several decades. The alternative is emotionally driven and motivated and does not have any supporting scientific basis.

I can be reached at c.wabnitz@oceans.ubc.ca

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:12:25 PM

This survey was submitted at 12:11:15am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Sarah Wachtl and I am a resident of Milwaukee, WI.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at sarah.wachtl@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 9:31:40 AM

This survey was submitted at 3:30:20pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Dorothy Waiwaiole and I am a resident of Hnl, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kwaiwaiole@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 11:23:36 AM

This survey was submitted at 5:22:26pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Doug Wald and I am a resident of Bridgewater, NJ.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at dwald1818@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 3:41:25 AM

This survey was submitted at 9:40:02am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Michael Wand and I am a resident of California, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

UH Manoa Alumni, Microbiology, 2009. Have scuba dived every island in Hawai'i, along with much of the world, with great love for our oceans and fish. Hawaii has always had best practices and the most sustainable fisheries, and I support reopening these sites for aquatic collection use. Safe, sustainable, and responsible collection and later care and keep of just a sliver of our oceans and reefs inspire children, our next generation, and people, and I believe have a strong positive net effect towards educating and demonstrating the importance and beauty of these animals to the world, and help to bring environmental concerns such as climate change and its effects on the reef into more people that may not otherwise have as much perspective.

I can be reached at michaelw9@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:46:25 AM

This survey was submitted at 4:45:11pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Eric Warren and I am a resident of Washington, .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at eric.w@aquariumconcepts.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 4:44:54 PM

This survey was submitted at 10:43:43pm GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Rodney Watanabe and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at rodneyw@hawaii.rr.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 8:47:45 PM

This survey was submitted at 2:46:35am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Bill Weaver and I am a resident of Dallas, TEXAS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Bill@billtgefishman.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 5:36:47 PM

This survey was submitted at 11:35:40pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Jacob Weber and I am a resident of Saint Charles, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at uiogd13@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:58:05 PM

This survey was submitted at 7:56:58pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is Bob Wedeman and I am a resident of Pahoehoe, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawaii'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I support the Fishing.

I can be reached at weedie60440@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 9:03:44 PM

This survey was submitted at 3:02:30am GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is James Wente and I am a resident of Portsmouth, OHIO.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Slimj78@hotmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 30, 2019 11:50:31 AM

This survey was submitted at 5:49:20pm GMT on 12/30/2019

Aloha Mr. Sakoda,

My name is Angela Wermes and I am a resident of KAILUA KONA, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at angela.mahealani@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 3:17:37 PM

This survey was submitted at 9:16:27pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Arthur Westwood and I am a resident of Billings, MONTANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

I would also like people given a way to catch a few fish for their own aquarium or for their school.

I can be reached at Art.westwood@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:42:46 PM

This survey was submitted at 12:41:34am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Charles Westwood and I am a resident of Bozeman, MONTANA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

Additionally, I would like to state the following:

People should also be aloud to take fish home to put in their own aquarium.

I can be reached at charlwstw1@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Thursday, December 19, 2019 10:15:57 PM

This survey was submitted at 4:14:46am GMT on 12/20/2019

Aloha Mr. Sakoda,

My name is Tom Wiatr and I am a resident of McHenry, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at twiatr2001@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, December 17, 2019 6:10:43 PM

This survey was submitted at 12:09:29am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Brenton Wickramasekera and I am a resident of Chicago, ILLINOIS.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at btwick90@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:40:01 PM

This survey was submitted at 4:38:54am GMT on 01/08/2020

Aloha Mr. Sakoda,

My name is Andrew Willmott and I am a resident of Vernon, BRITISH COLUMBIA.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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I can be reached at ajpetguy@me.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, January 6, 2020 2:14:53 PM

This survey was submitted at 8:13:47pm GMT on 01/06/2020

Aloha Mr. Sakoda,

My name is Thomas Wood and I am a resident of Manila, PHILIPPINES .

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
3. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.

Additionally, I would like to state the following:

This is ridiculous. Check your food fisheries first!

I can be reached at troutnation@googlemail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 2:00:19 PM

This survey was submitted at 7:59:01pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is David Woodham JR and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at davidwoodhamjr@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 10:05:24 AM

This survey was submitted at 4:04:07pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is David Woodham and I am a resident of Hilo, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Davidwoodhamjr@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 1:56:26 PM

This survey was submitted at 7:55:15pm GMT on 12/16/2019

Aloha Mr. Sakoda,

My name is Kristi Woodham and I am a resident of Kailua Kona, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at kmagnet43@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Tuesday, January 7, 2020 1:32:20 PM

This survey was submitted at 7:30:57pm GMT on 01/07/2020

Aloha Mr. Sakoda,

My name is DENNIS YAMAGUCHI and I am a resident of PEARL CITY, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at denty1024@gmail.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 1:22:29 AM

This survey was submitted at 7:21:20am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Carli Yamamoto and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
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4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Keko_monkey@yahoo.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 1:23:52 AM

This survey was submitted at 7:22:39am GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Carol Yamamoto and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Cmy@hawaiianisp.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:04:24 PM

This survey was submitted at 5:03:12am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Neivbea Zane and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
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3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Kikuo.omori@icloud.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Monday, December 16, 2019 11:03:24 PM

This survey was submitted at 5:02:18am GMT on 12/17/2019

Aloha Mr. Sakoda,

My name is Todd Zane and I am a resident of Kealahou, Hawaii.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
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9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at tyratevin@me.com

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From: [West Hawaii Aquarium Fishery](#)
To: [VanDeWalle, Terry](#)
Subject: Web Form: West Hawaii Aquarium Fishery Survey
Date: Wednesday, December 18, 2019 8:11:47 AM

This survey was submitted at 2:10:40pm GMT on 12/18/2019

Aloha Mr. Sakoda,

My name is Megan Zarate and I am a resident of Oak forest, IL.

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA).

1. I believe that it fully analyzes all of the potential impacts the 14 West Hawaii aquarium fishery may have on the environment under each of the alternatives.
2. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA.
3. The West Hawaii aquarium fishery is one of the best managed fisheries in the State of Hawaii, and in fact the world.
4. The West Hawaii Fishery Management Area was developed with significant input from all parties, including the environmental community as well as Native Hawaiians.
5. The proposed action is an overall reduction in take over the pre-ban alternative.
6. I request that additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.
7. Reducing landed catch via approving only the 14 permits proposed is a practical approach to address "no limits".
8. By issuing 14 permits, the fishermen can easily self-police as they know who is permitted to legally fish.
9. The limitation on the number of permits also assists DOCARE/enforcement as they will easily know who is legally allowed to fish by the limited number of boats which are registered.

I can be reached at Zaratemegan122711@gmail.com

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Comments and Applicant Responses to All Other Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
Adrian R. Fourie	N/A	1/6/2020	<p>Extinction is forever—it’s that simple. It’s my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It’s a devastating commercial enterprise that trashes near-shore habitat and species. Don’t export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It’s truly heart-breaking. Many factors conspire in this tragedy. Maybe we can’t combat global warming locally. But we bloody well can put a stop to aquarium collecting.</p> <p>The so-called “Environmental Review” consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii’s DLNR (to that department’s shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders’ credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii’s taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,</p> <p>PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>I implore you to do the right thing</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC’s Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>
Alan Breese	HI	1/5/2020	<p>As a fairly recent home owner on Maui, I do not understand allowing the local reefs to be harvested of fish with very little benefit to the Hawaiian islands and the Hawaiians. The Islands’ main industry is tourism and this needs to be protected. Most tourists enjoy snorkeling and scuba diving to see the local colorful fish population. Loss of numbers and varieties of fish could negatively impact the tourism industry.</p> <p>It’s my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC’s Mission is to represent the</p>

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			<p>aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic wellbeing depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>I implore you to ban aquarium collecting in Hawaii.</p>	<p>experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>
Alan Luken	FL	1/6/2020	<p>On behalf of Segrest Inc, I am emailing you to express our support for DLNR's adoption of the draft Environmental Impact Statement which analyzes the issuing of Commercial Aquarium Permits for the West Hawaii Regional Fishery Management Area. We believe that the draft EIS has fully and completely analyzed all of the potential impacts of the Hawaii aquarium fishery. In the draft EIS, measures are proposed that would further help avoid and minimize what are already insignificant impacts on fish species and the environment in the West Hawaii Regional Fishery Management Area. Researchers and scientists have consistently determined that the Hawaii aquarium fishery is one the best managed near shore fisheries in the world. This conclusion has been backed by data from the DLNR. In order to develop a management strategy for the West Hawaii Regional Fishery Management Area, input from native Hawaiians and the environmental community has been used. We fully support the DLNR resuming the issuance of permits for aquarium fishing in the West Hawaii Regional Fishery Management Area.</p>	<p>Your comment has been forwarded to the decision makers.</p>
Alexandra Riggle	N/A	1/7/2020	<p>One of the most memorable experiences of my life was snorkeling in the Kapoho tide pools on the Big Island. The tide pools are gone now-- not because of human exploitation, but due to natural forces. The aquarium industry, by contrast, takes Hawaii's native fishes and turns them into toys for aquarium hobbyists and a profit center for businesses. This is wrong.</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>Even with take restrictions, people can and will break the rules. This planet is facing unprecedented environmental crises, including the loss of coral reefs. Hawaii can't afford to let the aquarium industry plunder its reefs.</p> <p>Hawaii's fishes need and deserve real legal protection. They should be left in the wild.</p> <p>Please do the right thing and help create real, substantive protection for Hawaii's treasures.</p>	
Ali Manesh	HI	1/7/2020	<p>My name is Ali and my wife and I moved to the island of Hawaii about two years ago. The driving motivation for us to leave our corporate jobs behind and move here was to learn from the Hawaiian's peoples' perspective and relationship with nature to help us reconnect with the land and the natural resources that the island has to offer. So I was a bit dismayed when I learned that there was a push to reinstate the practice of catching fish from the ocean waters here to place in aquariums. I'm sure that you've received many comments regarding the potential impact that this type of activity can have on natural and cultural resources so I want to bring up the unjustified idea that we as men feel that we have the right to capture and remove any living beings from their homes solely for the purpose of our enjoyment and profit, even if some try to disguise it as for educational purposes. It's one thing, although almost just as appalling, that we've become ok with breeding various animals in captivity to accommodate a very inhuman pet industry. But the thought of capturing creatures who have known nothing but freedom in the beautiful open waters of Hawaii and to all of a sudden place them in small closures to be transported and placed in even smaller closures for our enjoyment is just heart wrenching for me. Regardless of what your views on animals may be and whether they can feel emotions like fear and sadness, do you honestly feel that we should have the right to remove and displace any free roaming beings from their natural habitats for our enjoyment?</p> <p>I feel that this is not only a cultural and environmental issue but also an important moral issue. We need to be honest with ourselves and re-evaluate how we view the vast natural beauty that surrounds us and our place within that environment. Do we want to see ourselves living in balance and harmony within this place that we all call home or do we view ourselves as more important than the other creatures around us and therefor giving us the right to remove and displace any creatures that we see fit?</p> <p>Since moving here, my wife and I have learned much about the idea of kuleana, particularly when it comes to the land and natural resources. Im sure that you and your colleagues at DLNR will agree that it is everyone's kuleana to appreciate and protect what is here. And I hope</p>	Your comment has been forwarded to the decision makers.

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			that you also agree with me that removing and displacing any creatures from their homes simple for our enjoyment and benefit definitely does not fit anywhere within the concept of kuleana. I appreciate but certainly don't envy the tough decisions that you and your colleagues have to make from time to time. Thank you for taking the time to read and consider my comment on this particular issue.	
Aliaska Brozen	N/A	1/6/2020	I am outraged by the decimation of our fish. How dare you allow businesses to come here and take our sea life? This is wrong on so many levels: this is their home and it is traumatic for them to be captured & transported. And did you know that fish are sentient beings? They have emotions & have families... And a good many of them never make it to their destination having died along the way. Not to mention the damage to our tourist industry here on Maui. AND also, coral reefs and fish have a symbiotic relationship: coral reefs supply a home to the fish...& an algae food source...and w/out the fish eating the algae there would be overgrowth, preventing coral larvae from settling down to grow up...adding to the destruction of our reefs...just one of the forces that are attacking them, including global warming & pollution. So it would be totally irresponsible & negligent & inhumane... (not to mention greedy -someone must be making money off this insane deal), to allow this theft to happen.	Your comment has been forwarded to the decision makers. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Amanda Cash	N/A	1/3/2020	Hawaii is my favorite vacation destination. I was very alarmed at the lack of beautiful wildlife during a recent snorkeling trip off the coast of Maui. It was vastly different compared to years past. I vehemently oppose aquarium collecting in Hawaii! This is destroying our reefs!	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.
Andrew John Bevolov IV	N/A	1/7/2020	I came across a public notice bringing light to policies concerning the removal of native fish from reefs in Hawaii for the aquarium trade which recommended contacting this email to urge that limitations on the policy be put in place. The Pet Industry Joint Advisory Council has apparently said that whatever extent of collection of these animals would only have a negligible impact on the ecosystem, but this is clearly a dismissal of the practically inevitable consequences virtually unrestricted collection will have. This is not a matter to take lightly simply at the first claim that it is "harmless".	Your comment has been forwarded to the decision makers. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be

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				collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.
Angela Huntemer	HI	1/7/2020	<p>DLNR made a serious mistake in engaging the Pet Industry Joint Advisory Council to assess the environmental impacts of the aquarium trade in Hawaii. It was a huge mistake to engage a lobbying group for the commercial pet trade and not a professional group dedicated to the study of coral reef ecosystems. This grave miscalculation has unfortunately left the Department susceptible to contested cases and even more. This is a shame because I am personally a huge supporter of the mission of DLNR and truly appreciate some of the heroic efforts made by some of your employees. This particular issue has, as far as I can see, not been given the important consideration it deserved. An anthropocentric view point has regrettably obscured what is the duty of DLNR and all of us that are fortunate enough to call Hawaii home. Frankly, the "livelihoods" of wildlife collectors are not an environmental impact. Livelihoods, are, by their own definition, a business impact. The few people employed in the taking of wildlife from our reefs are well equipped with material, skills, technology and experience to be able to repurpose themselves to a more positive "livelihood" related to the ocean. That is the "win win" solution here. Arguments of an educational value to privately held aquariums are false. Animals in tanks and cages engage in very little of their natural behavior and what is the educational value of that? As a teacher I can confidently tell you - none.</p> <p>There are obviously reasons why the Supreme Court closed the taking of wildlife from our reefs. We should be following in the footsteps of forward thinking jurisdictions such as Palau and ban commercial fishing or harvesting of any kind, in our territorial waters. We do not allow the taking of coral, why would it be OK to take other animals from the reef? In an era of overfishing, ocean warming, sea level rise, changing currents, habitats, and acidification why would we allow any more stressors to our reefs? Any taking of reef wildlife out of their habitat to die, without reproducing is an impact that cannot be entertained in 2020.</p>	Your comment has been forwarded to the decision makers.

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			<p>I have reviewed many EISs over the years. Many are poor efforts. Nearly all comments are routinely "dealt with". However, this particular EIS egregiously disregards the importance of the diverse array of animals that would be affected by their trafficking to isolation tanks (if they survive long enough to get to them). The results of this "review" are not only biased and inadequate, the whole document is largely irrelevant and misses the point completely. The removal of wildlife from coral reefs to be sold as decorations has no place in Hawaiian culture or ecosystems.</p>	
Angelina Misseri	HI	1/6/2020	<p>My name is Angelina Misseri, I have had the privilege to live, work, and most importantly, grow infinite respect and appreciation for the Big Island for 6+ years. Those of us that call the island home have sadly seen the massive decline in marine life. Between the Black Water run off along the West Coast of Hawaii Island, chemical spraying along the coastlines to keep golf courses green and weed free and the recent coral bleaching, our reefs are in disrepair.</p> <p>I am writing to respectfully inform you, I STRONGLY oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish. I understand that some would argue that this would provide some jobs, but what about those of us that already work in the industry, and our past, present and future visitors. It seems very short sighted to not consider how you are impacting all our current ocean operators that take people out to see our natural underwater wonderworld.</p> <p>Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawaii's Reefs is counter-productive. We need to find 14 more companies willing to put their efforts towards rejuvenating the reef, giving back to it; not taking more precious life from it. We tell our visitors to enjoy Hawaii here, don't take the lava rocks, the shells, the multi-colored sands from our beaches, why would you condone this? Our oceans are dependent on people like yourself to do what is Pono. Please choose to do the right thing, our community will be watching and the future generations are depending on you to aloha 'āina. I urge you to take action to protect our precious reef and life systems here in Hawaii.</p> <p>Thank you for taking the time to read my comments.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Anne Allison	N/A	1/5/2020	<p>Extinction is forever—it's that simple.</p> <p>It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between</p>

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			<p>habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,</p> <p>PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>I implore you to do the right thing</p>	<p>1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>
Anne Shaw	HI	1/6/2020	<p>The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade. It is just WRONG!!</p>	<p>Your comment has been forwarded to the decision makers.</p>
Arthur Parola	KY	1/6/2020	<p>I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA). This draft EIS fully analyzes all of the potential impacts the Hawaii aquarium fishery may have on the environment under each of the alternatives. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA. Scientists have consistently characterized the Hawaiian aquarium fishery as one of the best managed near-shore fisheries in the world. This is back by DLNR data. Native Hawaiians and the</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			environmental community input has been used to develop the management strategy for the WHRFMA. I support DLNR resuming the issuance of permits for aquarium fishing in the WHRFMA.	
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	The Pet Industry Joint Advisory Council submitted a Draft Environmental Impact Statement (DEIS) to the State of Hawai'i Office of Environmental Quality Control on their analysis of the ecological and cultural impacts of reissuing aquarium collection permits for West Hawai'i Island. Our review focuses on the scientific integrity and validity of data and conclusions provided in the DEIS as it pertains to West Hawai'i. We address three particular subject areas in Parts (I) Hawai'i ocean climate, (II) Fish resource trends and reporting, and (III) Coral reef damage.	Your comment has been forwarded to the decision makers.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Part I: A new ocean climate regime in the Hawaiian Islands renders the historical fish data collected by NOAA and State of Hawai'i Division of Aquatic Resources (DAR) scientifically unpredictable of the reef ecosystem in 2020 or into the future. NOAA and DAR fish count data span only one marine heatwave in 2014-2015, and the response of the ecosystem continues to evolve and is in strong disequilibrium. Subsequent marine heatwaves such as the 2019 event will continue to repeat, negatively impacting coral, fish and invertebrate communities, and these heatwaves will be increasing in frequency to near-annual events by 2035. A pivotal issue determining the ability of Hawai'i's coral reefs to persist in the new ocean climate rests in the abundance and diversity of the herbivore fish community under repeat heatwaves. Herbivore fish are primary determinants of reef algal cover, which competes directly with slow-growing corals for space during and between marine heatwaves. Reef science demonstrates that the probability of a marine heatwave generating a shift from coral to algal dominated reef is reduced to 20% - a key target threshold for management - at an herbivore fish biomass level of 250 kg per hectare. As of 2018, 74% of shallow coral reefs of West Hawai'i are near or below this threshold, and the biomass of deeper portions of the reef are insufficiently known. Beyond marine heatwaves, West Hawai'i development has rapidly expanded over the past two decades, resulting in numerous additional stressors to the reef ecosystem. A recent study of the shallow water fishery of West Hawai'i indicated that the two main sources of resource fish decline from 2008 to 2018 are nitrogen-rich effluent and commercial fishing. West Hawai'i's reefs are not well	<p>Your comment has been forwarded to the decision makers.</p> <p>It is unclear why historic collection numbers would no longer be relevant for predicting future trends, even in light of climate change, particularly due to the time period for the analysis (5 years). This is also why the EIS uses the most recent population data available (2016 populations; CREP 2018) and the most recent population trend data (DAR 2019a) in the analysis. In addition, Aquarium Permits are only valid for 1 year and must be renewed each year. Presumably the DNLR will evaluate renewal of permits each year and if conditions warrant the agency has the discretion not renew permits, thereby allowing it to react to changing conditions.</p> <p>As stated in the EIS, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>

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			prepared for repeated marine heatwaves from an herbivore fish standpoint.	
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Part II: The DEIS utilizes two different datasets to estimate fish populations along the west coast of Hawai'i Island: (i) Division of Aquatic Resources (DAR) West Hawai'i Aquarium Project (WHAP) surveys and (ii) NOAA Coral Reef Monitoring Program (CREP) surveys. The WHAP data are not spatially representative of West Hawai'i because they are not taken from randomly selected sites. The majority of the WHAP survey sites lie within geographically-limited marine managed areas and thus these surveys do not accurately represent fish populations across all of West Hawai'i. The DEIS report bases the majority of its estimations using the WHAP surveys, even while acknowledging that the CREP data would be more representative. The DEIS should present both datasets similarly to understand if the same trends in fish populations seen at the WHAP longterm monitoring sites also agree with the island-wide CREP surveys. Our analysis suggests that the WHAP and CREP data tell different stories of aquarium fish trends over time, including weakening fish population trends in CREP compared to those reported for WHAP by the DEIS. Meanwhile, another State of Hawai'i DAR report indicates major declines in fish abundance, ranging from a small relative decline in Yellow Tang (-9%) to an enormous decline in Achilles Tang (-97%). Additionally, State of Hawai'i DAR monitoring of shallow water reefs show major declines of certain herbivore fish species from 2008 to 2018.	<p>Your comment has been forwarded to the decision makers.</p> <p>The limitations of WHAP and CREP survey methods are described in Section 4.4.7 of the EIS. All population impact assessments are conducted using the CREP population estimates, though Appendix B has been added to the FEIS to provide the impacts of collection on WHAP Open Area populations for comparison.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>Additionally, as stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel	HI	1/3/2020	The DEIS uses invalid estimates of percent catch from the aquarium trade to evaluate the impacts of alternative actions. In particular, the DEIS claims that percent catch should be based on islandwide population estimates for each species by citing evidence for habitat connectivity between protected and open fishing areas around all of Hawai'i Island. This is incorrect, and past studies using drifters, larval sampling, genetic analysis, and oceanographic modeling indicate high local retention of larvae, and juvenile and adult fish populations, in	<p>Your comment has been forwarded to the decision makers.</p> <p>While the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring under the Preferred Alternative, has been added as Appendix B of the FEIS for comparison purposes.</p>

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Carlson, Roberta Martin and Christopher Balzotti)			West Hawai'i. As a result of this major error in the DEIS, the reported percent catch is erroneously low. It should be based on relevant West Hawaii Regional Fishery Management Area sub-populations considering the realistic home ranges of each species, not on island-wide populations.	
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Part III: The DEIS makes several broad and unsubstantiated claims that aquarium collection does not negatively impact the reef ecosystem. A key question is whether or not aquarium fish collectors make physical contact with the reef via their equipment and their bodily movement. Reports from the public and the conservation community, combined with our own in-situ observations, broadly point to common and persistent issues of aquarium collector contact with the reef. The DEIS makes no recommendation to provide third-party oversight of collector activities, and goes as far as to suggest that there is no impact from collection on corals or reef structure. Physical, biological, and chemical damage needs to be documented and prevented. Prevention is the only scientifically sound pathway, either by strong in-situ oversight of the industry or via banning of collections.	Your comment has been forwarded to the decision makers. The EIS cites Tissot and Hallacher (2003), who statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	INTRODUCTION On November 12, 2019, the Pet Industry Joint Advisory Council submitted a Draft Environmental Impact Statement (DEIS) to the State of Hawai'i Office of Environmental Quality Control on their analysis of the ecological and cultural impacts of reissuing aquarium (AQ) collection permits for West Hawai'i Island. Our review focuses on the scientific integrity and validity of data and conclusions provided in the DEIS as it pertains to West Hawai'i, defined as the area spanning the west or leeward side Districts of N. and S. Kohala, N. and S. Kona, and Ka'u. We do not address cultural issues in our review of the DEIS. Our investigation of the DEIS content required the focus and expertise of a panel of marine ecologists and biologists with a collective experience on West Hawai'i reef ecosystems of more than 50 person-years. Our review presented here is limited to three particular subject areas, two of which are directly addressed in the DEIS, and one that was not addressed in the document. These subject areas are organized into Parts (I) Hawai'i ocean climate, (II) Fish resource trends and reporting, and (III) Coral reef damage.	Your comment has been forwarded to the decision makers. All three subject areas are addressed in the EIS. Climate change is addressed in Section 5.4.3.5. Fish resource trends and reporting are addressed throughout the document, and specifically in Section 5.4 and in Tables 5-4 and 5-8. Coral reef damage is discussed in Section 5.4.1.2 under "Reef Habitat".
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna	HI	1/3/2020	PART I: HAWAI'I OCEAN CLIMATE IN 2020 AND BEYOND Like many regions of the world, the Hawaiian Islands have entered a new ocean climate regime that is less favorable to coral reefs as a whole. As a result, building resilient coral reefs must be a focal point for resource management to give reefs the best chance for persistence. One of the major limitations of the DEIS rests in its narrow analysis of the West Hawai'i coral reef ecosystem.	Your comment has been forwarded to the decision makers.

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Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)			Spanning a distance of about 180 km of coastline, the reef is extremely heterogeneous in terms of benthic substrate, coral cover, habitat condition, fish abundances, and accessibility by fishers. These issues alone raise serious concerns about the critically important limitations of an environmental impact study based solely on fish counts.	
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Adding the new ocean climate regime to the natural complexity of the West Hawai'i reef, historical fish data alone are not predictive of the reef ecosystem in 2020 or into the future, whether exposed to aquarium collection or not. Hawaiian reef ecosystems are part of the new ocean climate system that continues to rapidly expand in the Pacific and worldwide. In 2014 and 2015, the Main Hawaiian Islands underwent their first major system-wide ocean climate event, called a marine heatwave, that caused increased water temperatures resulting in large-scale coral bleaching and impacts on fish and invertebrate populations (Bahr et al. 2017; Couch et al. 2017). About half of the corals that bleached in 2015 ultimately died and became algal covered (Kramer et al. 2016). The 2019 marine heatwave again engulfed the Hawaiian Islands, causing up to 50% coral bleaching in some areas, and an average of 10% mortality in West Hawai'i (ASU GDCS 2019). Marine heatwaves are the new norm, and will be increasing in intensity and/or frequency in the years to come (Frolicher et al. 2018), putting enormous additional stress on coral reefs of Hawai'i.	Your comment has been forwarded to the decision makers. Data in the EIS include population trend data that spanned the 2014/2015 bleaching events. These events were also discussed in Section 5.4 of the EIS. The cumulative impacts of future climate change are discussed in Section 5.4.3.5 of the EIS.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Ocean temperature in West Hawai'i is projected to increase as a result of climate change. By the middle of the century, average monthly sea surface temperature will be ~1°C (1.8°F) warmer than present-day, and for about 6 months of the year will be warmer than the present-day summertime maximum (27°C; 80.6°F). This increase in ocean temperature is projected to influence the frequency and severity of coral bleaching. For example, severe bleaching is projected to occur on an annual basis in West Hawai'i beginning as early as 2035 (van Hooijdonk et al. 2016).	Your comment has been forwarded to the decision makers. The cumulative impacts of future climate change are discussed in Section 5.4.3.5 of the EIS.
ASU Center for Global Discovery and Conservation Science (Gregory	HI	1/3/2020	A pivotal issue determining the ability of Hawai'i's coral reefs to persist in the new ocean climate rests in the abundance and diversity of the herbivore fish community. Herbivore fish are primary determinants of reef algal cover, which competes directly with slow-growing corals for space. Regular marine heatwaves not only cause coral bleaching and mortality, they also promote algal growth that colonizes dead coral	Your comment has been forwarded to the decision makers. It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been

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Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)			and responds well to increased water temperature (Jessen et al., 2013; Graham et al., 2015). Herbivore fish biomass and diversity have become important combaters of algal growth during and between marine heatwave events.	no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	<p>In a scientifically-acclaimed global analysis and synthesis, Graham et al. (2015) found that the probability of a reef switching from a coral-dominated to an algal-dominated system was more than 50% when herbivore fish biomass dropped below 100 kg per hectare. Importantly, the probability of a regime shift from coral to algal domination decreased to 20% - a key target threshold for management – at an herbivore fish biomass level of 250 kg per hectare (Figure 1).</p> <p>Based on the State of Hawai'i Division of Aquatic Resources shallow water fish survey data, current herbivore biomass levels vary enormously along the coast of West Hawai'i (Figure 2). Among 72 sites included in this 2018 survey, 21% are near or below the super-critical 100 kg per hectare threshold for a 50:50 chance of coral-to-algal domination caused by a marine heatwave.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A review of Figure 2 from the commenter showed 30 Open Areas analyzed for herbivore biomass, of which 17 were above the 250 kg per hectare level (57%), 12 were within 100 and 250 kg per hectares (40%), and 1 was below the 100 kg per hectare level (3%). Compared to the 23 areas closed only the aquarium fishing (i.e., all other types of fishing are allowed), 13 were above 250 kg per hectare (57%), 9 were within 100 and 250 kg per hectare (39%), and 1 was below 100 kg per hectare (4%). Therefore based on the data provided by the commenters, it does not appear that areas open to commercial aquarium collection are any more at risk of having a lower herbivore biomass.</p>
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Approximately 64% of sites are currently near or below the critical 250 kg per hectare threshold for a 20% chance of coral-to-algal change from a marine heatwave. Only 19 of 72 sites (26%) are well above this guiding 250 kg per hectare minimum for good herbivore fish management. Numerous countries and jurisdictions are using the 250 kg threshold as the target for increasing reef resilience in the new ocean climate. However, West Hawai'i's reefs are not currently in such a state and are not well prepared for repeated marine heatwaves from an herbivore fish standpoint.	Your comment has been forwarded to the decision makers.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson,	HI	1/3/2020	Beyond marine heatwaves, development in West Hawai'i has rapidly expanded over the past two decades, resulting in numerous additional stressors to the reef ecosystem (Gove et al. 2019). These include nitrogen-rich effluent from both commercial and non-commercial wastewater discharge and over-fishing. In 2017, West Hawai'i released a total of 680 million gallons of effluent per year and a total of 400,000 pounds of nitrogen per year (Gove et al. 2019). A recent study of the shallow water fishery indicated that the two main sources of resource fish decline from 2008	<p>Your comment has been forwarded to the decision makers.</p> <p>The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium</p>

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Roberta Martin and Christopher Balzotti)			to 2018 (including four species on the aquarium White List) are nitrogen-rich effluent from onshore disposal sites and commercial fishing. Importantly, non-commercial fishing was not correlated with observed long-term declines in fish biomass in shallow water habitats (Foo et al. in review; available upon request). Only commercial fishing was statistically linked to herbivore fish declines.	fishing for all but one species, indicating that aquarium collection is not driving the decline. The commenter mentions an unpublished paper (Foo et al.), but it is not mentioned whether this analysis included commercial aquarium collection, or only other forms of commercial fishing (i.e., food fishing). The EIS relied on publicly-available data and literature available at the time of publication.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	In accounting for the new ocean climate regime with an increasing number of regional stressors, it has become clear that a new approach to the management of coral reefs in West Hawai'i, including the interactive role of herbivore fish and corals, is paramount to their near- and longterm survival. Whether the aquarium industry can guarantee that herbivore fish biomass levels remain above the critical 250 kg per hectare threshold is highly unlikely, but such levels of management will be needed moving forward to ensure that West Hawai'i reefs remain intact and biologically productive.	Your comment has been forwarded to the decision makers.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	PART II: FISH RESOURCE TRENDS AND REPORTING Assessment based on inadequate data coverage of West Hawai'i The DEIS utilizes two different datasets to estimate fish populations along the west coast of Hawai'i Island: (i) Division of Aquatic Resources (DAR) West Hawai'i Aquarium Project (WHAP) surveys and (ii) NOAA Coral Reef Monitoring Program (CREP) surveys, which we will refer to as WHAP and CREP to distinguish between the two survey types. The WHAP surveys represent the same 25 study sites surveyed annually from 1999 to 2018. These WHAP sites were originally established to monitor different protection levels – Marine Protected Area (MPA), Fish Replenishment Area (FRA), and Open or unprotected – in order to determine the effectiveness of protected areas on aquarium fish species. The WHAP data are not spatially representative of West Hawai'i because they are not taken from randomly selected sites. In fact, the majority of the survey sites lie within marine managed areas and thus WHAP surveys likely do not accurately represent fish populations across all of West Hawai'i, especially since FRAs and MPAs have very limited coverage (Figure 3, which is Figure 4 in the DEIS, page 79). The CREP data, on the other hand, represent randomly distributed fish surveys of Hawai'i Island, with 257 survey locations measured between 2010 and 2016. To ensure better representation of fish populations across West Hawai'i, both datasets	Your comment has been forwarded to the decision makers. The WHAP and CREP surveys are described in Section 4.4.7 of the EIS. The WHAP data used in the EIS come from all three types of areas (open areas, FRAs and MPAs), but the population data are restricted to the Open Areas. Both datasets are used in the analysis for the EIS: WHAP data to discuss population trends and CREP data for analyzing impacts on populations. In addition, while the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring, has been added as Appendix B of the FEIS for comparison purposes.

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			should be considered equally. A strength of the WHAP surveys is that, because they are permanently monitored sites, the data can be used to track changes over time, but the fact that the data from these sites are not representative of West Hawai'i is not discussed in the DEIS. A comparison of the WHAP and CREP data is essential to document the ecological status of fish populations of West Hawai'i and needs to be included in the DEIS.	
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	The DEIS report bases the majority of its estimations using the WHAP surveys, even while acknowledging in the executive summary of the report that the CREP data are more representative: "Both data sets are presented and analyzed in this DEIS. However, due to the larger spatial coverage and greater range of depths surveyed by CREP, these data are a better estimator of island-wide fish population size, and therefore serve as the primary basis for the impact analysis in this DEIS." Herein lies the first problem with the data cited in the DEIS: The authors acknowledge the shortcomings of the WHAP surveys yet base the estimations and justifications for aquarium fishing limits mainly on the WHAP surveys.	Your comment has been forwarded to the decision makers. Conclusions regarding population impacts in the EIS are based the CREP population estimates. WHAP data are used for population trends. In addition, while the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring, has been added as Appendix B of the FEIS for comparison purposes.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	The DEIS presents the trends in fish biomass for the WHAP permanent monitoring sites, summarized as percentage increases and decreases in fish biomass between the start and end of the monitoring time (Table 1, which is Table 5-4 in the DEIS, page 99). On the other hand, the DEIS only reports 2016 CREP surveys for each aquarium fish species, although surveys from 2010 to 2018 do exist and were available to the DEIS authors. The DEIS should present both datasets similarly to understand if the same trends in fish populations seen at the WHAP long-term monitoring sites also agree with the island-wide CREP surveys.	Your comment has been forwarded to the decision makers. As noted by the commenter earlier in their report, "a strength of the WHAP surveys is that, because they are permanently monitored sites, the data can be used to track changes over time". Thus, these data were used to analyze population trend data. At the time of the data request, the only population data provided to the Applicant by CREP were the 2016 population estimates. Population estimates from other years were not provided.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and	HI	1/3/2020	Presented here in Figure 4 and Table 2, we have calculated the average number of aquarium species counted across surveys for each year of CREP data to facilitate the comparison with the WHAP data that was left out of the DEIS. Comparing Table 1 (Table 5-4 from the DEIS), and Table 2 provided here, CREP data show moderate overall changes in fish abundance, as well as important decreases in species abundances, which directly contradicts results from the WHAP data alone, which show mostly large fish abundance increases in protected areas. The DEIS had equal access to the CREP data yet decided not to provide these summaries. It appears that the DEIS data have been targeted to show only large increases in fish biomass.	Your comment has been forwarded to the decision makers. The analysis presented by the commenters is not useful without a test of statistical significance, which the WHAP data provide, indicating whether changes in abundance are significant or not. Without a test of significance or inclusion of confidence intervals, it is impossible to tell whether these estimates are actually changing from year to year. Additionally, as stated above, the only population data available to the Applicant by CREP at the time of the data request were the 2016

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Christopher Balzotti)				population estimates. Population estimates from other years were not provided.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Note also from Figure 4 that there exists enormous variation in annual patterns of fish abundance. It would be more appropriate for the DEIS to consider annual trends rather than differences between the start and end of surveys, to assess whether long-term increases or decreases in fish populations occur or not.	Your comment has been forwarded to the decision makers. The analysis presented by the commenters is not useful without a test of statistical significance, which the WHAP data provide, indicating whether changes in abundance are significant or not. Without a test of significance or inclusion of confidence intervals, it is impossible to tell whether these estimates are actually changing from year to year.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	There is also a multitude of reports of West Hawai'i fish biomass provided by the Division of Aquatic Resources, available online at https://dlnr.hawaii.gov/dar/reports/ . For example, one report by Walsh et al. (2018) presents the continued, long-term decline of coral reef biota and associated fauna at key sites in West Hawai'i. This report notes major declines in fish abundance between the two survey periods, ranging from a slight relative decline in Yellow Tang (-9%) to an enormous decline in Achilles Tang (-97%); Both are two key aquarium fish species. The report also includes information on aquarium fish abundance. Table 3 below (Table 6 in Walsh et al. 2018) shows major declines for most aquarium fish species. Here, the top ten most collected aquarium fishes declined at both sites, except for Yellow Tang, and that aquarium fishing likely contributed to these declines. It is also stated that additional aquarium fish species are not included because of extremely low abundance and the inability to make any meaningful conclusions on changes in abundance over time.	Your comment has been forwarded to the decision makers. The Walsh et al. (2018) report that the commenter cites does state that 8 of the top 10 most collected aquarium species have declined at the two study sites. However, it also goes on to point out that both study areas in the report were protected from commercial aquarium collection with a varying duration, that 8 of the top 10 most common resource fish species (i.e., food fishes) also declined, and that 7 of the top 10 fish species not targeted for food or aquarium purposes also declined.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and	HI	1/3/2020	Shallow water resource fish surveys from 2008 to 2018 conducted by DAR include four aquarium species. These data show very different trends in aquarium species population dynamics, all with much less biomass in 2018 in comparison to 2008 (Figure 5). As also seen in Figure 4, annual trends differ greatly, and whether a population is increasing or decreasing depends on which years are being compared. As discussed earlier, we advocate for the inclusion of annual trends in the DEIS to determine truly whether a species is increasing or decreasing over time.	Your comment has been forwarded to the decision makers. Population trend data are included in the EIS, but are limited to the 1999/2000 to 2017/2018 range, as that is considered most representative of the current conditions in the WHRFMA, since it coincides with the creation of the WHRFMA and the resulting regulations that have been put in place. Analyzing trends for populations that occurred prior to some of the existing regulations (FRAs, MPAs, etc) is not relevant, as all of these regulations positively impact populations would continue under any of the alternatives under consideration.

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Christopher Balzotti)				The data presented in Figure 5 of the comment again do not have confidence intervals, which makes not possible to determine if differences in abundance between years is statistically significant. The DAR (2019a) reported that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Changes in aquarium fish populations differ between survey types, locality, and by which years are compared. We have presented two other datasets that show contrasting patterns to those presented in the DEIS. The DEIS should provide summaries of population dynamics for both CREP and WHAP data, as well as an analysis to assess whether individual species agree in the annual population trends observed across both datasets. It is crucially important to assess whether the WHAP long-term surveys at the 25 permanent monitoring sites show the same population patterns as those reported in CREP surveys. This will be key to determining whether the effects of an aquarium ban have only been effective locally, or across all of west Hawai'i.	Your comment has been forwarded to the decision makers.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	If aquarium fish species show both a clear increase in abundance through WHAP's different management systems and also increases in abundance in the CREP surveys, an alternative to the proposed aquarium fishing plan could be a greatly reduced White List with strict limits on catch of certain fish species. If no data or not enough data exist, a species should not be included in the white list.	Your comment has been forwarded to the decision makers.
ASU Center for Global Discovery and Conservation Science	HI	1/3/2020	Fish populations are extremely variable in time and space depending on reef rugosity, depth, temperature, currents as well as population dynamics such as season, mortality and recruitment. Consideration of the full body of scientific literature available for West Hawai'i and then a systematic analysis is needed, instead of basing catch limits on 25	Your comment has been forwarded to the decision makers.

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(Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)			sites across the west coast. Cherry-picking scientific findings to support aquarium fishing will, in the end, lead to poor outcomes for the most extensive reef system in Hawai'i.	
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Assumption of connectivity of fish populations across West Hawai'i The DEIS uses invalid estimates of percent catch from the aquarium trade to evaluate the impacts of alternative actions. In particular, the DEIS claims that percent catch (Table 4, which is Table 5-11 from the DEIS) should be based on island-wide population estimates for each species because "There is evidence for connectivity between FRAs and Open Areas around the island of Hawai'i (Christie et al. 2010)." This is incorrect: while neighboring FRAs and Open Areas may display high connectivity, the entire island of Hawai'i does not, and limited connectivity exists between East and West Hawai'i. The DEIS misinterprets Christie et al. (2010), which demonstrates connectivity across South/West Hawai'i. Past studies using drifters, larval sampling, genetic analysis, and oceanographic modeling indicate high local retention of larvae in West Hawai'i (Christie et al. 2010; Lobel 2011; Vaz et al. 2013). Critically, and as a result of this major error in the DEIS, the report's percent catch is erroneously low. It should be based on relevant West Hawaii Regional Fishery Management Area sub-populations considering the realistic home ranges of each species, not on island-wide populations.	Your comment has been forwarded to the decision makers. The language in the EIS regarding the Christie et al. (2010) paper has been edited to clarify. While the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring, has been added as Appendix B of the FEIS for compariso purposes. In addition, the population trend data used in the EIS is specific to the WHRFMA.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	The DEIS also fails to consider that connectivity between FRAs and Open Areas is not absolute. Some areas are more connected than others based on the strength and direction of ocean hydrodynamics (Vaz et al. 2013). Additionally, the DEIS does not mention where fishing will be allowed—if fishing occurs in "upstream" areas that are sources of fish larvae for downstream reefs, this can heavily deplete downstream fish stocks across large areas (Crowder et al. 2000). Lastly, referring back to Figure 2, we can see great variability across the different MPA types and across all of West Hawai'i. The DEIS assumption that fish connectivity is high is flawed.	Your comment has been forwarded to the decision makers. As stated throughout the EIS, commercial aquarium collection in the WHRFMA will only occur within the "Open Areas" under any of the alternatives under consideration. Figure 1 of the EIS shows the marine managed areas where collection would not be allowed.
ASU Center for Global Discovery and Conservation	HI	1/3/2020	To evaluate the Preferred Alternative, the DEIS compares its aforementioned, invalid percent catch estimates to a study by Ochavillo and Hodgson (2006) that itemized Total Allowable Catch for reef fish species in the Philippines—species that do not correspond to	Your comment has been forwarded to the decision makers. The sustainable thresholds provided by Ochavillo and Hodgson (2006) represent the best available science regarding sustainable harvest of

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Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)			Hawai'i's target aquarium species. However, Total Allowable Catch must always be based on the unique growth and mortality rates and reproductive traits of target species, in this case, for those in West Hawai'i, not on non-target species in a distant region. It is an irresponsible false equivalency to base wide-reaching policy decisions on "rules of thumb" for non-target species. In sum, a complete evaluation of the life histories and sustainable catch limits of West Hawai'i's target species should underlie this DEIS, weighed against percent catch of relevant, connected populations.	species with simialar life histories to those harvested in Hawai'i, as specific thresholds for the 40 White List Species (or for Hawai'i) are not available. Nevertheless, as concluded in the EIS, collection under the Preferred Alternative is below 2% for all 38 of the White List Species for which population estimates are available, and therefore below the lower limit set by Ochavillo and Hodgson (2006).
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Data analysis is incomplete and insufficient to support DEIS recommendation In addition to the lack of and bias-selected data cited in the DEIS, the only statistical analysis presented are simple t-tests. The DEIS makes major claims and states multiple times that commercial aquarium fishing is not driving a decline in fish biomass or coral cover. However, the DEIS fails to back up these claims with statistically valid analyses. The DEIS fails to account for confounding variables, biases, tests of the strength and direction of relationships – critical factors that are not captured by bar and line graphs. For example, a generalized linear mixed model considering the abundance of specific aquarium fish species, and the collection of aquarium fish (with year and site as random factors), would show more conclusively whether aquarium fishing impacts fish abundance.	Your comment has been forwarded to the decision makers. The analysis on population trend data was conducted by the DAR, and is cited as such throughout the EIS. The Applicant does not have this raw data in order to conduct an independent analysis such as a generalized linear mixed model.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	The DEIS biases its selection and use of data to very specific indicators of fish biomass, particularly from Gove et al. (2019) – a comprehensive report on West Hawai'i. Specifically, the DEIS states from this report that herbivore biomass increased more in open areas than in FRAs (page 116, 139, 140 of DEIS). However, this was not a significant finding (J. Gove, NOAA, Pers. Comm., Gove et al. 2019) and is one of the instances that the DEIS vacillates between using statistical significance to support their messaging in some cases and then dismisses statistical significance in other instances.	Your comment has been forwarded to the decision makers. The EIS specifically states in Section 5.4 that the change has not been significant, but that there is an increasing trend.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	Most importantly, if we examine the fish indicators from Gove et al. (2019), specifically Total Fish Abundance, Total Fish Biomass, Mean Adult Fish Length, and Juvenile Yellow Tang, each indicator had significant increases that were greater in FRAs compared to Open Areas from 2003 – 2017. This directly contradicts what was stated in the DEIS to support their statement that aquarium fishing does not impact fish abundance. These data that were specifically ignored from Gove et al. (2019) strongly contradict the	Your comment has been forwarded to the decision makers. The commenter suggests that four indicators are significantly greater in FRAs compared to Open Areas. However, based on Table 2-2 of Gove et al. (2019), that is incorrect. Total fish abundance and total fish biomass were not statistically different. The only fish indicators in Gove et al. (2019) that were significant between FRAs compared to Open Areas were adult fish length (11.8% longer fish in FRAs

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Carlson, Roberta Martin and Christopher Balzotti)			argument that aquarium fish collection had no impact on the fish community.	compared to Open Areas), juvenile Yellow Tang (90.2% more in FRAs compared to Open Areas), and species richness (which was 9.5% less in FRAs compared to Open Areas).
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	A failure to utilize other highly-available datasets for Hawai'i will result in inaccurate estimates of fish populations upon which the DEIS bases its claims. Misrepresentation and selective use of science is dangerous and has the potential to harm Hawaiian ecosystems. These very basic tenets of scientific analysis have not been considered properly in the DEIS.	Your comment has been forwarded to the decision makers.
ASU Center for Global Discovery and Conservation Science (Gregory Asner, Shawna Foo, Rachel Carlson, Roberta Martin and Christopher Balzotti)	HI	1/3/2020	<p>III. CORAL REEF DAMAGE</p> <p>The DEIS makes several broad and unsubstantiated claims that aquarium collection does not negatively impact the reef ecosystem. However, a large body of scientific study indicates that making contact with the reef, especially its corals, generates major negative impacts on all aspects of reef condition (Rubec et al. 2001; Barclay and Berkes, 2017; Nichols et al. 2018; Gove et al. 2019). The question then becomes whether or not aquarium fish collectors make physical contact with the reef via their equipment and their bodily movement.</p> <p>Reports from the public and the conservation community broadly point to common and persistent issues of aquarium collector contact with the reef. Our scientific observations of areas frequented by collectors also indicate areas of increased smashed coral, "troughing" for mesh fencing, staking, and finning. Hard data are challenging to generate since the aquarium industry maintains a semi-clandestine culture and does not offer opportunities for third-party oversight. Nonetheless, numerous photos have been taken of aquarium collector methods in West Hawai'i, which reveal divers making direct contact with live corals. The photos below provide a few examples taken from West Hawai'i embayments.</p> <p>The DEIS makes no recommendations regarding third-party oversight of collector activities, and goes as far as to suggest that there is no impact from collection on corals or reef structure. Physical, biological,</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenters cite anecdotal "reports from the public and the conservation community". The EIS cites Tissot and Hallacher (2003), who statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference. However, language has been added to the EIS to stating that "it is possible that coral could be inadvertently damaged by an anchor or during collection".</p>

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			and chemical damage needs to be documented and prevented. Mitigation of reef damage after it occurs has proven to be both financially prohibitive or ecologically unviable (Jokiel and Naughton 2001). Prevention is the only scientifically and financially sound pathway, either by strong in-situ oversight of the industry or via banning of collections.	
Barbara Steinberg	N/A	1/5/2020	Here are some of my children and adult students art to back my opposition to the aquarium trade . I sent my opposition email minutes ago and now I'm sending this art work under separate cover	Your comment has been forwarded to the decision makers.
Barbara Steinberg	HI	1/5/2020	I am a maui resident for 35 years and a voter that long . I oppose the aquarium trade. For 10 years I've taught animal kindness club art class to children age 6-16 and they always paint Hawaii's tropical fish and we all oppose the aquarium trade for future of Hawaii and future generations.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.
Beth Hird	HI	1/5/2020	Extinction is forever—it's that simple. It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade. Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting. The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood. But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills,	Your comment has been forwarded to the decision makers. The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/

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			<p>because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. I implore you to do the right thing</p>	
Beth McDermott	HI	11/25/2019	<p>I write in firm opposition to any new aquarium fishing permits being issued for West Oahu [commenter sent a correction that they meant West Hawai'i].</p> <ol style="list-style-type: none"> 1. CLIMATE CHANGE Our islands just saw another serious bleaching event this summer which persisted with warmer than average ocean temps through the fall and winter. This is expected to continue and worsen in the years ahead. Our reefs are struggling under unprecedented pressure right now, and for the foreseeable future, with global warming ramping up bleaching, ocean acidification, and more frequent and intense storms. This is not the time to be taking fish off our reefs, fish that contribute to keeping our reefs healthy. 2. OVERTOURISM Our reefs also suffer from overtourism, with record numbers of tourists trampling our reefs, and coating and killing our reefs with toxic sunscreens. While some bans have been enacted on wearing sunscreens with ingredients like oxybenzone that we know cause damage, most visitors arrive with their own sunscreen and have no awareness of any ban. More people in the water means more harm to our fish and corals. 3. OCEAN PLASTIC Recent reports revealed that even the tiniest fish are consuming masses of plastic waste, micro plastics that mimic plankton and other foods. Their health and survival are now endangered in ways we can't foresee yet. 14 commercial fishers out grabbing fish, causing stress and upsetting feeding patterns is not what our marine keiki need right now. 4. LACK OF ENFORCEMENT You can set all the bag limits you want, for yellow tang or other species, Fact is the state has proven unable to enforce these limits. Aquarium fishing often happens on weekends or at night when no one is watching. I've spoken personally to commercial aquarium fishers who told me they intentionally go out at night to avoid scrutiny. Without the capacity to enforce limits a permit becomes essentially permission to raid our reefs. 5. NOT A NEED Aquarium fishing takes fish purely for decoration, The vast majority of these fish die in transport and./ or have their lives cut short swimming endlessly in tanks that poorly replicate their ecosystem or meet their needs. These fish are not providing sustenance to families that survive on fish for food. This is purely for fun. With all the stress our fish are under now commercial aquarium fishing seems to me the place to cut back. Researchers are learning to 	Your comment has been forwarded to the decision makers.

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			<p>breed certain fish in captivity. While I'm not a fan of that either this would be preferable to raiding our reefs.</p> <p>I grew up in Hawaii, live on Oahu currently, and my parents lived on the Big Island for 11 years. I spend nearly every weekend snorkeling and diving and have seen first hand the deterioration of our reefs and drop in fish species. Please DO NOT issue 14 new aquarium fishing permits for West Hawaii.</p> <p>Thank you for the opportunity to comment.</p>	
Betty White	WA	1/7/2020	<p>Please do not issue any more Permits for Fish Collections....</p> <p>I worked on the Spirit of Adventure dive boat off Kailua Kona in 1978. I returned as a passenger in 1985 and saw a huge difference underwater.</p> <p>My brother, sister and I went to Hawaii in 1985 and went out on the Body Glove Hawaii boat.</p> <p>I was devastated by the lack of fish and the terrible condition of the coral...</p> <p>Issuing more Fish Collections permits will only make the situation worse...</p> <p>It appears to me that Hawaii cannot continue to be a dive destination if even more fish are gone.</p> <p>PLEASE do not issue any more permits....</p> <p>Thanks for your time</p>	Your comment has been forwarded to the decision makers.
Bill Coney & Dr. Sussanne Otero	HI	1/7/2020	<p>My name is Bill Coney, I am the co-founder of Legacy Reef Foundation, based on the Big Island at NELHA. We are a privately funded coral preservation and restoration lab dedicated to protecting and restoring our coral reefs here in Hawaii and around the world. I grew up here in Hawaii and have for over 50 years been actively involved in Hawaii's coral and marine life. After a long and successful career as a business entrepreneur, I retired 7 years ago and I decided to open the foundation. We now have some of the best scientists in the world working with us and I feel I have a good understanding of situation with the aquarium trade and its impact on our reefs.</p> <p>First, let me say I am pro-business and would never want to stifle any one's ability to make a living. Having said that, finding a balance</p>	Your comment has been forwarded to the decision makers.

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			<p>between the collector’s interest and the coral reefs that supports their trade is key to the long term success of the aquarium trade. Proper limits need to be set and enforced. One option would be to have the state give out, or sell, a preset number of “AQ fish catch certificates” (like tax stamps on alcohol and cigarettes). These certificates could be given to the collectors monthly that specify what and how many organisms can be collected and shipped off island . This is a simple and easy to implement system that allows them to collect and earn a living and while creating a “managed” fishery. Compliance is critical to the success of any program, and this system facilitates enforcement. Your agency could task the shipping entities to ensure every shipment has a “AQ fish catch certificate” before they can accept and ship them. Large fines for allowing noncompliant shipments should keep the shippers in line. Since there are only a few companies that ship fish the burden on the state would be manageable.</p> <p>I would suggest waiting two years to develop the “AQ fish catch certificate” program. This would give the corals some time to recover from the recent bleaching event. Our corals health depend on those same aquarium trade fish to recuperate and stay healthy. This year they are so stressed now, and we expect another bleaching event next summer. Our fear is if the coral losses any of the herbivores that keep them alive in the next year, the chances are high we will lose all our coral. They really need another 2 years to be safe. Without the corals to house, feed and act as nurseries , the aquarium fish will be endangered. Giving the ecosystem two years more years to stabilize, and time to establish a responsible and business friendly program, will result in Then an acceptable equilibrium between collectors and the reef that supports the fish of their trade, and all stakeholders win.</p> <p>Thank you for considering this as an option. Please feel free to contact use with questions or assistance in building this program,</p>	
Bob Curran	N/A	1/7/2020	Being a past Dive Charter operator, I may be biased. What is Hawaii thinking by still allowing fish collection in 2020? Look around the world. Even 3rd world countries have buoy anchorage systems in place and don't allow fish collection. Please help protect what's left.	Your comment has been forwarded to the decision makers.
Bob Flatt	N/A	12/13/2019	<p>1) The EIS contains disingenuous use of averages. For example "% of their overall island of Hawaii populations", the sample population size is arbitrary, why not local (collection area) populations (that would look overly extractive) or Pacific populations (that would look obviously misleading).</p> <p>2) The EIS contains disingenuous use of generalities "minimal impacts on populations in general". Nicely hiding that aquarium collecting is an economic activity biased towards higher priced (less common) species. The decimation of uncommon species does indeed have little short term impact on the population in general, but destroys species</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the FEIS maintains that the CREP population offers the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring under the Preferred Alternative, has been added as Appendix B of the FEIS for comparison purposes.</p>

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			<p>diversity - a key indicator of ecosystem health.</p> <p>3) As a society we try to limit anthropogenic stresses on the reef, such as pollution. It would be inconsistent to allow an anthropogenic stress such as fish collection. If a polluter said the pollution is only 1% of what they could pollute we would not accept this as a justification, if a fish collector says it is 1% of what they could collect we should not treat this as a justification.</p> <p>4) No Aquarium Permits is the only practical solution.</p>	
Bobbie Best	HI	1/6/2020	<p>Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. This is for the environment, tourists, locals & being pono.</p> <p>People are watching closely and will not relent on this issue!</p>	Your comment has been forwarded to the decision makers.
Bruce Cohen	N/A	1/7/2020	<p>Please. Do not allow our reef fish to be removed for commercial fishing interests. They are our precious resource and belong to all of us who call the islands home. Visitors want to see them as well. Healthy and abundant. The fish they desire can be found nearby uninhabited islands as well. They should go there.</p>	Your comment has been forwarded to the decision makers.
Carol Lynn Anderson	NC	1/7/2020	<p>As you are probably aware, The Pet Industry Joint Advisory Council has submitted an environmental impact statement "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem"! I am aghast at that statement - when everywhere we have continued to prove that our "use" of the wild has ended miserably and not just for them- but for US too. According to what I read, "Hawaii is expected to lose 70% of their coral reefs in the next couple of decades. There is not time nor reasonable cause for the aquarium industrysponsored justifications for raiding the reefs.</p> <p>Your native fishes and reefs deserve effective legal protection, and should be left wild. Please do all and everything you can to ensure that legal protection is given to this majestic area and its inhabitants.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter incorrectly states that the EIS surmises "that the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem". The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative</p>

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				would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.
Charles Humphrey	HI	1/7/2020	<p>I am writing this letter to oppose the aquarium fishing trade in West Hawai'i.</p> <p>For many years of my life I kept marine fish as pets and also worked at a fish store which specialized in marine corals and fish. I can tell you from first hand experience that most of the fish that are shipped off the reefs die premature deaths. Even if the fish survive the shipment process, many are not adequately cared for by the individuals that buy them.</p> <p>I do support marine fish and coral aquaculture which has made many break throughs in recent years. It is my belief that the marine fish and coral industry needs to move in this direction and create jobs through aquaculture and not through harvesting wild marine fish and coral.</p> <p>As an avid snorkeler here in West Hawai'i, I can say without a doubt that the collection of marine fish species would have a deleterious impact on our coral reefs. As an example, a popular aquarium fish, Arothron meleagris, the spotted or guinea fowl puffer, doesn't appear in large numbers on our reefs. When my wife and I snorkel for a few hours over a reef we may see one. Should a commercial aquarium company remove that one puffer from the reef, it would leave a huge hole in that ecosystem. Each species plays a part and is integral to the health of the reef.</p> <p>My wife and I worked for Sea Shepherd Conservation Society and so we have seen this issue play out in many other countries around the globe. If Hawaii does not protect its reefs and the creatures that inhabit it, tourism will soon wane. I have snorkeled extensively in the Caribbean and I have seen coral reefs that have been devastated by overfishing and a lack of protection. Once the fish are gone, the corals suffer and the algae takes over. Once the algae takes over it becomes an alternate stable state, and the reef cannot recover.</p> <p>It is my sincere hope that no fish collection permits will be issued for West Hawai'i, or at any reef in the Hawaiian Island chain. Our reefs are delicate enough with the pressures of climate change, and removing key species from our reefs would only precipitate their demise.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p> <p>The guinea fowl puffer is not one of the 40 species on the White List of species that can be collected under aquarium permits in the WHRFMA and is not proposed to be collected under any of the alternatives considered in the EIS.</p>
Charmaine Campbell	Canada	1/7/2020	Each species removed disrupt this ecosystem that is maintained by these species. Eventually, if there is no protection it will collapse The web of life is disrupted enough by ocean warming with coral reefs dying right now in Hawaii waters. The vanity of aquarium fish hunters collapsed many species in Amazonian waters This industry is fueled by ignorance, vanity. Capturing these species that are in Hawaii waters may bring a money flow to some, there is no value in captivity except	Your comment has been forwarded to the decision makers.

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			for those who profit from this. Captivity, containment, and removal from waters where these species were born and adapted to subjects fish species to stress, for the ones that survive. removes the genetic pool from the natural environment. It will leave what reefs that are left in jeopardy and cause a collapse of the natural ecosystem which is valued much more for the natural beauty, even more than the aquarium trade. When you become aware of the biology and interdependence of these species remaining intact then you will understand that profiting by removing certain species will result in a serious impact on the entire ecosystem. and perhaps the eventual extinction of these species. It is disheartening to know that you support this in your position.	
Chris Mentzel	N/A	1/7/2020	The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue!	Your comment has been forwarded to the decision makers.
Christina (last name not provided)	N/A	1/7/2020	I am writing to say that I think that working on repairing & building up healthy coral reefs is MUCH MORE important than supporting the aquarium fishing industry. If we continue to take and damage and not replenish then in the future this will be a moot point because we will have no reef or fish left. I do not think ANY aquarium collecting permits should be issued until our reefs ecosystem is fully replenished to a point of over abundance. Any taking before that point will be harmful. Thank you for taking time to read and consider this.	Your comment has been forwarded to the decision makers.
Christine Collins	N/A	1/6/2020	Please make protecting Hawaii's native fishes a priority and grant them the legal protection that they deserve. "Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" - Maxx Phillips, Hawaii director with the Center for Biological Diversity.	Your comment has been forwarded to the decision makers.
Cindy Whitehawk	HI	1/8/2020	It took years of individuals concerted efforts to stop the raping of our ocean by the pet fish aquarium industry. I have only lived here 14 years and have witnessed the decrease in our reef fish. Please do not give in and re-open our waters to the aquarium fish trade.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.

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Cindy Williams	HI	1/6/2020	As I witness the decline of beautiful fish in the Hawaiian waters over the last 2 decades, my belief is that the fish need your help. People who profit from this industry can have guppies and other fish that reproduce well and aren't wild-harvested. It is your hands to protect the beauty and diversity of our tropical fish, and I urge you to please help. The DLNR needs to be directed to care for and protect our national treasures and preserve the fish for future generations of kama'aina and tourists to enjoy. Please help!	Your comment has been forwarded to the decision makers. It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.
Claudia Kane	HI	1/6/2020	I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish.	Your comment has been forwarded to the decision makers.
Connie Rohal	N/A	1/5/2020	<p>Most people of Hawaii, and the millions of people from around the world that visit our most unique and amazing state, are worried about the health and viability of our reefs.</p> <p>The reefs are suffering. There are many reasons why. Some are out of the control of one person to fix, but there is one reason that one person can affect, and that person is you.</p> <p>You are a smart man, Governor Ige, so you know I am talking about shutting down the aquarium trade people.</p> <p>Your constituents depend on you to do what is best for the state. To do what will ensure a healthy ocean for the livelihood of all who live here and also for those who spend millions and millions of dollars to come here and enjoy the biggest draw our state has to offer, our island reefs.</p> <p>I appeal to your love of the state and your desire to do the right thing, to stop the ravage of the reefs. The reefs will not survive without the fish and without the reefs our biggest tourist attraction will disappear along with the tourists.</p> <p>The state is not benefiting from the aquarium trade and it is not in our best interest.</p> <p>When the fish are gone, and the aquarium trades people you are working to protect move on to other Polynesian islands...when our reefs are dead and barren because the fish have been scooped up and shipped away, when tourism declines, and the livelihood of Hawaii's people is impacted, they will look to you and ask why you didn't stop it when you had the chance.</p> <p>This is your time Governor, to make a difference, to impact in a most</p>	Your comment has been forwarded to the decision makers.

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			<p>positive way, the future of Hawaii's tourism, and the future of the aina and kai, and to live up to the righteous way that you swore to uphold, according to our state motto "Ua Mau ke ea o ka Aina i ka pono." The eyes of the people of your state look to you to stop the destruction of the reef caused by aquarium trade desperados.</p> <p>Do not be misled, manipulated or fall for the smoke and mirrors of the PIJAC. When you entered politics, did you want to serve the people, make a change, make a difference? Be that guy, Governor, be the hero you always wanted to be. Let your legacy reflect you took a stand and did the right thing, for your people and the land of your birth.</p> <p>Please stop the aquarium trade. Please stop every advantage they currently have.</p> <p>Please end this wanton destruction to our reefs once and for all.</p>	
Corina Young	HI	1/5/2020	<p>Extinction is forever—it's that simple.</p> <p>It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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			<p>collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. I implore you to do the right thing.</p>	
Corina Young	HI	1/5/2020	<p>Extinction is forever—it’s that simple. It’s my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It’s a devastating commercial enterprise that trashes near-shore habitat and species. Don’t export Hawaii reef wildlife to feed the mainland aquarium trade. Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It’s truly heart-breaking. Many factors conspire in this tragedy. Maybe we can’t combat global warming locally. But we bloody well can put a stop to aquarium collecting. The so-called “Environmental Review” consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii’s DLNR (to that department’s shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood. But where is the traders’ credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii’s taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. I implore you to do the right thing.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC’s Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>
Cory Bee	N/A	1/6/2020	<p>Please protect the native fish from being depleted largely from the actuarial industry. Thank you</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between</p>

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				1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Cyndy Urry	N/A	1/6/2020	<p>I was asked to write to you concerning fish collection in Hawaii. I thought that the ban on fish collecting was still in effect, but several people have contacted me saying that it was coming up for discussion again. Already? It hasn't been very long since the ban went into effect and it took years to get it passed. There must be some fish collectors pressuring someone to let them have free rein on our poor reefs. I am a longtime resident / scuba diver and I have seen a few more yellow tangs that were very much depleted just a couple of years ago. They are trying to come back but the numbers are still low. There are still so many endemic species that we don't even see anymore. We desperately need our algae eaters as with the coral bleaching we had this year (we really dodged a bullet with our rain we got that cooled the water temps just enough) . I swim, snorkel , and dive the whole west side of Hawaii Island (with several others) . Our waters here are the best in the state for scuba diving and snorkeling . People that are relying on the businesses around the waters are seeing less fish also. Please don't let a few greedy fish collectors ruin the reefs for everyone . We need at least 10 more years of untouched reefs to get back to our old Hawaii. There is poaching going on too and we realize that the DLNR can't be everywhere .</p> <p>We are so far removed from the rest of the world that we can't replenish our fish like they can in Indonesia . Help us save what we have because once it's gone, there's nothing at all we can do. If I can help you in any way , don't hesitate to call on me.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The October 2017 supreme court ruling was that a HEPA review needed to be completed before Aquarium Permits could be issued, not a permanent ban on commercial aquarium collection. This EIS is fulfilling that requirement for 10 Aquarium Permits.</p> <p>An analysis of the cumulative impact of poaching and underreporting has been added to the FEIS.</p>
Cynthia White	OH	12/18/2019	NOTE: Comments were omitted from email but the email subject line is: SUPPORT ENVIRONMENTAL IMPACT STATEMENT IN HAWAII and the email body includes 'Dear Terry Vandewalle' and ends with identification of commenter.	Your comment has been forwarded to the decision makers.
Dan Dolaptchieff	HI	1/8/2020	<p>Im a liscensed tropical fish collector. It unconstitutional for only 14 persons to fish that water in west hawaii, I have fished. On Big island for most of my 28 years here for tropical fish in west hawaii and on hilo side.</p> <p>My Boat shop burnt down in 2006 due to Mac. Nut opperation next door. I was diving west hi att. I had to sell my house and move to east side , it was all i could afford with my family.</p> <p>I was eagerly waiting for the west side to open so i could make a good living again. I could never afford to give the 14 guys 20 k to help with</p>	Your comment has been forwarded to the decision makers.

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			<p>the lawsuit. I did give funds to PIJAC. (Im a disabled Veteran) I humbly request that the council looks at my situation and acts appropriately. U would be excluding many already liscensed trop divers allready Living and working on the big island. Not a very good situation. How can a small group of fisherman have exclusive rights to fish one area. What is the hawaian trop divers gonna say? Descrimination against hawaians?</p>	
Dan Lanterman	HI	12/2/2019	<p>Aloha. Please note my strong disapproval of any commercial reef fish collection in Hawaii. There is no justification in satisfying a very small minority (collectors) at the expense of the remaining residents of Hawaii, not to mention the ecological damage the collectors have done.</p>	Your comment has been forwarded to the decision makers.
Dan Lanterman	HI	12/2/2019	<p>Please note my strong disapproval of any commercial reef fish collection in Hawaii.</p>	Your comment has been forwarded to the decision makers.
Dan Swenson	N/A	1/7/2020	<p>Please, if it is in your power, do not go along with the commercial exploitation of this limited beautiful resource. I have lived here in West Hawaii for 15 years and have seen the drastic decline of reef fishes here. Please do not allow the decimation of this beautiful resource, for the financial benefit of the commercial fish industry. The fish count is just too low and too slow to recover from this kind of threat.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Dane Enos	N/A	1/7/2020	<p>Howz it aloha everyone my name is Dane many in the business know who I'm those new divers will know who I'm by the end of this evening.. Before we begin I'd like to bring the public's attention to exactly who these divers are and some of the pet shops that are buying these fish... Names: I've seen a lot of divers come and go...most leaving damaged reefs and pure destruction in their methods... Ahh the New divers This is where problems began and has changed our reefs forever. During my time or tenure as a collector I would consistently catch 200 to 400 yellow tangs several times a week. I've caught as many as 2000 yellow tangs in a day...I've caught tons of variety... for public knowledge variety is any fish but the yellow tangs... These numbers are excessive, alarming and frightening.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>

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			<p>I would dive a reef and leave it to recover 14 to 18 months... that's on a short window....New divers would come in and dive on reefs which I had just dove the day before claiming there we're still hundreds of fish still to be caught.</p> <p>arguments would leave me with TRO's against me ... having to go to courts to continue my arguments...</p> <p>These new divers collecting tropical fish are hunters, relentless predators with the fish as their prey</p> <p>Today's diver are continuing to rape and pillage our reefs</p> <p>They are now diving on prestine virgin reefs, untouched until now... over on the east side of our island.</p> <p>Those Reefs I dove from upolu point north to south point, were prestine virgin and untouched... and now... gone... it's beyond recovery...it will take Mother Nature....all of her might to undo what we have done to her reefs... yes her reefs it's not ours... we're uninvited guests...</p> <p>There are pet stores and divers who claim things are fine... those claims are false.</p> <p>Fish Survival Survival rate is zero</p> <p>All fish I have caught have already died. Life expectancy less than a third in captivity.</p> <p>Fish recognize vibration... they hear like deer... they can hear the motors of the tropical boat, this automatically triggers a stress response to survive...</p> <p>from that exact moment, through the entire ordeal of swimming from capture to being caught in nets, then scooped... fins all the while being cut, scraped smashed and damaged... skin and scales removed</p> <p>Causing sickness and fever to set in...</p> <p>People we can't let this continue... we must all get involved and expose these divers names and pet companies... let our people know who they are and begin fighting back...</p> <p>Please feel free to call me... I have a lot more stories to share about what is really going on with the industry...and our reefs.</p>	<p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
Danielle Chomel	N/A	1/4/2020	<p>Please stop the aquarium trade. Keep the fish on the reefs which are already so compromised. The aquarium trade is not fishing it's a devastating commercial enterprise that trashes near shore habitat and species don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>I have been swimming and snorkeling in Hawaii for 45 years, and have seen the devastation of our coral reefs and diminishing population of our reef fishes. The more fish on the reefs the healthier our reefs and coral will be. Keep the fish where they belong, at home, in Hawaii on their reefs. Mahalo, Danielle Chomel</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium</p>

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				<p>fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Danielle Kaleinani Bunnell	N/A	1/8/2020	<p>My name is Danielle Bunnell, and I have been a Captain and submarine pilot with Atlantis Adventures for 17 years. I see approximately 25 acres of reef several times a day as part of my job. We must do EVERYTHING POSSIBLE to protect this fragile resource for generations to come. I realize that our dive site has been in a protected area, and that no fish collection has been allowed there since the year 2000. Reef fish belong on the reef. It is very difficult to monitor the take from permitted activities. DLNR simply does not have the resources to oversee this program. Period. I see egregious behaviors on the water on a weekly basis that go unchecked due to lack of resources and personnel. This will be no different. I do support the traditional and cultural practices of subsistence fishing, but that certainly does not apply here. The only people benefiting are the ones with the permit. I respectfully request that we continue to ban reef fish collection from the Island of Hawaii. Thank you very much for your time and consideration.</p>	Your comment has been forwarded to the decision makers.
Darby L. Partner	HI	11/24/2019	<p>I strongly urge you NOT to allow the collecting and selling of West Hawaii's reef fish.</p> <p>The reef is in dire need of protection.</p> <p>A healthy reef is a huge money-maker in Hawaii as many tourists come to snorkel and view the coral and fish.</p> <p>However the reef is very unhealthy presently due to the recent high temperatures of the sea (climate change), pollution, sunscreens and other damaging aspects of human disrespect and lack of education and knowledge. Taking the reef fish will hurt the reef even more.</p> <p>A healthy reef is extremely important. The fish are an important part of the eco-system.</p> <p>The reef fish must be protected.</p> <p>Please malama our beautiful reefs!</p>	Your comment has been forwarded to the decision makers.

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David and Sharon Pettus	HI	12/16/2019	<p>Places as near as Waipio Valley and as far away as the Mediterranean sea are dealing with unintended consequences arising from cultivating tropical fish and other non-native aquatic species and relocating them, inflicting damage that no one yet seems able to ameliorate, The “neat idea” of growing escargot snails in Waipio has left taro farmers dealing with a nightmare infestation of snails that has increased farmers expenses and workloads, and diminished their harvests and profits. The Mediterranean is clogged with underwater flora flushed down toilets from home aquariums, seriously damaging native aquatic plant and fish species.</p> <p>The project under consideration is laden with risks of similar and worse catastrophes, not to mention the fact that few of the fish captured here for marketing elsewhere can survive the ordeal. We urge you to oppose this project.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Neither the Proposed Action nor any of the alternatives considered in the EIS include cultivating tropical fish and other non-native aquatic species and relocating them.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
David Balfour	N/A	1/7/2020	<p>The aquarium trade is being used to denude our reefs and destroy the irreplaceable habitats around our islands.</p> <p>While Australia is battling wild fires destroying millions of acres of timber and marsupial animals unique to only that country we have an obligation to preserve what is natural and best for our island state. Please discontinue this harmful practice.....We can not relent on this critical threat to our island habitats.</p>	Your comment has been forwarded to the decision makers.
David Hunt	HI	12/15/2019	<p>I read with genuine sadness and horror, this application and DEIS. This application should be DENIED, and our public employer & employee time (and thusly, our tax dollars) should not (now or ever again) be wasted entertaining similar inhumane, immoral, unethical applications.</p> <p>These are NOT “aquarium fish” these are indigenous fellow residents of our shared island home. I am one of MANY who would be harmed by allowing this permit to be approved. Like others, I swim and snorkel frequently, to simply be amongst these beautiful creatures. It is an important part of my personal, recreational, and spiritual experience where I live and work.</p> <p>Using a more accurate and appropriate name, the “tropical fish enslavement industry” has a HORRIBLE history and record of capturing our indigenous, native tropical fish, and enslaving those FEW that survive capture, packaging, shipping, and wholesale and retail sales into foreign environments.</p> <p>Our Native Hawaiian tropical fish BELONG in Hawaii, in their native habitat - NOT LIVING A MISERABLE EXISTENCE ENSLAVED IN FISH TANKS FOR THE CRUEL “ENTERTAINMENT” OF HUMANS who somehow think they have a RIGHT to freely enslave others.</p> <p>WHO and WHAT gives ANYONE this right to enslave our beautiful, innocent, fellow indigenous island inhabitants?</p> <p>There is NOTHING “Sustainable” about this practice. It is narcissistic,</p>	Your comment has been forwarded to the decision makers.

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			<p>selfish enslavement of our fellow creatures who have an inherent right to live free in their habitat - all in the perpetual lust for dollars. This is the EXACT same barbaric ENSLAVEMENT scenario played out throughout human history: Capture the indigenous innocents, Destroy their connection with family, community, home, and steal their freedom, Force those innocents into inhumane conditions for the rest of their once beautiful - now brutally cruel, exploited lives, and IF they survive capture, packaging, transportation, wholesale and retail “sale” - End their lives enslaved in an unknown foreign containment. With Hawai’i’s history of colonization and stolen freedoms, lands and culture - does the reality of this cruelty - this theft and enslavement - not effect your conscience...? There is a very sick irony here. For too long, our standard EIS (and DEIS) protocols and process has looked at ONLY a narrow and limited number of “factors” upon which decisions are manipulated and rendered. Therefore, I formally ask that you correct this shortsighted error, and that the MORAL and ETHICAL DIMENSIONS AND CONSEQUENCES of this proposal, application, permit request, deliberation and decision NOW BE ADDED AND INCLUDED IN THIS EIS process and decision. Hope for human survival on our ailing earth will remain questionable at best until we recognize our past mistakes and our arrogantly presumed dominion mentality - and change our behavior. I can think of no better opportunity than now - this decision - to change our destructive course determining our collective future. We need gratitude and respect for the lives of all beings with whom we share our home, island, and planet - in this decision.</p>	
David O. Baldwin	HI	1/7/2020	No to tropical fishers. We need to recover not retreat. No no no!	Your comment has been forwarded to the decision makers.
Dawn Wallis	WA	1/6/2020	<p>Please re-open this sustainable fishery. I also request that any additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.</p>	Your comment has been forwarded to the decision makers.
Debye Leong	HI	1/6/2020	<p>Extinction is forever—it’s that simple. It’s my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It’s a devastating commercial enterprise that trashes near-shore habitat and species. Don’t export Hawaii reef wildlife to feed the mainland aquarium trade.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this</p>

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			<p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point.</p>	<p>impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Deirdra Rogers	CA	12/11/2019	<p>Dear David Sakoda, This so-called environmental review is actually a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people of economic treasures, to support a mainland amusement industry, and to condemn reef wildlife in a vicious cycle of replacement.</p> <p>PIJAC is a lobbying group for the commercial pet trade . This Environmental Review is not relevant, not accurate, and not legal. When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, an aquarium collector. I see that as a conflict of interest. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, DLNR Diretor Suzanne Case prevailed on Governor Ige to veto the bill. The Hawaii Supreme Court ruled that no further permits should be issued until Environmental Assessment, with injunctive relief to close it down. DLNR Director Suzanne Case trumped that ruling with: permits are no longer required, for aquarium collecting. It takes only a commercial fishing license. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes nearshore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who travel to Hawaii to relish the reef kingdom.. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater than the aquarium trade.</p> <p>This environmental review is a farce.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science.</p>
Denise Boisvert	HI	12/18/2019	<p>Accepting the EIS with its obviously skewed manipulation of data in order to find 'no significant impact' would be an insult to all the Native Hawaiian cultural practitioners who oppose the permits for</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>commercial reef fish collections.</p> <p>I am strongly OPPOSED to the Draft EIS for commercial reef fish collections because healthy reefs depend on the fish that live on them, and because commercial fishing of reef fish is a wasteful, destructive, and unnecessary industry.</p> <p>One has to wonder why those who wrote the EIS purposefully chose to manipulate the data, and what connection there may be to the proponents of such a destructive industry.</p> <p>Thank you for your kind consideration of rejecting the EIS.</p>	
DENZLER23 70 @twc.com	N/A	1/6/2020	No more permits to the fish collectors please.	Your comment has been forwarded to the decision makers.
Diane and Syd Marcus	N/A	1/6/2020	Native fishes must receive protection from the state. They are highly intelligent and sentient individuals and should be left wild.	Your comment has been forwarded to the decision makers.
Diane Ware	HI	1/6/2020	<p>I urge you not to side with the special interest industry over the welfare and rights of the Hawai'i people and reef fish.</p> <p>I first snorkeled in the islands before statehood and have visually noted the continued decline of reef fish until present. I am a concerned member and outings leader of the Sierra Club on Hawai'i island. We received numerous reports from members on coastal hiking, kayaking, and snorkeling outings that reef fish numbers were declining. We weren't sure why but in 2003 kayaking off Pebble beach a resident of the area advised us aquarium fish collectors were taking many fish. So much so that we weren't seeing them from land or in the water as abundantly as we had years before. The Gold Coast was gone. The beautiful under water view plane was gone. Subsistence fishing for native Hawaiians was impaired. Our Group supported a successful resolution by County Council asking the State to ban the trade in 2008. We have continued to support a ban on the trade and sponsored a program, 'Where Have All the Fishes Gone' one year ago. We met with Kaimi Kaupiko down in Miloli'i to learn how the trade affected his fishing village and were told they supported a ban. We snorkeled Honomolino, Puako, 2 step, and Papa Bay with Paul Cox. Rarely do we see more than 20-40 Tang at a time whereas we remember seeing large schools of Tang decades ago.</p>	Your comment has been forwarded to the decision makers.
Diane Ware	HI	1/6/2020	<p>We invited Mike Nakachi, Rene Umberger and Paul Cox to our program. Paul Cox showed photos of collectors damaging the reef, Mike Nakachi had me in tears as he spoke of the taking and selling of black coral and other species. This trade is unnecessary and profit based for a Pet industry mostly off island. It does not benefit local residents who have shown time and again they do not support the trade. It violates the Public Trust Doctrine, Article XI of the constitution and precautionary rule.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As described in Section 1.2.3.2, the collection of coral is illegal and would not be allowed under any of the alternatives under consideration.</p>

Comments and Applicant Responses to All Other Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
Diane Ware	HI	1/6/2020	<p>The trade is inhumane and violates Hawaii State Cruelty Statute: 711-1109 Cruelty to animals in the second degree. (1) A person commits the offense of cruelty to animals in the second degree if the person intentionally, knowingly, or recklessly:</p> <p>(a) Overdrives, overloads, tortures, torments, beats, causes substantial bodily injury to, or starves any animal, or causes the overdriving, overloading, torture, torment, beating, or starving of any animal;</p> <p>(b) Deprives a pet animal of necessary sustenance or causes such deprivation;</p> <p>(c) Mutilates, poisons, or kills without need any animal other than insects, vermin, or other pests; provided that the handling or extermination of any insect, vermin, or other pest is conducted in accordance with standard and acceptable pest control practices and all applicable laws and regulations.</p> <p>The trade as proposed in DEIS violates this statute. Is this why Stantec has made a disclaimer on the scope to exclude what happens to these creatures after caught? Truth is, many are brought up from reefs so quickly they suffer immediately. If their swim bladders are not punctured they can die. I suspect that is why they are found dead in trash cans (the 500 dead at the harbor). Several Hawaiians interviewed complain that they see bags of dead reef fish and this is not pono. We can ask what measures are taken to ensure fish are treated humanely. They are deprived of food at warehouses before shipping. Their fins are trimmed. Is the DOH and DLNR regulating care of fish? My sister is a vet tech and says they are susceptible to disease and handling by humans. If treated humanely maybe not so many would be taken. They are sentient beings, not a commodity. Sierra Club members met with Keith Dane from Humane Society USA. I notice plaintiffs are not named in DEIS</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The impacts of post-collection mortality have been added to Section 5.4.2 of the FEIS.</p>
Diane Ware	HI	1/6/2020	<p>d) For each of the 14 applicants, please note which collectors engage in the following practices in contradiction to HRS 711-1109: withholding of food (starvation) and for what period of time; flogging or puncturing of the swim bladder; cutting of spines or dorsal fins; body compression (squeezing animal to force out ejection of fecal matter</p>	<p>Your comment has been forwarded to the decision makers.</p>
Diane Ware	HI	1/6/2020	<p>DLNR has called for food fishers to reduce the take of herbivorous fish species but has remained silent on the hundreds of thousands of herbivorous animals the aquarium trade takes for commercial purposes.</p> <p>"except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state," said Earthjustice attorney Kylie Wager Cruz.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10</p>

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			<p>“It’s common sense that this level of unrestricted take can’t be sustainable.”</p>	<p>permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of “every fish and every marine creature” is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p> <p>In addition, as stated in the FEIS, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>
Diane Ware	HI	1/6/2020	<p>The DEIS was prepared by Iowa-based Stantec Consulting, the same consulting group that dismissed the protests of Native Americans and claimed that the Keystone Pipeline would similarly have minimal environmental impacts.</p> <p>“The DEIS is based on the false premise that aquarium collecting doesn’t impact fish populations on the reefs where the trade operates,” said Inga Gibson, policy director of Pono Advocacy.</p> <p>“Nothing could be further from the truth. This false premise lays the foundation for this extremely flawed study, and prevents DLNR from ultimately accepting the DEIS.”The DEIS skews data by comparing catch numbers to estimates for fish populations on the entire island and concludes that the trade would be taking just 1%, which misleadingly minimizes impacts to localized reef ecosystems.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The impacts of collection on WHAP Open Area population estimates have been added in Appendix B of the FEIS.</p>

Comments and Applicant Responses to All Other Comments Received on the DEIS

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Diane Ware	HI	1/6/2020	<p>For years, DLNR has allowed the trade to pillage Hawai'i's treasured coral reef wildlife, in violation of HEPA.</p> <p>The DEIS dismisses testimony from dozens of Native Hawaiian cultural practitioners, and instead summarily concludes that collection for the aquarium industry has no cultural impact as long as the populations of the reef animals are not substantially reduced from current numbers in spite of advocating for unlimited take of all but one fish, Achilles Tang.</p> <p>"We participated in this process in good faith, hoping for change by sharing our deeply personal, spiritual and cultural histories and concerns with this destructive trade. Instead, we've been slapped in the face—summarized into a one-liner that the trade has no significant cultural impact. The truth is, this industry harms our ability to gather the food we've relied on for generations, and it's time for the state to protect these resources from commercial exploitation," said Kaimi Kaupiko of Miloli'i.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The CIA completed a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.</p>
Diane Ware (second submission)	HI	1/6/2020	<p>I urge DLNR not to accept the preferred alternative of the biased DEIS payed for by special interest industry trumping the welfare and rights of the Hawai'i people and reef fish.</p> <p>For years, DLNR has allowed the trade to pillage Hawai'i's treasured coral reef wildlife, in violation of HEPA. I am a simple person with a deep connection to nature who values the Hawaiian ecosystems. I have volunteered 25 years on numerous including Hakalau, Mauna Kea Forest Project's Palila critical habitat to HVNP and also Kiholo Bay fishpond with TNC to preserve and restore habitats for future generations.</p> <p>I first snorkeled in the islands before statehood and have visually noted the continued decline of reef fish until present. I am a concerned member and outings leader of the Sierra Club on Hawai'i island. We received numerous reports from members on coastal hiking, kayaking, and snorkeling outings that reef fish numbers were declining. We weren't sure why but in 2003 kayaking off Pebble beach a resident of the area advised us aquarium fish collectors were taking many fish. So much so that we weren't seeing them from land or in the water as abundantly as we had years before. The Gold Coast was gone. The beautiful under water view plane was gone. Subsistence fishing for native Hawaiians was impaired. Our Group supported a successful resolution by County Council asking the State to ban the</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>trade in 2008. We have continued to support a ban on the trade and sponsored a program, 'Where Have All the Fishes Gone' one year ago. We met with Kaimi Kaupiko down in Miloli'i to learn how the trade affected his fishing village and were told they supported a ban. We snorkeled Honomolino, Puako, 2 step, and Papa Bay with Paul Cox. Rarely do we see more than 20-40 Tang at a time whereas we remember seeing large schools of Tang decades ago.</p>	
Diane Ware (second submission)	HI	1/6/2020	<p>We invited Mike Nakachi, Rene Umberger and Paul Cox to our program. Paul Cox showed photos of collectors damaging the reef, Mike Nakachi had me in tears as he spoke of the taking and selling of black coral and other species. This trade is unnecessary and profit based for a pet industry mostly off island. It does not benefit local residents who have shown time and again they do not support the trade. It is in conflict with the Public Trust Doctrine, Article XI of the constitution and precautionary rule.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As described in Section 1.2.3.2, the collection of coral is illegal and would not be allowed under any of the alternatives under consideration.</p>
Diane Ware (second submission)	HI	1/6/2020	<p>The trade is inhumane and violates Hawaii State Cruelty Statute: 711-1109 Cruelty to animals in the second degree. (1) A person commits the offense of cruelty to animals in the second degree if the person intentionally, knowingly, or recklessly:</p> <p>(a) Overdrives, overloads, tortures, torments, beats, causes substantial bodily injury to, or starves any animal, or causes the overdriving, overloading, torture, torment, beating, or starving of any animal;</p> <p>(b) Deprives a pet animal of necessary sustenance or causes such deprivation;</p> <p>(c) Mutilates, poisons, or kills without need any animal other than insects, vermin, or other pests; provided that the handling or extermination of any insect, vermin, or other pest is conducted in accordance with standard and acceptable pest control practices and all applicable laws and regulations.</p> <p>The trade violates this statute and looks the other way, not wanting to regulate just reap "socioeconomic benefits" touted in the DEIS. Is this why Stantec has made a disclaimer on the scope to exclude what happens to these creatures after caught? Truth is, many are brought up from reefs so quickly they suffer immediately. If their swim bladders are not punctured they can die. I suspect that is why they are found dead in trash cans (the 500 dead at the harbor). Several Hawaiians interviewed complain that they see bags of dead reef fish and this is not pono. What measures are taken to ensure fish are treated humanely? They are deprived of food at warehouses before shipping. Their fins are trimmed. Is the DOH and DLNR regulating care of fish? My sister is a vet tech and says they are susceptible to disease and handling by humans. If treated humanely maybe not so many would be taken. They are sentient beings, not a commodity. Sierra</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The impacts of post-collection mortality have been added to Section 5.4.2 of the FEIS.</p>

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			Club members met with Keith Dane from Humane Society USA. I notice plaintiffs are not named in DEIS. Why?	
Diane Ware (second submission)	HI	1/6/2020	<p>DLNR has called for food fishers to reduce the take of herbivorous fish species but has remained silent on the hundreds of thousands of herbivorous animals the aquarium trade takes for commercial purposes.</p> <p>"Except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state," said Earthjustice attorney Kylie Wager Cruz. "It's common sense that this level of unrestricted take can't be sustainable."</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of "every fish and every marine creature" is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p> <p>In addition, as stated in the FEIS, the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>
Diane Ware (second submission)	HI	1/6/2020	The DEIS was prepared by Iowa-based Stantec Consulting, the same consulting group that dismissed the protests of Native Americans and claimed that the Keystone Pipeline would similarly have minimal environmental impacts. The most recent oil spill was over 300,000	<p>Your comment has been forwarded to the decision makers.</p> <p>The impacts of collection on WHAP Open Area population estimates have been added in Appendix B of the FEIS.</p>

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			<p>gallons.</p> <p>The DEIS skews data by comparing catch numbers to estimates for fish populations on the entire island and concludes that the trade would be taking just 1%, which misleadingly minimizes impacts to localized reef.</p>	
Diane Ware (second submission)	HI	1/6/2020	<p>The DEIS dismisses testimony from dozens of Native Hawaiian cultural practitioners, and instead summarily concludes that collection for the aquarium industry has no cultural impact as long as the populations of the reef animals are not substantially reduced from current numbers in spite of advocating for unlimited take of all but one fish, Achilles Tang. Why should native Hawaiian fishers accept the diminished fish numbers after decades of the trade taking unlimited numbers of fish as a base line for sustainability? The cultural background provided is detailed and explains why Hawaiians have connections to places their ancestors frequented and fished. If that place is now diminished by the trade, they are deprived of the bounty their ancestors enjoyed. Thus the colonial overlordship of lands and ocean taken and regulated by the state continue to marginalize the people and the culture.</p> <p>“We participated in this process in good faith, hoping for change by sharing our deeply personal, spiritual and cultural histories and concerns with this destructive trade. Instead, we’ve been slapped in the face—summarized into a one-liner that the trade has no significant cultural impact. The truth is, this industry harms our ability to gather the food we’ve relied on for generations, and it’s time for the state to protect these resources from commercial exploitation,” said Kaimi Kaupiko of Miloli’i.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The CIA completed a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.</p>
Diane Ware (second submission)	HI	1/6/2020	<p>Finally, I have a great interest in protecting anchialine pond habitats. One or two of the DEIS so called "Red Pond Shrimp" are now endangered (Vetericaris chaceorum and Procaris hawaiana). V. chaceorum is found in Ka'u. The DEIS claims no endangered species are collected. Why? There is no limit on take of shrimp and the numbers taken are a "guess" but likely over 20,000 per year. Do the chosen collectors know the difference between the species of 'opae? Are endangered species caught and how many? The Center for Biological Diversity has another current lawsuit against USFWS for not designating critical habitat for anchialine ponds in violation of ESA. According to the Ka'u Calender (December 2019) Maxx Phillips of BCD says "These special species are found nowhere else...so if they disappear from here they'll be lost forever. Anchialine pool shrimp and the rest of the group needed habitat protection years ago but there not getting it from the anti-wildlife Trump administration. Species with</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Red Pond Shrimp are not on the White List, and in addition, invertebrates can not be collected from the WHRFMA. In East Hawai'i, invertebrates can be collected, but do not require an Aquarium Permit. Therefore, collection of red Pond Shrimp is not anticipated to differ between alternatives, including the No Action Alternative.</p>

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			habitat protection are twice as likely to be in recovery as those without". Dr. Scott Nelson researcher from Auburn University spoke at After Dark in the Park, 2011, stating they have found Hawaiian endemic 'opae'ula world wide, and "...has also garnered the interest of aquarists and companies in the pet trade industry. Over the last few years, closed ecosystems containing these shrimp have been marketed under a variety of trademarked names in retail stores and on the World Wide Web...Thus, habitat destruction and modification, as well as the potential for over-harvesting, could ultimately lead to the extinction of some H. rubra populations." Quote is from Molecular Ecology.	
Diane Ware (second submission)	HI	1/6/2020	I have empathy for those who have depended on the trade for income as I was forced to change professions due to health concerns. There are many pono possibilities such as tours, monitoring reef and fish or removing invasives which I believe the state could do to improve and protect the reefs.	Your comment has been forwarded to the decision makers.
Dominic Romer	FL	1/7/2020	I'm writing asking you to please keep the ban on the West Hawaii ornamental fish trade active. I first moved to the Big Island in 2001. Before that I was living in Oahu. When I moved to the big Island I was amazed at the variety and numbers of fishes and coral compared to what I'd seen on Oahu. I got my scuba certification and began to dive almost every day after work. After a few years I moved to the mainland for a job opportunity. I just move back to the Big Island in July 2019. I began snorkeling my 2nd day off the plane. I was shocked at what I saw. There was so much dead coral. The fish life was nothing like it was, In fact I can name specific fish..Since I've been back I've seen 3 scrawled file fish...I used to see numerous scrawled file fish every dive. The amount of parrot fish is also down an immense amount. Tinkers butterfly fish used to be common in large swarms all over the reefs. Now due to fish collection the only place to see them is either in south point or on very deep reefs well beyond the recreational diving limits. So what I'm asking is to please to not allow ornamental fish collection in West Hawaii. The reefs are in trouble and need the herbivores to keep them clean and healthy, the tourists comes to see the reefs and the fishes. There is only one West Hawaii there will be a tipping point where the fish populations are too small to reproduce effectively and like the Tinkers butterfly fish they will disappear. The science that the fisherman are using does not take into account the coral bleaching events of 2015 and 2019 and future events. Please don't let the greed of a few individuals ruin the precious underwater environment of West Hawaii.	<p>Your comment has been forwarded to the decision makers.</p> <p>Collection of scrawled file fish and parrot fish is not curenly allowed in the WHRFMA as they are not on the White List of 40 species that can be collected and neither the Proposed Action nor any of the alternatives considered in the EIS include collection of these species. Tinkers Butterflyfish are on the White List, however, collection under any alternative is anticipated to be less than 5% of the island-wide population. They are also known to be more common in deeper waters where aquarium collection does not occur</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The coral bleaching events are discussed in Section 5.4.3.5 of the EIS.</p>
Donna Marino	N/A	1/6/2020	Please limit fish collection for the aquarium trade; this practice has enormous negative implications for wild fish populations.	Your comments have been forwarded to the decision makers.

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			<p>Estimates predict that Hawaii is expected to lose 70% of its coral reefs in the next couple of decades and cannot afford to allow the aquarium industry to raid the reefs.</p>	<p>The Preferred Alternative would limit the number of Aquarium Permits to 10, and limit their use to the WHRFMA.</p>
<p>Dorothy Branch</p>	<p>N/A</p>	<p>1/5/2020</p>	<p>Extinction is forever—it’s that simple. It’s my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It’s a devastating commercial enterprise that trashes near-shore habitat and species. Don’t export Hawaii reef wildlife to feed the mainland aquarium trade. Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It’s truly heart-breaking. Many factors conspire in this tragedy. Maybe we can’t combat global warming locally. But we bloody well can put a stop to aquarium collecting. The so-called “Environmental Review” consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii’s DLNR (to that department’s shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood. But where is the traders’ credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii’s taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. I implore you to do the right thing</p>	<p>Your comment has been forwarded to the decision makers. The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC’s Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>
<p>Doug Perrine</p>	<p>HI</p>	<p>12/2/2019</p>	<p>Of the listed alternatives, the No Action alternative is preferable to any of the others as written. However, I would support the Limited Permit Issuance alternative with the following modifications: 1) Collecting is limited to the White List species statewide, not just in the WHRFMA only; 2) The following species are removed from the White List: flame wrasse, Cirrhilabrus jordani; psychedelic wrasse, Anampses</p>	<p>Commenter sent a revised comment later, and asked that this one be discarded. See response to other comment.</p>

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			<p>chrysocephalus; longfin anthias, Pseudanthias hawaiiensis; Tinker’s butterflyfish, Chaetodon tinkeri; These endemic (nearendemic in the case of C. tinkeri) species do not have sufficient population data to determine a safe level of take, while anecdotal evidence indicates that collection has severely reduced populations in waters shallow enough for recreational scuba diving.; 3) Collection of harlequin shrimp, Hymenocera picta, is prohibited statewide. The genetically distinct Hawaiian population segment of this species is an obligate commensal of the coral Pocillopora eydouxi, which suffered >90% mortality in the bleaching event of 2015 2015, followed by extremely high mortality of newly recruited colonies in the 2019 bleaching event. The loss of critical habitat severely threatens the survival of harlequin shrimp in Hawaiian waters.</p> <p>Thank you for considering my comments.</p>	
Doug Perrine	HI	12/3/2019	<p>Please discard my previous comments (sent yesterday), which contained a factual error.</p> <p>Revised Comments on PIJAC DEIS for Hawaii Aquarium Fishery. Of the listed alternatives, the No Action alternative is preferable to any of the others as written. However, I would support the Limited Permit Issuance alternative with the following modifications: 1) Collecting is limited to the White List species statewide, not just in the WHRFMA only; 2) The following species are removed from the White List: flame wrasse, Cirrhilabrus jordani; psychedelic wrasse, Anampses chrysocephalus; longfin anthias, Pseudanthias hawaiiensis; Tinker’s butterflyfish, Chaetodon tinkeri; These endemic (nearendemic in the case of C. tinkeri) species do not have sufficient population data to determine a safe level of take, while anecdotal evidence indicates that collection has severely reduced populations in waters shallow enough for recreational scuba diving.; 3) Collection of harlequin shrimp, Hymenocera picta, is banned statewide. The preferred habitat of the genetically distinct Hawaiian population segment of this species is the coral Pocillopora eydouxi, which suffered >90% mortality in the bleaching event of 2015 2015, followed by extremely high mortality of newly recruited colonies in the 2019 bleaching event. The loss of critical habitat severely threatens the survival of harlequin shrimp in Hawaiian waters.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Collection with the use of fine mesh nets (i.e., with an Aquarium Permit) will be limited to the WHRFMA, and thus the 40 White List Species. No invertebrates, including the harlequin shrimp, will be allowed to be collected in the WHRFMA.</p> <p>Psychedelic wrasse and Tinker's butterflyfish populations have been estimated by CREP, and collection under the Preferred Alternative would be up to 1.06% of the Psychedelic Wrasse island-wide population, and up to 0.87% of the Tinker's Butterflyfish island-wide population, both below the lower limit of the 5% to 25% threshold (Ochavillo and Hodgson 2006). Collection of Longfin Anthias is anticipated to be only 3-5 individuals per year, and collection of Flame Wrasse 24-73 individuals per year. As noted in Section 4.4.1.38 of the EIS, prime Flame Wrasse habitat is within an FRA, where aquarium collection is not allowed.</p>
Dr. Will Tuttle	N/A	1/6/2020	<p>The Pet Industry Joint Advisory Council has submitted an environmental impact statement surmising that " the unlimited collection of Hawaii’s reef animals has a minimal impact on the state’s coral reef ecosystem” - This is self-serving and patently false! Please do all you can to protect the fishes on Hawaii’s reefs from capture for the pet industry!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter incorrectly states that the EIS surmises "that the unlimited collection of Hawaii’s reef animals has a minimal impact on the state’s coral reef ecosystem". The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis</p>

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				<p>period. The concept of “unlimited” collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Ed Dowling	N/A	1/3/2020	I am against taking live fish for the Aquarium trade.	Your comment has been forwarded to the decision makers.
Elizabeth Hoffman	N/A	1/7/2020	Please do not allow native Hawaiian fish to be caught for the aquarium trade. It is wrong for so many reasons. Bad for the coral reefs, and a nightmare for the fish.	Your comment has been forwarded to the decision makers.
Elizabeth McDermott	HI	11/25/2019	Oops, Meant to say West Hawaii not West Oahu. I am opposed to 14 commercial aquarium fishing permits being issued for West Hawaii in my first sentence.	Your comment has been forwarded to the decision makers. A note was made in your previous comment correcting the location.
Elizabeth Parker	N/A	1/6/2020	NO to reef damage, please do what is right	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Ellen Robbins	N/A	12/9/2019	Hawaiian Supreme Court made their decision clear two years ago, regarding precious marine life, but it has been circumvented.	Your comment has been forwarded to the decision makers.

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			<p>Those of us here on the mainland, tourists, divers, lovers of Nature and Beauty ask that the Hawaiian Paradise be protected. The aquarium trade is sadly voracious and greed driven.</p> <p>I ask that the long term lure of dollars from tourists, such as myself, take priority over destructive short term dollar gains to be made by plundering precious Hawaiian reefs for the aquarium trade.</p>	<p>The Supreme Court decision was that issuance of Aquarium Permits required HEPA review, not a permanent ban on commercial aquarium collection.</p>
Eric Moreno	N/A	1/8/2020	<p>Once again, I want to express that my position hasn't changed regarding Commercial Aquarium Reef Fishing. I still believe that Aquarium Reef Fishing along Hawaii coastal reefs should be prohibited, and I provide two reasons.</p> <p>First, the largest economic industry is tourism. It is estimated the tourism industry led to over \$16 Billion in visitor spending ("Annual visitor report" (PDF). files.hawaii.gov. 2017.) Tourist come to our islands to see all the beauty of the land and her oceans. Risking this industry for the sake of an industry est. to be under a \$1Million, lacks common sense and proper stewardship.</p> <p>Second, ornamental reef fish contribute to the overall health of our reefs and waters. Further, collection methods have inadvertently damaged the reefs. As we deal with water quality and safety issues for our residents and visitors, it would seem neglectful to allow potential damage to our reef balance.</p> <p>While I know the EIS discusses sustainability, I caution trusting in the data that benefits the parties with a vested interest.</p> <p>An additional point I will make regards the aquarium fish industry. As I'm sure you are aware. They had a similar fight in Florida regarding taking of fish off the coastal Florida waters. They claimed that it would have a devastating impact to the aquarium industry and that the fish in question COULD NOT BE farmed economically. But, the truth was they never needed to try because they were getting the fish for free off the coast. When Florida denied their request and shut down the removal of this species, they figured out a way to farm them and, over time, it was actually cheaper and safer to do so. So, they have a track record of fighting to take from the wild and environment risking an eco system, when a potential safer and more lucrative solution is in front of them. It is common knowledge that the closer the fish are raised to the potential customer / market, the more likely of survivability of the fish. So, if you can farm the fish on the mainland, where the market is, you will save the long shipping and potential harm to the fish.</p> <p>I'm sure I don't need to tell you any of this. As someone in your position, I'm sure has seen the decline in ornamental fish and water quality over the years on our reefs and in our waters. You know, first hand the reality and while we can discuss legal fishing, there is</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>

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			<p>another issue of illegal fishing. The issue is fundamental. When we wake up in the morning and look at our families, and ourselves in the mirror, we only have one real responsibility. It is to be true in our convictions and responsibilities. We know what is right. We know we want a better future for our keiki. They deserve, especially from the DLNR, to have their lands, waters, reefs, and fish, protected</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>For the Fishes, Center for Biological Diversity, The Humane Society of the United States, and the other undersigned individuals and organizations (collectively, “Commenters”), are conservation and animal protection organizations and individuals with strong interests in preserving the State of Hawai’i’s natural resources and protecting its delicate coral reefs. Commenters submit these comments on the Pet Industry Joint Advisory Council’s (PIJAC’s, or “Applicant’s”) Draft Environmental Impact Statement (DEIS) purporting to analyze the environmental impacts of commercial aquarium fish collection by 14 permittees in the West Hawai’i Regional Fishery Management Area (WHRFMA).¹</p> <p>The DEIS was required to fully analyze the environmental impacts of commercial aquarium collection in the WHRFMA and specifically address the significance criteria in HAR § 11-200-12, including, but not limited to:</p> <ul style="list-style-type: none"> • Involving an irrevocable commitment to loss or destruction of any natural or cultural resource; • Curtailing the range of beneficial uses of the environment; • Conflicting with the state’s long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders; • Substantially affecting the economic or social welfare of the community or State; • Involving a substantial degradation of environmental quality; • Cumulatively has considerable effect upon the environment or involves a commitment for larger actions; • Substantially affects a rare, threatened, or endangered species, or its habitat; • Affects or is likely to suffer damage by the activity/activities being located in an environmentally sensitive area such as a beach, erosion-prone area or coastal waters. <p>To this end, we expected the Applicant to comply with the requirement “to develop a fully acceptable EIS prior to the time the EIS is filed with the office, through a full and complete consultation process, and . . . not rely solely upon the public review process to</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>See Section 6.1 of the EIS. All parties who had requested to be consulted were contacted on August 2, 2019 via email and/or mail, seeking advice and input for DEIS development. The Applicant requested any information or advice concerning the fishery and other potentially impacted environmental, cultural, or other resources. Consulted Parties were asked to respond within 30 days. Comments received and responses to those comments are provided in Appendix B. The consultation process for cultural resources is described in depth in Section 4 of Appendix A.</p>

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			<p>expose environmental concerns.”² However, the Applicant failed to conduct the required early consultations prior to submitting its Draft and Final Environmental Assessments, despite the HEPA requirement that the application must “at the earliest practicable time, . . . consult with . . . those citizen groups and individuals which the approving agency reasonably believes to be affected.”³ In this case, it is clear from the long history of litigation that Commenters, at the very least, should have been consulted. The Applicant should also have consulted Native Hawaiian groups (outside of those contacted as part of CIA).</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Further, we expected our substantive comments on the FEAs to be incorporated and consultation to be responded to in writing and incorporated into the DEIS by the Applicant prior to the filing of the DEIS with the Hawai’i Department of Land and Natural Resources (DLNR) and Office of Environmental Quality Control (OEQC). We also expected that the responses would not be merely self-serving recitations of benefits and/or rationalizations of the proposed actions. However, these expectations were not met. See Appendix 1 for a detailed description of how the Applicant’s responses to the questions we raised during consultation process were inadequate. As a result of this failure to abide by HEPA’s mandate of early consultation, the DEIS fails to adequately analyze all impacts, and is skewed toward a favorable result for the trade.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>All comments received on the FEA-EISPN and from consulted parties were responded to in Appendix B of the DEIS, and incorporated in the EIS where appropriate.</p> <p>Responses to specific issues raised in Appendix 1 of this comment letter are included below.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Most importantly, we expected the DEIS to accurately and adequately evaluate the HEPA significance criteria, to disclose any and all effects (beneficial and adverse) to biological, socioeconomic, and cultural resources and traditional cultural practices, stemming from the proposed alternatives, and, to propose mitigation measures to reduce impacts, as set forth in HAR § 11-200-17.</p> <p>However, serious, fundamental errors in various factors used to determine impacts render the DEIS fatally flawed. They include, but are not limited to: the use of an incorrect baseline, an expanded and exaggerated spatial scale, minimization of catch levels, overestimations of fish populations and other omissions in determining impacts. These missteps have contributed to erroneous conclusions and improper evaluations of HEPA significance criteria.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The DEIS uses the best available science to evaluate impacts. Responses to specific issues raised in this comment are addressed below (where the Commenters raised each issue in depth).</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory,</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Finally, we also expected the DEIS to factor climate change into the analyses, as envisioned by HAR § 11-200.1-13 Significance Criteria, Criterion 11 (based on the December 2017 Climate Change Mitigation and Adaptation Commission report) to address concerns related to climate change adaptation, such as impacts from increased hurricane frequency and/or intensity, potential endangered species migration, impacts on areas likely to experience wave inundation, increased</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of climate change are addressed in Section 5.4.3.5 of the EIS. The referenced December 2017 Climate Change Mitigation and Adaptation Commission report has been reviewed and relevant information from the report has been added where appropriate.</p>

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and The Humane Society of the United States			exposure to hurricanes, or flooding, and further impacts discussed below.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	DLNR has the authority to issue permits for the taking of fish and other aquatic life for aquarium purposes. ⁴ While these permits are limited in duration to one year, neither the aquarium collection statute nor DLNR places any limits on the number of animals that can be captured per commercial permit, nor on the number of permits the Agency issues. ⁵ In fact, prior to court mandated compliance with HEPA, DLNR automatically granted every commercial aquarium permit application, and allows the collection of unlimited numbers of animals under those permits. ⁶ DLNR also automatically granted every recreational permit application, which effectively allowed for unlimited recreational collection of nearly 2,000 fish per year per collector. ⁷ In addition, DLNR also automatically grants commercial marine licenses for aquarium collecting issued pursuant to HRS § 189-2, but does so without HEPA review as required by law. Furthermore, while commercial collectors are required to report their collections (but in practice, do so inaccurately), there is no similar requirement for recreational permits. ⁸ Therefore, there are no definitive data on how many of each type of fish or other aquatic animal is taken from the State's delicate coral reef ecosystem each year, nor on what level of take would be sustainable.	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS is entirely inadequate under the Hawai'i Environmental Policy Act (HEPA, Haw. Rev. Chapter 343) and its implementing regulations. The DEIS fails to address these and other notable flaws that we outlined in our prior comments on the Environmental Assessments: The DEIS fails to analyze the impacts of collection over time (i.e. the expanded 5-year scope of the analysis, beyond one year, is still inadequate);	Your comment has been forwarded to the decision makers. The EIS does analyze impacts of collection over time. A five-year analysis period was chosen because, as stated in Section 5.0. of the EIS, the temporal scope of the impacts analysis is five years because the WHRFMA management plan is reviewed every five years by the DLNR in cooperation with the University of Hawai'i (DAR 2019a). Because the most recent DAR review was released in 2019, the next DAR review overlaps in time with the analysis period in the EIS. If the Preferred Alternative is implemented, presumably the DAR will review the effects during its next five year review and can make any necessary changes to permit issuance at that time. In addition, because Aquarium Permits have a 1-year duration, the DLNR can decide each year whether or not to issue permits based on new data.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus	N/A	1/7/2020	<ul style="list-style-type: none"> • The DEIS fails to accurately analyze the environmental consequences (i.e. direct, indirect, and cumulative impacts) of unlimited collection of aquatic life to biological, cultural, and socioeconomic resources in the WHRFMA; • The DEIS fails to accurately analyze the environmental consequences 	Your comment has been forwarded to the decision makers. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred

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Environmental Laboratory, and The Humane Society of the United States			(i.e. direct, indirect, and cumulative impacts) of unlimited collection of aquatic life to biological, cultural, and socioeconomic resources in East Hawai'i and other parts of the State that may be connected via larval dispersal patterns;	<p>Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of "every fish and every marine creature" is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p> <p>Impacts to species are evaluated using the island-wide populations to account for larval dispersal, but limited to the island of Hawai'i due to the barriers for dispersal between islands (see Section 4.4 of the EIS).</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<ul style="list-style-type: none"> The DEIS fails to accurately analyze the cumulative impacts of commercial collection along with recreational collection; 	<p>The cumulative impacts of recreational aquarium fish collection are analyzed in Section 5.4.3.1. Because, as noted by the Commenters, data are not available on the number of fish collected by recreational aquarium permit holders, the EIS evaluates a reasonable worst case scenario (i.e., all permit holders collect 50% of their allowable catch). These estimates are likely high based on results from Harding (2017), which found that 57% of recreational aquarium permit holders surveyed had not utilized their permit in the previous 12-month period. Of the 43% who had used their permits, their average yearly catch was 45 fish per permit (Harding 2017), which is below the maximum allowable number of 1,825 fish or the 50% used to estimate impacts above.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus	N/A	1/7/2020	<ul style="list-style-type: none"> The DEIS fails to accurately analyze impacts on cultural resources; 	<p>Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.</p>

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Environmental Laboratory, and The Humane Society of the United States				
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<ul style="list-style-type: none"> The DEIS fails to accurately analyze the alternatives presented; 	Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<ul style="list-style-type: none"> The DEIS fails to accurately analyze the impacts of collection practices harmful to corals; 	Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<ul style="list-style-type: none"> The DEIS relies on inaccurate, misleading, and incomplete data; 	Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.
For the Fishes, Center for	N/A	1/7/2020	<ul style="list-style-type: none"> The DEIS fails to propose and analyze mitigation measures; and 	Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.

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Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States				
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS fails to adequately incorporate input of Native Hawaiian groups, experts, affected citizens and consulted parties.	Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The Applicant's Preferred Alternative does not ensure that commercial aquarium fish collection is lawful, responsible, and sustainable for any of the White List fish species from nearshore habitats in the WHRFMA nor for any species taken elsewhere in the state where collection is allowed under the current geographic scope of the aquarium permits. The DEIS's continued conclusion that the aquarium fishery in the WHRFMA has "no significant impact" on targeted reef fish species, coral reefs, and the human communities that rely on them is unsupported. The DEIS fails to accurately evaluate the true primary, secondary, cumulative, short-term and long-term effects of the Preferred Alternative and fails to propose any proper mitigation.	Your comment has been forwarded to the decision makers. The geographic scope of Aquarium Permits under the Preferred Alternative is limited to the WHRFMA, and use of an Aquarium Permit outside of this area would not be allowed under the Preferred Alternative. Issuance of Aquarium Permits outside of the WHRFMA would require a separate HEPA analysis.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane	N/A	1/7/2020	As previously mentioned, fundamental errors in the DEIS's impact analysis resulted in patently false findings of no significant impacts and improper evaluations of HEPA significance criteria. Those errors include, but are not limited to, the use of an improper baseline, the minimization of potential collection rates under the proposed alternatives, and an expanded area to which the impacts would apply. A properly conducted DEIS would focus on impacts to the area(s) where the subject activity is to take place. This DEIS is fundamentally flawed in that it fails to do so. In addition, the DEIS ignores the true evidence of impacts, including the most important one: the magnitude	Your comment has been forwarded to the decision makers. Responses to these issues are addressed below.

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Society of the United States			of depletion to targeted species in the areas from which they are taken as determined by a comparison to the baseline.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>A. The use of an improper baseline.</p> <p>A critical component in any DEIS is the establishment of proper baseline against which to compare the impacts of the proposed action. Any analysis stemming from an improper baseline cannot be considered accurate or relevant. A proper baseline reflects pre-project environmental conditions, and is spatially relevant. In this case, a proper baseline is found in the conservation districts and managed areas, collectively referred to as Marine Protected Areas (MPAs), within the WHRFMA where aquarium collecting has been prohibited for nearly 30 years.</p> <p>Rather than using a proper baseline, free from the impacts of aquarium collecting, the DEIS incorrectly incorporates the effects of prior aquarium collecting into the baseline, and states in sections on the scope and affected environment, “the evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s,” and “permitted commercial aquarium fishing has been a part of the socioeconomic, cultural, physical, and biological resources for decades and is considered a part of the baseline condition of the affected environment.”⁹</p> <p>The important role MPAs serve as a baseline for fish populations in the WHRFMA is underscored by their use as such in reports and papers that seek to document the effects of aquarium collecting on targeted fish populations. For example:</p> <ul style="list-style-type: none"> • Six MPAs were among the 25 study sites established by West Hawai’i Aquarium Project (WHAP) to measure the effects of aquarium collecting in the WHRFMA as part of the WHAP design, because at the time (1999), they had been closed to aquarium collecting for at least 9 years (now 28 years as of 2018) and were presumed to have close to “natural” levels of aquarium fish abundances and, thus, “serve as a reference or ‘control’ to compare with the [Fish Replenishment Areas] FRAs and open areas.”¹⁰ <p>They further noted, “changes in FRAs and open areas can best be estimated by comparing them to other areas which have been protected for relatively long periods of time. These areas (MPAs) serve as control areas against which the FRAs are measured both before and after the closure of the FRAs. This rationale is derived from a well-known statistical procedure known as the BACI (Before-After-Control-</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS includes a comparison of fish densities between MPAs and Open Areas in Table 5-4 and Table 5-8. The proposed action in the EIS is the issuance of 10 aquarium permits in the WHRFMA. Therefore, the proper baseline that reflects pre-project environmental conditions (i.e., conditions prior to issuance of the 10 permits) and is spatially relevant is harvest data and population data for the past 20 years since the creation of the FRAs and MPAs and bag limits along with the most recent population estimates available for these fish (2016 CREP population estimates and 2017/2018 WHAP population estimates).</p>

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			<p>Impact) procedure (Tissot et al, 2004) which is an especially appropriate and statistically powerful method . . ." (emphasis added).¹¹</p> <ul style="list-style-type: none"> • Two MPAs were used in 1997-1998 to document the magnitude of the effect of aquarium collecting on natural populations: <ul style="list-style-type: none"> o "The magnitude of the effect was estimated by comparing fish abundance at collection sites where aquarium fish collecting was known to occur and control sites where collecting was prohibited. Because the study was initiated after collection had begun, we assumed there were no differences between control and collection sites in the abundance of aquarium fishes prior to the onset of aquarium harvesting (i.e. their natural abundances were similar." (emphasis added).¹² 	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>B. Flawed Impact Analysis In determining the level of impact to targeted (i.e. White List) species that would occur under the preferred alternative, the DEIS compares reported catch from "the 14 fishers" (presumably the 14 unidentified collectors who are seeking aquarium permits) to the estimated island-wide populations of those species. When used properly, the basic analysis – catch as % of population – is useful in describing impacts and has been employed since at least 2010 as one method for doing so in the WHRFMA.¹³ The analysis would be properly conducted by comparing the estimated population of a given species in the area of interest to the average reported catch of that species during the same time frame. Unfortunately, the analysis is easily manipulated, and in the DEIS, the impacts are minimized as described below:</p> <p>1. Affected Environment/Directly Affected area The use of island-wide fish populations in determining impacts of the proposed action to targeted (i.e. White List) species, which would occur in the WHRFMA, minimizes the appearance of impacts by expanding the population. Proper analyses use the WHAP data to assess aquarium collecting impacts via catch as % of population, because, as noted in the DEIS, the WHAP was designed to "gauge the effects of the aquarium fishing industry" in the WHRFMA.¹⁴ In those analyses, the impacted populations have appropriately been defined as those within the WHRFMA open areas, and more narrowly, within the 30'-60' depth range, because those are the areas and depths from which the fish are taken (i.e. the directly affected area).¹⁵</p> <p>The DEIS includes an example of a WHAP catch as % of population analysis, but discards it for the impact analysis in favor of island-wide</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>WHAP population estimates for each of the 40 White List species (where available) are provided in the EIS in Section 4.4.1. The trends in populations, and specifically within the open areas in the presence of historic commercial aquarium collection, are provided in Table 5-4 and Table 5-8.</p> <p>Data used in the EIS are publicly available and can be found online here: http://files.hawaii.gov/dlnr/reports-to-the-legislature/2020/AR20-WHRFMA-Rpt-FY19.pdf</p> <p>As requested, the impacts of collection on WHAP Open Area population estimates have been added in Appendix B of the FEIS.</p>

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			<p>population estimates.¹⁶ The DEIS expands the affected environment in the impact analysis to include the fish populations in the nearshore reefs of the entire island of Hawai'i which is inappropriate, irrelevant, and wrong. The proposed action is for 14 aquarium permits to be issued in the WHRFMA, as stated throughout the document and as identified in the TMK (tax map key) sections in the Applicant submittal and publication forms. The action would not occur throughout the WHRFMA, but, specifically, on reefs and other areas only within the open areas of the WHRFMA. These open areas are where the direct (and greatest) impacts occur. Other indirect impacts likely occur to the closed areas of the WHRFMA, and possibly to East Hawai'i (i.e. Hawai'i Island as a whole), but they would be eclipsed by the impacts in the actual areas where the activity would take place.</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>similar data on</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter is correct that not all fishers that may be issued permits under the Preferred Alternative (or any other alternative) have collected every year in the past. However, for this reason, the EIS used the maximum collection rates over the past 20 years for the Preferred Alternative, and then adjusted for annual growth, to project future collection over the 5-year analysis period. This was done to account for years in which certain fishers may not have collected, and then to account for growth in collection that may occur.</p> <p>Furthermore, it should be noted, as outlined in Section 5.2.1 of the EIS, although all members of the dive team must have a permit, only the principal diver is required to report the catch and effort for a dive team in order to avoid duplicate fish catch reporting. Therefore, while not all 10 fishers may have reported catch in a given year, some may have still been actively collecting as part of a team, and their catch was thus accounted for by the principal diver.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>C. Flawed Threshold for "Sustainable" Collection</p> <p>The applicant bases the DEIS on the premise that fish collection is considered sustainable if it removes less than 5% to 25% of the entire island-wide population (annually), but the reasoning behind this threshold is entirely flawed. The DEIS states that "While specific research into sustainable levels of collection has not been conducted for the 40 White List Species, Ochavillo and Hodgson (2006) suggest collection between 5% and 25% is sustainable for various reef species in the Philippines that are similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish).¹⁹ However, the DEIS should not use these thresholds because:</p> <ul style="list-style-type: none"> • These thresholds for sustainable ornamental fish collection are 	<p>Your comment has been forwarded to the decision makers.</p> <p>The sustainable thresholds provided by Ochavillo and Hodgson (2006) represent the best available science regarding sustainable harvest of species with simialar life histories to those harvested in Hawai'i, as specific thresholds for the 40 White List Species (or for Hawai'i) are not available. Nevertheless, as concluded in the EIS, collection under the Preferred Alternative is below the lower limit of 5% for all 38 of the White List Species for which population estimates are available.</p>

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			<p>species-specific based on estimated natural mortality rates (M) and fishing mortality at maximum sustainable yield (FMSY) or year-per-recruit analysis. Natural mortality rates for reef fishes are based on growth rates and length and thus are also area-specific. Mortality is based on catch data. Yield-per-recruit analysis should be derived from several annual surveys. Thus, these parameters should be specifically calculated for Hawaiian reef fish targeted by the aquarium industry as highlighted in Ochavillo and Hodgson (2006).</p> <ul style="list-style-type: none"> • These thresholds were developed to calculate total allowable catch (TAC) in comparatively small “collection areas” that are orders of magnitude smaller than Hawai’i Island. Specific collection areas used by Ochavillo and Hodgson (2006) to develop the methodology are adjacent to Bohol island in the Philippines, which is close in size, though smaller, than Hawai’i Island. One collection area, Clarin, is part of a coastal town of the same name that has a coastline of approximately 6 linear km. Another, Batasan Island, lies approximately 6.4 km off the coast of Clarin. Applying the 5%-25% threshold to the entire island of Hawai’i far exceeds the parameters it was developed for. • The 5%-25% threshold indicates “a good rule-of-thumb of collection limit” for coral reef fishes in the Philippines.²⁰ This does not mean it is a good rule of thumb for collecting reef fishes in Hawai’i. • Most ornamental fish species in Ochavillo and Hodgson (2006) are species different from those on the White list. Only a few species share the same genus or species (butterflyfish, a couple of wrasses, one angelfish, a couple of damselfish, one tang and one triggerfish). Thus, it is questionable whether this fairly wide threshold (5%-25%) is representative and applicable to Hawaiian species. • Finally, this report is not peer-reviewed research, it is a field manual: Marine Aquarium Trade for Coral Reef Monitoring Protocol with a Data Analysis and Interpretation Manual. This field manual was designed in part to: “provide a scientific basis for recommending sustainable levels of collection.”²¹ 	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>The DEIS continues to assert that current fish abundance for target species is the baseline, and thus 1% to 5% of individuals removed from the population would be considered sustainable. But this is wrong. The DEIS fails to acknowledge that current population abundance of most of these fish species is already depleted due to in part to heavy exploitation by the aquarium trade since at least the 1980’s and habitat degradation. The total allowable catch for each species must be calculated based on information on natural mortality rates and the available and limited information on catch records, specific to the geographic areas and locations where they are taken in the WHRFMA.²² Additionally, an analysis of larval dispersal and</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The DEIS does not calculate total allowable catch, but discloses the percent of the population that would be collected via commercial aquarium collection as the metric for determining significance. Current population estimates are used to evaluate impacts, as those are the populations that would be impacted. The DEIS also addresses cumulative impacts, including other fisheries (i.e., non-commercial aquarium collection).</p>

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Society of the United States			connectivity patterns for White List species on Hawai'i Island is key to preventing local extirpation of heavily targeted and/or rare species.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>D. Unrepresentative Data Used</p> <p>The Coral Reef Ecosystem Program (CREP) data used in the DEIS for the entire Island of Hawai'i (based on 2010-2016 surveys) are not representative of regional population abundance such as in East Hawai'i and the WHRFMA, and should not be used to estimate regional proportions of fish catch.</p> <p>Population abundance estimates for fish species for the entire island of Hawai'i²³ are not representative of regional fish abundances such as East Hawai'i and WHRFMA. The CREP data collect fish data from 257 stationary point count locations around Hawai'i between depths of 0-98 feet. In contrast, the West Hawai'i Aquarium Project (WHAP) collected data from 25 transect survey sites from WHRFMA area between depths of 30-60 feet.</p> <p>It is well established that population abundances of reef fish species in Hawai'i, especially relatively small-size species that are targeted by the aquarium industry, are highly variable in space depending on reef complexity, depth and wave exposure, and in time (within and among years) depending on the season, mortality, recruitment to the population, and environmental factors.²⁴ The relative proportion of fish species taken annually by the aquarium industry should be based on regional total abundances and regional catch records (e.g., aligned with the aquarium fish trip report zones). Allowable levels of take should be determined in conjunction with the wishes of Hawai'i residents and visitors who strongly desire that fish populations are restored to their naturally occurring (i.e. unfished) levels of abundance on the majority of Hawai'i reefs.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring, has been added as Appendix B of the FEIS for reference.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>The allowable number of individuals that could be collected from aquarium fish populations must be substantially less than those proposed in the DEIS Preferred Alternative, because most of these species are already depleted. Fishing effort has substantially increased for aquarium fish species on the Island of Hawai'i.²⁵ Prime-targeted species have significantly declined due to overharvesting.²⁶ For example, population abundance of one of the most heavily exploited species, Yellow Tang (<i>Zebrasoma flavescens</i>), on the west coast of the island of Hawai'i (West Hawai'i) declined 45% due to exploitation in areas open to fishing/collection from 1999 to 2007.²⁷ Yellow Tang abundance is closely tied to annual levels of recruitment, and after good recruitment levels from 2008 – 2013, Yellow Tang abundance in the Open Areas improved, but was still 4.7% lower than the 1999 – 2000 Open Area baseline.²⁸ As noted earlier, an anomalous recruitment pulse in 2014 is likely behind the increase in abundance seen since</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS relies on the most up-to-date population estimates, as such the DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or have significantly increased between 1999 and 2017, and, for the 12 White List Species which had significant declines, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a).</p> <p>The commenter specifically references a decline in Yellow Tang and cites an earlier source. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range</p>

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			<p>then.²⁹</p> <p>Even when including marine managed areas (MMAs) such as FRAs, where collection is prohibited and abundances are five times higher than in open areas, the population abundance of Yellow Tangs on West Hawai'i is substantially less than historical levels.³⁰ The established networks of MMAs have definitely worked to increase Yellow Tangs and some other fish species in the West Hawai'i FRAs,³¹ but not all species have responded positively, and some have actually decreased overall since the FRAs were established. The extent to which collection pressure—whether in the Open Areas or due to poaching—is driving the decline of heavily targeted aquarium species in the areas closed to the trade must be studied. While the DEIS attempts to minimize the impacts of collection pressure by proposing that factors other than aquarium collecting are also affecting their populations, it remains highly likely that the main cause is collection pressure. An example of the effect of collection pressure on populations in MMA's is found in the significant decline of Yellow Tangs in those areas from 2004-2009 which coincided with Yellow Tang reported catch during that period that was substantially higher (e.g. in 2004 and 2006 it was more than double that reported in 2002).</p>	<p>over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Given the relative long life-span of Yellow Tangs (>40 yrs.) and increasing fishing intensity, these MMAs are just becoming sources for the aquarium fishing industry. The recovery of this species to past levels is unlikely if fishing/collection intensity continues or increases in the future.</p> <p>The commercial aquarium fishery in the Island of Hawai'i has grown over the last three decades, particularly after the O'ahu aquarium fishery substantially declined in the early 1990s due to hurricanes and localized overfishing.³² It is thought that the expansion of the Island of Hawai'i aquarium fishery was due to new collectors and relocation of collectors from O'ahu.³³ Scientific evidence shows that collecting activities substantially affect targeted species in Hawai'i³⁴ and fishing intensity remains high even when stocks are depleted or recruitment is weak.³⁵</p> <p>Therefore, the current estimates of population abundance of fish species for the entire Island of Hawai'i (from 2010 to 2016)³⁶ should not be used as regional/local reference abundances (e.g., East Hawai'i, WHRFMA) to estimate minimum and maximum percentage of fish taken per year.³⁷ This is because these calculations underestimate the proportion of fish collected by region (East and West Hawai'i) and assumes fish populations of the entire Island of Hawai'i are distinct or discrete. A more accurate calculation of allowable catch would be based on regional population abundance, using the aquarium trip</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As shown in Table 5-4 of the EIS, the Yellow Tang population has significantly increased in FRAs, Open Areas and MPAs between 1999/2000 and 2017/2018, even in the presence of historic collection rates. The current population estimates are used, as those are the populations which would be impacted by the Proposed Action (issuance of 10 commercial aquarium permits).</p> <p>While the FEIS maintains that the CREP populations offer the best estimates to analyze impacts, as requested, the impact of collection on WHAP Open Area populations has been added as Appendix B of the FEIS.</p>

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			<p>report zones, and by using the WHAP data estimates obtained from the depth ranges where the fishes are captured, rather than by regions.</p> <p>Finally, sustainable fishable abundance for target species must take into consideration the fact that most target species are depleted in comparison with historical levels. The EIS fails to analyze the impact of collection/fishing on current population abundance and fails to consider that these populations are far below the historical baselines as represented in the MPAs, or otherwise.</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>E. Catch Is Grossly Underreported</p> <p>As mentioned above, there is no requirement for recreational aquarium collectors to report catch. For commercial collectors, while reports are required, catch report compliance is substantially low. As such, the impact of the aquarium fishing industry is likely larger than is reported, which has been discussed in the scientific literature.³⁸ As a former DLNR employee succinctly wrote regarding aquarium catch reports: “The reliability of the data depends upon the sincerity of the permittees.”³⁹ There is no verification system, such as that provided by independent observers, to ensure the accuracy of self-reported data. One additional major impediment to accurate data stems from the lack of a license requirement for marine dealers and/or exporters. Currently there is a requirement for dealers (i.e. those who buy directly from aquarium collectors) to report their purchases. According to DLNR, the effect is that “dealer reporting is essentially on a voluntary basis and a few dealers are not reporting in whole or in part.”⁴⁰ DLNR cannot know whether a “few” or a dozen dealers are not reporting, without a requirement for these businesses to have licenses, thus, these businesses operate beneath the radar and serve as a conduit for moving unreported catch out of the state. Establishing a marine dealer/exporter license has long been a priority for those within DLNR concerned about Hawai‘i’s marine resources, because it would enable the department to verify catch reports, identify unlicensed collectors (and all commercial fishers), identify dealers and helped with generating economic data about the fisheries. Without this information, DLNR/DAR has no accurate data on health of fish populations. According to a former DAR Commercial Fisheries manager, Karl Brookins, the process of establishing the license was abandoned due to lack of funding.⁴¹</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, analysis by the DAR (2019a) has shown that actual underreporting of catch is small, with a 3.5% difference between the number of animals reported caught and sold in 2010 and a 0.4% difference in 2014 , which likely represent live releases and mortality. This impact has been added as a Cumulative Effect in Section 5.4.3.6 of the FEIS.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>F. Further Necessary Data Excluded is Needed for an EIS</p> <p>As discussed above, there is no reliable data on how many fish and other species are actually taken pursuant to aquarium permits in any given year. The DEIS repeatedly refers to a lack of data for numerous species. For example:</p> <ul style="list-style-type: none"> • “Most of the Flame Wrasse population occurs below the 60-foot 	<p>Your comment has been forwarded to the decision makers. The EIS used the best available science, including population estimates for those species which were available.</p>

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Environmental Laboratory, and The Humane Society of the United States			<p>depth surveyed by the WHAP and below the 98-foot depth surveyed by the CREP, and therefore the species is not observable by the methods of either survey. As such, data are not available to produce a reliable WHRFMA or island-wide population estimate.”⁴²</p> <ul style="list-style-type: none"> • For Psychedelic (Redtail) Wrasse, Tinker’s Butterflyfish, Longfin Anthias, Flame Wrasse, Fisher’s Angelfish, and Eystripe Surgeonfish (Palani), open area populations and catch as a percent of the open area populations are not available, because species “occur[] in habitats not adequately surveyed by transects.”⁴³ <p>This data is necessary in order for the EIS to properly assess impacts. Furthermore, the Agency must conduct stock assessments of species before it is able to determine a sustainable rate of take. Clearly the Agency has not done so, as DLNR personnel have stated that to do so would take over a decade for just 40 fish species, out of the more than 287 fish and invertebrate species the Agency identifies as targeted by the trade (found at Appendix 5).⁴⁴ Without such data, the Agency cannot meaningfully assess the environmental impacts of commercial aquarium collection. Such assessments must be completed prior to the issuance of the EIS, and in the face of any uncertainty, the EIS’s analyses must err on the side of caution to protect these vulnerable species.</p>	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>G. Examples of Proper Impact Analyses</p> <p>Other comparisons of reported catch to estimated populations reveal that upwards of 80% of Achilles tangs and 60% of yellow tangs in the WHRFMA open areas have been taken by commercial aquarium collectors in some years and concluded that “aquarium collecting is having a major impact on Achilles and yellow tang.”⁴⁵ Although these estimates are imperfect, because they do not factor under-reporting, they are still more accurate than presented in the DEIS because they are spatially relevant. Still, the extremely high levels of take are reflected in the difference between populations where they are taken (i.e. the open areas) and baseline areas where they have not been taken for decades (i.e. the MPAs). For yellow tangs, it has resulted in a 62% reduction in natural abundance in those areas, on average, compared to the MPA baseline since researchers began documenting the differences in 1999 in the three management areas comprising the WHRFMA.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, populations of Yellow Tang have increased significantly in FRAs, Open Areas, and MPAs between 1999/2000 and 2017/2018, even in the presence of commercial aquarium collection. The Achilles Tang population has decreased in all three areas (significantly so in FRAs and Open Areas), indicating that commercial aquarium collection is not driving the decline (DAR 2019a). The Preferred Alternative includes bag limits and size limits for both of these species, including a reduction in the bag limit for the Achilles Tang, as well as reducing the number of commercial aquarium permits to 10.</p> <p>As requested, the impacts of collection on WHAP Open Area population estimates have been added in Appendix B of the FEIS.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental	N/A	1/7/2020	<p>III. All Impacts Improperly/Inadequately Analyzed</p> <p>A. Failure to Adequately Analyze Long-Term Impacts</p> <p>The Applicant unlawfully limited its analyses to the time period of five years.⁴⁹ PIJAC’s provides no reasoning for this 5-year period, while noting that each permit lasts only one year, and therefore a new HEPA analysis would need to be completed on an annual basis.⁵⁰ However, while Commenters agree that it is critical for the Agency to continue</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A five-year analysis period was chosen because, as stated in Section 5.0. of the EIS, the temporal scope of the impacts analysis is five years because the WHRFMA management plan is reviewed every five years by the DLNR in cooperation with the University of Hawai’i (DAR 2019a). Because the most recent DAR review was released in 2019,</p>

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Laboratory, and The Humane Society of the United States			<p>to monitor the impacts that aquarium collection is having over time, the relatively short time period of the activity itself does not nullify HEPA’s clear requirement for considering the long-term effects of that activity.⁵¹ For example, a large excavation project could destroy habitat in an area of an island that takes decades to regrow—and even if the excavation itself was only for a year, HEPA would clearly require consideration of the impacts to the environment during the decades of regrowth. Similarly, the use of a pesticide could have known impacts on a species where serious or lethal effects are felt far beyond the time frame of the actual application of the pesticides—yet HEPA would clearly require consideration of those expected impacts. Thus, PIJAC’s logic simply does not hold up. Additionally, stating that the Agency can simply reevaluate the consequences of a year-long permit after that year is up entirely contradicts HEPA’s mandate to evaluate the potential consequences of an action before the Agency authorizes the action.</p> <p>Additionally, a 5-year timeframe that analyzes impacts is inadequate because the impact of fish removal will accumulate over time. For example, though collection pressure has been removed from the White List species in the FRAs, populations of once heavily targeted species in those areas, such as yellow tangs, have yet to return to natural levels of abundance, as reflected in the baseline MPAs, even after 20 years of protections. For very long-lived species such as the yellow tang and other surgeonfishes heavily targeted by aquarium collection, which have lifespans measuring decades, and which may not reproduce until they are at least 5 years old, a 5-year analysis period is far too short.</p>	<p>the next DAR review overlaps in time with the analysis period in the EIS. If the Preferred Alternative is implemented, presumably the DAR will review the effects during its next five year review and can make any necessary changes to permit issuance at that time. In addition, because Aquairum Permits have a 1-year duration, the DLNR can decide each year whether or not to issue permits based on new data. The cumulative impact of fish collection is addressed in Section 5.4.3.3 of the EIS.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>In addition, studies show that catch numbers from the commercial aquarium fishery in Hawai’i have significantly increased over the last few decades and are likely to increase even more, despite the limited request for 14 permits.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>To account for this, the EIS uses the maximum collection rates from the past 18 years, and applies an annual growth rate to that collection to account for increasing collection over time.</p>
For the Fishes, Center for Biological Diversity,	N/A	1/7/2020	<p>DLNR data shows a strong correlation between the number of permits issued and the level of catch (Fig. 2); however, historically commercial aquarium collectors have reported catching fish just three days per week.⁵² There is nothing preventing them from increasing that effort,</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of “unlimited” collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful</p>

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Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States			via increasing the number of hours and/or days they collect, in response to perceived scarcity from, for example, impacts to habitat from storms and climate change, or from additional collectors seeking permits through the HEPA process (i.e. the “get it while you can” mentality); or, in order to meet the high demand for aquarium reef fish and their increasing market value. ⁵³	<p>(and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of “every fish and every marine creature” is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	Furthermore, the Hawai’i Supreme Court has made clear that the proper inquiry under HEPA is “the outer limits of what the permits allow” ⁵⁵ The outer limits allowed by the permits are the take of every fish and every invertebrate from every reef in the state of Hawai’i that isn’t in a protected area. Permits issued under this DEIS would allow just that without a new law, rule, or permit condition, defining geographic and take limits. Further, as there are no limits on the number of commercial marine licenses (CML) issued for aquarium collecting, in the rest of the state and East Hawai’i, the issue of aquarium trade impacts to Hawai’i’s coral reefs remains unresolved.	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of “unlimited” collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of “every fish and every marine creature” is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1</p>

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				of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS analyzes the effects of issuing aquarium permits to 14 people in the WHRFMA, however permits are issued statewide, with no geographic limits, other than those pertaining to managed areas, which are regulated by other statutes. The DEIS fails to identify this unresolved issue, to discuss how it will be resolved prior to commencement of the action, or describe any overriding reasons for proceeding without resolution of the issue, though legally required to do so. ⁵⁶ Currently the use of fine mesh nets for aquarium purposes is prohibited everywhere, and with the issuance of any geographically limited permits, DLNR would likely be unable to enforce those geographic limits given their extremely limited resources.	Your comment has been forwarded to the decision makers. The following statement has been added to the Limited Permit Issuance Alternative and the WHRFMA-only Programmatic Issuance of Permits Alternative: <i>It is assumed that, upon issuance of an Aquarium Permit, a permit condition would be included in each permit limiting the geographic area covered by the permit to the WHRFMA.</i>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	Furthermore, the DEIS is for 14 fishers, however nothing prevents more fishers from seeking permits through additional HEPA reviews. In addition, pursuant to HRS § 189-2, DLNR is currently issuing an unlimited number of commercial marine licenses for aquarium collecting. The relationship between the number of participants in a fishery and impacts to fish populations is well-established in the literature. The importance of restricting access to fisheries has been acknowledged and used for thousands of years to conserve and help sustain fish populations. ⁵⁷	Your comment has been forwarded to the decision makers. While it is true that additional persons may seek permits, issuance of additional permits beyond the 10 analyzed in this EIS would a separate HEPA review and analysis by the DLNR before permits could be issued.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS failed to take into account how increasing demand and increasing market value will affect already depleted targeted reef fish species in the coming years, thus resulting in significant environmental impact. For example, the market value of tropical reef fish (e.g., Yellow Tang) has increased and thus collection/fishing pressure is also likely to increase in the near future. The commercial aquarium fishery in Hawai'i reports annual landings of over 579,000 organisms (fish and invertebrates combined). ⁵⁸ The number of aquarium fish caught on the island of Hawai'i since 1976 has substantially increased by 645%. ⁵⁹ Similarly, the adjusted value of the Hawai'i Island aquarium fishery increased by over 280% between 1976 and 2003. ⁶⁰ The DEIS fails to properly analyze this relationship, and fails to propose	Your comment has been forwarded to the decision makers. The EIS conservatively uses maximum collection rates to project future collection, and also applied a growth rate for socioeconomic and biological consequences based on historic trends. A five-year analysis period was chosen because, as stated in Section 5.0. of the EIS, the temporal scope of the impacts analysis is five years because the WHRFMA management plan is reviewed every five years by the DLNR in cooperation with the University of Hawai'i (DAR 2019a). Because the most recent DAR review was released in 2019, the next DAR review overlaps in time with the analysis period in the

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			<p>mitigation to reduce population declines. The DEIS claims that the high fecundity and long lifespans of reef fishes combined with the limited targeting of adult brood-stock by the trade removes the certainty that the losses will accumulate over time is false. Studies show that populations of heavily targeted species, such as Yellow Tangs, are neither annually replenished, nor restored over time to their natural levels of abundance, even 20 years after collection pressure has been removed. On the contrary, they have been severely depleted over time, especially in the areas where they are collected. While the DEIS noted that for Yellow Tang and kole, which represent two of the top three collected species, population trends are stable or increasing, it failed to acknowledge that the increase in fish abundance is due to an anomalous recruitment pulse that coincided with warming waters in 2014.⁶¹ Typical recruitment pulses, such as those that occurred in 2002 and 2009, have resulted in short-lived increases in fish populations that were followed by prolonged or short and steep population declines. ⁶²</p> <p>More importantly, the 2017 and 2018 increases in populations of White List species in the Open Areas was due to the total prohibition of aquarium collecting in the WHRFMA as of January 5, 2018. In fact, the 2018 surge in yellow tang abundance was the largest ever recorded in the WHRFMA and occurred only in the Open Areas while populations in the FRAs declined in 2018, and were slightly, but insignificantly higher in the MPAs (i.e. they cannot be attributed to anything other than the removal of collection pressure).</p> <p>Thus, the DEIS not only fails to acknowledge the evidence of depletion caused by collection activities that is apparent when using the proper baseline, but also fails to acknowledge the beneficial impact that would occur in the WHRFMA under the No Action Alternative.</p> <p>The failure of the DEIS to conduct a proper analysis, as described above, is not only a legal flaw but also the main reason that the DEIS does not find a significant impact of the aquarium fishing industry on targeted species and their habitat. In addition, by limiting the timeframe of their analysis to five years, the DEIS fails to accurately consider the impacts of one-year collection permits cumulatively with other “past, present, and reasonably foreseeable actions” “over a period of time.” ⁶³</p>	<p>EIS. If the Preferred Alternative is implemented, presumably the DAR will review the effects during its next five year review and can make any necessary changes to permit issuance at that time. In addition, because Aquairum Permits have a 1-year duration, the DLNR can decide each year whether or not to issue permits based on new data. The cumulative impact of fish collection is addressed in Section 5.4.3.3 of the EIS.</p>
For the Fishes, Center for Biological Diversity,	N/A	1/7/2020	<p>B. Failure to Analyze Indirect and Cumulative Impacts Coral reefs are connected by currents which carry and disperse fish larvae to other areas, both near and far. Most fishes on Hawai'i's reefs are the result of other fishes upstream of that reef.⁶⁴ The currents</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS recognizes and acknowledges larval connectivity around the Island of Hawai'i, which is why it is felt that the island-wide population</p>

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Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States			<p>and conditions that control larval connectivity and dispersal processes are complex. The larvae of some species are able to travel between islands, while others do so to a lesser extent. For example, in one study, some yellow tang larvae on Hawai'i Island travelled on ocean currents for 15 km before settling on a reef while others traveled 184 km.⁶⁵</p> <p>Recent research into two species of small bodied surgeonfishes, including kole which is heavily targeted by the aquarium trade, has determined that populations of these fishes are genetically distinct on each of the main Hawaiian Islands. This means that, for at least these two species, there is little genetic mixing between islands, and once species are depleted on any given island, there is no other source for population replenishment. Further, connectivity and dispersal studies on the island scale for certain species have identified important spawning source areas that are essential for maintaining populations on other reefs across the island.</p> <p>This larval connectivity between coral reefs serves to highlight areas where secondary or indirect impacts of the Applicant's actions will manifest. Regardless of whether larval connectivity exists mainly intra-island or extends inter-island, reduced populations of reef fishes in their source areas will seriously impact reef fish abundance in their downstream, sink reefs, and thus the entire island.⁶⁶ The DEIS fails to account for this critically important reproductive strategy used by Hawai'i's reef fishes. The precautionary approach requires the determination of source areas for the 40 White List species on Hawai'i Island and the establishment of protections for those populations to ensure local species survival, which was not provided in the DEIS.</p>	estimates based on CREP data are the best metric when measuring population impacts.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>Additionally, the DEIS fails to properly address the true nature of what the Applicant is requesting in its Preferred Alternative whereby: "DLNR would issue Aquarium Permits to 14 aquarium fishers in the WHRFMA...No Aquarium Permits would be issued for areas outside of the WHRFMA (in East Hawai'i aquarium collection using legal gear or methods other than fine-mesh nets could continue but use of fine mesh nets would not be allowed). Permittees would abide by all rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List Species only, and reporting requirements.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Size and bag limits exist for species other than the Achilles Tang, as outlined in Section 1.2.3.2 of the EIS.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each</p>

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			<p>In addition, under this alternative, the daily bag limit for commercial aquarium collection of Achilles Tang within the WHRFMA would be reduced from 10 per day to 5 per day.” 67</p> <p>In other words, the Applicant’s Preferred Alternative continues to be the collection of an unlimited number of fish, with one exception for the Achilles Tang—the limits of what regulation allows. Yet, the DEIS considers only very limited collection. HEPA requires that an EIS assess the potential cumulative impacts of what State regulations allow, not just what some permittees may claim they intend to do, or have historically done, with their permits. As the Hawai’i Supreme Court clearly stated, “the properly defined activity for the purposes of the HEPA analysis must encompass the outer limits of what the permits allow and not only the most restrictive hypothetical manner in which the permits may be used.”68 The DEIS failed to address this.</p>	<p>year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of “every fish and every marine creature” is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Relatedly, the DEIS assumes that aquarium collection without the use of fine-mesh gear will continue “legally” in East Hawai’i; however, as indicated in a letter dated January 7, 2020, from Earthjustice to DLNR (attached as Appendix 8), such collection also requires HEPA review, which currently is not being conducted. If this purportedly “legal” collection were halted pending environmental review, then the 14 collectors would have even greater incentive to increase collection levels in West Hawai’i in the meantime. The DEIS fails to consider this effect.</p>	<p>Your comment has been forwarded to the decision makers. The 10 fishers have historically collected an average of only 294 fish from East Hawai’i, so closure of the East Hawai’i fishery, if it were to close, is not anticipated to greatly increase their collection in the WHRFMA.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Likewise, although the DEIS purports to analyze impacts cumulatively with those of recreational collection permits, the DEIS still does not account for the fact that the Agency issues a permit for every application that is submitted, and therefore the take under recreational permits is potentially unlimited as well.69 And the DEIS admits that, as there is no required reporting for recreational permits, it is currently impossible to know how many of each species are taken under those permits, and therefore, the impact of collection under these permits on species collected under these permits cannot be quantified.70 This lack of data is not properly addressed in the EIS.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of recreational aquarium fish collection are analyzed in Section 5.4.3.1. Because, as noted by the Commenters, data are not available on the number of fish collected by recreational aquarium permit holders, the EIS evaluates a reasonable worst case scenario (i.e., all permit holders collect 50% of their allowable catch). These estimates are likely high based on results from Harding (2017), which found that 57% of recreational aquarium permit holders surveyed had not utilized their permit in the previous 12-month period. Of the 43% who had used their permits, their average yearly catch was 45 fish per permit (Harding 2017), which is below the maximum allowable number of 1,825 fish or the 50% used to estimate impacts above.</p>

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For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The analysis of cumulative impacts included the impact of the commercial aquarium fishery, regardless of the gear used to capture the marine life, combined with non-aquarium commercial and recreational fisheries and other activities that impact population abundance, but reached a conclusion that is erroneous. Commercial and recreational fishing combined with the aquarium fishery have a substantial impact on targeted species. The EIS fails to determine cumulative impact of all fishing on target species. In addition, the EIS fails to analyze indirect impacts from collection such as vessel traffic and accumulated reef damage due to vessel anchoring and collection practices.	Your comment has been forwarded to the decision makers. Section 5.4.3.7 of the FEIS concludes that cumulative impacts to the 12 White List Species with declining population trends would be significant, but that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines. In addition, for the 12 species that have shown a significant decline in population size in one or more management area since establishment of the WHRFMA in 1999, commercial aquarium collection under any of the five alternatives would collect less than 1% of the island-wide population estimates for 10 of the species (Table 5-14). For the remaining two species, Achilles Tang and the Pyramid Butterflyfish, commercial aquarium collection would collect less than 4% of the island-wide population (Table 5-14). Based on this, while commercial aquarium collection does contribute to the cumulative impact, it is a less than significant factor in the observed declines.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS fails to adequately evaluate the potential of cumulative impacts of climate change (warming, coral bleaching, and ocean acidification) on targeted fish species such as decline of coral coverage which have been demonstrated to influence reef fish species diversity and abundance. ⁷¹ The EIS recognizes that climate change poses serious threats to Hawai'i's coral reefs and the species targeted by the Applicant, yet ironically claims that climate change impacts coupled with the impacts of implementing the Preferred Alternative is expected to be less than significant. These statements completely dismiss the research and data that demonstrate what is stated, that climate change impacts, specifically ocean warming, acidification and coral bleaching events will continue, thus further analysis of impacts and exacerbation of impacts due to climate change is required. ⁷²	Your comment has been forwarded to the decision makers. The EIS does not claim that climate change impacts, when combined with other cumulative impacts and the Preferred Alternative, will be less than significant. The EIS does say the following: "When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species. However, the Preferred Alternative is not a significant contributor to the cumulative effect upon the environment. " Collection under the Preferred Alternative is less than 2% of any population of White List Species .
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The	N/A	1/7/2020	It is clear from an analysis of cumulative impacts that many of HEPA's "significance criteria" apply. ⁷³ Had proper analyses been conducted, the Preferred Alternative most certainly would have shown significant effects on the environment due to at the least, the following: the loss or destruction of natural and cultural resources; curtailing the range of beneficial uses of the environment; substantial degradation of environmental quality; cumulative effects on the environment; and potentially substantially affecting rare, threatened or endangered species, or its habitat. ⁷⁴	Your comment has been forwarded to the decision makers.

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Humane Society of the United States			<p>Flawed analyses prevented the DEIS from accurately assessing and addressing these effects, in part, because the DEIS uses as a baseline, current conditions, which have been impacted by decades of the aquarium collecting activity.⁷⁵ Therefore, the scope fails to factor the impacts of collection pressure over time. Proper examination of the magnitude of the effect of aquarium collecting on natural populations and the coral reef ecosystem over time requires a proper baseline such as occur in MPAs, which reflect natural populations, before they were depleted by this activity, and have been used as such in numerous studies.⁷⁶</p>	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>IV. Failure to Adequately Analyze and Address Significance Criteria and Other Areas of Concern Proposed by DLNR in NOD</p> <p>DLNR, in the Final Environmental Assessment, Notice of Determination, described five HEPA significance criteria and eleven additional areas requiring further analysis by the Applicant. Here too, the DEIS is totally inadequate, falls far short of providing proper analyses, and fails to reach conclusions that are supported by the evidence.⁷⁷</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The HEPA significance criteria, and the Applicant's conclusions, are provided in Section 5.6 of the EIS.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>A. HEPA Significance Criteria #1: To the question of “whether the annual take of cumulative numbers of fish as a percentage of estimated population results in irrevocable loss or destruction of populations of fish,” the DEIS wrongly concludes “the Preferred Alternative (i.e., Limited Permit Issuance Alternative) does not involve an irrevocable commitment or loss or destruction of any natural or cultural resource.”</p> <p>Fish Populations: Any and all substantial reductions in natural abundance of White List species in West Hawai’i indicate lost natural and cultural resources. While it may be true that a potential revocable loss may be indicated by increasing populations of some White List species when aquarium collecting is halted, such as occurred for yellow tangs in the FRAs after their establishment in 2000 and in the open areas after collection was prohibited in 2018, there is no evidence that natural abundance will ever return. The reduced populations of yellow tangs in the FRAs, compared to baseline, natural populations found in the MPAs, even after 20 years of no aquarium collecting, is further evidence of an irrevocable loss that has occurred. Furthermore, severe coral bleaching caused by climate change has already reduced coral cover in West Hawai’i and is only expected to worsen, with annual bleaching that could begin as early as 2030 and</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>which will result in the loss of 70% of Hawai'i's reefs. This loss of White List habitat virtually assures that a depleted population will not be able to rebound to the same extent, or at all, in the future, though it may have in the past.</p> <p>Further evidence is found throughout this document and all combined point to significant adverse impacts to fish populations as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Reef Habitat: The DEIS wrongly claims that “the pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on reef habitat as a result of the Preferred Alternative would occur.” Damage to reef habitat from commercial aquarium collection is well documented. See “Damage to Reef Habitat” later in this document and also Appendix 3 where photographs of these practices and their effects can be found. The DEIS cites a 2003 study (Tissot and Hallacher) in an attempt to conclude that no significant impact on aquatic invasive algae control is anticipated as a result of the Preferred Alternative, noting that the authors “found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting.” However, the DEIS omits the author’s subsequent conclusion that the study may not be a good test of that hypothesis for several reasons, including that herbivores taken by aquarium collectors primarily consume filamentous algae (i.e. turf), not macroalgae, and that further investigation is warranted.⁷⁸ Additionally, macroalgae accounts for <2% of algal cover in West Hawai’i – the majority is turf algae, further underscoring the irrelevance of the 2003 study.⁷⁹ Evidence throughout this comment document points to significant adverse impacts to reef habitat as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>In addition to the Tissot and Hallacher (2003) study, the DEIS also cites the DAR (2018c) which has statistically evaluated coral cover over time between Open Areas and areas closed to commercial aquarium collection, but has not found any statistically significant difference.</p> <p>Breaking or damaging coral will remain illegal under state law (HAR 13-95-70 and HAR 13-95-71) under any of the alternatives under consideration.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Cultural Resources: The DEIS wrongly claims that “White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural resources would occur as a result of the Preferred Alternative.” This follows the conclusion in the CIA that “cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.” As described in detail in this comment document, White List species are currently in decline as a direct result of aquarium collecting and will</p>	<p>Your comment has been forwarded to the decision makers.</p>

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Society of the United States			continue to decline as such as long as aquarium collecting occurs on Hawai'i Island. Therefore, cultural resources are in fact impacted. Further evidence is found in the CIA which includes descriptions of significant adverse impacts to cultural resources as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>HEPA Significance Criteria #2: To the question of whether “the take of aquarium fish curtails the uses of the environment, including aquatic invasive algae control, the tourism industry, and the overall integrity of diverse aquatic ecosystems,” the DEIS wrongly concludes “the Preferred Alternative does not curtail the range of beneficial uses of the environment.”</p> <p>Aquatic invasive algae control: The DEIS wrongly claims that “the pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on aquatic invasive algae control as a result of the Preferred Alternative would occur. The DEIS cites a 2003 study (Tissot and Hallacher) to attempt to conclude that no significant impact on aquatic invasive algae control is anticipated as a result of the Preferred Alternative, noting that the authors “found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting.” However, the DEIS omits the authors subsequent conclusion that the study may not be a good test of that hypothesis for several reasons, including that herbivores taken by aquarium collectors primarily consume filamentous algae (i.e. turf), not macroalgae, and that further investigation is warranted.⁸⁰ Additionally, macroalgae accounts for <2% of algal cover in West Hawai'i – the majority is turf algae, further underscoring the irrelevance of the 2003 study.⁸¹</p> <p>Reductions in herbivore biomass drive an increase of algae abundance. In West Hawai'i, herbivore biomass is as much as 2 times higher in the baseline MPAs than in the open areas and FRAs.⁸² Historically, 26.5% of the total biomass removed from West Hawai'i reefs in fishing and other extractive uses has been aquarium take, 98% of which are herbivores.⁸³ Logically, it follows that algae control is being significantly curtailed by aquarium take in the open areas. Evidence throughout this comment document points to significant adverse impacts to aquatic invasive algae control as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>In addition to the Tissot and Hallacher (2003) study, the EIS also cited the DAR (2019a), who reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>
For the Fishes, Center for Biological	N/A	1/7/2020	<p>Tourism: The DEIS wrongly claims that “populations of the White List Species are not anticipated to significantly decline, therefore not significantly impacting viewing opportunities. Consequently, continued</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The DAR (2019a) has noted that 24 of the 40 White List Species have</p>

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Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States			commercial aquarium collection under the Preferred Alternative, which would limit the number of Aquarium Permits and decrease collection, is not anticipated to significantly impact tourism.” As described below, viewing opportunities and marine tourism revenue losses resulting from depleted populations of beautiful, charismatic and iconic fishes are captured in studies documenting willingness to pay and consumer surplus losses. Therefore, there are significant adverse impacts to marine tourism as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.	<p>remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was occurring at the rates anticipated under the Pre-Aquarium Collection Ban Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.</p> <p>As stated in the EIS, the Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	Integrity of Diverse Aquatic Ecosystems: The DEIS wrongly claims that “The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on the integrity of diverse aquatic ecosystems as a result of the Preferred Alternative would occur.” As described throughout this document, White List species are currently in decline as a direct result of aquarium collecting and will continue as such as long as aquarium collecting occurs on Hawai'i Island. Additionally, local extirpation has already been identified for some aquarium targeted species, which have been described by DAR and former aquarium collectors as “once common, now rare”, a condition that likely exists for other species, as well. ⁸⁴ Therefore, there are significant adverse impacts to the integrity of diverse aquatic ecosystems as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.	<p>Your comment has been forwarded to the decision makers.</p> <p>The DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was occurring at the rates anticipated under the Pre-Aquarium Collection Ban Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The	N/A	1/7/2020	B. HEPA Significance Criteria #3: To the question regarding the extent to which the take of aquarium fish conflicts with the state's long-term environmental goals, the DEIS wrongly concludes that “the Preferred Alternative does not conflict with the State's long-term environmental policies, goals, or guidelines as expressed in chapter 344 HRS.” As described throughout this document, significant adverse impacts to natural resources would occur as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.	Your comment has been forwarded to the decision makers.

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Humane Society of the United States				
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>C. HEPA Significance Criteria #4: To the question of the impact of the take of aquarium fish on cultural practices in the state, the DEIS wrongly claims that “White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural resources would occur as a result of the Preferred Alternative.” This follows the conclusion in the CIA that “cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.” As described in detail in this comment document, White List species are currently in decline as a direct result of aquarium collecting and will continue as such as long as aquarium collecting occurs on Hawai’i Island. Therefore, cultural resources are in fact impacted.</p> <p>Further evidence is found in the CIA which includes descriptions of significant adverse impacts to cultural resources as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact.</p>	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>D. HEPA Significance Criteria #8: to the question regarding the cumulative effect of the commercial take of aquarium fish using fine mesh nets when combined with the effects of: the commercial take of aquarium fish by other legal methods; the take of aquarium fish for recreational purposes; and, the commercial and non-commercial take of aquarium fish species for consumption as food, particularly including Achilles Tang and kole, the DEIS wrongly concludes “the Preferred Alternative does not involve a commitment for larger actions. When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species. However, the Preferred Alternative is not a significant contributor to the cumulative effect upon the environment.”</p> <p>As described throughout this document, fundamental errors in the DEIS’s impact analysis resulted in patently false findings of no significant impacts and improper evaluations of these HEPA significance criteria. By failing to properly identify the varied and significant effects of commercial aquarium collection, the DEIS fails to accurately assess the cumulative effects when combined with other extractive activities.</p> <p>The evidence is clear that all proposed Alternatives would significantly</p>	Your comment has been forwarded to the decision makers.

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			contribute to the cumulative effect upon the environment, with the exception of the No Action alternative, which would have a beneficial effect.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>E. Additional Areas Requiring Further Analysis as Described in the DLNR NOD:</p> <p>1) "It is also necessary to analyze the potential impacts under the no action alternative resulting from non-issuance of aquarium permits, including the increased take of larger, reproductively mature aquarium fish in East Hawai'i using legal mesh nets." Since aquarium collecting was prohibited in the WHRFMA, aquarium take in East Hawai'i has grown to be 5X the historic average catch for that entire coastline.⁸⁵ Most of that catch has been reported from zones 107 and 108, which share a boundary with Punalu'u, a known source area for juvenile yellow tangs in West Hawai'i (see DLNR map of aquarium fish zones at Appendix 6).⁸⁶ As previously stated, understanding and factoring larval dispersal and connectivity patterns is critically important for determining impact. It is through the identification of larval source and sink areas that appropriate direct, indirect and cumulative impacts, whether past, present or future, can be assessed and proper levels of take determined in order to prevent harm to populations of targeted species.</p> <p>Both DLNR and the DEIS assert that under the no action alternative, aquarium take outside the WHRFMA is performed by using purportedly legal nets with larger than 2 inch mesh, and therefore, small fish will not be captured at the same rates as they would be with small (less than 2 inch) mesh, because "the smaller fish would escape the larger mesh."⁸⁷ The DEIS concludes that the impact of this scenario cannot be quantified at this time.</p> <p>We understand that because catch reports do not require information on fish sizes other than for yellow tangs, it impossible to determine size-related volumes of catch in the states commercial data. However, information gleaned from the retail market provides ample evidence that fish under 2" (i.e. small enough to escape purportedly legal mesh nets) continue to be captured in very high numbers despite the prohibition on small mesh nets (see Appendix 7 for examples). Further, and as noted in Appendix A, there was no response to our questions as to the specific methods or net sizes used for ongoing collection outside of the WHRFMA.</p> <p>Therefore, the DEIS wrongly concludes that in East Hawai'i, the "no action alternative would have a less than significant direct impact on reef fish populations and the reefs in which they occur." As with the WHRFMA, a proper and thorough analysis of the impacts has not been conducted for East Hawai'i.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS does not state that smaller fish will not be captured, only that the size class of fish collected may increase.</p> <p>Per the DAR, in lieu of fine mesh nets, other gear types that were previously allowed are still legal to use outside the WHRFMA. See the following for more details: https://dlnr.hawaii.gov/dar/files/2017/11/aquarium_permit_faq_rev4.pdf</p>

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For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>2) "The FEA identifies the scope of the analysis as one year and states that an EA with updated data and analysis would need to be completed on an annual basis. This improperly segments the analysis which must include the long-term and cumulative impacts over time of aquarium collection."</p> <p>The DEIS expands the scope of the analysis to 5 years. However, this time frame is too short to adequately analyze long-term and cumulative impacts over time. For example, though collection pressure has been removed from the White List species in the FRAs, populations of once heavily targeted species in those areas, such as yellow tangs, have yet to return to natural levels of abundance, as reflected in the baseline MPAs, even after 20 years of protections. For very long-lived species such as the yellow tang and other surgeonfishes heavily targeted by aquarium collection, which have lifespans measuring decades, and which may not reproduce until they are at least 5 years old, a 5-year analysis period is far too short.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A five-year analysis period was chosen because, as stated in Section 5.0. of the EIS, the temporal scope of the impacts analysis is five years because the WHRFMA management plan is reviewed every five years by the DLNR in cooperation with the University of Hawai'i (DAR 2019a). Because the most recent DAR review was released in 2019, the next DAR review overlaps in time with the analysis period in the EIS. If the Preferred Alternative is implemented, presumably the DAR will review the effects during its next five year review and can make any necessary changes to permit issuance at that time. In addition, because Aquarium Permits have a 1-year duration, the DLNR can decide each year whether or not to issue permits based on new data. The cumulative impact of fish collection is addressed in Section 5.4.3.3 of the EIS.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>3) "There is no statistical analysis of population growth compared to the life span of each fish and the number of years to and size of first reproduction against which this annual proposed take can be measured for purposes of estimating sustainable take."</p> <p>The DEIS fails to address this issue entirely, providing zero of the statistical analyses that were requested and zero reasons for not doing so. Notably those statistical analyses form the foundation of determining estimations for sustainable in the Ochavillo and Hodgson (2006) work, which is referenced throughout the DEIS concerning what constitutes "sustainable reef fish harvest". Instead, the DEIS relies solely upon analysis of catch as % of population, which as described here, is far too flawed to be used to legitimately justify the levels of take proposed in the DEIS.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, specific research into sustainable levels of collection has not been conducted for the 40 White List Species. Therefore, the best available science (i.e., Ochavillo and Hodgson 2006) was used, in conjunction with the DAR (2019a) data on past population trends in the presence of commercial aquarium collection.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>4) "With regard to proposed levels of sustainable catch, using "5% to 25% annual take of estimated populations as proposed in several research papers, we note that 5% to 25% is a wide range, and the precautionary principle calls for applying the lowest estimated percentage of sustainable take in the absence of scientific certainty." Here again, using the fatally flawed analysis described earlier, the DEIS summarizes that "under the Preferred Alternative, collection of any of the 40 White List species is anticipated to be below 5% of the island-wide populations." It is to be expected that inaccurate and under-reported catch levels applied to areas far beyond the directly impacted environment will result in a greatly reduced level of impact. The 5% to 25% annual take of estimated populations, as proposed by Ochavillo and Hodgson (2006) pertains to small finite areas, called "collection areas" where the collection activity occurs. For example, two of the Philippine collection areas that form the basis for Ochavillo</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the Ochavillo and Hodgson (2006) paper is the best available science. Collection under the Preferred Alternative in the FEIS is below 2% for any of the 38 White List Species with a population estimate. The two species which do not have a population estimate, the Flame Wrasse and the Longfin Anthias, have been collected on average less than 175 individuals per year, even when the number of Aquarium Permits was unlimited.</p> <p>Furthermore, the DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was at a higher rate than what would occur under the Preferred Alternative. For the 12 White List Species which had significant declines, as noted in Section</p>

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			<p>and Hodgson’s work, Batasan Island and Clarin, are part of Bohol, an island with a coastline that’s 390 km long and comparable to, though smaller than, Hawai’i Island’s 428 km long coastline.⁸⁸</p> <p>One area is Batasan Island, a minor island of less than 120,000 m² that lies about 6.4 km off the Bohol coast, and is part of the municipality of Tubigon, itself just 81.87 km². The other collection area is the neighboring municipality of Clarin, which has a total municipal land area of 62.79 sq. km and a coastline of approximately 6 linear km. The Ochavillo and Hodgson total allowable catch (TAC) as % of population is based on estimated natural mortality rates for certain reef fishes in those specific areas. Furthermore, their TAC relates to fish populations in those specific small areas, not the entire island of Bohol. The DEIS erroneously takes their 5% to 25% range, applies it to species that are not included in their work, to an area that extends far beyond the proposed collection area (i.e. the WHRFMA) to encompass the entire island of Hawai’i, an area which is orders of magnitude larger than those used by Ochavillo and Hodgson.</p>	<p>5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>5) “We also note that there are no bag limits for most species, and that the fishery as currently regulated does not limit the number of permits, so that the annual take as a percentage of estimated population could rise significantly. Alternatives of overall annual take limits, a limited entry aquarium fishery program, and restrictions including full moratoria on the take of herbivores, species of special concern, and species evidencing severe population declines have not been proposed or analyzed.”</p> <p>The DEIS does not address this issue. The Preferred Alternative includes limited issuance of permits in this instance, but nothing prevents others from pursuing additional permits for themselves. Other than a reduced bag limit for Achilles tang, nothing more is proposed or analyzed.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>It is beyond the scope of this action to impose or recommend restrictions on additional permits that may be requested in the future. Should such permits be requested, it would be a separate action requiring its own HEPA review and DLNR decision. The FEIS has been limited to 10 permits, and as stated in the FEIS, the species with the highest collection under the Preferred Alternative as a percentage of the population, the Yellow Tang, is at a maximum of 1.93% (see Section 5.5.1). Collection would need to increase by 2.6X to reach the lower end of the 5% to 25% sustainable threshold in Ochavillo and Hodgson (2006). Collection of other species would need to increase by even more than that.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>6) “The FEA asserts that certain types of fish such as Psychedelic Wrasse, Tinker’s Butterflyfish, and Fisher’s Angelfish inhabit waters deeper than the CREP monitoring studied, resulting in populations being underestimated and thus the annual take as a percentage of estimated population being overestimated.”</p> <p>The inclusion of these species on the state’s species of concern list indicates a heightened need for an accurate and thorough assessment of their populations.⁸⁹ As noted earlier, the annual take as a percentage of estimated population should factor under and non-reporting and should apply to the areas where direct impacts occur. Reporting sub-zones would represent the largest area that might be considered appropriate, however more specific areas would be the most appropriate (e.g. bays, reefs, and depth ranges). Allowing limitless take under the Preferred Alternative is contrary to DLNRs</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Even with the underestimated population estimates, collection of these three species is less than 5% under any of the alternatives under consideration. Given that the population estimates are likely underestimated, the actual impact is likely even less.</p>

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			<p>conservation actions identified for these species which includes protecting current populations and establishing further populations to reduce the risk of extinction.⁹⁰</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>7) "In addition, we note the proposed alternatives for reduction in bag limits for Achilles Tang, but do not see a scientific basis for concluding that the proposed reduction would be sufficient to sustain the population." The DEIS fails to address this issue entirely. Reducing the Achilles tang daily bag limit from 10 to 5 would do nothing to prevent further depletion, and extirpation of these important species. In 2014 a bag limit of 10 Achilles Tang per day was imposed on the aquarium trade in an attempt to address declining populations in West Hawai'i. Since 2014, the Achilles tang market price has increased, while populations have decreased. The outer possibilities of what the permits would allow must be considered. A cursory analysis of the Preferred Alternative and the data presented in the DEIS shows that 14 permittees taking 5 Achilles tang per day equates to 25,550 fish. This amount exceeds to total population estimate in the WHAP surveys in the 30'-60' range and is 11% of the island-wide population under the CREP estimates. Combined with the limitless take allowed by aquarium collectors in East Hawai'i, and the pressure from food fishers, the cumulative impact on this important species is extreme.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The following explanation has been added to the FEIS: A 50% reduction is assumed, as collection decreased markedly from an average of 7,732 and a maximum of 13,615 per year prior to imposing the bag limit of 10. Since the bag limit of 10 was imposed, collection has stayed fairly constant, ranging from 5,473 to 5,757 per year (difference of 284 fish), suggesting that fishers may be collecting near the maximum allowed under the bag limit since there has been no growth in collection. Therefore, if fishers are currently collecting at or near the maximum allowed under the bag limit, it is reasonable to assume that reducing that bag limit by 50% would result in a 50% reduction in collection.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable (including all 10 fishers collecting the bag limit 365 days a year, which is not reasonable to assume if for no other reason than weather). Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA, including a bag limit of 5 Achilles Tang per day. Within the WHRFMA, the collection of Achilles Tang is not feasible for the following reasons: (1) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (2) The level of effort to collect all individuals of the Achilles Tang from the Open Areas is not reasonable, as collection would need to increase by 240% over the historic maximum collection under the 10/day bag limit that has occurred when the fishery was open to all collectors (19-21 reporting from 2014-2017) in order to take 100% of the Open Area population. However, under the Preferred Alternative, effort would actually need to be an estimated 960% higher than previous years (due to the 50% decreased bag limit and the 50% decrease in number of permitted fishers).</p>

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For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>8) "Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action's potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis."</p> <p>As extensively noted herein, the DEIS' Cultural Impact Assessment (CIA) is extremely flawed and inadequate, with its inherent purpose-- to identify cultural impacts and propose mitigations measures to limit such impacts, not being met.</p>	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>9) "Enforcement and compliance needs and challenges are key factors in the effectiveness of fisheries management, and should be analyzed as part of the environmental impact statement."</p> <p>The DEIS fails to address this issue, citing only an unreliable claim regarding so-called "catch report validation" that did not indicate substantial underreporting of catch by aquarium collectors. DLNR is well aware of the major gaps and flaws in their reporting system that facilitates any amount of under and non-reporting. Additionally, an important avenue for validation, tallies of the species and their numbers leaving the state via air cargo, which are required by federal law, are not being provided, exposing both aquarium trade members and air cargo carriers to violations of the federal Lacey Act.⁹¹ Furthermore, the DEIS fails to analyze other significant gaps in enforcement and compliance, as we, too, spelled out in our comments to the Applicant/Stantec, responding with a single sentence, "enforcement is within the purview of the State of Hawai'i."⁹²</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Enforcement is within the purview of the state of Hawai'i.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>10) "We appreciate that as an applicant action, the applicant can propose but not ensure regulations aimed at protecting and restoring populations of aquarium fish. We are interested in proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions even in the absence of or prior to establishing other regulations to accomplish the same purposes."</p> <p>The DEIS fails to address this issue, providing no proposals for self-regulation that could be incorporated into permit conditions.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Reporting of catch is already a permit condition. An additional permit condition limiting the collection to the WHRFMA has been added to the Preferred Alternative in the FEIS. The Preferred Alternative limits the number of permits to 10.</p>

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For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	11) "Overall, we appreciate that certain alternatives have been proposed, but believe they are more appropriately proposed as mitigation measures in an environmental impact statement to mitigate potential environmental impacts, rather than as alternatives in an environmental assessment, which, if implemented, might result in a finding of no significant impact. The Department of Land and Natural Resources is obligated to ensure full analysis under HRS Chapter 343 of potential environmental impacts of its actions in issuing aquarium permits. We believe this is most appropriate in an environmental impact statement." The DEIS fails to address this issue and proposes no mitigation measures because their flawed analysis concludes there are no significant impacts to mitigate.	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	IV. Further Impacts Inadequately Analyzed Environmental impacts from aquarium trade activities have been documented for over forty years. Under the Preferred Alternatives, every fish and marine creature, other than corals and those associated with live rock, could be removed from one, or all, of the State of Hawai'i's reefs—with catastrophic effects. This is not speculation: there is currently no law, regulation or enforcement capability that would prevent this from occurring. The potential for unlimited collection is a fact that encompasses the outer limits of what the aquarium permits allow, as was explained earlier.	Your comment has been forwarded to the decision makers. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, the collection of "every fish and every marine creature" is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.
For the Fishes, Center for Biological	N/A	1/7/2020	Collecting individual species in high numbers poses a significant threat to coral reef health. As explained herein, herbivorous species, such as Yellow Tangs and Goldring Surgeonfishes, are the most heavily	Your comment has been forwarded to the decision makers. The term "irrevocable" is defined by Webster's dictionary to mean

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<p>Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>			<p>targeted.⁹³ Herbivorous fish are essential to avoid algal overgrowth of corals and concomitant degradation of the reef. Other important functional groups include: planktivores (e.g. Hawaiian Dascyllus), corallivores (e.g. Fourspot Butterflyfish, Multiband Butterflyfish), fish predators (e.g. Hawkfishes, Hawaiian Lionfish) and cleaner fishes (e.g. Hawaiian Cleaner Wrasse).</p> <p>The reduction of natural populations of species taken by the aquarium trade in any area (e.g. specific site, zone, coastline, island or statewide), and by any amount, whether one or one hundred percent, indicates an irrevocable commitment and loss of a natural and cultural resource.⁹⁴ This very loss curtails the range of beneficial uses that would otherwise be provided by the natural abundance of these populations.⁹⁵</p> <p>We disagree with the DEIS response to our comment above that “this is not an irrevocable action, as commercial aquarium permits may be suspended pursuant to HAR 13-74-3(1) if the department determines that it is necessary for the protection and conservation of aquatic life. In addition, fish will continue to reproduce.” As previously stated, any and all substantial reductions in natural abundance of White List species in West Hawai’i indicate lost natural and cultural resources. While it may be true that a potential revocable loss may be indicated by increasing populations of some White List species when aquarium collecting is halted, such as occurred for yellow tangs in the FRAs after their establishment in 2000 and in the open areas after collection was prohibited in 2018, there is no evidence that natural abundance will ever return. The reduced populations of yellow tangs in the FRAs, compared to baseline, natural populations found in the MPAs, even after 20 years of no aquarium collecting, is further evidence of an irrevocable loss that has occurred.</p>	<p>“not able to be changed, reversed or recovered; final.” The preferred alternative does not meet this definition because available scientific data indicate that the populations targeted by the fishery are naturally self-sustaining, and population levels for many of the species are stable or increasing. For species that are decreasing, they are decreasing in areas both open and closed to aquarium collection, indicating that aquarium collection is not driving the decline, and that banning aquarium collection would not reverse this decline. Consequently, the impacts of the fishery are will not cause an irreversible impact on either the populations or the ecosystems they inhabit.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>As has been long recognized, The impact of commercial aquarium fish collecting is a complicated issue. The fish community members are highly dependent on one another. There is a constant interaction between predators and competitors, as well as other members of the food web. There is a lot of variability in the system, even when it is not disturbed by man. Reefs seem to undergo natural cycles. At times they may be very abundant. There is also natural variation in the fish community at different locations.⁹⁶</p> <p>The DEIS fails to assess the high aesthetic value of this beautiful marine life as well as impacts to the complex relationships inherent in coral reef ecosystems and impacts to overall coral reef health. “Animal communities” are included in the rule definition for “environment,” however the EIS excludes any mention of the impact to fish and invertebrate communities, or the impact to the animals themselves.</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>The Hawai'i State Wildlife Action Plan (SWAP) states that "Excessive extractive use constitutes a threat to wildlife. Certain reef fishes are harvested for sale in the aquarium trade . . . These activities are not sustainable on a large scale and impact native wildlife."⁹⁷</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>A. General Impacts on Targeted Species</p> <p>The list of species of greatest conservation need includes at least 18 native fish species that are threatened by the aquarium trade and in need of conservation actions to reduce the risk of extinction (depicted in Fig. 3).</p> <p>Butterflyfishes are among the most beautiful of coral reef fishes (see Fig. 4). Their bright yellow, white and black markings are especially striking against pale corals and deep blue waters. When encountered by snorkelers/divers the beauty of these species is often breathtaking. They are heavily targeted by the aquarium trade in Hawai'i. In 1976 five of the top ten most collected species were butterflyfish (see Fig. 5).⁹⁹</p> <p>Reported aquarium harvest of those same five species has since plummeted (see Fig. 6). The same is true for other heavily targeted butterflyfish species that have been among the top twenty aquarium fishes collected by the trade since 1976.¹⁰²</p> <p>This sharp decline in reported catch is not an indicator that these species are no longer in demand. Continuing demand is confirmed by several examples:</p> <ul style="list-style-type: none"> • These species' inclusion in the West Hawai'i White List. • Their exclusion from the O'ahu rules. <ul style="list-style-type: none"> o The O'ahu aquarium rule prohibits take of three butterflyfishes, citing their "coral diets" as the need for the restriction.¹⁰⁴ Since 1999 total reported take of those three species was 50 fish.¹⁰⁵ o Zero restrictions were provided for three additional coral eating butterflyfishes, with total reported take of over 51,000 individuals since 1999.¹⁰⁶ • The Fourspot Butterflyfish catch increase that followed the 2014/2015 warming event and unprecedented fish bloom.¹⁰⁷ Subsequently, catch of the Fourspot Butterflyfish declined to an all-time low.¹⁰⁸ <p>The EIS fails to use a temporal baseline that captures the impacts of the heavy collection pressure on these species over time, before their natural populations were depleted by this activity.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Of the four species identified in Figure 4 of the comment (the Longnose Butterflyfish and the Forcepsfish are now classified as the same species), three may be collected in the WHRFMA. Collection of the Fourspot Butterflyfish is less than 0.4% of the population. collection of the Multiband Butterflyfish is less than 0.25% of the population, and collection of the Forcepsfish is less than 1.15% of the population. The Forcepsfish has not exhibited significant declines between 1999/2000 and 2017/2018, and the other two species have exhibited declines in both Open Areas and protected areas, indicating that aquarium collection is not driving the decline (DAR 2019a).</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>B. Damage to Reef Habitat</p> <p>In nearly every encounter with commercial aquarium collectors on West Hawai'i reefs, snorkelers and divers have witnessed and documented destructive practices that harm corals, with the most damage coming from vessel anchors and chains. Sticks, buckets, nets, underwater propulsion devices (scooters) are laid in the corals and the</p>	<p>Your comment has been forwarded to the decision makers.</p>

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Environmental Laboratory, and The Humane Society of the United States			fins, knees and legs of collectors often come in contact with the reef—in fact, they are typically described as “crawling across” or “standing” on the corals. The results of these actions include abrasion and coral breakage. Both FEAs refer to a study that determined there was no evidence to indicate the presence of destructive fishing practices (e.g. breaking apart corals to capture hiding fishes). ¹⁰⁹ However, the abundance of photographic evidence documenting coral breakage from vessel anchoring and fish capture activities, these impacts cannot be dismissed and must be evaluated in the EISs. Photographs of these practices and their effects can be found at Appendix 3. Abundant coral reefs—put at risk by the Preferred Alternative—have a range of beneficial uses. The DEIS fails to adequately assess the curtailment of “the range of beneficial uses of the environment.” ¹¹⁰	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	C. Examples of Impacts in Various Hawai’i Island Regions Baseline fish population data from the 1970’s at Honaunau in West Hawai’i were compared to data gathered in surveys conducted 1998 – 2001. The results indicated that nearly all small bodied surgeonfish, butterflyfish and angelfish (i.e. species targeted by the aquarium trade) declined in abundance. Commercial aquarium collecting was implicated in the decline (see Fig. 9). ¹¹¹ Similar results were found at Ke’ei where the site had been intermittently surveyed since 1979. ¹¹² “Of the 20 most collected aquarium species, 18 declined in abundance with the species facing the heaviest fishing pressure typically showing the greatest declines.” ¹¹⁴ In addition to documenting the impact of aquarium collecting in these areas, these studies also document baselines for abundance levels of aquarium targeted and other impacted species. Examinations of reported catch, as documented by DLNR, serve to further highlight the impacts of the trade. ¹¹⁵ The documentation shows that the initial surveys were conducted during a time when the aquarium trade reported taking fewer than 50,000 fish annually from West Hawai’i reefs. In subsequent years, from 1987 to the final surveys in 2001, reported aquarium fish catch in West Hawai’i ranged between 150,000 and 300,000 individuals taken. Since then the annual West Hawai’i aquarium fish catch has ranged between 250,00 and >450,000 fish. Additionally, with the closure of approximately 32% of the reefs in West Hawai’i with the implementation of the FRAs in 2000, this increased fishing pressure was focused in smaller areas with likely intensified results.	Your comment has been forwarded to the decision makers. While this paper does note a decline in fish abundance between 1975-1978 and 1998-2001, it should be noted that this study utilized data collected prior to establishment of the WHRFMA, establishment of bag limits, the creation of the White List, and closure of >30% of the West Hawai’i coastline to commercial aquarium fishing. More recent data from the DAR (2019a) has shown that 9 of the top 10 collected species have increased significantly since establishment of the FRAs in 1999, even in the presence of continued commercial aquarium collection. This includes increases in Open Areas where collection is now focused.
For the Fishes, Center for Biological Diversity, Moana Ohana,	N/A	1/7/2020	Another long-term study looked at reefs in South Kohala and determined that reef fish abundance was in “drastic decline” and reefs were in “dire straits”. ¹¹⁶ Populations of all of the top five most abundant fish families had declined since the original surveys conducted in 1979-1981 (see Fig. 10). Thirty-one of the thirty-five	Your comment has been forwarded to the decision makers. More recent data from the DAR (2019a) has found that two of three long-term monitoring areas in South Kohala and South Kona have Yellow Tang populations that have increased to levels found over

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Haereticus Environmental Laboratory, and The Humane Society of the United States			<p>most abundant fish species had declined, including 19 species targeted by the aquarium trade. Most of the aquarium targeted species had declined by more than 50% and many were down by more than 80%.¹¹⁷ The extent to which the massive increase in reported take has contributed to this decline was not studied in the DEIS.</p> <p>As the Applicant noted in the FEAs' responses to this comment, the "Dire Straits" report concluded that "the widespread declines in families of fish not typically targeted either for food use or for the aquarium fishery suggest that other, more widespread factors are additionally contributing to the overall long-term declines in fish abundance."¹¹⁸[emphasis added] Rather than rebutting the argument that further analysis is needed, this statement only served to highlight why the DEIS needed to also evaluate the potential of cumulative impacts of other factors (e.g. pollution, and sedimentation) on targeted fish species, such as decline of coral coverage, which have been demonstrated to influence reef fish species diversity and abundance.¹¹⁹ Here, too, the flawed analyses failed to accurately identify impacts.</p> <p>The areas south of these reefs are subject to some of the most intense aquarium collecting pressure in the state. Aquarium take between Keahole Point and these reefs in South Kohala, in one year alone, exceeds the aquarium take from the entire Great Barrier Reef in Australia, which has a reef area that is 300 times larger than Hawai'i's. For example, in 2014 aquarium collectors reported taking 191,083 fish from this Hawai'i zone. ¹²¹ By comparison, 2014 reported aquarium take from the Great Barrier Reef was 112,000.¹²²</p>	<p>three decades ago, prior to the expansion of commercial aquarium collecting in West Hawai'i. Kole populations in South Kohala have declines, however, the DAR (2019a) concludes that "given the length of protection at these sites and the overall decline in habitat quality and fish populations in South Kohala it seems unlikely that the declines are due primarily to aquarium collecting." In addition, "Aquarium targeted species are not the only ones which have declined but rather major declines were apparent in all trophic levels and most fish families. As noted above, both areas have been off-limits to aquarium collecting for quite some time and thus it is not reasonable to attribute the extensive changes in habitat and fish populations at these sites to aquarium collecting."</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>Abundant populations of herbivorous fishes are critically important to coral reefs. They keep algae from overgrowing corals or preventing new corals from starting. Important families of herbivorous fishes in Hawai'i include surgeonfishes, damselfishes and parrotfishes. The vast majority of fishes taken by the aquarium trade are surgeonfishes. Yellow Tangs are the dominant herbivore in West Hawai'i.¹²³ They are also the most heavily collected species. The Dire Straits study documented a 90% decline in herbivorous surgeonfish and damselfish populations, while parrotfish populations had actually increased over time.¹²⁴</p> <p>This aforementioned 90% decline in herbivores contributed to a 35% reduction in coral cover, a 64% reduction in coral building coralline algae, a 38% increase in algae at one site and a staggering 322% increase in algae at another. DLNR claims that parrotfishes are more important herbivores than surgeonfishes when it comes to keeping algae in check on coral reefs. ¹²⁵ On these South Kohala reefs, the increased parrotfish populations were not enough to offset the loss of surgeonfishes and damselfishes, and the algae still outcompeted the</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS notes the importance of herbivores throughout the document. As stated in the EIS, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>

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			corals. The notion that surgeonfishes taken by the aquarium trade are not an important component to coral reef health is challenged by this study.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS attempts to downplay the importance of surgeonfishes and other herbivorous fishes taken by the trade by citing a 2003 study by Tissot and Hallacher (described more in the next section) that found no evidence of increased macroalgal growth in areas of collection versus areas without collection, despite reduced fish abundance in the collected areas. ¹²⁶ However, the authors concluded that the study may not be a good test of that hypothesis for several reasons, including that most surgeonfishes taken by aquarium collectors consume filamentous algae, not macroalgae, and that further investigation is warranted. ¹²⁷	Your comment has been forwarded to the decision makers. As stated in the EIS, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	Further, a more recent assessment of ecosystem trends in West Hawai'i includes, among other data, the differences in herbivore biomass and coral cover between reefs on the northern portion of the West Hawai'i coast (which encompasses the South Kohala area described above and extends from Keahole Point, northward) and reefs on the southern portion (from Keahole Point, southward). ¹²⁸ The data shows that herbivore biomass in the north is significantly lower than that found on the south. ¹²⁹ Additionally, while the northern reefs are now dominated by algae, and coral cover has declined by ~30%, the same not true for the southern reefs. ¹³⁰ Notably, though the northern area is ~33% smaller than the area to the south, catch reports do not indicate a corresponding reduction in take. In fact, in 2014 take was higher in the north than in the south. ¹³¹ The extent to which heavy collection pressure in the north has contributed to this shift was not addressed in the DEIS.	Your comment has been forwarded to the decision makers. As stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The DEIS also attempts to downplay the importance of herbivores taken by the trade by claiming that they target the smaller fish which are "the least effective sizes for cropping algae." ¹³² However, research shows that these fish play key roles: <ul style="list-style-type: none"> • "The degree of change that a herbivore or group of herbivores can impose on a system is determined by several factors, including the intensity of the bit size, the number of bites and the number and type of each grazer in the system."¹³³ • Research on Maui shows that more herbivorous fishes on the reef, even those that are smaller bodied, equates to "more mouths on the algae."¹³⁴ • In addition, a comparison of adult Yellow Tang densities in the West Hawai'i long-term protected areas (i.e. MPAs) vs. the Open Areas, shows that collection pressure on small, juvenile, Yellow Tangs has 	Your comment has been forwarded to the decision makers. As stated the EIS, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.

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			reduced the natural abundance of sub-adult and adult yellow tangs, which are 2 – 4 times larger than juveniles, by an average of 60%. ¹³⁵ The fact remains that algae now dominates many West Hawai'i reefs, but the DEIS failed to accurately evaluate Applicant impacts that occur as a result of reduced herbivory.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	D. Examples of Impacts to Species Two peer reviewed studies documented the magnitude of the effect of aquarium collecting on natural populations of heavily targeted species by the aquarium trade. One, published in 2003 by Tissot and Hallacher, was conducted the two years prior to the establishment of the West Hawai'i Fish Replenishment Areas (i.e. aquarium no-take zones). ¹³⁶ The next study, by Tissot, et al., was conducted in 2000-2002, three years after those area closures. ¹³⁷ The results of each study showed that aquarium collectors have a significant effect on the abundance of targeted aquarium fishes (see Fig. 11). The U.S. Coral Reef Task Force described these results as follows: "Severe overfishing for aquarium trade occurs even in the United States: Aquarium fishes outside of reserves [in West Hawai'i] experience significant declines – from 14% to 97%." ¹³⁹	Your comment has been forwarded to the decision makers. The DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was occurring at the rates anticipated under the Pre-Aquarium Collection Ban Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	In a 2010 grant report to NOAA, DLNR documented that "a number of aquarium-targeted species have not responded to the increase in protected areas and have actually decreased in West Hawai'i since 1999" (see Fig. 12). ¹⁴⁰ Per DLNR aquarium catch reports, these species are also among the top 20 most harvested fishes. Nonetheless, all but two species, the Moorish Idol and the Hawaiian Cleaner Wrasse, were included in the West Hawai'i 40 Species White List adopted in 2014. DLNR therefore calls for the continued harvesting of these species, despite knowing that their populations are in decline.	Your comment has been forwarded to the decision makers. As noted in the EIS, more recent data from the DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was at a higher rate than what would occur under the Preferred Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines. The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental	N/A	1/7/2020	Three species identified in the SWAP, the Bandit Angelfish, Bluestripe Butterflyfish, and Hawaiian Turkeyfish Figure 4 (in gold outline) were included in a DLNR presentation on West Hawai'i Species of Special Concern (Fig. 3) where two were described as routinely seen in the 1970's and now very rare, and one was described as down by 99% in two different areas. ¹⁴² In West Hawai'i the decline of butterflyfishes has been well-	Your comment has been forwarded to the decision makers. None of these species are on the White List, and therefore cannot be collected with the WHRFMA.

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Laboratory, and The Humane Society of the United States			documented in both population surveys and aquarium catch data. A 2008 presentation on West Hawai'i aquarium species of special concern reported declines in butterflyfish abundance and diversity. ¹⁴³ Two species were particularly hard hit: the Bluestripe Butterflyfish and the Teardrop Butterflyfish, experienced population declines ranging from 89% - 100% in two West Hawai'i areas (see Fig. 13).	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>The Bluestripe Butterflyfish is a highly unique, endemic Hawaiian species that, having no sister species elsewhere in the Indo-Pacific, is also known as a relic (see Fig. 14).¹⁴⁴ Until 1980, this species was among the top twenty fishes collected in West Hawai'i, with an annual average harvest of 347.¹⁴⁵ By 2012, the last year this species appeared on West Hawai'i catch reports, reported harvest had dropped to a total of nine.¹⁴⁶ This species was excluded from the West Hawai'i forty species White List which went into effect in 2014.¹⁴⁷</p> <p>The 2015 Hawai'i SWAP lists the Bluestripe Butterflyfish among the species of greatest conservation need. Threatened by the aquarium trade, conservation actions include to "protect current populations, but also to establish further populations to reduce the risk of extinction."¹⁴⁸</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Bluestripe Butterflyfish is not on the White List, and therefore cannot be collected within the WHRFMA.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>According to DLNR reef surveys and catch data, the Teardrop Butterflyfish has also experienced drastic declines on West Hawai'i reefs (see Fig. 13). This beautiful species is named for the striking upside-down black teardrop located mid-body (see Fig. 4). Until 1980, the Teardrop Butterflyfish was among the top ten fishes collected in West Hawai'i with an average annual harvest of 1,454 individuals (see Fig. 15).¹⁴⁹ During the following five years, the harvest rate dropped, but it was still among the top twenty species collected (see Fig. 15).¹⁵⁰ Though collection continued until at least 2013, by the late 1990's DLNR considered Teardrop Butterflyfish as no longer targeted by the aquarium trade and excluded them a list of aquarium targeted species provided to researchers, Brian Tissot and Leon Hallacher, who were embarking on a project to document the magnitude of the effect of aquarium collecting on natural populations.¹⁵¹ They were, however, included in the surveys to test assumptions since they were similar to targeted species.¹⁵² The researchers encountered just one individual Teardrop Butterflyfish during the entire study and so they were excluded from further analysis.¹⁵³</p> <p>In 2011 a group of divers encountered an aquarium collector at a popular North Kohala dive site. They watched in horror as the collector scooped up the first Teardrop Butterflyfish they had seen in that area in years along with a number of Yellow Tangs and other</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Teardrop Butterflyfish is not on the White List, and therefore cannot be collected within the WHRFMA.</p>

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			fishes (Fig. 16).154 In 2013, the last year Teardrop Butterflyfish appeared on aquarium catch reports, reported take had dropped to a total of ninety, reflecting a 99% drop in annual catch since 1980.155 This species was excluded from the West Hawai'i forty species White List which went into effect in 2014.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The exclusion of any formerly collected species from the White List, such as the Bandit Angelfish, Bluestripe Butterflyfish, Hawaiian Turkeyfish, Teardrop Butterflyfish, or Thornback Cowfish, is not an exemption for a thorough analysis of their current status within the West Hawai'i Regional Fishery Management Area (WHRFMA) and elsewhere on Hawai'i Island, compared to the baseline (i.e. historic natural abundance)..	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS evaluates the effects of the proposed action. Since collection of species not on the White List would not be allowed under the proposed action, the EIS does not evaluate impacts of future collection on these species as it is assumed to not occur. The action being evaluated in the EIS is the issuance of 10 Aquarium Permits with the current restrictions, and not past issuance of permits prior to establishment of the White List.</p> <p>An analysis of the cumulative impact of poaching and underreporting has been added to the FEIS.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>The aquarium fishery in West Hawai'i takes 1.8X more reef fish than recreational and other commercial fishing combined. Most of these fish are Yellow Tangs.156</p> <p>"Overall Yellow Tang abundance in 30'-60' hardbottom habitat in West Hawai'i increased by 355,758 individuals from 1999/2000 to 2010-2012 even though Yellow Tang abundance in the Open areas decreased by 21%. This decrease is attributable largely to an increase in the number of aquarium collectors and collected animals relative to the period when the FRAs were established."157</p> <p>Over sixty percent of West Hawai'i reefs are open to the aquarium trade. On the reefs in those areas, the impact of the aquarium trade on natural populations of Yellow Tangs has been a significant reduction in the abundance.158 For example, natural populations were reduced by over 75% in 2007-2009 and in recent years, by 60% (see Fig. 17). The increase in FRA Yellow Tang abundance that began in 2002, three years after establishment of these protected areas, is a clear example of the impact of the trade on natural populations: when collection pressure is removed, given enough time, populations may be able to rebound. As noted earlier, the overall increase in Yellow Tang abundance that has occurred since 2014 is due to an anomalous recruitment pulse that coincided with warming waters in 2014.159 Typical recruitment pulses, such as those that occurred in 2002 and 2009, have resulted in short-lived increases in fish populations that were followed by prolonged or short and steep population declines (see Fig. 17).</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter is citing a report from the DLNR from 2014, compared to more recent 2019 data used in the EIS. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
For the Fishes, Center for	N/A	1/7/2020	E. Failure to Assess Impacts to Aesthetic Value In addition to the impacts to biodiversity, ecosystem function, and	Your comment has been forwarded to the decision makers.

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Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States			<p>other fisheries, aesthetic and other social values are also heavily impacted.¹⁶¹ Species experiencing the heaviest collection pressure, with a corresponding reduction in natural abundance, are Hawai'i's most beautiful, charismatic and iconic fishes. The diminished aesthetic value from the cumulative and substantial reductions in species such as Yellow Tangs, butterflyfishes and Moorish Idols, which are dominated by vibrant yellows and oranges and striking white and black patterns, cannot be overestimated (see Fig. 7). These colors are more than aesthetically pleasing, as our eyes are physiologically attuned to them. The frequencies and wavelengths of yellows, oranges and reds allow them to strike our eyes much faster than the other colors.¹⁶²</p> <p>By removing the species with prominent yellow, orange, red or white coloration and markings, the palette and very essence of what makes a coral reef beautiful to the human eye is diminished and degraded. It is impossible to decrease populations of a coral reef's beautiful wildlife without greatly decreasing the natural beauty of the place. Divers who have frequented these coral reefs, such as some of the Commenters, have noticed decreased abundance of colorful fish in recent years. The DEIS fails to address these cumulative losses and propose proper mitigation measures.</p>	As stated in the EIS, the DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was occurring at the rates anticipated under the Pre-Aquarium Collection Ban Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>F. Failure to Assess Impacts to Property/Amenity Value</p> <p>The DEIS fails to acknowledge and address the effects of the trade on the amenity/property values and propose proper mitigation measures. Houses that are within a block or 100 meters of beautiful, clean and healthy coastlines, beaches and coral reefs are more valuable and sell for significantly higher prices than comparable properties elsewhere. The same is true for condos and hotels/hotel rooms which generally command higher room and occupancy rates. Healthy coral reefs are also more likely to prevent beach erosion and, therefore, add value as a form of coastal protection. One and a half percent of the sale price of these properties is attributable to the marine ecosystem. Hawai'i's reef-related property value in 2001 was calculated at \$40 million.¹⁶³</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS evaluates impacts to land values in Section 5.2.2. As stated in the EIS, despite the housing crisis and recent recession, the average sale price of homes steadily increased in Hawai'i from 2011 to 2014 after a few years of year-to-year fluctuation. The average sale price of homes in 2014 was \$594,440, which was 26.4% higher than the average sale price in 2011. A rapid price increase was observed particularly in 2013 and 2014. The average sale price in 2013 and 2014 was about 10% higher than the price in the prior year. In 2015, the total number of home sales increased by 9.3%, but the average sale price was 0.3% lower than the previous year (HDBEDT 2016). This occurred while commercial aquarium collection was also occurring.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>G. Failure to Assess Impacts to Recreational Value</p> <p>The DEIS fails to acknowledge and address the effects of the trade on the recreational value of this marine life and their coral reef homes and propose proper mitigation measures. The annual estimated expenditures related to marine life viewing (i.e. snorkeling and scuba) in Hawai'i is \$551 million. Reef-adjacent marine tourism expenditures (including hotel rooms) within 30 km of the coastline are an annual \$680 million.¹⁶⁴ These amounts exclude the lost value from declining fish abundance which is captured in willingness to pay surveys and summarized below:</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the commenter cites "anecdotal reports" about revenue loss, as stated in Section 5.2.2.2 of the EIS, there is no available data to suggest that commercial aquarium collection has impacted the tourism industry. In fact, Hawai'i's tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). When adjusted for inflation, total</p>

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Society of the United States			<ul style="list-style-type: none"> • Healthier reefs lead to substantial economic gains. • Recreational users are willing to pay higher rates for a healthier marine environment. 165 • Snorkel/dive businesses benefit when there are more fish for their clients to see.166 One recent study showed divers were willing to pay \$93 to \$110 more to dive with abundant fish life. 167 • Without new regulations the potential for increasing losses is real. • Inability to stem declining reef fish numbers could cause significant losses to dive tourism industry (i.e. reductions in willingness to pay).168 • These consumer surplus losses could range from \$1.2 million to \$12.2 million annually.169 • Areas with degraded reefs and low fish populations could also see significant losses from a decrease in their share of the global dive market.170 • Anecdotal reports from long-time residents and visitors point to revenue loss already occurring from reduced abundance of beautiful fishes on Hawai'i reefs. 	<p>visitor spending was up 3.5% from 2016 (Figure 3). A total of 9,404,346 visitors came by air or by cruise ship to the state, up 5.3% from the previous record of 8,934,277 visitors in 2016. Total visitor days rose 4.8% compared to 2016. The average spending per day by these visitors (\$198 per person) was also higher than 2016 (\$197 per person; HTA 2018).</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>H. Failure to Assess Impacts to Passive Use Value</p> <p>The DEIS fails to acknowledge and address the effects of the trade on the substantial non-use values of this marine life and their coral reef homes and propose proper mitigation measures. Intrinsic and social values associated with coral reefs are diminished by reduced fish populations. Concern for the marine environment has increased in recent years and people now place tremendous value on coral reef ecosystems. Many people value beautiful and healthy coral reef ecosystems as part of their legacy and responsibility to ensure future generations are able to experience them. A 2011 report for the National Oceanic and Atmospheric Administration (NOAA) estimated the passive use annual value of Hawai'i's coral reef ecosystems through a willingness to pay survey of U.S. households. The survey included a visual representation of an overfished and an abundant coral reef (see Fig. 8).</p> <p>The project determined that increased protections and restoration of degraded coral reefs in Hawai'i is worth about \$288 to the average U.S. household which aggregated over all U.S. households amounts to a \$34 billion annual passive use value for Hawai'i's coral reefs.172 This and other socio-economic values described here provide meaningful insights into the public's concerns and should be addressed in a comprehensive DEIS.</p>	<p>Your comment has been forwarded to the decision makers.</p>
For the Fishes, Center for Biological Diversity,	N/A	1/7/2020	<p>I. Failure to Assess Impacts to Aquatic Life Post Capture</p> <p>A major factor that drives the rates of collection is premature mortality rates in captivity. According to a long-time industry insider, most Yellow Tangs die with the first month in a hobbyist tank and</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS. However, the paper referenced here (Cartwright et al.</p>

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Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States			<p>fewer than 1% of those captured survive one year in captivity.¹⁷³ A 2012 study determined that mistreatment in capture, handling, transport, and holding plays a larger factor in these premature deaths than hobbyist inexperience.¹⁷⁴ Hawai'i's Yellow Tang ranks among the top ten fish sold in the marine aquarium trade.¹⁷⁵ As such, it was prominently featured in the study, in both the consumer survey, as one of the nine fish species featured, and in the supply chain analysis, as one of the eighty-five species analyzed which included eleven other species that are captured both in Hawai'i and elsewhere in the Indo-Pacific.¹⁷⁶ The researchers also determined that each step in the supply chain significantly profits from customer purchases to replace fish that die prematurely, and that profits from replacement fish sales are so high, stores have no incentive to take action to reduce deaths.¹⁷⁷</p> <p>Every fish that dies early puts extra pressure on natural resources because of the take of replacements. There is a general consensus in many countries that it is not ethical to trade in live animals, unless their health and welfare are ensured. These unnecessary and early deaths have given the trade a poor image. A \$20 million, multi-stakeholder reform effort failed, in part, because of trade reluctance to address, and take steps to reduce, mortality rates.</p>	<p>2012) is focused on marine ornamentals from the "Coral Triangle" (Philippines, east Malaysia, Indonesia, Timor-Leste, Papua New Guinea, and the Solomon Islands), where they commonly use harmful chemicals such as cyanide and dynamite to catch fish, which then leads to extremely high mortality rates in the supply chain. These practices are not used in Hawaii.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>Fifty percent of species among Hawai'i's historical top 20 fish list are either not guaranteed to arrive alive or stay alive longer than 7 – 14 days when purchased from online or "brick and mortar" retailers. Examples are found in Appendix 4.</p> <p>The DEIS erroneously excludes an analysis of impacts to fish and other aquatic life once they are taken, stating "because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population." One of the core requirements of the aquarium collection statute, HRS § 188-31 is that aquatic life taken under the permit is maintained alive and in reasonable health. Aquarium catch reports capture presumed mortalities between capture and sale to marine dealers and indicate that an average of 3% of captured fishes die at this stage of the chain of custody. Self-reporting by a handful of wholesalers report that up to 2% more die while in their custody and an additional 1% - 2% die in air cargo transport. Wholesalers receiving fish from Hawaii report a similar "dead on arrival" rate, and note that the industry standard is to allow up to 5% to arrive dead with no charge-back to the shipper for losses.</p> <p>Per Appendix A, the Applicants failed to respond to any questions regarding mortality rates. In order to fulfill its statutory duties to exercise discretion in granting permits, DLNR needs the average and</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>

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			<p>maximum annual mortality rates for fish taken by the 14 fishers. Without this information the state has no way of assessing whether these permittees are responsible aquarium collectors that deserve these exclusive privileges. Furthermore, the public needs this information, as well, which is one of many reasons why withholding the identity of the 14 fishers is unacceptable.</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>V. Flawed Analysis of Cultural Impacts and Lack of Proposed Mitigation Measures As set forth in HAR §§ 11-200-10 and -16 through -18, a complete analysis and discussion of impacts to cultural resources is required. The EIS must acknowledge and address the direct, indirect, and cumulative impacts on cultural resources. The loss and harm caused by the irrevocable commitment of natural resources equally applies to impacts to cultural resources, as well. The EIS must also acknowledge and address the effects of the trade on Native Hawaiians traditional reliance on species targeted by the trade for subsistence, and most importantly, propose proper mitigation measures.</p>	<p>Your comment has been forwarded to the decision makers. The impacts on cultural resources were analyzed in the CIA, which was included as an appendix to the EIS and incorporated by reference.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>While the CIA provided an extensive history of native Hawaiians and their symbiotic relationship with the ocean and its animal inhabitants, it completely dismissed the overwhelming oral testimonies in opposition to 178both past and current trade practices and impacts. More than 90 percent of those interviewed noted how the trade both directly and indirectly impacts their cultural resources, beliefs, practices and values, yet none of these concerns were included in the conclusion or proposed mitigation measures.</p>	<p>Your comment has been forwarded to the decision makers.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>The CIA also failed to propose any substantive mitigation measures to address the biological and various socio-economic impacts to cultural resources and the ethical concerns and harm done to the animals, themselves. The CIA initially acknowledges “As stated in the OEQC Guidelines for Assessing Cultural Impacts, the goal of the oral interview process is to identify information ‘relating to the practices and beliefs of a particular cultural or ethnic group or groups’ (State of Hawai‘i, Office of Environmental Quality Control 2012:11). It is our contention that, in addition to assessing the significance of any identified traditional cultural properties, oral interviews should also be used to augment the process of identifying traditional cultural properties.” Thus, it is the researcher’s responsibility to utilize the gathered cultural-historical background information, as well as the information</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>collected through the consultation process, to identify and describe potential cultural impacts to resources, practices, and beliefs, and to propose appropriate mitigative measures for those impacts as necessary.</p> <p>The DEIS further states: “As discussed in Section 4.2 and detailed in the CIA, many of the 40 White List Species have a cultural significance in Hawai‘i, and there are distinct differences between the traditional Native Hawaiian approach to fish harvest and management and the western model approach” (emphasis added).179</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>However, the above statements and subsequent lack of proposed mitigation measures, do not reflect these findings. Fifty-five individuals were consulted for the CIA, 50 of whom voiced strong concern with the trade.</p> <p>The CIA further concludes that “...if the issuance of commercial aquarium permits leads to a significant depletion of the populations of the above-mentioned species (either directly or indirectly through habitat disruption), then the result would be a cultural impact. Conversely, if the biological assessments (conducted by others) indicate that the issuance of the fourteen commercial aquarium permits will have no significant effect on either the fishes or their habitat, then the issuance of the permits would not result in a cultural impact” (emphasis added).180</p> <p>As discussed earlier, the biological assessments used to analyze the impacts of the trade is extremely flawed, thus, the above conclusion, that the issuance of 14 permits will have no significant impact, is equally, inherently flawed.</p>	<p>Your comment has been forwarded to the decision makers.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>We continue to agree with a number of concerns earlier raised by DLNR, and respectively, the Office of Hawaiian Affairs (OHA):181</p> <p>“Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action's potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis” (emphasis added).</p> <p>The DEIS failed to respond to our questions regarding what type of gear/nets are currently being used to collect animals (outside of fine mesh nets). The CIA failed to include a discussion on gear types or recommend any regulations or prohibitions on the use of aquarium collection gear, that allows for the take of hundreds more animals per</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			day, than if using traditional subsistence fishing methods. Further, there is no discussion about additional species take-prohibitions, bag limits (less reducing the daily bag limit of Achilles Tang from 10 to 5), “pono” fishing practices, the foundation of which is taking only what is needed, or a discussion on “resting” (closing) certain areas from commercial extraction.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	OHA also states it “anticipates that the DEIS will include a broader scope of analysis and include a consideration of all consequences on the environment, including both direct and indirect effects, in accordance with Hawai’i Administrative Rules § 13-200-17(i)...” yet the scope of the discussion of impacts is limited to 14 collectors who made up nearly 80 percent of the total catch even in years when not all 14 collectors were reporting take. The CIA also fails to include any legally required proposed mitigation measures, to address cumulative (past, present and reasonably foreseeable future) impacts to cultural resources.182	Your comment has been forwarded to the decision makers. Direct, indirect, and cumulative impacts are discussed in Section 5.0 of the EIS, both for the Preferred Alternative (issuance of 10 Aquarium Permits) as well as for the other alternatives under consideration.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	In yet another gross contradiction, the CIA states that: “According to those guidelines: In scoping the cultural portion of an environmental assessment, the geographical extent of the inquiry should, in most instances, be greater than the area over which the proposed action will take place. This is to ensure that cultural practices which may not occur within the boundaries of the project area, but which may nonetheless be affected, are included in the assessment. (State of Hawai’i, Office of Environmental Quality Control 2012:11) For this reason, for assessing the potential cultural impacts of the issuance of fourteen commercial aquarium permits within the WHRFMA, the entire fishery management area along the western coast of Hawai’i Island is considered, not just those areas within which commercial aquarium fishing will be permitted. To Hawai’i’s host culture, the ocean is viewed as an integrated whole, flowing unrestrained by politically imposed boundaries...” but fails to consider the impacts to the entire island of Hawaii, including the East side of the island which is seeing increased take rates from those seen in the past, with no disclosure or discussion of current gear-take methods, or the impacts of reducing species in one area impacting their health and abundance in other areas.183	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus	N/A	1/7/2020	The CIA concludes with the following inadequate and/or unmeasurable recommendations, that in no way could be considered substantive mitigation measures, especially based on the numerous oral interviews and testimonies proposing a full closure of the trade or significant remedies to past and continuing conflict: “It is clear that the nearshore waters of West Hawai’i Island, along	Your comment has been forwarded to the decision makers.

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Environmental Laboratory, and The Humane Society of the United States			with all of its contributing tangible and intangible elements and associations, could be considered a traditional cultural property significant under Criteria a, b, and e. Having a comprehension of the traditional cultural significance of nearshore waters of West Hawai'i Island by all of its user constituencies, is a first step in ensuring that the activities of any one user group does not in any significant way conflict with the activities of another user group. As part of any future permitting processes associated with the WHRFMA, it is recommended that DLNR-DAR provide to potential permit issues a document that provides a synopsis of the traditional cultural significance of the fishery” (emphasis added).184	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	It is woefully inadequate to attempt to simplify this complex issue by only providing collectors with “a” document. There is no way to ensure that collectors even read the document let alone take any actions not to impact cultural resources, beliefs and practices. The CIA then states: “... the authors recommend that PIJAC, and any commercial aquarium fishers who intend to conduct their operations within the WHRFMA, consider developing or partnering with governmental and/or local organizations to help improve the management and sustainability of the nearshore fishery as a means to not only sustain, but actually improve reef-fish populations in the take areas...” (emphasis added).185	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The CIA notes that aquarium collectors should “consider developing or partnering with governmental and/or local organizations to help improve management and sustainability of the nearshore fishery...” yet fails to provide even the most basic information, timeline or explanation as to how any partnership would proceed. The CIA further states the hope of improving reef-fish populations in the take areas, yet goes on to support the status quo, “it is recommended that the existing bag limits and no-take areas within the WHRFMA remain in-place...”.186 The CIA adds “Furthermore, it is recommended that the applicant (PIJAC) continue to work with the approving agency (DLNR), and the various other user groups within the WHRFMA, to help improve the transparency of the accounting methods for fish takes, and the enforcement of the existing rules and regulations that govern those takes. With respect to limiting the potential for cultural impacts, DLNR-DAR plays a significant role in managing and enforcing the rules and regulations that are intended to support the sustainability, viability, and fecundity of the WHRFMA . . .” yet provides no information or guidance on actually improving the transparency of catch/accounting records and enforcement. This approach removes any all responsibility and accountability from the collectors and offers	Your comment has been forwarded to the decision makers.

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			<p>no solutions to the issues of enforcement, compliance and oversight.¹⁸⁷ The CIA continues, “As voiced by many of the consulted parties, the lack of support and funding have hampered DNLR DAR’s ability to fulfill its fiduciary responsibility, namely to enhance, protect, conserve, and manage Hawai’i’s unique and limited resources, which are supposed to be held in public trust for the current and future generations of the people of Hawai’i nei, and visitors alike. While achieving this goal is not an easy task, and it certainly cannot be achieved by any single means, DLNR-DAR should be proactive in seeking additional funding sources, and work with the various user groups who are most familiar with the WHRFMA, including the commercial aquarium fishers, to improve its enforcement capacity” (emphasis added). ¹⁸⁸ Again, this empty statement provides no information on mitigation measures, including proposed regulations, or funding sources, that could encourage better compliance or enforcement.</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>Finally, the CIA notes “As expressed by multiple community members, the lack of enforcement by DLNR-DAR has resulted in community members feeling the need to police their respective areas themselves, which ultimately diverts time and energy from their desire to educate the next generation of Hawai’i and to perpetuate their own cultural practices. As part of improving enforcement, as expressed by some of the consulted parties, the DLNR-DAR should consider incorporating more traditional Hawaiian fishery resource management practices (as detailed above) into the management of the WHRFMA, and representatives from the aquarium fishing industry should continue to work with the other user constituencies (i.e., Native Hawaiian organizations) that maintain an interest in the WHRFMA” yet fails to include any discussion on what, if any, traditional Hawaiian fishery resource management practices should be considered, when they might be considered or how.¹⁸⁹ In summary, the CIA remains extremely flawed and inadequate, with its inherent purpose-- to identify cultural impacts and propose mitigations measures to limit such impacts, not being met.</p>	<p>Your comment has been forwarded to the decision makers.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>VI. Additional Deficiencies A. Lack of Meaningful Alternatives Analyses The DEIS does not propose or consider adequate alternatives. The Limited Permit Issuance Preferred Alternative is not reasonable, as is required by HEPA.¹⁹⁰ The Preferred Alternative ignores the vast majority of comments submitted on the DEA, FEA and by the consulted parties. Instead, it focuses on just one species, the Achilles Tangs and ignores the many comments naming locations where the impacts of collecting pressure are of concern. The conclusion that no</p>	<p>Your comment has been forwarded to the decision makers.</p>

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Humane Society of the United States			<p>significant adverse effects would occur as a result of the Preferred Alternative is erroneous and unsupportable, The Agency’s letter of determination stated that “because the applicant can propose but not ensure regulations aimed at protecting and restoring populations of aquarium fish, [the Agency] is interested in proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions even in the absence of or prior to establishing other regulations to accomplish the same purposes.”¹⁹¹ We dispute the value of any self-regulation measure. Meaningful change must be binding on the industry, and a meaningful alternatives analysis requires the Applicant to propose binding measures. Here, the Applicant proposed neither self-regulation nor binding measures.</p> <p>A reasonable alternative would require the Agency to first determine:</p> <ol style="list-style-type: none"> 1) the life history, spawning grounds and offspring/recruitment patterns for each species to be collected for aquarium purposes (see DLNR list of aquarium species at Appendix 5);¹⁹² 2) natural abundance (i.e. unfished) levels and complete stock assessments, for each collection zone, for those same species (see DLNR map of aquarium fish zones at Appendix 6);¹⁹³ 3) a definition for “sustainable” as it relates to the natural abundance of coral reef species taken in Hawai’i for aquarium purposes; and 4) annual total allowable catch, by species, designed to restore and then sustain natural abundance levels, with negligible impacts as defined in the Queensland Ecological Risk Assessment of the Marine Aquarium Fish Fishery, for each species to be taken for aquarium purposes, in each zone.¹⁹⁴ <p>After making these necessary threshold determinations, the Agency should issue limited numbers of Aquarium Permits, by zone and by species with corresponding total allowable catch limits, per the above parameters. Additionally, the Agency should require Aquarium Collection Permits, for all take for aquarium purposes, regardless of the method of collection.</p>	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane	N/A	1/7/2020	<p>B. Lack of Mitigation Measures</p> <p>HEPA also requires an EIS to consider mitigation measures.¹⁹⁵ With minor exceptions, such a discussion is plainly absent from the DEIS. Decades of Applicant actions have directly impacted more than 200 species and indirectly impacted an unknown number of additional vertebrate and invertebrate species found in Hawai’i’s coral reefs, one of the most complex ecosystems on Earth, where the fate of each species is determined by the existence, abundance and diverse actions of a multitude of other species that inhabit or otherwise rely upon these unique places. Yet, the DEIS claims there are no significant impacts whatsoever, and therefore, proposes no mitigation measures</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the HEPA Guide (OEQC 2014) indicates that an EIS needs to consider all mitigation measures to avoid, minimize, rectify, or reduce adverse impacts. Therefore, mitigation is only considered for alternatives with a significant adverse impact. No significant adverse impacts from the issuance of 10 Aquarium Permits are anticipated, and therefore, no mitigation is proposed.</p>

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Society of the United States			outside of the bag limit for Achilles tang found in the Preferred Alternative. ¹⁹⁶ The DEIS also fails to propose mitigation measures to address biological and related impacts to the various socio-economic values described herein, and also fails to propose mitigation for impacts to cultural resources, and for the ethical concerns and harm done to the animals, themselves, also described herein.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	VII. Conclusion For the reasons explained above, the DEIS is patently insufficient in its analysis of the impacts of commercial aquarium collection permits. A serious overhaul of aquarium fish permitting in Hawai'i is needed. Because currently there are not restrictions on the number of collection permits or the amount of take per species under a fine mesh net (i.e. aquarium) permit or commercial marine license, the impact that collection may have on target species must be evaluated before issuing permits. As such, each aquarium collection permit or commercial marine license issued for aquarium collecting must show the total allowable catch, per species and ideally per zone that permit holders must follow to prevent unsustainable fishing. Catch limits per species and per zone should be calculated in conjunction with input from all stakeholders and based on the stock assessment for each target species in the specific areas where they will be allowed to be taken under a permit.	Your comment has been forwarded to the decision makers. The Preferred Alternative includes a limited issuance of permits (i.e., 10 permits), bag limits on several species (including pre-existing bag limits, as well as a reduction in the Achilles Tang bag limit)), and continuation of the restrictions of which species can be collected from the WHRFMA (i.e., White List Species). Collection will also only be allowed within Open Areas.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	The legislature has decreed it the "policy of the State" that DNLR and other agencies must "[c]onserve natural resources . . . by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics . . ." ¹⁹⁷ The Agency must also "[e]ncourage management practices which conserve . . . all natural resources," and encourage all individuals "to fulfill the responsibility as trustees of the environment for the present and succeeding generations." ¹⁹⁸ In enacting HEPA, the State legislature found "that the quality of humanity's environment is critical to humanity's well-being, [and] that humanity's activities have broad and profound effects upon the interrelations of all components of the environment . . ." ¹⁹⁹ The Agency simply cannot meet these mandates by continuing to allow unlimited aquarium collection, in light of the serious environmental consequences of those permits.	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental	N/A	1/7/2020	Appendix 1 Outstanding Questions from Consultation APPENDIX A Outstanding Questions The below questions were prompted after we were made aware of the limited geographic scope of the forthcoming DEIS, to include only West Hawaii, as well as the DEIS's intent to provide exclusive	Your comment has been forwarded to the decision makers.

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Laboratory, and The Humane Society of the United States			<p>aquarium collection privileges to 14 individuals, which was contrary to the earlier Draft Environmental Assessments (DEAs). Stantec’s failure to provide this crucial information to all Consulted Parties limited some of the Consulted Parties’ ability to meaningfully comment, and undermined HEPA’s notice requirements.</p> <p>Despite our objections to this flawed process, we submitted the below comments and questions to Stantec in an effort to inform and improve the DEIS and ensure that they were thoroughly evaluating the environmental impacts of this proposed action pursuant to HEPA. Stantec’s response to our concerns with compliance with the HEPA process simply stated “Comment noted. The commenters were included in the consultation process for the DEIS.”</p> <p>Therefore, below are our outstanding questions and in red, those questions that were inadequate in their response, or were not answered, and thus await DLNR’s response. Stantec’s responses are italicized:</p>	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>1. What are the environmental benefits of removing tens to hundreds of thousands of animals annually for the West Hawaii aquarium trade? Response: Comment noted. No environmental benefits were provided by Stantec.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Environmental consequences, including benefits, are included in Section 5.0 of the EIS.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>2. Why is the proposed DEIS limited to West Hawaii? Collection continues in East Hawaii and at even greater rates since the Supreme Court of Hawaii’s September 2017 opinion. Why would other areas of collection be excluded? Do the 14 collectors propose to collect only in West Hawaii, or is this due to the need for an additional West Hawaii permit to take in this area? <i>Response: Comment noted. The DEIS evaluates the impact of commercial aquarium collection on the entire island of Hawai’i. However, the Applicant is not requesting any permits to be issued for East Hawai’i...</i> Aquarium Collection permits issued under HRS 188-31 are issued statewide and necessary in order to have a West Hawaii aquarium fishing permit thus, it is not accurate/incorrect to state that the applicants are not requesting any permit to be issued for East Hawaii. Further, Stantec fails to state if the applicants have or will be fishing in East Hawaii or other areas, as we explicitly asked.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The FEIS has been revised to clarify that a permit condition would be added to the permits issued, limited their use to the WHRFMA.</p>

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			<p>Under the Preferred Alternative, 14 individuals would be provided exclusive access to take aquarium fish in the WHRFMA and use fine mesh nets, privileges that no other person would otherwise have. Given these 14 applicants are requesting special permission to access and remove constitutionally protected public trust resources, the below information is needed to explain how and why these 14 applicants should be granted this exclusive access, that would otherwise be denied to others.</p> <p>Inadequate response. Awaiting response from DLNR.</p>	
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>3. Please identify the 14 applicants by name and business name (DBA). <i>Response: Comment noted. The applicant information is provided in the DEIS.</i></p> <p>Stantec claims the information on the 14 applicants is provided in the DEIS however, they only list PIJAC as the applicant. We repeatedly requested this information from Stantec and they never responded. We await this critical information. PIJAC is not an individual/collector nor are they a/the person who would potentially apply for, possess the necessary permits and engage in the activity (aquarium collecting) that is subject to HEPA. Again, given these 14 individuals/collectors are requesting exclusive access to natural resources, otherwise denied to all others, we need the name and business name of the collectors. This information is not privileged and is routinely disclosed any time an individual is requesting permission to potentially alter or degrade the environment, or access a resource held in the public trust. Further, as defined under HEPA, an Applicant is “Any person who, pursuant to statute, ordinance, or rule, officially requests approval for a proposed action. Under HEPA, an applicant cannot be an agency, nor can an agency be an applicant. This mutual exclusivity establishes an important boundary in HEPA and serves to divide the universe of actions in one of two different areas: applicant actions (see Section 343-5(c), HRS) or agency.</p> <p>Inadequate/no response. Awaiting response from DLNR.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>PIJAC is the applicant and Stantec's response indicated this. The comment erroneously indicates Stantec claimed information on the 14 applicants is in the DEIS. There are not 14 applicants.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>4. How many reef animals have been taken by the 14 applicants in the past decade (list per year, per species and method of collection) and in what area, and how many are the applicants proposing to take each year for the next decade (list per species and method)?</p> <p><i>Response: Comment noted. The average and maximum collection by species of the 14 fishers has been added to Table 5-11. It should be noted that these fishers waived their right to confidentiality, and as such, this includes all their collected numbers from 2000 through 2017 (no data are excluded due to Hawai'i confidentiality laws). The collection numbers are limited to the WHRFMA for the analysis. It is assumed for the environmental consequences that the collection rates seen over the past 18 years will remain relatively the same over the 5-</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter is correct that not all fishers that may be issued permits under the Preferred Alternative (or any other alternative) have collected every year in the past. However, for this reason, the EIS used the maximum collection rates over the past 20 years for the Preferred Alternative, and then adjusted for annual growth, to project future collection over the 5-year analysis period. This was done to account for years in which certain fishers may not have collected, and then to account for growth in collection that may occur.</p> <p>Furthermore, it should be noted, as outlined in Section 5.2.1 of the</p>

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			<p><i>year analysis period, though the maximum collection is also included in the analysis. Collection would occur via fine mesh nets or other legal methods.</i></p> <p>This is not correct nor accurate. As discussed in more detail in our comments, all 14 fishers either did not fish or did not disclose their catch in the data provided. In some years as few as 3 collectors reported taking in the WHRFMA. This grossly underestimates the impacts of 14 collectors in the WHRFMA. Moreover, the DEIS assumes that aquarium collection without the use of fine-mesh gear will continue “legally” in East Hawai’i; however, as indicated in a letter dated January 7, 2020, from Earthjustice to DLNR (attached as Appendix 8), such collection also requires HEPA review, which currently is not being conducted. If this purportedly “legal” collection were halted pending environmental review, then the 14 collectors would have even greater incentive to increase collection levels in West Hawai’i in the meantime. The DEIS fails to consider this effect.</p>	<p>EIS, although all members of the dive team must have a permit, only the principal diver is required to report the catch and effort for a dive team in order to avoid duplicate fish catch reporting. Therefore, while not all 10 fishers may have reported catch in a given year, some may have still been actively collecting as part of a team, and their catch was thus accounted for by the principal diver.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>5. Have any of the applicants been charged with any offense related to the aquarium trade or occurring during the course of aquarium trade activities, or county or state natural resource related offenses? If so, include date, offense and outcome of each offense.</p> <p><i>Response: Comment noted. We do not possess this information. Enforcement and information occurring during the course of aquarium trade activities, or county or state natural resource concerning it is within the purview of the State of Hawaii.</i></p> <p>Stantec could have asked the 14 applicants for this information. Given they chose not to provide this information we are requesting this information from DLNR. Again, given the 14 collectors are requesting exclusive privileges and access that no other person would have, it is in the interest of the public and the state, if these 14 collectors have been charged with any criminal or natural resource violation (i.e. at least 1 collector was criminally charged with attacking a diver in the WHRFMA in the past).</p> <p>Inadequate response. Awaiting response from DLNR.</p>	<p>Your comment has been forwarded to the decision makers.</p>
<p>For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>6. What steps will be taken by the 14 applicants to reduce the impacts of climate change, specifically, coral bleaching and ocean temperature rise, which is predicted to occur more frequently and more severely over the next decade, given they will be removing thousands of herbivorous species?</p> <p>The environmental review must fully disclose the changing baseline from climate change and the effects of the proposed activities on the reef in light of climate change. The Fourth National Climate Assessment, released in late 2018, projects that by 2040 Hawaii’s coral reefs will bleach annually which will result in the loss of 71% of the state’s current coral reef cover by mid-century, and 99% by 2100.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impacts of climate change are addressed in Section 5.4.3.5 of the EIS. As stated in this section, based on studies in the Great Barrier Reef, fishing pressure had minimal effect on bleaching (Hughes et al. 2017). On the island of Hawai’i, the total cover of hard coral decreased between 2003 and 2017 in MPAs, FRAs and in Open Areas, with the smallest decline seen in Open Areas, though all areas saw significant declines ranging from 48.7% in Open Areas to 57.8% in FRAs (DAR 2019a, Gove et al. 2019). Given that Open Areas did not see a more severe decline than areas closed to commercial aquarium</p>

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Society of the United States			<p>Unprecedented coral bleaching across Hawaii and especially in West Hawaii has already occurred: back-to-back years of increased sea temperatures in 2014 and 2015 caused 50% of bleached corals to die in West Hawaii.</p> <p>Further, on August 23, 2019, the Hawaii Dept. of Land and Natural Resources (DLNR) warned of possible severe and widespread coral bleaching across the state within the next two months as the result of sea temperatures that are currently 3 degrees above normal. Because temperatures are expected to rise even further, this bleaching event will likely be even worse than the one that damaged so many of Hawaii's reefs 4 – 5 years ago. Reefs in West Hawaii are already showing signs of stress such as bleaching and both DLNR and the National Oceanic and Atmospheric Administration (NOAA) have asked the public to take actions to minimize any additional stress to Hawaii's reefs. Notably, among the actions to be avoided are many that are widespread and/or inherent to the aquarium trade, referenced below.</p> <p><i>Response: Comment noted. There is no evidence that suggests that commercial aquarium collection is a major contributor to climate change, including coral bleaching or ocean temperature rise...</i></p> <p>Our question did not suggest that aquarium collection causes climate change but that collection exacerbates the impacts of climate change, which include coral bleaching and ocean temperature rise and the removal of herbivores, which is discussed further in our comments.</p>	<p>collection, it is not anticipated that commercial aquarium collection has a less than significant impact on coral declines.</p> <p>In addition, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>7. How will the 14 applicants 1) specifically comply with the following recommended actions, and, given the extremely limited enforcement resources and capabilities of DLNR, 2) how do they propose to show compliance with these recommended actions?</p> <ul style="list-style-type: none"> • Reduce or stop taking herbivorous fishes such as surgeonfish which are needed to keep algae growth under control so as not to smother and kill corals stressed from bleaching • Avoid touching, standing in corals • Keep vessel anchors and chains off corals <p>Inadequate response. Stantec failed to provide any information on how the 14 collectors would comply or show compliance with DLNR's recommended actions.</p> <p>Inadequate response. Awaiting response from DLNR.</p>	Your comment has been forwarded to the decision makers.
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory,	N/A	1/7/2020	<p>8. How do the 14 applicants propose to prevent population reductions of reef species when, outside of the current court order, there are no limits on:</p> <ul style="list-style-type: none"> • the issuance of West Hawaii aquarium collection permits • the issuance of State aquarium collection permits • the issuance of Commercial Marine Licenses • caps on the issuance of the above permits or a limited entry program • the use of certain types of gear that may be detrimental to the 	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS evaluates the effects of proposed action, which is the proposed issuance of 10 Aquarium Permits. Any additional Aquarium Permits issued in the WHRFMA, East Hawai'i, or elsewhere in the state, would need to complete their own HEPA review. The EIS also analyzes the environmental affects resulting from the issuance of other permits required to make use of Aquarium Permits, including</p>

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and The Humane Society of the United States			<p>environment</p> <ul style="list-style-type: none"> • overall take (Total Allowable Catch) • area/geographical limitations outside of “no take” areas • collection of species outside of the “white list” • number of “white list” species that may be taken <p>Aside from reducing the bag limit of Achilles Tang, Stantec failed to respond to any of the above questions. Further, they premise their Preferred Alternative on rules, regulations or legislative changes that the Applicants are not in a legal or policy position to change. Only DLNR, with public input, could make the changes necessary to amend or create a new permitting process to limit statewide issued aquarium collection permits (issued under HRS 188-31) to a specific geographic area and change the West Hawaii aquarium permit process to limit issuance to only 14 individuals. No other case is known where a proposed alternative subject to HEPA is contingent upon a state action(s) that has yet to be undertaken. A proposed action or alternative must be described in its entirety and cannot be broken up into component parts, as suggested in the preferred alternative that has yet to be initiated if at all. Per HEPA this could be considered a phased project (involving a later phase that cannot be fully described) or “segmenting”, which is generally forbidden under HEPA. This proposal further exemplifies the flawed process as the Applicants are proposing policy and legal changes that have yet to be implemented and are subject to the public input process and other approvals (BLNR, DLNR, state legislature). On pages 17-18 of the DEIS Stantec states “The Applicant has no legislative or regulatory authority and cannot create, eliminate, or alter conservation areas (e.g., MPAs, FRAs, MLCDS); create, eliminate, or alter current regulations (e.g., bag and size limits, season length, permit term); or change reporting requirements. Despite this, during the public comment period on the Draft EA Draft Environmental Impact Statement Alternatives 18 that was published on April 8, 2018, in response to DLNR concerns and in coordination with the DLNR, the Applicant developed an alternative that required regulation creation by DLNR (i.e., implementation of bag limits).”</p> <p>Please clarify if DLNR-DAR coordinated with and made any commitments to the Applicants about undertaking such regulatory/statutory changes, without notifying the public about such proposed actions, that must be disclosed immediately. Inadequate/no response. Awaiting response from DLNR.</p>	<p>commercial marine licenses and WHRFMA permits. Where appropriate, based on the best available scientific information, limits on collection activities for certain species are proposed for DLNR’s consideration when issuing such permits. The EIS also discloses and analyzes the reasonably foreseeable impacts of fishing activities on the environment as required by HEPA for consideration by DLNR in its issuance of fishing permits. DLNR will issue any permits in compliance with all applicable laws and regulations, including such limits as necessary to comply with law.</p>
For the Fishes, Center for Biological Diversity,	N/A	1/7/2020	9. The Hawaii Department of Land and Natural Resources (DLNR), specifically the Division of Aquatic Resources (DAR) and their enforcement arm, the Division of Conservation and Resource Enforcement (DOCARE) has severely restricted resources, such as	Your comment has been forwarded to the decision makers.

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Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States			<p>inadequate staff and funding for enforcement, and there are current statutory restrictions on searches of certain containers carrying marine life and certain vessels.</p> <p>How do the 14 applicants propose that enforcement will be achieved on any proposed limits to their activities, including verifiable compliance with current administrative rules, and state and federal laws, including those listed below. How are the 14 applicants currently complying?</p> <ul style="list-style-type: none"> • Federal Lacey Act requirements USC Title 16 • Hawaii Misdemeanor Cruelty to Animals statute HRS 711-1109 <p><i>Response: Comment noted. Enforcement is within the purview of the State of Hawaii.</i></p> <p>Stantec fails to respond to our questions or provide any information as to their required compliance with the federal Lacey Act, specifically how they are complying with labeling and documentation laws when shipping live animals, or HRS 711-1109 which prohibits the starvation or abuse of animals. Animals are defined in HRS 711-1100 as “any non-human animal.”</p> <p>They also failed to provide any information on what they will do to assist with enforcement given DOCARE’s limited resources, staff and restrictions on inspections. The applicants/collectors fail to show any earnest interest in proposing any actions to assist with their complying and cooperating with law enforcement.</p> <p>Inadequate/no response. Awaiting response from DLNR.</p>	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>10. The commercial aquarium trade has long operated with fewer regulations, oversight and compliance-verification mechanisms than those that commercial food fisheries must adhere to. Further, while the issuance of aquarium collection permits is discretionary, and subjects the permit holder to certain legal obligations, including inspection of facilities holding marine life, many of these regulations have not been actively enforced. For clarification, do the 14 applicants cooperate and comply with the following:</p> <ul style="list-style-type: none"> • provide open and immediate access to coolers, containers, vessels and other aquarium related gear, equipment and holding facilities upon request of a DLNR-DOCARE Officer, as per the conditions of their permits? • allow observers on their vessels with/without notice? <p><i>Response: Comment noted. Permit holders must comply with law. Enforcement is within the purview of applicants cooperate and comply with the following: the State of Hawaii.</i></p> <p>Again, Stantec fails to respond to the questions or propose any applicant actions to mitigate potential violations, or to encourage or assist law enforcement. This same issue was raised in DLNR’s rejection</p>	Your comment has been forwarded to the decision makers.

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			of the EA and was not addressed by the applicants. Inadequate response. Awaiting response from DLNR.	
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>11. The earlier DEAs for the aquarium trade failed to include data and records which are not readily accessible to the public and other interested parties. Please provide the necessary data and response to the following to address our outstanding concerns with enforceability of the above-referenced laws specifically as it relates to animal health, welfare and mortality rates:</p> <p>a) Thousands of fish have been taken since the Supreme Court opinion and subsequent District Court orders were issued in September and October of 2017 which prohibited the use of fine mesh nets (nets with a mesh less than 2 inch). Ninety plus percent of catch prior to the court ruling involved the use of fine mesh nets. Please explain in detail the gear and method(s) of collection currently (October 2017 to present) used by each of the 14 applicants and for what species. If the 14 collectors did NOT collect during this period please provide that information as well.</p> <p><i>Response: Comment noted. Within the WHRFMA, collection of aquarium fish is not occurring under any method. In East Hawai'i, collection can occur without fine mesh nets...</i></p> <p>Stantec again fails to answer the questions, including providing info as to if and who is collecting in East Hawaii, and what methods of catch are currently being used by the applicants if collecting in East Hawaii, given the use of fine mesh nets are prohibited and 90+ percent of collection prior to the court ruling was performed with fine mesh nets. Inadequate/no response. Awaiting response from DLNR.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Data on collection numbers is available via the DAR.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>b) Per HDOA intrastate shipment records, thousands of fish have been shipped since the above-referenced court order took effect. For the 14 applicants please provide:</p> <ul style="list-style-type: none"> • how many fish/animals were shipped by each applicant per month since October 2017 to the present and; • specifically where these fish/animals were shipped to (e.g., intrastate to Honolulu, interstate or international) and; • the mortality rates for each shipment (a) upon arrival and (b) at 14 days post-shipment; • what percentage of animals remain in Hawaii (for resale) versus those who are shipped 1) to the US mainland and 2) international; <p>Inadequate/no response. Awaiting response from DLNR.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>2018 collection rates are provided in Table 5-2 for the 10 fishers, as well as for all other fishers. The Applicant does not have the data to split this out by month, or information on where fish were shipped.</p>
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus	N/A	1/7/2020	<p>c) For each of the 14 applicants please note whether the collector is also a dealer. If the collector is not a dealer, provide who the collector sells their catch to;</p> <p>Inadequate/no response. Awaiting response from DLNR.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Applicant does not have this data.</p>

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Environmental Laboratory, and The Humane Society of the United States				
For the Fishes, Center for Biological Diversity, Moana Ohana, Haereticus Environmental Laboratory, and The Humane Society of the United States	N/A	1/7/2020	<p>d) For each of the 14 applicants, please note which collectors engage in the following practices in contradiction to HRS 711-1109:</p> <ul style="list-style-type: none"> • withholding of food (starvation) and for what period of time; • fizzing or puncturing of the swim bladder; • cutting of spines or dorsal fins; • body compression (squeezing animal to force out ejection of fecal matter). <p>Inadequate/no response. Awaiting response from DLNR.</p>	Your comment has been forwarded to the decision makers.
Gail Grabowsky	HI	1/8/2020	<p>I have followed the aquarium fish issue for over 15 years now, conducted fish counts with my students, taught many classes on climate change, and done research on the effects of the removal of aquarium fish as revealed by the scientific literature. I am currently the interim dean of the school of natural sciences and math at Chaminade University. I would like to make testimony on the environmental impact statement re the aquarium fish industry.</p> <p>As I am sure you are aware, coral reefs all over the world are being lost and degraded by increasing water temperatures and polluted runoff that causes algae to grow. Most of the fish that are removed from the ocean for the aquarium trade are algae eaters, so they help defend the reef. We are now at a point with climate change so severe that most of the worlds reefs, including Hawaii's, have bleached multiple times recently and we are at risk of losing the keystone species that defines them - the coral.</p> <p>Because of this we need to leave all of the variables that help protect and defend the reef intact and the aquarium fish are one of those. I know it is sad that some will lose their jobs but there are many jobs right now and there is much room for new careers in aquaculture. I find that the EIS is just another statement allowing further use of a resource that the reef cannot afford to lose.</p> <p>Please opt for the cessation of the collection of these important fish that have nothing to do with food and are only about money. They may make some money in the short term but they will cost us all in the long term when we lose our Reefs and all of the food fish and eco</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>

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			tourism and aesthetic value that they create. Thank you for your time and consideration.	
Gary Harrold	HI	12/11/2019	As an proactive, lifetime member of The Sierra Club, I am advocating for Hawaii's Coral Reef health. Years upon years of cyanide poisoning our inshore waters, decades of juvenile reef fish extraction, globally broken swim fin damaged coral colonies due to careless divers/snorkelers, overfishing due to rising human population and demand and, now, ocean warming and acidification has most definitely had major negative impacts of reef vibrancy and species numbers and diversity. All marine creatures are victims of human impact. Lifetimes are cut short by disease and death due to aquatic plastic contamination. { As a certified diver, I have seen drastic deleterious changes in Hawaii, Fiji, Indonesia, Cook Islands, Mexico, Jamaica and California. } Any collection that may be allowed should be licensed educational aquariums such as the Monterey Bay Aquarium and the Waikiki Aquarium. And captive breed programs should be encouraged. That will take pressure off taking directly from our ocean environment. Extremely strict EIS should be drafted. I appreciate you three, David, Terry and Brian taking my testimony to heart.	Your comment has been forwarded to the decision makers. The use of cyanide or other harmful methods is not currently allowed in Hawai'i nor would it be allowed under any of the alternatives under consideration in the EIS. The Aquarium Permit is only for the use of fine mesh nets. Damage of coral will continue to remain unlawful as described in Section 1.2.3.2 of the EIS.
Gary Johnson	N/A	1/8/2020	I am a bit surprised ..actually shocked that our baby fish are being allowed to be sold to die in aquariums. Please make this stop immeniately or as quickly as possible I think you can really help out here David.	Your comment has been forwarded to the decision makers.
Gloria Snyder	HI	1/5/2020	Extinction is forever—it's that simple. It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade. Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting. The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood. But where is the traders' credibility? The Pet Industry Joint Advisory	Your comment has been forwarded to the decision makers. The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/

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			<p>Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>I implore you to do the right thing.</p>	
Grant Rakowski	MI	12/17/2019	<p>I feel that Aquarium hobby both professionally and at the hobby level is important way to learn about our earth.</p> <p>Through the use of conservation I think that Hawaiian fish can be enjoyed my many around the world without effecting the natural state of things on a reef. Often times aquariums are the only way for some to truly understand how beautiful the ocean world can be because of the cost it takes to visit Hawaii.</p>	Your comment has been forwarded to the decision makers.
Gregg Blue	HI	1/6/2020	Please leave the fish alone...no more shipping or capturing.	Your comment has been forwarded to the decision makers.
Haley Van Noord	N/A	1/3/2020	<p>The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Wildlife is best left in the wild.</p>	Your comment has been forwarded to the decision makers.
Heather Howard	HI	1/6/2020	<p>My name is Heather Howard. I am the Co-Founder of the Coral Reef Education Institute located on the Big Island. I am in extreme opposition to issuing any permits for fish collection for the aquarium trade in the state of Hawaii and especially the Big Island. Our coral reefs are in extreme decline and allowing fish collectors to remove our herbaceous fish from our reefs is negligent. Coral reefs are stressed more than they have been from the ever more frequent bleaching events. The state's new initiative 30% by 2030 should never allow our reef fish to be removed for resale and should focus on MPA's to protect our reef fish so they may become geriatric and produce more spawns for rehabilitation.</p> <p>Please do not allow the fish collection to restart in Hawaii.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed</p>

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				<p>to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
Heather Rosmarin	CA	12/28/2019	<p>As a frequent visitor to Hawaii, I strongly oppose the collection of wildlife from reefs to supply the aquarium trade. It is unsustainable and unethical, especially when there are alternatives such as farmed fish for the trade. We cannot continue to exploit and destroy our reefs. I want to bring my children and grandchildren to Hawaii to see the reefs. Please protect them.</p>	Your comment has been forwarded to the decision makers.
Ilene Harrington	HI	1/7/2020	<p>My name is Ilene Harrington and I am absolutely confused why you would consider issuing 14 permits to allow our beautiful and unique tropical fish to be collected. Sometimes it not about the money but about what's right for our oceans and earth.</p> <p>I own and operate two million dollar businesses and two non-profits in Kona and Waimea. I have lived on the Big Island for 14+ years and I snorkel up and down the North and West Hawaii coastline. I have sadly seen the massive decline in marine life. Between the Black Water run off along the West Coast of Hawaii Island, chemical spraying along the coastlines to keep golf courses green and weed free and the recent coral bleaching, our reefs are in disrepair.</p> <p>I am writing to respectfully inform you, I STRONGLY oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish. I understand that some would argue that this would provide some jobs, but what about those of us that already work in the industry, and our past, present and future visitors. Its seems very short sighted to not consider how you are impacting our</p>	Your comment has been forwarded to the decision makers.

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			natural underwater wonderland. Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawaii's Reefs is counter-productive. Shouldn't we tell our visitors to enjoy Hawaii here, don't take the lava rocks, the shells, the multi-colored sands from our beaches, why would you condone this? Our oceans are dependent on people like yourself to do what is Pono. Please choose to do the right thing, our community will be watching. Thank you for taking the time to read my comments.	
Jack Lavin	Hi	12/27/2019	Stealing the reef fish from Hawaii is a crime and must Stop. We have enough pressure on our ocean reefs Home salt water aquariums are another selfish way to destroy Hawaii's ocean beauty This must Stop. Jack Lavin Maui Hawaii Voter	Your comment has been forwarded to the decision makers.
Jack Zimmerman	N/A	12/16/2019	I share your feelings and will make a the phone call... [David Hunt's email attached]	See response to David Hunt's comment.
Jacqueline Wessel	N/A	1/6/2020	I am writing to you to say that here at Earth Warrior Project we are devastated to learn about the 14 new permits for fish collection in Hawaii. This is unacceptable since the coral reef is already being destroyed due to the current environmental issues which is plaguing our oceans. Action like this is like taking 10 steps in the opposite direction , we must move forward and help life on this planet flourish. I hope you consider the long term effects of what this will do to not only Hawai'i but the world.	Your comment has been forwarded to the decision makers.
James Ward	HI	1/6/2020	I'm writing to voice my concerns regarding the possible reversal of the tropical fish collection ban that's been in place for a few years. As a scuba dive in the south Kona , captain cook area over the last 11 years I've seen first hand how some species were decimated, particularly in the Milolii area where some of the collectors operate. Since the ban went into effect I've noticed some of the species start to appear in juvenile form. As the tropical fish population starts to recover, it seems an odd time to lift the ban. The argument that 14 licenses won't hurt isn't valid, as many divers can operate under one license. Also determining which collectors are legitimate and which are not will be impractical given DNLRs limited resources. While I personally think a permanent ban is the right thing, certainly leaving the ban in place for the next few years only makes sense as the reef fish are only starting to recover. The reef fish are also vital to the health of the coral reefs which have been struggling due to bleaching. Further stressing the coral at this time doesn't make sense. As someone who worked in the tourism industry until this year, I received many comments from visitors that they don't see as many fish (yellow tang, clown fish, butterfly fish etc) as they used to. Knowing how important tourism is	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA

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			to this island, it seems foolish to deplete what keeps visitors coming back for snorkel adventures. Even if you remove the moral element to this situation, it seems like taking from the many to benefit the few financially. Again, having seen the collection operations of the past first hand, I'm quite sure bringing them back will be very harmful to our ecosystem and our livelihoods. I appreciate you time	2018). This occurred in the presence of commercial aquarium collection.
Janet Mercer	HI	1/6/2020	I have been swimming almost daily in the water off south Maui for over 30 years. During that time I have seen a huge decline in the tropical fish population and the degradation of the coral reef. Now I know that the aquarium trade is not solely responsible for the decline in tropical fish but it has been a contributing factor. How can it not be? With the aquarium trade removing tropical fish from the ocean, they are also removing all the future fish those collected fish would have created. The math just doesn't add up to 'no impact' which the aquarium trade would like us to believe. As a long term resident of Maui County and an avid ocean swimmer, I urge you to reject any Environmental Review which supports aquarium collection. Please protect Maui's fish and thus our ocean.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Jason Murray	HI	12/5/2019	I am an avid snorkeler, underwater photographer and I snorkels every chance I get. Over the last 6 years I have watched many coral populations along the Kona coast die due to climate change and a warming ocean. These corals that are stressed need every fish they can to help keep them clean of the onslaught of ever growing algae. It does not make any sense to sell these fish for novelty pets so a few people can make a buck. These islands make money from tourist dollars, people come here to see these essential, beautiful, native fish. Last night I read the passage below on an underwater photography guide for travelers to Kona and it made me very sad. "Hawaiian Fish Life Some people report that the aquarium trade has taken its toll on the fish life here, and the reef fish around Kona do tend to be on the smaller side. However, there are still plenty of fish to see, especially on the less-dived sites south of Kona." The word is out. Fish collection takes it's toll. Please leave the aquarium collection ban in place and move to stop the collection of reef fish in all of Hawaii. This does not line up with the pono practices of caring for the 'aina in Hawaii. You would never sell a I'iwi or Nene to a pet store, these fish are our native wildlife as well, and they deserve protection.	Your comment has been forwarded to the decision makers. It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Jeanne Schaaf	HI	1/5/2020	Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue ! Mahalo nui loa	Your comment has been forwarded to the decision makers.

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Jeannine Moore	N/A	1/7/2020	Please do NOT allow the 'Pet Industry' to start capturing fish in our Hawaiian waters again. Too much damage has already been done - wildlife need our help, as does the Eco-system that now hangs in the balance.	Your comment has been forwarded to the decision makers.
Jennifer Hagens	N/A	1/6/2020	paradise on earth, your native fishes need and deserve effective legal protection and should be left in the wild. "Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" - Maxx Phillips, Hawaii director with the Center for Biological Diversity. More info is at: https://www.thegardenisland.com/2019/12/02/hawaii-news/comment-nowon-aquarium-fishing-impacts/ https://www.hawaiinewsnow.com/2019/11/27/input-sought-proposal-resume-commercial-aquarium-fishing-off-west-hawaii/ The Dark Hobby is a film about this cruel industry: https://thedarkhobby.com/index.html	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	I tried to give you a call today and would love to chat.	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	Respectfully, please accept my comments on this proposed Draft Environmental Impact Statement (DEIS), which totally fails to meet the legal requirements specified by HRS Chapter 343. It's difficult to comment on this document because almost nothing was done properly and the underlying assumptions and status quo are simply wrong. For one, the consultation process was incomplete and is invalid, because many people, organizations and agencies were not consulted or notified of the proposed action. There is information that was not considered as a result. For example, regularly beach goers, park users and many Native Hawaiians who access the beaches and nearshore waters in West Hawai'i were not given notice or consulted. I wonder who is advising PIJAC and if anyone on the Hawai'i State Environmental Council was notified of this issue. I personally was not made aware, given notice or consulted even though I have been publicly outspoken and actively involved in the aquarium collection policy and regulatory compliance issues for more than 5 years and, as the former Director of the Office of Environmental Quality Control (OEQC) agency, authored the October, 2015 letter advising the Governor and DLNR that it was critical to put an immediate moratorium on commercial collection of reef wildlife until the HEPA process could be completed. In addition, the proposed DEIS treats the action as being relevant to people and interests on the island of Hawai'i in West Hawai'i only, yet there are statewide implications.	Your comment has been forwarded to the decision makers. See Section 1.1.2 of the EIS for a summary of the previous HEPA documents submitted related to this action, including a public review period after the DEA was published in The Environmental Notice in April 2018. All parties which requested to be consulted parties were contacted in August 2019 during preparation of the EIS, as described in Section 6.1. The commenter did not request to be a consulted party after the publication of the EISPN on August 8, 2018.

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Jessica Wooley	N/A	1/7/2020	Two, there is no clear applicant - just a commercial trade association that profits off of trafficking Hawai'i reef wildlife, asserting that it represents 14 unnamed permittees; nothing and nobody, not even a corporation connected to Hawai'i, is identified as having a role or responsibility.	Your comment has been forwarded to the decision makers. PIJAC is the applicant who is officially requesting approval of the proposed action, which is issuance of 10 Aquarium Permits. Permits would still be issued by the DAR, PIJAC is simply requesting approval for the issuance of 10 Aquarium Permits.
Jessica Wooley	N/A	1/7/2020	The "applicant" tries to assert all alternatives are similar and there is no significant difference between any alternative, including the illegal activities occurring under the status quo, and so no mitigation is necessary. 1 2 1 The proposed DEIS explains as follows: "Given the long history of commercial aquarium collection in Hawai'i, it is reasonably foreseeable that commercial aquarium collection will continue. Based on available data regarding species abundance and yearly commercial aquarium catch over the past 18 years, it is expected that in the reasonably foreseeable future, commercial aquarium collection will proceed generally at the same rate and have the same level of impact as in the past 18 years. To the extent new data regarding the impacts of commercial aquarium collection on biological resources becomes available in the future, DLNR may consider those data and, to the extent necessary, supplement this impacts analysis. 2 This is so indicative of the larger problem here, the applicant has no concept of "give back", "take care" or "respect" (e.g., malama `aina).	Your comment has been forwarded to the decision makers. The differences between the alternatives are summarized in Table 5-13 of the EIS. The commenter does not indicate what illegal activities she is referring to; however, legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling. The Applicant has no control over the continued collection of aquarium fish using other methods in East Hawai'i. Regarding mitigation, as stated in Section 5.0 of the EIS, the HEPA Guide (OEQC 2014) indicates that an EIS needs to consider all mitigation measures to avoid, minimize, rectify, or reduce adverse impacts. Therefore, mitigation is only considered for alternatives with a significant adverse impact.
Jessica Wooley	N/A	1/7/2020	There is no valid regulatory system for a West Hawaii, 14 permittee option. The old, illegal regulatory system (that was in place prior to the Hawaii Supreme Court ruling in Umberger) is a statewide and unlimited permit system that does not fit the proposed action (to allow exclusive use by 14 West Hawaii unnamed "permittees" to collect nearly unlimited reef wildlife for the aquarium industry in West Hawai'i using small mesh nets). There is so much missing. What is the system? What are the rules? What are the limits? How is anything enforced? Who profits? Who pays?	Your comment has been forwarded to the decision makers. The October 2017 supreme court ruling was that a HEPA review needed to be completed before Aquarium Permits could be issued. This EIS is fulfilling that requirement for 10 Aquarium Permits. Any additional permits requested would need to undergo their own HEPA review. All existing rules and regulations, outlined in Section 1.2.3 of the EIS, would be enforced under any of the alternatives involving issuance of Aquarium Permits. A section on enforcement and compliance has been added to Section 1.2.3 of the FEIS.
Jessica Wooley	N/A	1/7/2020	Perhaps most offensive, the proposed DEIS asserts that the no alternative and baseline is essentially the continued unlimited	Your comment has been forwarded to the decision makers.

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			<p>collection of reef wildlife. There is no alternative evaluated that does not include unlimited collection of reef wildlife.³ The alternatives are a wish list of the options PIJAC would like, not the options that are legal or available, and no option examines “no action alternative” as in, no commercial collection of reef wildlife by aquarium profiteers.</p> <p>³ For example, the applicant states “During the evaluation process, it was determined that some resources typically evaluated in an EIS would not be impacted by any of the alternatives under consideration. The evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s. Because a significant increase in commercial aquarium fishing is not anticipated during the 5-year assessment period evaluated in this DEIS, and in fact a decrease when compared to historic conditions is anticipated due to the issuance of only 14 Aquarium Permits, this DEIS does not anticipate a significant change in the current baseline condition of these resources.”</p>	<p>As stated in the EIS, under the No Action Alternative, the court order would remain in place, and no Aquarium Permits would be issued for the entire island of Hawai’i and the taking of aquarium fish or other aquatic life in the WHRFMA for commercial aquarium purposes would be prohibited.</p> <p>Legal commercial aquarium collection has and would continue outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling, and none would be allowed under the No Action Alternative. The Applicant has no control over the continued collection of aquarium fish using other methods in East Hawai’i.</p> <p>Section 3.6 has been added to the FEIS to outline the alternatives considered but dismissed.</p>
Jessica Wooley	N/A	1/7/2020	<p>The document is totally incomplete in myriad ways. It’s as if someone got about 1/50th of the way through a final exam then hurriedly turned it in. Essentially, the document does not evaluate environmental impacts but simply claims there are none and proposes no mitigation.</p> <p>When it comes to data, the document includes references and charts with some remnants of some data collected but it’s not clearly sourced, accurate or peer reviewed and is admittedly incomplete in many circumstances. It’s as if the authors’ shrugged their shoulders, looked around real quick, found most data was missing or scarce, and conclude it’s not important to know much, including numbers and habitat availability as climate change impacts increase for each species, cumulative impacts, effects on subsistence fishers, economic costs and benefits or interactions and impacts on commercial food fishing (just some examples). Also, the limited scope in time (5 years) is too short, the document does not analyze the alternatives, impacts on corals or climate change implications, for example.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The environmental consequences for all alternatives are disclosed in Section 5.0 of the EIS and summarized in Section 5.5. The EIS used the best available science and best publicly available data (historic collection data and population trend data from the DAR and population estimates from CREP), and all data and references are cited in text and included in the literature cited.</p>
Jessica Wooley	N/A	1/7/2020	<p>The document ends with the Cultural Impact Statement, which was clearly tacked on in the end of the proposed DEIS when it should have been relevant from the beginning. The DEIS itself needs to incorporate what was described in the CIA from the start. It is impossible to conclude the proposed action would have no significant impacts. The cultural and environmental (and economic) impacts are inextricably intertwined and they were not analyzed in this document.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The CIA is referenced throughout the EIS, however, additional summaries of the CIA have been added to Section 5.3.1 of the FEIS. As concluded in the CIA, cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.</p>

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Jessica Wooley	N/A	1/7/2020	The application for 14 unnamed permittees to be able to obtain a permit to use a small mesh net to collect reef wildlife, presumably for the trade organization PIJAC, if granted, would result in a total incoherent management philosophy that permits the use of small mesh nets in West Hawaii and prohibits them every else, and prohibits the use of small mesh nets everywhere but West Hawaii. This bizarre outcome is the result of the wacky illegal activities still occurring outside West Hawaii that the State Executive branch has sanctioned.	Your comment has been forwarded to the decision makers. The Preferred Alternative in the FEIS would be issuance of 10 Aquarium Permits for the WHRFMA. If other fishers request Aquarium Permits for other areas of Hawai'i, including other islands, they would need to perform their own HEPA review. The Applicant does not have the authority to ban issuance of Aquarium Permits for any area.
Jessica Wooley	N/A	1/7/2020	In summary, this DEIS is a total sham and throughout reveals what appears to be an illegal deal between the Executive Branch and the applicant, PIJAC, the trade association for the reef wildlife trade (now trafficking) industry. As the recent Hawai'i Supreme Court in the 2016 Umberger v. DLNR decision, the Hawaii Environmental Policy Act (HEPA), the OEQC and EC letter make clear (in addition to numerous statutes and the Hawai'i State Constitution Sections 11.1, 11.2, 11. 6, 12.4 and 12.7), the state government cannot allow unlimited collection of reef wildlife until and unless the environmental review process under HRS Chapter 343 is complete, if at all.	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	It's almost impossible to further comment on this document because every aspect of it is devoid of relevant facts and information The focus is generally on the benefits of aquariums and zoos, for example, not on the environmental impacts due to removal of reef wildlife from nearshore waters. I can't help but want to elaborate and provide some examples.	Your comment has been forwarded to the decision makers. The focus of the EIS is the disclosure of the impacts of the Proposed Action on socioeconomics, cultural resources, and biological resources (see Section 5 of the EIS, which includes over 50 pages of relevant information). Of the over 170 pages in the main body of the EIS, Section 4.2.1.2 on public and private aquariums is one paragraph encompassing less than ½ a page.
Jessica Wooley	N/A	1/7/2020	Despite the very clear rule of law that there should be no commercial aquarium collection of reef wildlife absent compliance with HEPA, an illegal scheme to get around the review and disclosure laws was devised once again. So at this moment unlimited numbers of collectors continue to be able to capture unlimited numbers of reef wildlife from our islands' nearshore waters (except in West Hawai'i due to specific permit rules, Maui due to County prohibitions based on cruelty to animals and a few small protected areas). ⁴ One irony is commercial collectors are collecting plenty of animals and being told they can use any kind of technology except a small mesh net. So under the current administration, during these most important times to be paying attention to coral reefs, wildlife and climate change challenges, the most harmful collection techniques for capturing our underwater wildlife are proliferating, hurting reef wildlife and habitat. ⁴ Under the new illegal scheme and status quo, any person can apply and receive a commercial license to sell (export) reef wildlife, with no limits. There are no regulations, limits or boundaries save a few tiny	Your comment has been forwarded to the decision makers.

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			<p>geographically excluded areas (e.g., Hanauma Bay) and the requirement that you report what you catch. There is no enforcement or it is miniscule. Any person with a license can use any technology they want except a small mesh net to capture the native and wild reef animals, bring them to the surface and, if they survive, export them to make some money.</p>	
Jessica Wooley	N/A	1/7/2020	<p>Who knows what is happening? No one, is the answer, because anything goes.⁵ It appears to be a policy and goal to take what can be taken to maximize profits regardless of the law, people, animals, bigger economy and long-term consequences; hurry up, before numbers drop, someone realizes the wild populations are in jeopardy, climate changes make collection impossible for whatever reasons (e.g., the reefs are dead) or some group figures out how to more cheaply raise captive bred animals for aquariums.</p> <p>⁵ Please note that now, like previous years, the DLNR has been non transparent and developed an ad-hoc system for the aquarium industry to be able to collect as much as collectors can get, of any and all species (except live corals and rock). This can make it difficult to explain how it's possible that the State Executive allows unlimited, unmonitored and unstudied commercial collection of all reef wildlife species (save corals and rock). It makes the description of what's happening a little vague and unbelievable.</p>	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	<p>Although the commercial aquarium collectors were permitted to exploit the reef wildlife resources all these decades in violation of the law as HEPA (authorized in 1970) was never even initiated, the trade industry and apparently the Executive Branch continue to operate like the illegal activity is legal. In addition, the applicants are trying to say the the nearly 50 years of illegal activity that occurred and the status quo of unlimited collection is now the baseline for all studies moving forward. The applicants are trying to normalize the illegal activity of unlimited collection by claiming it is the status quo. ⁶</p> <p>⁶ Let's say there have been a minimum of 50 million Hawaii animals removed from our reefs over about 50 years without ever having the impacts on the economy, the environment, the culture or the animal abundance itself studied or potential impacts discussed or disclosed with the public. And this year, about a million more animals will be found, removed from their reef homes, brought to the surface and sold, if they survive the journey. At the same time, kupuna describe how 50 years ago, the reefs provided dinner to families throughout the islands. Not so long ago, there was reef wildlife abundance like you still see in the Northwest Hawaiian Islands. Now, not only is there no dinner to find, the commercial fishermen themselves are barely</p>	Your comment has been forwarded to the decision makers.

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			able to find fish for the market. There is just not much left. Now the aquarium collection trade industry group PIJAC wants all of us to believe that there is no significant socioeconomic, environmental or cultural impact when the collectors are allowed to take unlimited reef wildlife— never has been a significant impact and never will be? 50 million animals don't matter? How many would it take to matter?	
Jessica Wooley	N/A	1/7/2020	<p>This proposed DEIS is a sham,⁷ like the regulation of the industry itself for the last 50 years. It reveals the applicant's total misunderstanding of reef wildlife issues as well as the State Executive branch's willingness to collude with corporate commercial interests to evade environmental review requirements. Does DLNR continue to claim that there is no problem with unlimited commercial collection of reef wildlife because the commercial collectors are not complaining?</p> <p>⁷ In this bizarro world, the rule of law appears meaningless — just words thrown around, as the Executive Branch will do whatever it takes to accommodate commercial corporate profiteers; in this instance, reef wildlife traffickers. Despite the ruling by the Hawaii Supreme Court, the Hawaii Constitution, agency and board urgings and official letters, legislative action and grave public concern for decades, the Executive Branch has totally ignored the rule law, the public trust and well being of our island people.</p>	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	How does this document comply with HRS Sections 1 - 853, HRS Chapter 342, 343, 344, 345 in particular? What are the agencies tasked with prioritizing natural resources, the public trust or protecting the environment? Who are the Governor's Cabinet members, who advise him on environmental issues? Is there no agency funded and tasked with advising the Executive Branch or advocating primarily for the protection of environmental resources?	<p>Your comment has been forwarded to the decision makers.</p> <p>The FEIS, DEIS, FEA, and DEA explain in detail how they comply with HEPA and other applicable laws. The HEPA EA and EIS has been prepared by PIJAC for use by the Hawaii Department of Land and Natural Resources in its deliberations whether to issue Aquarium Fishing Permits and other required permits subject to HEPA. Questions regarding the Governor's Cabinet should be directed the Governor's office and DLNR. DLNR is responsible for advocating for resources under its jurisdiction consistent with applicable laws.</p>
Jessica Wooley	N/A	1/7/2020	Even if all the illegal issues were ignored and the government were to accept this Draft EIS on its face, as being accurate, what are the consequences for violations? What happens when we discover various species populations have been depleted, perhaps beyond recovery? We could be there already. Are there any penalties for violations? Is there any plan for enforcement?	<p>Your comment has been forwarded to the decision makers.</p> <p>A section on enforcement and compliance has been added to Section 1.2.3 of the FEIS.</p> <p>Regarding population monitoring, as described in Section 1.2.3 of the EIS, a review of the effectiveness of the WHRFMA plan shall be conducted every five years by the DLNR in cooperation with the University of Hawai'i (UH). The DLNR shall submit a report of its findings and recommendations based on the review to the legislature no later than 20 days before the convening of the regular session following the review.</p>

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Jessica Wooley	N/A	1/7/2020	For there to be a valid draft EIS to evaluate potential environmental impacts from commercial aquarium collection, there must be a state program in place that ensures cumulative impacts are evaluated before individual permits are granted or the applicant must provide that cumulative analysis. There has yet to be a programmatic evaluation of actions by the Executive Branch to grant permits and/or licenses so the applicant must do it themselves to meet the statutory requirements. Where is that?	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	There is no legal permit system for commercial aquarium collection of reef wildlife. The State has the authority to set up a permit program, similar to the program the Hawaii Supreme Court found illegal, after the program goes through the environmental review process. This is an important point to understand. Based on this proposed DEIS, it appears PIJAC wants to be a quasi-agency, pre-determining government actions statewide. It appears PIJAC is proposing to be the exclusive applicant throughout the state, e.g., this is an application for PIJAC to get sole use and control over all nearshore water permits. Please explain the concept envisioned here.	Your comment has been forwarded to the decision makers. The October 2017 supreme court ruling was that a HEPA review needed to be completed before Aquarium Permits could be issued. This EIS is fulfilling that requirement for 10 Aquarium Permits. PIJAC would not act as an agent of the DLNR. Permits would still be issued by the DAR, PIJAC is simply requesting approval for the issuance of 10 Aquarium Permits.
Jessica Wooley	N/A	1/7/2020	This is the use of conservation land adjacent to county and state parks. Have all park users been notified if the proposed actions by PJAC in the conservation district and associated activities in the shoreline area? Are any county shoreline access authorizations relevant and do they need to be applied for?	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	How is a pet association trade group planning to be responsible for the actions of the collectors? Are they employees? Why are their names not revealed? What is being hidden? Are there any other situations where an environmental review process has been complied with that are similar, e.g., with a trade association acting as the agent for collectors? Has there ever been an environmental review document with such anonymity? What PIJAC business interests and in-state business addresses exist and where locally can the applicant be found? Does the applicant have any experience, responsibilities, connections or obligations in the State of Hawaii? If so, please list and specify all.	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	Does the consultant preparing the draft EIS have any experience, responsibilities, connections or obligations in the State of Hawaii? If so, please list and specify all.	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	Is Section 1.2.3.1, a complete list of opportunities provided throughout the history of the commercial aquarium fishery for citizen participation, as alleged?	Your comment has been forwarded to the decision makers. Section 1.2.3.1 of the EIS is a summary of the West Hawai'i Fishery Council and does not claim to include a complete list of opportunities.
Jessica Wooley	N/A	1/7/2020	The action summary is "to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable	Your comment has been forwarded to the decision makers.

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			commercial collection of various fish species from nearshore habitats” by getting 14 permits. However, there is no definition of what is lawful, responsible or sustainable for any species. And again, under what program do these definitions exist?	<p>Issuance of Aquarium Permits would be under HRS 188-31 and HAR 13-60.4. Existing bag limits and regulations are summarized in Section 1.2.3 of the EIS and would be implemented under any of the alternatives analyzed.</p> <p>Regarding sustainability, collection under the Preferred Alternative in the FEIS is below 2% for all of the 38 White List Species with a population estimate. The two species which do not have a population estimate, the Flame Wrasse and the Longfin Anthias, have been collected on average less than 175 individuals per year, even when the number of Aquarium Permits was unlimited. This level of collection is under the lower limit of 5% to 25% in Tissot and Hallacher (2006).</p>
Jessica Wooley	N/A	1/7/2020	Please explain when and how the State Executive has been working with PIJAC, to try to explain the regulatory system and/or figure out ways around it. The DEIS states “The DLNR has been working with stakeholders (e.g., public, various fishing and tourism industries, local governments) since the 1970’s, and continues to work with them to ensure the commercial aquarium fishery is environmentally sustainable and prevents degradation of fish populations and the habitats in which they occur. “ When has the DLNR worked with the public, environmental groups or Native Hawaiians? When has the DLNR worked with the various fishing, snorkeling, scuba diving and tourism industries? When has the DLNR worked with local governments? What are the actions that have been taken for all of the above?	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	Table 3-1 demonstrates how PIJAC and DLNR are trying to present a false sense of choices — alternatives — the choices PIJAC would like, and has dictated in the past. These are not the legally allowable choices.	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	What, if any, of the data and studies referred to in this proposed DEIS have been peer reviewed? Please provide details if there is any data or are any such studies. For the data that is not peer reviewed, are there alternative data or studies that have been evaluated? If not, why not?	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS used the best available science and best publicly available data (historic collection data and population trend data from the DAR and population estimates from CREP), and all data and references are cited in text and included in the literature cited.</p>
Jessica Wooley	N/A	1/7/2020	What ethical, transparency or accountability rules or limits exist to ensure the state government employees are not making money from the industry or being paid by the collectors and/or trade industry agents or given gifts or, at least if they are, there is public disclosure?	Your comment has been forwarded to the decision makers.
Jessica Wooley	N/A	1/7/2020	In a footnote, the proposed DEIS acknowledges there is very little information on 4 unique species that the proposed action would allow to be collected in unlimited numbers. Like so often in this document and Executive agency documents, the authors of this document rely on what commercial collectors reported they were able to catch	<p>Your comment has been forwarded to the decision makers.</p> <p>The footnote is actually referring to WHAP population estimates and trend data. CREP population estimates are available for two of those species. Tinker’s Butterflyfish have a CREP (2018) population estimate</p>

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			to conclude that not much would be collected. In other words, because collectors could not find very many, we shouldn't worry about the impacts, despite the fact that this very information is an indication that the species is unusual, rare, perhaps it should be an endangered species but we don't know much. Please explain and, I hope, prove me wrong.	of 18,475, and collection under any of the alternatives would be less than 5% of the island-wide population (though it should be noted that the vast majority of the population occurs well below the 98-foot depth surveyed by the CREP and thus the population estimate is likely low). Eyestripe Surgeonfish has a CREP (2018) population estimate of 578,835, and collection under any of the alternatives would be less than 0.3% of the island-wide population.
Jessica Wooley	N/A	1/7/2020	It's difficult to make comments or ask questions of this document, so please go ahead and put a "why" before each statement, so that it is read as a question. For example, when I state "The document totally fails to meet the legal requirements specified by HRS Chapter 343." Please read it as "Why does this document totally fail to meet the legal requirements specified by HRS Chapter 343?" ⁸ 8 Here is a conclusion I agree with but it looks like a typo, FYI. "Given that Open Areas did not see a more severe decline than areas closed to commercial aquarium collection, it is not anticipated that commercial aquarium collection has a less than significant impact on coral declines."	Your comment has been forwarded to the decision makers. The text in the FEIS has been edited.
Jessica Wooley	N/A	1/7/2020	I'm hopeful PIJAC will see the light and stop selling Hawai'i reef wildlife and begin to invest in captive-bred options to create reef wildlife abundance and a world-class aquarium industry in Hawai'i that is respectful and gives back to Hawaiian culture and the environment.	Your comment has been forwarded to the decision makers.
Joan Lloyd	HI	12/27/2019	In October 2017, when the Hawaii Supreme Court issued injunctive relief and shut down all aquarium collecting pending environmental review, it was disturbing to see Kona aquarium collecting persist with support from Kona DAR and Hawaii DLNR. Hawaii's people have spoken, but no one's listening. And now, the "environmental review" supplied by DLNR with heavy support from PIJAC (Pet Joint Advisory Council) advocates for aquarium collectors' livelihood. This isn't an environmental review, it's a transparent lobby for Big Island and Oahu collectors who believe Hawaii's reefs are their private reserve, to trash and sell for personal gain. Aquarium collecting isn't fishing, it's a debilitating commercial enterprise ravaging Hawaii reefs. Don't sell out Hawaii reefs to the a handful of collectors and mainland interests. Stand firm and defend Hawaii reefs for Hawaii reef wildlife, Hawaii people, and Hawaii's economic future which has far more to gain by preserving this public trust.	Your comment has been forwarded to the decision makers. Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.
John and Diane Appler	HI	12/14/2019	We are concerned that the aquarium trade is being protected by DLNR at the expense of our reef species and habitat here around our islands. Please do all you can to discontinue this practice. We will be watching this issue closely.	Your comment has been forwarded to the decision makers.

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John Naylor	HI	1/6/2020	<p>The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. I've been observing our Maui reefs for over 37 yrs.</p> <p>It's shockingly different now than when I started! Please cease the aquarium trade and all netting immediately. I am watching closely and will not relent on this issue!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p>
John Replogle	N/A	1/7/2020	<p>Mission Statement: Enhance, protect, conserve and manage Hawaii's unique and LIMITED natural resources held in PUBLIC TRUST for current and future generations of the people of Hawaii Nei and its visitors in partnership with others from public and private partnerships.</p> <p>This Mission Statement of the Division of Land and Natural Resources is in its essence from Hawai'i Constitution Article XI section 1. To promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of self-sufficiency of the State. Furthermore "All public natural resources are held in Trust by the State for the benefit of the people".</p> <p>All this being said, when one considers what is happening climatically on our planet; our coral reefs are bleaching, there is sea level rise in evidence around our State (Hauula), unheard of rainfall events and to round it out, over 200 record High temperatures were broken around the State is past 2019 year. "Australia today is ground zero for the climate catastrophe. It's glorious Great Barrier Reef is dying, its world-heritage rainforests are burning, its giant kelp forests have largely vanished, numerous towns have run out of water or about to, and now the vast continent is burning on a scale never before seen." (The New York Times) It is no longer disputed within the scientific community that our current situation concerning the climate is Homo sapiens (man) induced (caused).</p> <p>Our Hawaiian Reefs and its Species have evolved and developed over millennia in time. Do people think there were too many fish on the Hawaiian reefs before Kanaka first arrived? The first Kanaka had a good working knowledge of their nearshore reefs and species therein; through a system of Kapus and understanding of the species were able to maintain a very healthy reef and fishery. (in furtherance of self-sufficiency of the State) Our State has no fishing license requirement and no ocean/reef education program even though we are surrounded by reef and ocean. This however is on the people of Hawaii for accepting this situation. This then brings us to the handing out of 14 special permits for the collection of reef fish from west Hawaii waters. How does letting 14 special entities extract natural resources benefit the reefs first and the public trust? There are no Ecosystem Services Fees in place, Climate change is a real threat and our reefs may need all their components and species in tack to with</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>stand the onslaught of climate change. Our State Dept. of Conservation and Resource Enforcement has but three people on duty at any one time on Hawaii Island and they struggle to deal with that. So let us saddle them with monitoring and enforcement in reef collecting of 14 different permits. So it will turn to self-regulation and enforcement by the Aquarium industry itself and that is tantamount to the proverbial Fox guarding the Hen House. Public Trust will be broken. There will be no benefit or reward to the people of Hawaii or to the Natural Resource. (Hawaii Constitution Article XI section 1.)</p> <p>We should not grant these permits. We do not have the capability of enforcing or monitoring. We should not grant these permits. We have no idea of what climate change will visit upon us way out here in the Pacific Ocean and what we may need to survive; We the people and our Natural Resources. [P]romote the development and utilization of these resources in a manner consistent with their CONSERVATION and in furtherance of SELF-SUFFICIENCY of the State. Hawaii Constitution Article XI, section 1; I in the strongest terms urge you to deny this Application for Commercial Aquarium Fishing Permit on Hawaii Island. I further encourage you to rescind all previously issued permits within the entire State at this time. Please look down the road to where we are heading and remember we are the most isolated place on the planet. We must look out for our collective best interests; the Public Trust is in your hands.</p>	
Jon Jokiel	N/A	12/2/2019	Of the listed alternatives, the No Action alternative is the most preferable . I think letting the reefs of Kona rest for another few years is a good idea to replenish the fish. It's been shown to work at Kahupulehu and other places in the state.	Your comment has been forwarded to the decision makers.
Jon. Kuahiwi Moniz	HI	11/27/2019	<p>I am a Native Hawaiian Cultural Practitioner. I also come from a line of fishermen on both sides of my family. I have noticed the fish population depleting. I have notice a surge in invasive fish such as the Toao and Roy. Take more efforts into eradicating those first. Put more efforts into restoring our reefs, rather than depleting our marine life.</p> <p>No more. Stop and Deny this request to resume commercial aquarium fishing not only in West Hawai`i, but in Hawai`i shores... from Lo`ihi to Papahanaumokuakea.</p>	Your comment has been forwarded to the decision makers.
Jonathan Boyne	N/A	1/6/2020	<p>Hawaii is considering the impact that fish collection for the aquarium trade has on wild fish populations.</p> <p>The Pet Industry Joint Advisory Council has submitted an environmental impact statement "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem"!</p> <p>"It's common sense that this level of unrestricted take can't be sustainable," explains Earthjustice attorney Kylie Wager Cruz, who</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter incorrectly states that the EIS surmises "that the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem". The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis</p>

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			<p>further notes that the state shouldn't ignore "that except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state." "Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" - Maxx Phillips, Hawaii director with the Center for Biological Diversity. Hawaii's native fishes need and deserve effective legal protection, and should be left in the wild.</p>	<p>period. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Judith Culler	N/A	1/6/2020	Please, do the right thing, ban aquarium collecting on Hawaiian reefs.	Your comment has been forwarded to the decision makers.
Judith Graham	N/A	1/1/2020	<p>Applicant Seems Ineligible The Applicant, Pet Industry Advisory Council, is named only once in the DEIS on an unnumbered page at the start. This page scarcely seem to be included in the document. Other EISs submitted in Hawaii, for example "The Village at Aina Lea,"(September 2010) which I checked, describe the Applicant in at least some detail. The cause in this instance may be that the Applicant is inappropriate for this Action. The statutory definitions in HRS 343, the state's environmental law, of Applicant and Action appear to be somewhat circular but in any case show the two to be inseparably linked. The Applicant undertakes the Action which in turn is a project or program undertaken by the Applicant. But in this case the two appear not to be so linked unless the Action is construed to be preparation of an EIS. But the effects described in the DEIS concern the collection of reef fish. This activity will not be undertaken by the Applicant, which appears to be a trade industry advocacy group. Thus, this EIS submittal does properly represent a portion of its membership--aquarium industry wholesalers, retailers, etc. Information about the PIJAC is readily available on its main web site and a handful of related sites such as that for its Aquatics Committee, where a FAQ about donations is partly answered in this manner:</p>	Your comment has been forwarded to the decision makers.

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			<p>"If you are a PIJAC member, consider the connection between ensuring access to live organisms and the success or failure of your enterprise." This appears closer to the purpose for PIJAC's involvement in the EIS preparation than the frequently cited purpose of ensuring the livelihood of 14 fish collectors.. Hawaii's Supreme Court had stopped commercial aquarium fishing in West Hawaii as of 2018. Yet the DEIS acknowledges that West Hawaii is among the state's richest sources of reef fish for collection. In any case, in this instance the Applicant does not undertake the Action. The Action may not properly be seeking the issuance of 14 permits from the DLNR. If the DNLR undertakes that action, it is an agency action and this instance is not an agency EIS process.</p>	
Judith Graham	N/A	1/1/2020	<p>Probable Consequences for Yellow Tang Yellow tang are a pleasing yellow in color and according to saltwaterfish.com, a retail dealer with web pages very similar to Amazon's, "is among the most popular of all marine species" for aquariums. Its prices per individual, depending on size from 1.5 to 4.5 inches, vary on this site from \$62.99 to \$162.99. These high prices will drive up collection rates. According to the DEIS, about a quarter million individuals were collected in 2013-14 and again in 2017-18, some recent years for which figures were cited (page 74). Further, the West Hawaii commercial aquarium fishery depends over 80% on yellow tang collection (page 74)..Actually, the take may have been higher, one reasons, because according to a table on page 24, the percentage of statewide collectors who submitted the DLNR-required monthly reports of their takes was about 30% in 2017, about 40% in 2016 and about 42% in 2015. (I have interpolated figures given.)</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS in Section 5.2.1, to avoid duplicate fish catch reporting, only a principal diver is required to report the catch and effort for the dive team (DAR, pers. comm., 2018). This process ensures that reported catch data are not duplicated in the State's system. However, this reporting mechanism can lead to confusion by outside observers, as the total number of permit holders is higher than the number of permit holders reporting data (Table 4-1), giving the appearance of under reporting.</p> <p>Collection of Yellow Tang under the Preferred Alternative is anticipated to be 0.84% to 1.93% of the island-wide population. In addition, see Section 1.2.3.2 for the existing size and bag limits on Yellow Tang, which would remain in effect under any of the alternatives under consideration.</p>
Judith Graham	N/A	1/1/2020	<p>The DEIS describes all sales in Hawaii after collection as valued at about \$5 million annually while noting in the same sentence that most sales are to the US mainland, Europe and Asia pages 24-25). It becomes clear that this market is very large, and for the popular yellow tang, quite overbearing. In 2017 the chair of PIJAC's board of directors described it thus: "Ninety-three percent of the world's Yellow Tangs found in aquariums come from Hawaii. This is at risk thanks to ... the Hawaii court decision." (reef2rainforest.com/2017/11/09/aquarium-industry-under-siege) The commercial aquarium take from other islands--Maui, Kauai,Oahu-- has not been described in the DEIS, so what proportion of total collection is yellow tang could not even be inferred .. The DEIS does say Hawaii Island represents well over half of State of Hawaii collection. Given the relatively high retail price for yellow tang, and the apparent size of the market relative to the West Hawaii grounds, it</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>All alternatives under consideration in the EIS are limited to the island of Hawai'i. The Proposed Action is limited to the WHRFMA.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish.</p> <p>In addition, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow</p>

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			is unreasonable to suppose this species will survive the five-year period envisioned in the DEIS without serious depletion. Serious depletion can occur and can be attributable to commercial aquarium collection as stated in the Humane Society's comment herein pertaining to the loss of butterfly fish off Oahu.	<p>Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>As stated in the FEIS, Toonen et al. (2011) conclude that the Hawaiian Archipelago is not a single, well-mixed marine community, but rather there are at least four significant multi-species barriers to dispersal along the length of the island chain, and that species that appear capable of extensive dispersal, such as Yellow Tang and Kole, show significant population differentiation within the Hawaiian Archipelago. In addition, there are significant consensus genetic breaks that restrict gene flow between islands, including a barrier between the island of Hawai'i and the rest of the Main Hawaiian Islands (MHI). Therefore, the geographic boundary for analysis of cumulative effects is the island of Hawai'i.</p>
Judith Graham	N/A	1/1/2020	In one instance, the DEIS has used an island-wide CREP count of the yellow tang base population, instead of a regional West Hawaii count, to infer no significant diminishment (page 100). But that is erroneous, and in this instance collection would be augmented by the factors mentioned above--beauty, price, size of market. It is hard to see how the DLNR, given its mandate, could accept a program or project that did not clearly address this jeopardy to yellow tang. The current DEIS unfortunately does not address it,	<p>Your comment has been forwarded to the decision makers.</p> <p>The impacts of collection on WHAP Open Area population estimates have been added in Appendix B of the FEIS for comparison purposes.</p>
Judith Graham	N/A	1/1/2020	A Question Would a conservation district use application be required?	Your comment has been forwarded to the decision makers.
Jules Usinger	HI	1/7/2020	Please vote against the rights for aquarium fishing in Hawaiian waters. I find it sad that the fish populations have dwindled since I first snorkeled here 30 years ago. Now "snorkel beach" (Kahalu'u) has hardly any fish. I remember swimming around schools of all types of fish. Please stop the fishing.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

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Karen Bret Harte	N/A	1/7/2020	Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue! Stop using wildlife for profit. How would you like to be placed in a glass home for all to see and never be able to get out? Want to see the fish, try watching videos or go to an aquarium!	Your comment has been forwarded to the decision makers.
Karima Katharyn Morgan	HI	1/3/2020	I am a resident of Maui and want to express my strong opposition to the way that the aquarium trade has been given so much access to the wildlife on our reefs, depleting them in ways that are absolutely unacceptable. The aquarium trade is a devastating commercial enterprise that trashes near-shore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater. The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.	Your comment has been forwarded to the decision makers.
Karin Nelson	Canada	1/6/2020	Hello. I am writing to ask and insist that Hawaii help work towards a change in human attitudes about keeping animals captive for their entertainment. Please protect the fish living in the reef systems around your islands for the aquarium trade and please take a position against the use of (especially) wild fish for the aquarium trade. The bigger picture is of course that we have to end the industrial catch of all sea creatures in order to preserve the oceans. Please consider this in decisions going forward.	Your comment has been forwarded to the decision makers.
Kate Kenner	VT	1/6/2020	I am writing out of concern for wild fish populations there. I have received word that the Pet Industry Advisory council has submitted an environmental impact statement that states that the unlimited collection of Hawaii't reef animals will have little effect on the state's coral reef ecosystems. Of course they are going to say that because that means more fish thus more money for them. It is common sense that too much of something is never good. The ocean, like the rest of nature, has a balance and if too many fish are removed that balance will be upset and cause great harm to the coral reefs and there is an expected loss of those of 70% in the next couple of decades according the the Center of Biological Diversity. what is to stop the Pet Industry from practically depleting the amount of fish there? They do not care about the environment or fish but only about what they want. It is up	Your comment has been forwarded to the decision makers. The commenter incorrectly states that the EIS stats "that the unlimited collection of Hawaii't reef animals will have little effect on the state's coral reef ecosystems". The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10

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			<p>to you to do what is right for Hawaii and the health of its ecosystems which includes not letting anyone have carte blanche for their own purposes. People who visit and want to see coral reefs and fish will be sorely disappointed when there are few to see.</p>	<p>permits, and limits the permits to the WHRFMA.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Katherine Green	N/A	1/6/2020	<p>Native fish need protection! Please make the best informed decision to help them.</p>	<p>Your comment has been forwarded to the decision makers.</p>
Kathy Boyd	HI	1/6/2020	<p>My name is Kathy Boyd, I am the Lead Concierge for our on Island Expedia Local Expert Team. I have lived on the Big Island for 12+ years and have worked in the travel industry since day one. Those of us that call the island home have sadly seen the massive decline in marine life. Between the Black Water run off along the West Coast of Hawaii Island, chemical spraying along the coastlines to keep golf courses green and weed free and the recent coral bleaching, our reefs are in disrepair.</p> <p>I am writing to respectfully inform you, I STRONGLY oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish. I understand that some would argue that this would provide some jobs, but what about those of us that already work in the industry, and our past, present and future visitors. Its seems very short sighted to not consider how you are impacting all our current ocean operators (and supporting resort staff like myself) that take people out to see our natural underwater wonderland. Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawaii's Reefs is counter-productive. We tell our visitors to enjoy Hawaii here, don't take the lava rocks, the shells, the multi-colored sands from our beaches, why would you condone this?</p> <p>Our oceans are dependent on people like yourself to do what is Pono.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>

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			Please choose to do the right thing, our community will be watching. Thank you for taking the time to read my comments.	
Kathyrn Lezenby	PA	1/7/2020	<p>As an animal and nature lover, I urge you to keep the fish who live in reefs off Hawaii's coast in their natural habitat where they belong. They are adapted to live in these reefs and are integral to them. Hawaii's reefs nurture life as well as protect its coasts from erosion. Over 500 species of plants and animals are found only in Hawaii coral reefs. These coral reefs depend on fish to eat algae that, left unchecked, can smother coral, rob it of nutrients or promote the growth of harmful algae that may kill it.</p> <p>Marine biologist Mike Gil has observed that fish only feel comfortable entering risky feeding grounds abundant with algae when they see other fish doing the same and, that, when fewer fish are present, fish are more risk averse and eat less which can allow algae to grow unchecked. Thus, removing fish from a reef ecosystem threatens the reef itself.</p> <p>And fish are living, feeling creatures, not commodities. Allowing them to be torn from their natural home to live in the confines of a tank at the mercy of humans is cruel as well as environmentally unsound.</p> <p>As someone who oversees Hawaii's natural heritage, please protect its fish and the reefs they protect from unnecessary exploitation. Thank you for considering my concerns.</p>	Your comment has been forwarded to the decision makers.
Kea Clebsch	HI	1/6/2020	<p>My name is Kea Clebsch and I am a sophomore at Kealahou High School and a frequent intern at Reef Teach; a program dedicated towards the education of our tourists and citizens about the importance of coral reef protection. Reef fish are an essential part of our marine ecosystems. We are already seeing the detrimental effects of overfishing, and our reefs are experiencing the consequences. Please keep in mind the severe environmental costs that will come as a byproduct of new fish collection permits. I — along with many in our community — am passionate about the wellbeing of our home and Hawaiian marine life. We hope that you keep this in mind when making your decision.</p>	Your comment has been forwarded to the decision makers.
Keith Christie	HI	11/29/2019	<p>My name is Keith Christie and I am a 35 year resident of Maui and have been an active underwater sports enthusiast for that entire time. I strong oppose the Aquarium Trade in Hawaii. It devastates the reefs by removing/extracting the very lives that are required to maintain a healthy and complete ecosystem for our reefs.</p> <p>The reefs are dying and we need all fish present and accounted for on our reefs, NOT IN AQUARIUMS AROUND THE WORLD FOR ENTERTAINMENT.</p> <p>These are wild animals and are part of the larger ecosystem that requires all inhabitants to maintain balance and health.</p> <p>The financial situation for the handful of these aquarium collectors is</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is</p>

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			<p>irrelevant to the health of our reefs. They can get other livelihoods and be retrained. The reefs cannot afford this very harmful practice. I have seen the affects first hand and and hear to tell you that it must stop at all costs.</p> <p>Please answer me this if you have the information: How is it that the trade has continued even in the face of a Hawaii Supreme Court ruling to halt all collecting? Who has allowed this?</p>	<p>not driving the decline.</p> <p>Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.</p>
Ken Stover	HI	1/7/2020	<p>The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue!</p>	<p>Your comment has been forwarded to the decision makers.</p>
Kerry Beane	HI	1/5/2020	<p>I am very concerned about losing most of our reef fish to the pet trade. To quote Snorkel Bob, "It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,</p> <p>PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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			<p>not legal. I implore you to do the right thing.” Please do not facilitate this trade in our marine heritage!!</p>	
<p>Kim (Last name not provided)</p>	<p>N/A</p>	<p>1/7/2020</p>	<p>I was born and raised in Kona, and have seen significantly less fish on our reefs in my lifetime. I have also seen the drastic, irreparable damage to our coral reefs that the reduction of herbivorous fish greatly exacerbates. No Hawaiian reef fish should be taken to supply the mainland pet trade. This is wildlife trafficking.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p>
<p>Kim Jorgensen</p>	<p>HI</p>	<p>12/18/2019</p>	<p>I am OPPOSED to the Draft EIS for commercial reef fish collections. Commercial aquarium fish collection permits are detrimental to our reefs and the survival of the populations of fish that care for them. Please do not accept this flawed EIS that suspiciously finds no significant impact caused by commercial fishing of reef fish. It is a wasteful and destructive industry, and anyone who truly cares about</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			our reefs will not exploit the fish for their own financial gain, or allow it to happen.	
Kristina Kahl	HI	1/6/2020	<p>It has come to my attention that the DNLN is set to issue 14 more permits for Fish Collections on the Big Island within areas Ka'u to Kohala West Shores.</p> <p>With the unprecedented climate changes occurring globally, allowing "reef raping" of Hawaii's natural sealife will undoubtedly create even more instability of our natural global world. For what? Money? The short term focus on monetary gain is what has produced the overwhelming climate and environmental problems we are seeing today and what will occur in the future.</p> <p>It is time to fully embrace Hawaii's Aina and reject profit and honor the land.</p> <p>My family has lived on the islands for over 50 years and I want the land and ocean to thrive, flourish, and be preserved for future generations.</p> <p>Do not issue any permits for Fish Collections.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS analyzed the impacts of issuing Aquarium Permits. The DLNR has not yet made a final decision on whether or not to issue the permits.</p>
Kristy Knudsen	HI	1/7/2020	<p>I have lived on the Big Island for 43 years. The ocean has always been a big part of my life. Working on boats over the years I was able to observe the "trop collectors" always with disdain. My belief is that there are too many people and visitors who live and vacation here to spend their time in our beautiful ocean. I have witnessed firsthand the decline of our reef fish.</p> <p>I ask you to please consider this before granting more permits for tropical fish collectors.</p>	Your comment has been forwarded to the decision makers.
Kurt Lieber	N/A	12/27/2019	<p>I have been diving the beautiful reefs of Hawai'i since 1979. I used to go there at least 3 times a year because it was a short jaunt from my home in California. I stopped going there altogether around 1996, because the once abundant reef fish were mostly gone. I started visiting again in 2014 because my organization was asked by Hawaiian's to help clean up the reefs of all the fishing gear that is smothering the reefs. While I still don't see the fish in the abundance I once did, protected areas like Hanauma Bay, remind me of what wonders Hawai'i could still hold if we just STOPPED letting the aquarium trade remove the fish. Please put a stop to it NOW!! The tourism industry will reap the rewards, which bring much need money into the local economy AND the government gets all the taxes that come with it.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Laci Waters	N/A	1/7/2020	<p>I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. Why would you even consider this? Protect your island don't help destroy it!</p>	Your comment has been forwarded to the decision makers.
Lacey Levitt, Ph.D.	N/A	1/6/2020	<p>As an American, I believe native fishes deserve effective legal protection and should be left in the wild. Please protect them and their habitat.</p>	Your comment has been forwarded to the decision makers.

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Lali Prince Music	N/A	11/28/2019	<p>I am a HI voter & resident. I am shocked and dismayed by this recent submission for permits. This is in violation of UN Development Rights Article 41/128 adopted in 1986 & affirmed by the 1993 Vienna Declaration and Programme of Action. This needs to be brought before the Hawaii Supreme court to obey the law.</p> <p>Exploitation by greedy investors abound in Hawai'i. Our coral reefs and all animal life surrounding are dying or dead. No limu, kupipi, manini, kaunaoa, wana, gobi's, or hinalea to be found. Coral shelf at Kahalu'u beach is bleached out. Dive and see that this destruction is beyond tragic! This reef needs to be protected not pillaged. These sea life needs time to return to safe numbers. This area should not be allowed for permits.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>DLNR will determine the applicability of state, federal and international laws, and comply with such laws in administering its programs.</p>
Lanny Sinkin	HI	12/3/2019	<p>As an attorney whose primary area of practice has been environmental law, I sometimes feel like really bad ideas impacting the environment surface almost every day.</p> <p>As a broad context for any environmental discussion these days, we have to start with the tsunami of climate chaos that is already appearing now with fires, floods, "rain bombs," droughts, ecosystems collapsing,</p> <p>Of particular concern are the changes taking place in the ocean. The temperature of the ocean is rising, contributing to coral bleaching. That temperature increase is causing the ocean to expand in volume, contributing to ever more destructive hurricanes and storm surge. Ocean acidification is steadily increasing.</p> <p>The bottom line is that the ecosystems on Earth, and particularly the ocean, are under great stress. As one of the primary causes of that stress, humans have an obligation to those alive today and to future generations to take every possible step to reduce such stress.</p> <p>Which brings me to the terrible proposal to issue commercial aquarium fishing permits. Having been in the waters around Hawai'i Island for more than 25 years, I see far fewer fish today than in the past. While I know my observations are anecdotal, they are at least suggestive that something is going on.</p> <p>You will receive a number of comments that will detail the cruel and wasteful nature of the aquarium industry that is happy to strip mine our local fish population for private profit. That permit application highlights (again) the issue of why people come to our islands. There are those who come out of love and extend that love to protecting the 'Aina. Then there are those who come to exploit the 'Aina. The Hawaiian ways of sustainability have been supplanted by avaricious greed that apparently cares for nothing other than short term benefits not matter how destructive their actions are in terms of long term sustainability.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

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			I urge you to deny the permits based on the need to protect what is left of wildlife populations.	
Laura Roberts	HI	1/7/2020	I am an avid diver and also volunteer for coral restoration in Kona. The ornamental fish trade should NOT be allowed. Hawaii needs to keep its waters healthy, beautiful and bountiful. Without a healthy reef and fish to look at. The tourists will stop coming and that would be detrimental to the entire economy. The negative environmental impacts should be obvious. The waste is horrendous in the collection process. The dumpsters at Honokohau Harbor used to have giant trash bags full of dead yellow tangs that didn't survive collecting. That absolutely must STOP.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Lee Ann Donner	MA	12/3/2019	I do not know where you stand on this issue, but I do know this: I come to Hawaii for one reason, and one reason only, to snorkel the reefs, to see the gorgeous reef fish of Hawaii alive and healthy in their natural habitat. The divers who vacation in Hawaii would say the same thing. You must know that reef ecosystems are delicate. Hawaii is the tourist destination that it is, not only because of the beautiful beaches, but also because of the reefs off those beaches. It is absurd to posit that the ecosystems of the reefs can serve as a cash cow for the aquarium trade and survive. There is no such thing as "sustainable" harvest from the reefs. You cannot "harvest" from the reefs and expect them to survive. No reefs = no tourists. Please stop any and all permits, now and in the future. The aquarium trade has no business in Hawaii. Please protect the reefs and the creatures that call them home.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Leigh Bowles	HI	1/7/2020	Thank you for the opportunity to comment on this issue. Recently, on a visit to Two Step I had the wonderful opportunity to see how much the beloved yellow tangs have recovered since the ban on the aquarium trade went into effect. The last time I had been there, I saw hardly any at all. We should keep in place efforts to protect these creatures in their homes, and not allow them to be taken away to be used as a ornament in someone's living room in Kansas. Folks who live and visit Hawaii deserve to see these creatures in their homes in the ocean. We should be using each opportunity we have to protect Hawaii's resources from further degradation, especially considering climate change. Do we truly believe that Hawaii's sea life will be able to battle both aquarium trade collectors and warming temperatures, not to mention trash and people who don't always know the rules to respect the reefs? In short, our planet--including the oceans--is in crisis, as we are all aware. If we believe that allowing a trade to continue taking fish is going to help our fragile planet, we are sadly wrong. We have to keep our priorities logical. It's not logical to allow this trade to wreak further	Your comment has been forwarded to the decision makers. As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui. While the EIS acknowledges that reefs and reef fish face many threats,

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			<p>havoc on Hawaii's wildlife. There are plenty of people who live and visit here to scuba dive and snorkel who contribute much more to Hawaii's economy than an aquarium owner ever will. What happens when there's nothing left to see scuba diving or snorkeling? Will we have to start planning vacations to go visit Hawaii's sea life in aquariums on the mainland, or to some other islands where they loved their natural resources instead of taking them for granted? Let's focus on supporting the trades that boost the economy while leaving nature intact.</p>	<p>the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Lila Sherman	N/A	1/7/2020	<p>Please! STOP the theft of Hawaii's Reef fish. No reason for allowing it is a good reason</p>	<p>Your comment has been forwarded to the decision makers.</p>
Lisa Thomas	HI	1/4/2020	<p>I am a Hawai'i resident since 1995. As an ocean swimmer and scuba diver, I have noticed a remarkable decrease in the numbers of colorful reef fish in the 30 years I have been utilizing our beautiful waters. Most of my ocean swimming has been on the south shores of Maui, on a weekly basis, over these years. The quantities of fish used to take my breath away, now I can do a 1 1/2 hour swim and sometimes see less than 20 fish total. Please do not allow aquarium fishing in our fragile waters. Thank you for your attention to this matter.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Liysa Swart	N/A	12/1/2019	<p>Please do not allow aquarium fish to be taken from Hawaiian waters. Already, the populations have declined to the point they look nothing like it did when I was young. Don't let greed and short sightedness destroy our fish populations.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines</p>

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				are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Liz Colwell	N/A	1/3/2020	<p>I swim and paddle our reefs several times a week and the changes over the years is stunning</p> <p>The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Save our Reef fish!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Liz Laliberte	HI	12/4/2019	<p>I strongly oppose the granting of 14 aquarium collecting permits for West Hawaii for many reasons.</p> <p>Currently Hawaii's coral reefs are under great strain. Agricultural runoff, boat traffic, heavy storms and climate change all damage the reefs and harm fish. If reefs are struggling to survive this means the fish which inhabit the reef are also under threat.</p> <p>Among the threats to reef fish is the mass bleaching of their habitat, coral and in particular staghorn coral. Some estimates of bleaching in 2016-2017 are as high as 70% of corals on West Side.</p> <p>Without a healthy coral reef habitat, many reef fish are already struggling to survive and don't need additional threats such as collecting.</p> <p>With the loss of reefs along Kapoho coastline it's even more critical to protect the intact reefs and wild fish that remain.</p> <p>The bottom line is that Hawaii has more to gain from conserving its ocean wildlife than it does from its short-term exploitation. I'm not advocating a reliance on tourist \$\$, but a large percentage of tourists want to dive/snorkel when they visit. Keeping our reefs healthy with plenty of reef fish is a draw for tourists and their revenue.</p> <p>At the end of the day we must consider the greater good for our communities which comes from a healthy ocean ecosystem which sustains us in so many ways. Protecting jobs of aquarium collectors who exploit our oceans is foolish and short-sighted. Ban aquarium collecting on Hawaii island!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Louise Knop	N/A	1/7/2020	<p>Please respect marine life and leave it untouched. We should not be pulling fish out of their habitats to have glorified saltwater fish tanks.</p> <p>Thanks for being a supporter for keeping marine life where it should be....in the ocean.</p>	<p>Your comment has been forwarded to the decision makers.</p>

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Lu Haner	N/A	1/6/2020	Please leave native fishes in the wild!	Your comment has been forwarded to the decision makers.
Luther waiwaiole	N/A	1/7/2020	If said permits will be allowed then you will be REQUIRED to also consider opening all fma-fish management areas to commercial bottom fishermen-it is an unfair practice to allow these permits and not allow bottom fishermen to do the same In the case of a net versus a hook-there will be more collected by net-both legal and illegal-then any bottom fisherman can catch in a day by hook In closing: you have not regulated the tropical fish industry as stringent as you have the commercial fish side-and unless regular inspectors are at the pier upon the return of these collectors-there will be irreparable damage to the reef fish and coral-if you can control the sunblock industry then this should be controlled and regulated also	Your comment has been forwarded to the decision makers. All alternatives under consideration would include the existing regulations put in place for the WHRFMA, including MPAs, FRAs, and bag limits. Commercial aquarium collection would only be allowed within the Open Areas, and not within any managed areas (see Figure 1 of the EIS).
M.J.Wells	HI	1/7/2020	I hope it's not too late for my two cents about the Pet Aquarium trade. I'm very concerned about the disappearance of many species of beautiful local fish here in Maui and in these islands. Please do whatever is necessary to prevent any further losses, including stopping further losses that would result from supplying the pet trade outside Hawai'i. The reefs are dying and they too need the fish to keep them from disappearing faster. I heard this was the deadline for testimony including emails. Please add my voice to the others you've heard from. A moratorium or permanent ban seems like what's necessary to protect the wildlife here. Thanks for your consideration.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.
Madolin Wells	HI	1/5/2020	I urge you to right action for saving Hawai'i's reefs! A 500-page lobbying piece does not deserve the title "Environmental Review" - a false and misleading designation. "Environmental impact review" is the term used for PUBLIC REVIEW AND HEARINGS on a proposed project, allowing typically at least 6-12 months for input from concerned citizens and relevant scientists in the public interest. (Which includes environmental interest.) The way this type of review was initially conceived was NOT to give equal time to the developer; it was to allow all necessary time for citizen input especially local, plus research developed in the public interest to consider potential hazards. The onus was on the developer/commercial interest to prove the project was safe, or to make changes that adequately addressed safety, quality-of-life, and environmental considerations. Failing that, the project would not be permitted to proceed. The "need" of any commercial interest to make profits is utterly bogus.	Your comment has been forwarded to the decision makers.
Madolin Wells	HI	1/6/2020	NOTHING justifies stealing critical parts of Maui's fragile ecology for commercial profits. This is stealing the birthright of the Hawaiian people. It is a crime against nature.	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives

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			<p>It is extremely short-sighted financially as well. Without the fish and the reefs, Maui - or any other part of the state - would lose a significant part of the tourist trade.</p> <p>I urge you and the advisory council to block this massive theft by the interests represented by PIJAC and by their so-called "Environmental Review."</p>	<p>evaluated in the EIS.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Maggie Brown	HI	1/6/2020	<p>My name is Maggie Brown, I am owner of Body Glove Ocean Adventures. I have lived on the Big Island for 45+ years and have been operating commercial snorkeling and SCUBA diving tours since 1974. The massive decline in marine life, mostly fish has declined immensely since then. Between the Black Water run off along the West Coast of Hawaii Island and the recent coral bleaching, our reefs are in disrepair. I compare underwater pictures of our BI coral reefs/marine life from the 1970's- 80's and the devastating change would make a grown man cry.</p> <p>I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish.</p> <p>I invite you to view my page on TripAdvisor and see how many complaints we get, due to lack of fish and the condition of our coral reefs. We at Body Glove donate portion of our ticket sales to Legacy Reef Foundation and other non-profit organizations for the for the preservation, restoration and education of our coral reefs. Permitting those to collect Hawaii's Tropical Fish and take them from our Reefs is counter-productive.</p> <p>Thank you for taking the time to read my comments.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Manu S-M	N/A	1/6/2020	<p>Please do everything in your power to ensure that native fishes gain effective legal protection, and are left in the wild to live their lives in peace.</p>	<p>Your comment has been forwarded to the decision makers.</p>
Margaret Kahoilua	HI	1/6/2020	<p>My name is Margaret Kahoilua. I am a Native Hawaiian, past Expedia Local Expert, member of The Coral Reef Alliance, Bail Bondsman, and a current participant on the Vibrant Hawaii Leadership Team.</p> <p>I am concerned w/the condition of our coral reefs. In September of 2019, I joined some guests on a snorkeling tour to Kealekekua Bay. My heart was broken by the vast difference/depletion of diversity among our reef fish. Given the fact that this area is a conservation area, it was surprising to observed the devastation.</p> <p>There are many factors already impacting the health of our local reefs. Allowing the collection/removal of our reef fish only exacerbates an</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium</p>

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			<p>existing crisis & may lead to the depletion of essential reef species. Please ensure any decisions made regarding permits to collect fish are made with the sustainability of our coral reef ecosystems as TOP PRIORITY. Mahalo...</p>	<p>fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Margie Park	HI	1/6/2020	<p>My name is Margie Park. I have been a resident of Hawaii Island for 30 years. I am writing to you voicing my strong opposition to the issuance of reef fish collection permits.</p> <p>I am a proud employee of Body Glove Cruises. We are an ocean adventure company that provides snorkeling, SCUBA, whale watching and historical dinner cruises. During my years living on the island and working in the ocean industry I have noticed fewer and fewer reef fish. Issuing permits for collections of our island's dwindling fish populations would negatively impact our fragile ecosystem. Not only have I personally noticed a decline in reef fish populations, we also have guests who complain about our dwindling populations. Working for a company that provides island guests a safe, ecologically friendly opportunity to enjoy our island's natural resources is a great honor. Body Glove Cruises donates a portion of its proceeds towards the preservation, restoration and education of our coral reefs. Please make your island's preservation contribution by not issuing fish collection permits. Making the "right" decisions now will make a huge difference in our future. Mahalo for your consideration.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Marian Hussenbux, The Animal Interfaith Alliance	N/A	1/7/2020	<p>I write on behalf of The Animal Interfaith Alliance, an international alliance of faith groups founded in Britain concerned about the welfare of animals. Our member organisations and individual members include Buddhists, Christians, Hindus, Jains, Jews, Muslims and Sikhs. We are all united by our common concern for animals, based on our various faiths. Our member organisations are listed below.</p> <p>We send our compliments and refer to the report that Hawai'i is considering the impact that fish collection for the aquarium trade has on wild fish populations. We read that The Pet Industry Joint Advisory</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commenter incorrectly states that the EIS surmises "that the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem". The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful</p>

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			<p>Council has submitted an environmental impact statement "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem".</p> <p>We cannot understand this complacent and dangerous assertion. On three occasions in 2017, when SB 1240 was on Governor Ige's desk for signing, we wrote to urge him to do so, fearing that unlimited fishing on the reef would decimate populations of native fishes and destroy the pristine marine environment of which you should be proud. We read that Earthjustice attorney Kylie Wager Cruz states:"it's common sense that this level of unrestricted take can't be sustainable," and further notes that the state shouldn't ignore "that except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state."</p> <p>Maxx Phillips, Hawaii'i director with the Center for Biological Diversity, an excellent group some of our members support, says: "Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" -.</p> <p>This is appalling and we hope that you agree. We are appealing to you to accept that your native fishes need and deserve effective legal protection, and should be left in the wild where they belong, not exploited for human amusement.</p>	<p>(and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Marie Aguilar	HI	1/6/2020	<p>I am a long time resident of Hawai'i Island and know first hand on the conditions of the impact of fish collection on my island. First, the seriousness of the loss of our coral on the Hawai'i coasts are listed as severe and may not recover anytime soon. The State of Hawai'i has a responsibility to protect Hawai'i's natural resources. The tropical fish of Hawai'i are declining year after year. and I have seen the decline from 1988 through 2020. Yellow tang swam along the Kailua Pier and their visual presences created the name "Gold Coast" of the Big Island.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of</p>

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				<p>adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Marie Aguilar	HI	1/6/2020	<p>The effects of environmental conditions have to be taken into consideration for the future of maintaining the population of our tropical fish populations. The recent Draft Environmental Impact Statement from Pet Industry Join Advisory Council is completely flawed. First, there is an impact of collection of tropical fish collecting on the population. The population of reef fish is declining due to over collecting reef fish from past years. The damage was severe to our coral from the warm waters this summer and need to recover, if its possible. Our coral reef live symbiotically with tropical fish to flourish and nurture.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Marie Aguilar	HI	1/6/2020	<p>The Supreme Court in 2017 held that collection without environment review violates the Act, and DLNR later ordered to cease issuing further aquarium collection permits until the environment effects of aquarium collection is fully and publicly vetted through the HEPA process. The heaviest impact to our fish collection is the lack of holding the permit holders with a limit to their taking aquarium fish.</p> <p>Today, the same permit holders want to be able to take aquarium fish with no limits. This most definitely will not support what the Supreme Court ruled. There is no management of the fish collection limits.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when</p>

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				the fishery was open to all collectors in order to take 100% of the Open Area population.
Marie Aguilar	HI	1/6/2020	The most startling outcome of this Draft Environment Impact Statement written by Pet Industry Joint Advisory Council is this Council has a conflict of interest in presenting a proposal for the whole benefit for the retailing of our reef fish. They support aquarium fish pet stores throughout the mainland. Their impact statement is false, their statements do not prove the actual outcome of the fish population with fish collections with no limits. There is no study that would support their statements.	Your comment has been forwarded to the decision makers.
Marie Aguilar	HI	1/6/2020	In their DRAFT, there is no mention of who the 14 permit holders are and who they represent. Are these permit holders, actual residents of Hawai'i. Are we seriously trusting this Council with what they will do when the permit holders gain access to our reef fish every day of the year. Our fish population will dwindle to a server depletion, and could not recover.	Your comment has been forwarded to the decision makers.
Marie Aguilar	HI	1/6/2020	I oppose any fish collections on the Island of Hawai'i, especially as the Draft indicates from Ka'u to Kohala. Our island depends on economic sustainable tourism where tour operators bring visitors to snorkel, dive and swim and view our pristine waters. We can not have fourteen permit holders taking our natural resources for their economic benefit. Its true, third world countries protect the collection of their reef fish, and Hawai'i must continue the restriction on any fish collection for years to come. Thank you for reading my comments and recording the receipt of this letter.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Marie Le Boeuf	HI	1/7/2020	I have been actively diving and snorkeling in Hawaii for over twenty years and I know that the aquarium trade most definitely has a VERY negative impact on the reefs. I produced a documentary in 2005 about Hawaii's near shore reefs and the animals that live there, and it is devastating to me to STILL see a steady decline in the health of ALL Hawaii's reefs. Our native fishes need and deserve effective legal protection, and should be left in the wild! Please help make the PONO choice! NO MORE FISH COLLECTING! If you'd like to view my film, you can find it here: https://www.youtube.com/watch?v=9NciCVLt3nY	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Mark and Zinnia Cardamomum	N/A	1/6/2020	Greetings! We are a mother and father who cherish our region's fish. Please do not allow native Hawaiian fishes to be harvested for the aquarium pet trade. It's essential to protect our marine biodiversity, which is an irreplaceable treasure. Thank you for your time, and take good care.	Your comment has been forwarded to the decision makers.

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Mark Joiner	HI	1/7/2020	<p>I am a resident of South Maui and a frequent visitor to the reefs in our area. I have noticed a depletion of our beautiful fish over the years, especially the yellow tangs. The difference between protected Molokini Crater and our near shore reef is stunning, as one is teeming with fish and the other is scant at best.</p> <p>Please take all steps necessary to stop this harmful practice, which I understand is being subsidized by my tax dollars through the DLNR. For the sake of the reefs and our tourism, this should have been addressed years ago.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Mark Koppel	HI	12/3/2019	<p>I agree with all of the following. Mark Koppel Hawaii Island Mahalo</p> <p>Aloha, Granting 14 people aquarium fish collecting permits, with loose rules, realistically policed by no one, is a terrible idea. 14 more people making a (potentially full-time) career out of stripping our reefs of "aquarium fish " is detrimental to the health of the ocean, The west side of Hawaii Island and our own existence (loss of species on the planet has a domino effect that does in fact affect human beings). There are already many challenges that wildlife on the Westside have had to endure: resort/golf course runoff, Gated community on cliffs' landscape run off, Bloom which is said to be caused by Energy Lab that killed off Honokahau Harbor, and it is said that the Kawaihae harbor's bad design has stifled the circulation in the region and sickened fish. What is frustrating is, in the past, it seems that the state has sided with aquarium fish trade collectors and flown the doors wide-open for their collecting while regulating sustenance fishing of the same fish. Aquarium fish trade collectors have already stripped other islands of the beautiful reef fish and coming to Hawaii Island to do the same, must not be allowed. Hawaii's resources should not be for sale. The County of Hawai'i has</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

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			<p>declared an emergency with the state of the climate (changing). And because we are experiencing extreme rains, run off, reef bleaching events, etc., I Believe that we need to give the ocean a well-deserved break. I cannot imagine that an EIS could be done with any accuracy if it says that it is an OK thing to have harvesting of reef fish happen at this time.</p>	
Mark Tang	HI	12/6/2019	<p>I am writing to urge DLNR to select the "NO ACTION" alternative listed in the draft Environmental Impact Statement. Nothing in this report should convince an unbiased person that it is in the best interest of the people of this state to continue the wasteful and destructive Aquarium 'fishery' for the sake of just 14 recalcitrant collectors. Indeed, fishery it is not! It is a highly lucrative criminal enterprise that happens to specialize in our all too important reef maintaining organisms.</p> <p>Furthermore, it is highly ironic and the height of hypocrisy to ask, as DAR has recently, recreational and subsistence fishers to refrain from taking herbivorous reef fish while encouraging a select few collectors, the applicants of this report, to gain special license for the unlimited taking of many of the same species of fish!</p> <p>How sad is it that your agency tasked with conserving vital and imperiled resources such as still exist, would even entertain the perpetuation of this abominable business?</p> <p>Shall we bring back shark-finning while we are at it?</p> <p>Ua Mau Ke Ea O Ka Aina I Ka Pono!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when</p>

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				the fishery was open to all collectors in order to take 100% of the Open Area population.
Marta Barreras	N/A	11/25/2019	<p>I strongly urge you NOT to allow the collecting and selling of West Hawaii's reef fish.</p> <p>The reef is in dire need of protection.</p> <p>A healthy reef is a huge money-maker in Hawaii as many tourists come to snorkel and view the coral and fish.</p> <p>However the reef is very unhealthy presently due to the recent high temperatures of the sea (climate change), pollution, sunscreens and other damaging aspects of human disrespect and lack of education and knowledge. Taking the reef fish will hurt the reef even more.</p> <p>A healthy reef is extremely important. The fish are an important part of the ecosystem.</p> <p>The reef fish must be protected.</p> <p>Please protect our beautiful reefs!</p>	Your comment has been forwarded to the decision makers.
Mary Beth Witzel	HI	1/7/2020	<p>I am a local resident who is concerned about our fish population. There is a decrease in the fish we can see when snorkeling along the shore. Please STOP giving out permits of the profit of a few!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Mary Finelli	MD	1/7/2020	<p>Fish Feel is a 501(c)3 organization that promotes respect and consideration for fishes and other animals. The following comments are submitted on behalf of our thousands of constituents, and in regard to the Pet Industry Joint Advisory Council (PIJAC)'s draft environmental impact statement.</p> <p>Hawaiian wildlife is invaluable, and among the state's greatest treasures. Hawaii's native fishes are cherished by many residents, and the ability to see them in their natural habitat is a great attraction to many others, too. Public perceptions of nonhuman animals are increasingly improving, and many people now recognize that these fellow beings deserve consideration as individuals with their own lives to live, which should be free from gratuitous human interference and cruel exploitation. Science has shown what many people have intuitively realized: that fishes are sentient beings who can suffer fear and pain: http://fishfeel.org/resources/facts/#accordion-1-3 Their well-being is deserving of our moral consideration.</p> <p>Taking animals from the wild to be kept in captivity for human</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>

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			<p>amusement is increasingly recognized as an inhumane and unethical thing to do. Removing them diminishes wild populations and disrupts social structures. Even the largest zoos and aquariums cannot truly replicate natural conditions, let alone for home aquariums to do so. Few people will seek veterinary care for an ailing fish, and there are relatively few veterinarians who can capably treat fishes, especially exotic fishes. Many wild-caught fishes perish before even arriving at their final destination, and many if not most perish within their first year there.</p> <p>No one needs to collect or keep wild-caught fishes, instead it is a luxury pursuit. They should not be caught for private profit and pleasure but instead left in nature to be enjoyed by all and perform the invaluable ecological services they provide there. It is absurd for PIJAC to claim that continued removal of fishes as it has proposed will not affect species populations, and it is insulting to the intelligence of any reasonable person. They should not be removing any, for the sake of the fishes, the other animals who are genuinely dependent on them, and of the public. This is all the more important given the grim state of flux the oceans are in, and the hardships that coral reefs are experiencing – environmental changes which are only expected to worsen.</p> <p>Thank you for your consideration of these comments. Please act in the best interests of Hawaiian wildlife and the public by upholding the ban on commercial aquarium fishing.</p>	
Mary Marvin Porter	HI	1/7/2020	<p>Review of: DEIS</p> <p>As a resident and snorkeler on the island of Hawai'i for 25 years, I see a big decrease in the fish population. I have been snorkeling all around the island, Hilo, Kapoho, Kona, and Kohala, Before living here, I lived on Molokai for several years and there I had the wonderful experience of getting to eat small fresh fish, other than the few expensive varieties, available in grocery stores today. Fish is one of best food sources and should not be wasted as often happens in the aquarium fish capture, shipping off island, and then mismanagement in home aquariums resulting in early deaths.</p> <p>Given the severe planetary climate crisis, "There Were More Than 100 "Billion Dollar" Climate Disasters in the Past Decade," we need to do all possible to become more sustainable in food and fish. The island of Hawai'i also had major fish losses with the recent lava flows in the Puna area covering beautiful Kapoho coral reef and covering the only boat ramp for Puna fishermen. We need to do all possible to protect and replenish our fisheries.</p> <p>Although I am college graduate, getting through the draft EIS was a horrendous task and often seemed to make statements contradictory, confusing, and unclear.</p>	<p>Your comments have been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>

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			<p>However the interviews with long time Hawaiian residents, was very interesting and they repeatedly spoke of how there used to be many more fish. I think that it should be our goal to do everything possible to increase fish populations.</p> <p>The EIS seems to claim studies show we have not lost in fish population in last 20 years so no problem with continuing aquarium collection, but my personal observation does not indicate that. And certainly much of the coral has died in last few years and how that will affect the future of the fishes is unknown, but probably badly. I used to see schools of fish, I rarely see that now. I do not find the draft EIS clear or acceptable. I oppose the continuation of aquarium collection other than for educational facilities that can care for the fish properly.</p>	
Matt Binder	HI	12/15/2019	I would like to submit this letter from my friend, David Hunt, as my testimony, as it expresses my own feelings as well.	See response to David Hunt's comment.
Matthew Gurewitsch	HI	1/4/2020	<p>Extinction is forever—it's that simple.</p> <p>It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,</p> <p>PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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			<p>retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>I implore you to do the right thing</p>	
Maureen Welch	N/A	1/7/2020	<p>This is in regards to whether unlimited fish take should be allowed by the pet industries.</p> <p>Look, with all that is going on with our planet, we need to be doing EVERYTHING we can to protect all it's beings. Allowing unlimited take of reef fish is not sustainable and not in the best interest of the reefs, Hawaii or the planet. Hawaii native fishes need and deserve effective legal protection, and should be left in the wild, not circling some tired fish bowl.</p> <p>Thank you for taking my comment and concern in to consideration</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of “unlimited” collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Mendy Dant	HI	1/7/2020	<p>I am part of a third generation family owned snorkel business in Kona Hawaii that began in 1971. We have 50 employees and entertain over 80,000 customers each year. We feel privileged to be in the marine tourism industry where we share the natural beauty of Hawaii everyday. We have visited this topic of controlling aquarium fishermen's take many times before. The West Hawaii Fisheries Council worked to protect our coastline from the daily extraction of our critically important tropical fish. Prior to this aquarium fishermen were going out and bringing in igloo's full of yellow tangs, many different species of butterfly fish, moorish idols, etc. I've seen photographs of hundreds of fish lying dead near garbage cans at the</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No</p>

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			<p>harbor. These fish are part of an intricate reef system, all together making a reef that can help protect shoreline damage from storms, providing a healthy coral infrastructure and home for hundreds of marine life.</p> <p>Educate people that these fish should be in the wild not in tanks. Tanks are prison for these fish, they have no space, no natural life. The high percentage of these fish that die in transit is horrendous and then the chance that they will survive in someone's home is not high either. Let's just realize we are better than this and should not decorate our homes with tropical fish in tanks. As many countries have stopped trophy hunting, people have learned not to put Zebra skins on our floors, or lion heads on walls. Hawaii needs to stop the collecting and killing of tropical fish. This is how a population evolves, little by little we learn and teach one another not to kill or be cruel to other living beings, especially when they are critical in our survival too. Fish keep the reefs healthy and coral reefs rival the Amazon in producing oxygen for the world.</p> <p>We have seen a huge decline in the reefs here in Kona over the past decades and we all need to do our part to repair the damage and protect the reefs for our future generations. Please do not allow the fish collectors to make this trade their livelihood. It is time for them to find a new avenue for their living by not taking the lives of the fish and our reefs to oblivion.</p>	<p>Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Michael Bell	HI	1/7/2020	<p>My name is Michael Bell. I have been a resident of Hawaii Island for nearly 30 years. I am writing to you voicing my strong opposition to the issuance of reef fish collection permits.</p> <p>I am a proud employee of Body Glove Cruises. We are an ocean adventure company that provides snorkeling, SCUBA, whale watching and historical dinner cruises. During my years living on the island and working in the ocean industry I have noticed fewer and fewer reef fish. Issuing permits for collections of our island's dwindling fish populations would negatively impact our fragile ecosystem. Not only have I personally noticed a decline in reef fish populations, we also have guests who complain about our dwindling populations.</p> <p>Working for a company that provides island guests a safe, ecologically friendly opportunity to enjoy our island's natural resources is a great honor. Body Glove Cruises donates a portion of its proceeds towards the preservation, restoration and education of our coral reefs.</p> <p>Please make your island's preservation contribution by not issuing fish collection permits.</p> <p>Making the "right" decisions now will make a huge difference in our future.</p> <p>Mahalo for your consideration.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>

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Michael Gilbert	HI	1/8/2020	Lived on Maui for thirty years and active diver and many years with Earthtrust I watched in Makena as off shore boats docked in our shallow reef and raped our reef fish It's disgusting short sighted and stupid. For want decimate reefs for a few commercial folks who give nothing back Are you kidding we met a few years back as I serve on the Board of our Hawaii State Art Museum. I know you understand so please stand up and be counted help do the right thing	Your comment has been forwarded to the decision makers. The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.
Micholene O'Haheer	N/A	1/6/2020	As a touring family wanting to visit Hawaii we strongly object our family will not visit if this proposal goes a head this is a cruel industry and must be stopped. Our intention is to visit this year. 2020. We will be keeping a close eye on this proposal Thank you tourists for South Africa.	Your comment has been forwarded to the decision makers.
Mike Essner	N/A	12/15/2019	David, the aquarium trade that you are supporting is removing all the fish from the reef the people come here to see! Please the remove your head from your a***** he mediately! Keep fish in the water we will keep people coming to Hawaii How much money are you receiving privately??? TAKE NO REEF FISH BAN SALT WATER AQUARIUMS	Your comment has been forwarded to the decision makers.
Mike Rudenko	HI	1/7/2020	I'm a scuba instructor, I work in the ocean every day. Commercial aquarium collection hurts Hawaii in so many ways. I'll list a few examples here: People come to Hawaii to enjoy the ocean and see beautiful tropical fish. Eco-tourism is ever growing, but with no bright and beautiful reef fish (such as Tangs and all other herbivores) the reef will be dead, which means less people will travel to Hawaii to enjoy it. Commercial aquarium fishing will bring irreversible damage to already harmed reef and its habitants. As we know from many studies reef is a very complex and precisely balanced system, with all links of the chain equally important in keeping that balance. All reef fish play major roles in keeping reef healthy and with recent coral bleaching events our reef needs to be left alone more than ever. Taking reef fish will only increase the damage which will lead to an end of the reef as we know it. The riches of Hawai'i are in the ocean, please don't let them to be taken away. Especially knowing that about 80% of collected reef fish dies during the process and never makes it to aquarium.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection. A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.
Ms. Jojo Tanimoto	HI	1/6/2020	I am writing to oppose the draft EIS. 1. There is not enough DOCARE officers to check on infractions as is. 2. There is an unfair advantage to shoreline fishermen who fish for food sustenance. In South Kohala especially, there is a challenge to access favorite areas because of many gated communities and resort	Your comment has been forwarded to the decision makers.

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			<p>Limitations to shoreline fishing.</p> <p>3. There is a disproportionate amount to catch from vessels versus from shore.</p> <p>4. There is no acknowledgment of spawning seasons when collecting is prohibited. Much information about how the fish spawn, but nothing about replenishment and prohibited times to fish. Even though the amount of Permits has been reduced, the amount of Fish and revenue seems more important than the responsibility of the State of Hawaii to protect, preserve and restore Hawai'i's natural resources. Please respond.</p>	
Nancy Haag	HI	1/8/2020	<p>Please do not let a lobbying group representing commercial interests influence your decisions.</p> <p>The reef fish are needed here in Hawaii for the enjoyment of our local community and tourists.</p> <p>We as a state have more to lose than the commercial enterprises that want to continue. I have been snorkeling here since I came to live in Maui in 1975 and I have seen a real decline in reef fish populations. Let the aquarium collectors find another method to make money and not jeopardize one of our state's treasures that will also have a negative impact on our tourist economy.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is issuance of 10 permits for the WHRFMA. No permits would be issued for Maui under any of the alternatives evaluated in the EIS.</p>
Nancy Kelley	N/A	1/6/2020	<p>I write to urge you to leave your native fishes alone. Provide them the legal protection they deserve and allow them their wild and free nature! The reefs are integral to the ecosystem in Hawaii. Do not permit them to be raped by careless people for the sake of entertainment. Really? I will be watching. Would appreciate a reply to my request.</p>	<p>Your comment has been forwarded to the decision makers.</p>
Nawahine Kahoopii	N/A	12/16/2019	<p>beautifully expressed</p> <p>[David Hunt's email attached]</p>	<p>See response to David Hunt's comment.</p>
Nina Groll	Germany	12/15/2019	<p>I am from Germany and unfortunately never visited your beautiful country yet.</p> <p>From the Internet I learned, that your reefs are in danger due to fish and marine wildlife are captured from the sea for the pet / aquarist industry. I am very sad to hear this and hope you can help to end this threat.</p> <p>It was suggested to write to you directly to comment on this until 7 January 2020.</p> <p>I hope you can do all in your power to protect the reefs and wildlife in your beautiful country.</p> <p>Please help as much as you can. Thank you.</p>	<p>Your comment has been forwarded to the decision makers.</p>
Noelle Prasada	N/A	12/4/2019	<p>Please stop permitting our fish for sale.</p> <p>I have been snorkelling on big island for years. I have seen very sad declines in both creatures</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with</p>

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			<p>and corals. Let's please put an end to this to help our seas recover</p>	<p>population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>
Oralea Starr Astrology	N/A	1/7/2020	<p>What next? Enough already! Why is our government and DLNR allowing people to purge our reefs to ship dish (half of which die along the way) to the mainland for people to keep in aquariums. It's barbaric! Money? When will all of this greed stop?!</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
Pamela Small	HI	1/7/2020	<p>I am writing to let you know that I am opposed to issuing any permits for aquarium collection on Hawaii Island. I am opposed for myriad reasons: the health of the reefs is foremost, the sybiotic relationship between coral and reef fish (ALL reef species) that lead to a healthy reef system, The fact that a healthy coral reef system leads to a healthy land environment, the tourism industry, the pleasure of scuba diving and snorkeling in a diverse marine environment with healthy coral and reef fish, abundant aquatic life, a pristine ocean, the list goes on and on...</p> <p>You may not currently be aware, but the aquarium collectors did not stop their collecting under the current restrictions. The collectors began unlimited taking of fish from the east side of Hawaii Island and truck it to the west side where they ship it out. I have witnessed three collectors at a warehouse in Kona myself. They have no sign on their warehouse door and try not to let anyone know what they are doing. They show up with a truck full of tanks of fish and routinely get 20 foot containers of shipping materials delivered. Hawaii Island CAN NOT sustain this industry! We are a state that relies on TOURISM. Tourists want to snorkel and</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p> <p>Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.</p>

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			<p>scuba dive with fish. They want to see healthy coral reefs teeming with reef fish. When I tell guests at my house that Hawaii allows collections for the aquarium trade they are appalled. Utterly appalled.</p> <p>It is your job to protect our oceans. Our reefs. Our aina. Our reef fish. I ask that you not give in to the demands of a few people here and on the Mainland who want to exploit our natural resource.</p>	
Pat Harmon	N/A	1/6/2020	<p>Please protect the fish. The Pet Industry Joint Advisory Council is wrong in their statement re environmental impact of unlimited collection of Hawaii's reef animals. Common sense will tell you that unrestricted access and taking of fishes will lower the numbers. Nature is not infinite and these sentient being should be protect. You have a beautiful coral reef ecosystem. Please don't let them spoil it.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p> <p>All alternatives under consideration would include the existing regulations put in place for the WHRFMA, including MPAs, FRAs, and bag limits. The Preferred Alternative would limit the permit issuance to 10 permits, and would limit permits to the WHRFMA.</p>
Patti Breitman,	CA	1/6/2020	<p>Please keep wild fish in the wild. It is neither sustainable nor wise to collect them without limit for display in private when coral reefs and fish populations are in decline.</p>	<p>Your comment has been forwarded to the decision makers.</p>
Patti Morton	N/A	1/6/2020	<p>Extinction is forever—it's that simple. It's my understanding that a so-called Environmental Review by the</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium collector livelihood.</p> <p>But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,</p> <p>PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>I implore you to do the right thing.</p>	<p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>
Paul Cox	HI	1/7/2020	<p>Thank you for the opportunity to comment on the Pet Industry Joint Advisory Council Draft Environmental Impact Statement (DEIS) for the issuance of commercial aquarium permits for the West Hawaii Regional Fishery Management Area.</p> <p>I am a West Hawaii, South Kona, Papa Bay resident and after review of the DEIS I would like to comment on the environmental, the cultural, and financial impact of the aquarium collecting industry with photo documentation as I have been a primary witness to aquarium collecting in West Hawaii and AQ collectors are personally known to me including individuals of the 14 permit applications to which this DEIS pertains, some represented in the following photos.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference. Breaking or damaging coral will remain illegal under state law (HAR 13-95-70 and HAR 13-95-71) under any of the alternatives under consideration.</p>

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			<p>Moving to South Kona as a retiree with no prejudices or knowledge that aquarium collecting took place in the wild, while swimming recreationally near my home in Papa Bay I observed collecting of ornamental fish, I thought it odd and wrong that an apparent variance on coral damage was inherent with an aquarium collecting permit. After being advised by a Honokohau DOCARE officer via phone that coral damage certainly was an offense but that they would have to witness the coral damage and response time would prohibit that, I took up underwater photography.</p> <p>Logistics ruled DLNR's Conservation and Resources Enforcement out of the equation as Papa Bay is over an hour away from the Honokohau DOCARE office. Being aware that the breaking and damaging, with dive fins, leaded nets, and stick implements, of stony coral was occurring (HAR 13-95-70) I felt ethically obligated to assist, especially considering that I was one of very few non-collectors who have ever witnessed AQ collecting.</p> <p>Although not familiar with Hawaii's standards and training, as a retired California Peace Officer I Intended to contribute professionally and positively. My first actions were to swim to collectors that came into Papa bay, introduce myself and tell them I intended to photo document when I observed the reef being busted up. Four out of six sets of collectors never came back to Papa.</p> <p>Photos attached are small for the sake of a manageable email file. Full-size photos are available at this dropbox link: https://www.dropbox.com/sh/1ja1vagb7jI3suq/AAAafxptHkElgboCx6pmDpWHa?dl=0</p> <p>DEIS 2.0 Purpose and need</p> <p>2.1 "The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats."</p> <p>2.2 "The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods in compliance with all applicable laws, rules, and regulations pertaining to the industry.</p> <p>Photos #1 & 2, anchor damage, Papa Bay, February 25, 2014</p> <p>I filed anchor damage to coral report with DOCARE and it was referred to the Hawaii county prosecutors office. I was never interviewed. Months later I was told by an office assistant at the Hawaii County Prosecutors office that my case number was not in the system. The reporting DOCARE officer that took my report said that although it is clear that the AQ collectors are anchored in a healthy coral area it is not clear that any damage occurred therefore the case was dropped. In photo #1, the collector is aware that they have anchored into a rich coral area but made no effort to move and set the anchor into a sandy</p>	

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			<p>or rubble area. When this collector returned to Papa Bay a few weeks later, he was angry and stated that I should have understood that the wind came up after he was in the water causing the coral damage. In photo #2, I would like to point out that the majority of AQ collectors do not use buoyancy control device (BCD) vests, also note that knee pads are worn over the wetsuit. As with this photo, my observations of collectors confirm that contact with the reef is an inevitable part of the collecting process.</p>	
Paul Cox	HI	1/7/2020	<p>Photos #3 & 4, Poaching, incomplete vessel hull number and no AQ permit number on equipment, Papa Bay, March 18, 2014. I filed a poaching report with photos to DOCARE and this was also passed to the Hawaii County Prosecutors office. I was never interviewed and my subsequent phone inquiry produced the same result from the prosecutors' office, my case number was not in the system. The reporting DOCARE officer never returned my calls. Photo #3, This photo illustrates contact with the reef. In the DEIS executive summary, page ii, the statement "the aquarium industry has no significant impact on the reef ecosystem" and "the targeted collection of smaller, less fecund individuals, commercial aquarium collection likely has minimal impacts on populations in general". Hawaii's endemic finger coral makes the perfect sanctuary for the targeted juvenile herbivores, a maze to foil predators. For collectors to herd the fish into the apex of the collection net the collector must use an aggressive technique, the use of sticks to penetrate the finger coral depths and the collectors themselves crawling along the reef floor. In this photo, a rough count reveals 75 Yellow Tang and 80 Kole, this was one of four setups on the first of two dives by these collectors. One thousand fish may have been taken that day. This day most certainly had a significant impact on the reef ecosystem. Photo #4, the white broken tips of finger coral visible mostly to the right of the nets, this is a photo taken while the collectors were packing up gear upon completion of the dive. Photo #5 & 6, poaching, Collecting inside the boundaries of the Miloli'i Fish replenishment area (FRA), June 4, 2015</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The cumulative impact of poaching and underreporting has been added to Section 5.4.3.6 of the FEIS.</p> <p>Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference. Breaking or damaging coral will remain illegal under state law (HAR 13-95-70 and HAR 13-95-71) under any of the alternatives under consideration.</p>
Paul Cox	HI	1/7/2020	<p>DEIS 1.2.3.2 HAR 13-60.4 "Aquarium collection is prohibited within FRAs, FMAs, and MLCDS. I sent photo documentation and a report to DOCARE as the responding DOCARE officer was unable to respond before these three AQ collectors on this Miloli'i, South Kona based collectors' boat left the area. A follow-up call to Honokohau DOCARE revealed that the collectors in the photos had reported to the DOCARE office and apologized for unintentionally collecting AQ fish inside the FRA and no charges were filed. Would the collectors have reported to the DOCARE office if they hadn't known I photographed the violation? and should</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Under the Proposed Action, permit holders will continue to be required to comply with all permit conditions.</p>

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			<p>that matter as this Miloli'i based collector has been cited twice before for collecting inside the Miloli'i FRA?</p> <p>Again, the DEIS pledge in the Purpose and need section 2.0, mainly that "The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats." On February 17, 2015, a Miloli'i fish collector was told by the Hawaii county planning department to stop packaging and shipping fish in a noncompliant ag zoned residential area, Miloli'i Beach Club Association II, South Kona.</p> <p>This collector appealed the decision, one of his points was that he was not an aquarium collector but a fish breeder.</p> <p>Quote: "The Petitioners' use of the property consists of gathering aquarium fish, holding such fish in tanks, breeding and propagating fish using wild stock, and packaging of some of the fish gathered and bred on the Property for shipment to customers."</p> <p>The Planning Department Administrator agreed and closed the case before any neighbors could respond or submit evidence at the hearing:</p>	
Paul Cox	HI	1/7/2020	<p>Photo #7, A fish breeding and propagating facility at Miloli'i Beach Club Association, Ag zoned residential lots on the day that the planning department interviewed for possible zoning violation, January 5, 2015. The packaging of 19 tubs full of "bred and propagated" fish. This individual is one of the 14 commercial aquarium fishers of which the DEIS pertains, therefore, is the DEIS incomplete?should the breeding and propagating of aquarium fish be included in the DEIS?</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Neither the Proposed Action nor any of the alternative considered in the EIS include breeding or propagating aquarium fish.</p>
Paul Cox	HI	1/7/2020	<p>DEIS 2.5 Scope of Analysis, "The proposed action and resulting commercial collection does not include any activities different from or in addition to those that have occurred in the past."</p> <p>The preceding sentence with my observations, that the collection of the targeted juvenile fish, in profitable amounts, can not be accomplished without aggravating actions to stoney coral, is disquieting.</p> <p>And the inability to monitor and enforce rules will result in continued reef damage by the careless time and cost saving actions of the AQ collectors such as improper anchoring.</p> <p>Peoples observation skills are honed by their experiences. I worked for some years in the logging industry and so an analogy between timber harvesting and aquarium collecting and the management system contrasts between these two natural resources are in my thoughts as I observe AQ collectors at work. The Forest Service offers timber to logging contractors in a bid process were the opening bid is set to insure that infrastructure for the sale is not a cost liability to the</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>public trust, the taxpayers. Road construction, environmental study and the resulting protections to plant and wildlife, and monitoring personnel, these costs are covered before a tree drops. If an endangered or threatened species or a historical/cultural site is discovered the timber sale does not happen. During and after the timber harvest forest service monitoring persons are on site to document that environmental safeguards such as erosion control are satisfactory.</p> <p>For the most part the people in the logging industry love the woods and understand the importance of sustainability of our forests. But I can affirm that when profit is a factor shortcuts will be taken if the monitoring is not in place. More than one big Sugar Pine has made it to the mill with no evidence that it ever existed. Humans can justify actions and when something is gone it is often forgot.</p>	
Paul Cox	HI	1/7/2020	<p>DLNR Mission: "Enhance, protect, conserve and manage Hawaii's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawaii nei, and its visitors, in partnership with others from the public and private sectors."</p> <p>Public trust does not owe fourteen or four hundred individuals our natural resources. Until the removal of reef life can happen with assurances that such removal will enhance, protect and conserve the reef for future generations and the cost of those assurances, such as effective law enforcement, be paid for by the individuals removing that reef life, the moratorium needs to remain in place.</p> <p>Mahalo Nui Loa for your service,</p>	Your comment has been forwarded to the decision makers.
Paul Cox	HI	1/7/2020	<p>Last one! Photo #8, Anchor Chain in Coral</p> <p>On the Memorial Day holiday, May 29, 2017, an AQ vessel with three collectors was working in Papa Bay. I photographed the AQ vessels anchor, Photo #8, then continued on swimming with four other neighbors. Moments later the AQ vessel buzzed us at full 200hp throttle missing my wife by 15 feet, they knew we were there as one of the collectors was waving at us with her middle finger. A conflict between recreational use of a neighborhoods swimming and snorkeling area and AQ collectors on a holiday weekend, I am thankful no injuries occurred.</p> <p>Whats important to note in this photo is the 20 plus feet of the 9mm chain and the small claw anchor. Most AQ collectors, as most west side boaters in general use the chain to anchor not the actual anchor itself, enabling easy pull-up but damaging more square meters of coral as a result. A system of day-use mooring buoys has not been established in AQ collecting areas.</p>	Your comment has been forwarded to the decision makers.
Paul Juszcak	NY	12/17/2019	<p>Please support this draft. Do the right thing!</p> <p>Thank you</p>	Your comment has been forwarded to the decision makers.

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Paul Kohman	N/A	1/7/2020	An environmental review done by an organization with the sole purpose of financial gain by its members should not be considered to be valid for environmental conservation purposes. Please do not allow this review to influence your decisions regarding the operation of the reef fish collecting trade trade in Hawaii. Reef wildlife is in dire need of protection by laws and enforcement.	Your comment has been forwarded to the decision makers.
Paul Moss	MN	1/6/2020	I am very concerned about the impact of fish collection for the aquarium trade on Hawaii's wild fish populations. I don't feel that the Pet Industry Joint Advisory Council's environmental impact statement is accurate in "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem". Hawaii's native fish need and deserve effective legal protection and should be left in the wild. Please don't allow these fish to be collected. Thank you for your consideration of these comments.	Your comment has been forwarded to the decision makers. The commenter incorrectly states that the EIS surmises "that the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem". The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.
Penny Niederer	N/A	1/6/2020	Please, do NOT allow the reef fishing permits!!! I swim the Kailua pier, down at Magic Sands, and around Kua Bay. For 30 years, I've swum these waters and the changes are so devastating between the coral bleaching and the lack of fish. We need these reef fish, not more people fishing these reef fish. Please, please do NOT allow more permits. I'm completely opposed to any more permits so we can keep the few reef fish we have left to help balance our ecosystem. Thank you for listening, and a bigger thanks if permits are NOT issued	Your comment has been forwarded to the decision makers.

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Peter Riva	NM	12/2/2019	PIJAC is a lobbying group for the commercial pet trade . PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.	Your comment has been forwarded to the decision makers. The EIS was prepared using the best available science. PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC’s Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/
Philip Hayward	HI	1/7/2020	Considering: unwarranted culling native populations of fish in a challenged and changing finite reef resource area; aquarium fishing mortality is such a high percentage of catch; aquarium fishermen are highly unsupervised; extremely limited HI employment base propped up by aquarium fish; It should be apparent that this activity is not in the public's, nor in the malama-aina interest and should not be allowed in Hawaiian waters.	Your comment has been forwarded to the decision makers.
Rachel Silverman	HI	12/5/2019	I have been swimming and snorkeling with my husband and daughter on our beautiful coral reefs, in the last six years we have seen two major bleaching events in Hawaii. More than 80% of cauliflower coral colonies have died due to warmer temperatures caused by climate change. The White List fish species are all dependent on the health of the reef as it is their birthplace, nursery, and home. Just as the fish depend on the coral, the coral depends on the fish to help fight off the ever encroaching algae. We have seen the reef habitat for the fish, that this DEIS proposes we start collecting again, shrink and contract. The reef needs a healthy balance and right now there are so many factors that are impacting it that it would be harmful to the continued efforts to protect these vital habitats in West Hawaii. Our main industry is tourism, and harming this potential revenue stream for the benefit of a small number of people actually in Hawaii is inappropriate and reckless. Please leave the aquarium fish collection ban in place and protect these vulnerable resources for our communities and keiki!	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.
Ralph Jewell	HI	1/7/2020	I understand your office will be issuing permits for more fish collecting off the reefs here in Hawaii. In the early 70's, I witnessed the decline in reef fish population because of collection. I really do not see the reason why this has to continue to this day. There is so much conversation about the world's fragile reefs and the importance of them to civilization. Our glassbottom boat operation has witnessed a decline in tropical fish, over the last 20+ years. The 20 years before that, our snorkel operation saw the beginning of the decline, as a	Your comment has been forwarded to the decision makers. The EIS analyzed the impacts of issuing Aquarium Permits. The DLNR has not yet made a final decision on whether or not to issue the permits. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with

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			<p>result of collecting, coral bleaching or other reasons. Permitting more destruction of the reef really does not make any sense, except for the companies that will take the resource away for their own profit. They will ship these fish elsewhere, where a huge percentage will die, even before they make it to a consumer's tank. Due to the decline, these companies only have a small window of operation and will eventually fold, as the resources disappear. What are you thinking? I wrote letters to the state in the early 70's and ended up being threatened by local collectors. The letter ended up landing in the hands of a individual who's son was a collector. This letter may simply land on deaf ears. I guess time will tell. I invite you, and your staff to join us on our tour, and see the reef now, and then come again in a year to see the change. This makes no sense. Please let me know why this is even considered. How about enforcing rules already in place. We see that enforcement is difficult as it is, and now you open up more need for enforcement. There is currently little enforcement to limits, or methods in collecting, or areas permitted. What are you thinking? Please reply.</p>	<p>population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>A discussion on post-collection mortality has been added to Section 5.4.2 of the EIS.</p>
Rebecca Canright	N/A	1/6/2020	<p>As a college student who cares deeply about Hawaii's wild marine life, I recently learned that our state is considering the impact that fish collection for the aquarium trade has on wild fish populations. I ask you respectfully to strongly limit the amount of native fishes that can be caught for the aquarium pet trade. Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, thus it is our duty to steward and protect our state's incredible marine diversity from exploitation and over-harvesting.</p>	Your comment has been forwarded to the decision makers.
Renea Cooper	N/A	1/6/2020	<p>Extinction is forever—it's that simple. It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium</p>	Your comment has been forwarded to the decision makers.
Richard Farnham	HI	1/7/2020	<p>I completely support Maggie Brown in her concern for the coral reefs and indigenous fish in Kona waters. It seems almost criminal to further deplete our reefs for the benefit of a few collectors. I'm sure there are other places to collect fish with far less impact. Let's protect the local businesses that support the reefs, instead of supporting the businesses that exploit them.</p>	Your comment has been forwarded to the decision makers.
Richard Marks	MA	1/6/2020	<p>I swim in the ocean every day and have been shocked by the rapid decline of small tropical fish in our reefs. I understand they are being harvested commercially to be sold for aquarium fish.</p>	Your comment has been forwarded to the decision makers.

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			<p>Is there anything that can be done about this on your side? Mahalo in advance!</p>	
Robert B. Smith	N/A	1/5/2020	<p>I was given your name to email and I assume you work with DNLR. I will try to call your office this week. As a taxpayer who pays your salary, I really don't appreciate you selling our natural resources. I snorkel on Maui everyday and even though if I understand correctly the permit is for the Big Island, I can only assume the waters and fish populations are somewhat similar. There are not abundant fish in our waters. You rarely see schools of fish or huge varieties so I find it hard to believe that someone could do a multi page study and come up with the notion that there are so many fish in Hawaiian waters that we can sell them off to who ever is paying you. I hear from many visitors, " where are the fish". It's depressing. Please tell me: 1. Your telephone number so I can discuss with you. 2. How this benefits the tax payer and the visitor. 3. What exactly is in it for the state.</p>	Your comment has been forwarded to the decision makers.
Robert E. Rutkowski	N/A	1/8/2020	<p>A coalition of Native Hawaiians and conservation groups has warned the Hawai'i Department of Land and Natural Resources (DLNR) that the agency could end up back in court if it doesn't end a policy allowing the practically unlimited extraction of reef fish and other aquatic creatures for the aquarium pet trade without any environmental review, circumventing a court injunction halting such activities until the review process is completed. The policy began after the Hawai'i Supreme Court ruled in September 2017 that aquarium collection under permits is an action subject to environmental review under the Hawai'i Environmental Policy Act (HEPA), and the circuit court subsequently voided all unexpired permits and placed a moratorium on renewing or issuing new permits pending the environmental review process. Under the new policy, DLNR has been renewing and issuing new commercial marine licenses to aquarium collectors without also requiring aquarium collection permits or HEPA review, as long as collectors don't use fine-meshed nets and traps. Yet, the agency does nothing to verify the methods collectors claim to be using. It would be extremely difficult to gather the types and amounts of animals that the industry has continued to collect without using fine-meshed gear, which has always been the primary means for gathering aquarium fish. DLNR's policy has enabled the aquarium trade to harvest more than half a million marine animals without any environmental review during the past two years. Instead of embracing the courts' rulings and ensuring that the</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on</p>

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			<p>environmental effects of aquarium collection are properly considered, the agency has given the industry a free pass to continue collecting without any oversight. Deregulation for the benefit of private industry is completely contrary to DLNR’s constitutional mandate to safeguard our marine life for present and future generations.</p> <p>The policy violates HEPA, state aquarium collection laws, and the public trust doctrine under the Hawai’i Constitution.</p> <p>I was shocked to learn that under the agency’s watch, the industry has continued ravaging Hawai’i’s reefs without any assessment of environmental harm, despite the courts’ rulings. Taking hundreds of thousands of marine animals for private profits obviously requires vetting under the environmental review process.</p> <p>The collected animals are primarily herbivorous reef-dwellers that serve important functions in the coral reef ecosystem, such as helping to control algae growth. Studies have shown that reducing the abundance and diversity of reef fish and important invertebrates affects a reef’s ability to respond to stresses or disturbances.</p> <p>Telling the aquarium trade it no longer needs permits or HEPA review to continue operating makes a mockery of the agency’s duty to conserve and protect our reefs and fish populations so that they can support public purposes, including traditional and customary practices such as subsistence fishing.</p> <p>Hawai’i’s reefs are the lifeblood of kanaka maoli and their communities.</p> <p>The agency’s decision to deregulate the aquarium trade threatens Hawai’i’s precious reef ecosystems, which are already at risk due to climate change.</p> <p>DLNR is overseeing the ongoing court-ordered environmental review process, currently underway for West Hawai’i and O’ahu. But unless this policy is changed, the industrial-scale extraction of marine animals purportedly using non-fine-meshed gear will continue without any environmental review under HEPA.</p>	<p>species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p> <p>Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling.</p>
Robert Kitsell	HI	1/7/2020	<p>I strongly object to the extraction of Hawaiian Reef fish by Aquarium fisherman.</p> <p>The fish need to be allowed to live on the reef where they belong.</p> <p>On many parts of the Big Island Reef fish are scarce please do not allow the permits.</p>	Your comment has been forwarded to the decision makers.
Robert Wintner	HI	12/2/2019	<p>THE AQUARIUM TRADE in cahoots with Hawaii DLNR appeals for livelihood in an “environmental review.” DLNR commissioned this report from the Pet Industry Joint Advisory Council (PIJAC). Did Hawaii taxpayers fund this report? Or did the aquarium trade pay for it?</p> <p>PIJAC is a lobbying group for the commercial pet trade and not in the best interests of Hawaii reefs or people. PIJAC FAILS to recognize the Hawaii Environmental Protection Act (HEPA) as required in the</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS is an Applicant-prepared EIS, and was not funded by the DLNR.</p> <p>Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the</p>

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			<p>HAWAII SUPREME COURT RULING.</p> <p>PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director’s discretion, that director was William Aila, aquarium collector.</p> <p>When the Intermediate Court of Appeals ruled for the aquarium trade, DLNR Director/Nature Conservancy Director Suzanne Case said, “It’s been litigated!”</p> <p>THEN the Hawaii Supreme Court ruled that no further aquarium permits should be issued until Environmental Assessment, with injunctive relief to SHUT IT DOWN NOW! DLNR Director Case trumped that ruling with a new rule of her own: permits are no longer required. Aquarium collecting now takes only a commercial fishing license. Many Kona aquarium collectors never stopped collecting, with tacit support from Kona DAR and Hawaii DLNR. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater.</p> <p>DLNR Director Case scoffed the Supreme Court ruling and met with aquarium collectors to advise on speech and behavior in the 2017 legislative season. These meetings are in the public record. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, Case prevailed again on Governor Ige to veto the bill. Ige knows nothing of ocean species or habitat.</p> <p>Spirit and intent in the Supreme Court ruling is clear. The PIJAC PROMO piece claims a surge in recovery, as if that should justify a new wave of reef carnage. Those claims are not based in reality. The PIJAC PROMO piece notes a catch limit on Achilles tangs of 5 per collector per day, down from 10 per day. Few people have seen 5 Achillies tangs in a single day in many years. All aquarium trade self-imposed catch limits are bogus, far beyond historical catch. This PIJAC Promo piece is not an environmental review but a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people— especially its host culture—of iconic, endemic and economic treasures. The PIJAC PROMO piece supports a mainland amusement industry that condemns reef wildlife to a vicious cycle of replacement. THAT is what the aquarium trade calls “sustainable.” Enough!</p>	<p>WHRFMA since the supreme court ruling.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p> <p>It should also be noted that Achilles Tang are also collected as part of other fisheries (e.g., food fishery), and commercial aquarium collection is currently the only fishery with an existing bag limit.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC’s Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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Ron Hirschi	WA	12/27/2019	<p>I am a fish biologist and though I live in western Washington, I've spent many years snorkeling and fishing over on Kauai. I've also had the honor of doing research out on Midway with NOAA, The US Fish and Wildlife and the State of Hawaii. In addition, I write Hawaiian nature books for keiki.</p> <p>In my experiences observing and counting reef fish for more than 30 years, I've seen a sad decline in many species. I know there are many causes for population declines, but I've seen aquarium harvest and know many species are actually disappearing from our reefs due to the collecting of yellow tangs and many other fish valued by the aquarium trade.</p> <p>I urge you to ban the trade or greatly limit ability to collect our fish so that future generations can enjoy the diversity of fish once present when I first came to the islands.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>
Ron Tubbs	HI	1/5/2020	<p>I am asking DLNR for the complete renewal of all aquarium small mesh permits for Hawaii. The 490 page environmental review and past DLNR fish counts have already proved the sustainability of the fishery at past full fishing takes.</p> <p>It was unfair for the fishery to be the only fishery or DLNR permitted ocean user to have to do an EIS. Please correct this by reinstating the issuance of all permits.</p> <p>This year has seen another large fish drop and ocean fish populations are very healthy. Any change in fish populations will be address by DLNR and the fishery. We strongly believe in a fluid ocean management approach.</p> <p>We did work with DLNR and West Hawaii Fishery Council in the past to create new rules in 2015 to ensure sustainability and health fish populations. We will continue to do so if any global warming issues need to be addressed in the future.</p> <p>Right now Hawaii fish populations are increasing, and reefs are healthy. Links below with the facts:</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>http://hawaiitropicalsaltwateraquariumfish.com/index.html The Environmental review concludes that the fishery can reopen and it is not only sustainable but a model fishery! The link to the full 490 page environmental review: http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf Those who oppose the fishery say we are unlimited in catch and the fishery can deplete the reefs, this is not true we are limited by many laws, catch limits, size limits, closed areas, limited holding on boats, limited to dive deco times, and recent 2015 rules were passed with even more laws to ensure sustainability of the fishery. Link to those laws: https://dlnr.hawaii.gov/dar/fishing/fishing-regulations/ The fishery is so well regulated and studied it is considered a model fishery because it has been proven sustainable. Thanks for your time and more info for your review: Hawaii's Fish Populations Increase (it is happening again this year 2019 and into 2020) Videos show tropical fish swarming state's reefs</p>	
Roz Downing	CT	1/6/2020	Native fishes need and deserve legal protection, and they should be left in the wild. Please do not cater to the self-serving aquarium industry.	Your comment has been forwarded to the decision makers.
Ryan Christopher	HI	12/4/2019	<p>Granting 14 people aquarium fish collecting permits, with loose rules, realistically policed by no one, is a terrible idea. 14 more people making a (potentially full-time) career out of stripping our reefs of "aquarium fish " is detrimental to the health of the ocean, The west side of Hawaii Island and our own existence (loss of species on the planet has a domino effect that does in fact affect human beings). There are already many challenges that wildlife on the Westside have had to endure: resort/golf course runoff, Gated community on cliffs' landscape run off, Bloom which is said to be caused by Energy Lab that killed off Honokahau Harbor, and it is said that the Kawaihae harbor's bad design has stifled the circulation in the region and sickened fish. What is frustrating is, in the past, it seems that the state has sided with aquarium fish trade collectors and flown the doors wide-open for their collecting while regulating sustenance fishing of the same fish. Aquarium fish trade collectors have already stripped other islands of the beautiful reef fish and coming to Hawaii Island to do the same, must not be allowed. Hawaii's resources should not be for sale. The County of Hawai'i has declared an emergency with the state of the climate (changing). And because we are experiencing extreme rains, run off, reef bleaching events, etc., I Believe that we need to give the ocean a well-deserved break. I cannot imagine that an EIS could be done with any accuracy if</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

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			it says that it is an OK thing to have harvesting of reef fish happen at this time.	
Sandra Bruce	DC	1/7/2020	I think take' should be kept at a sustainable level and not be unlimited	<p>Your comment has been forwarded to the decision makers.</p> <p>The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Sandra Greene	HI	1/7/2020	<p>It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.</p> <p>Anyone who sees the near-shore reefs on a daily basis, as I have done for over the past 20 years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we bloody well can put a stop to aquarium collecting.</p> <p>The so-called "Environmental Review" consists of 500 pages of</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period. The EIS acknowledges that reefs and reef fish face many threats. The DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as</p>

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			<p>soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii’s DLNR (to that department’s shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.</p> <p>But where is the traders’ credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii’s taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point.</p>	<p>the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Sandra Romer	N/A	1/7/2020	<p>I am writing to you today to encourage you & your team in the complete & final banning of fish collection (for ornamental purposes). I see no reason why the state of HI and the coastline of West Hawaii in particular should be such a source for aquarium fish around the world. Anyone who has spent time in the waters off HI will tell you about the dramatic decrease in the amount of fish life here. The excitement on various Facebook groups when a fish such as a Tinkers Butterfly fish is spotted while diving, should be enough of a sign that this collection industry is causing untold harm to our marine species.</p> <p>We need all these fish to have a complete functioning ecosystem...each creature plays it's part...now, we need to play ours & support those without voices.</p> <p>Collecting for home aquariums and to line the pockets of mainland sellers is not a valid use of any HI governmental permit. Surely, we should restrict collecting to only those needed for public/scientific aquaria. This can then be the inspiration for generations of fish lovers & marine enthusiasts.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Sari Kala	N/A	1/7/2020	<p>Stop aquarium trade !!!!</p>	<p>Your comment has been forwarded to the decision makers.</p>
Sera Bell	N/A	1/6/2020	<p>I am writing this email to inform you that I am opposed to the passing of the 14 new permits allowing the collection of Hawaiian reef fish on Hawaii Island.</p> <p>As a diver and general lover of the ocean, I have seen so much reef damage occurring over the past few years alone. Our reefs are already suffering so much, and the reef fish are an integral part of reef survival. The removal of these fish upset the natural ecosystem that allow the reefs to grow and heal, which they already need so much.</p> <p>Please take into consideration the state of the reefs, and the ocean at large, and do not pass the new fish collection permits.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that reefs face many threats and reef conservation is important; however, as stated in the EIS, from 2003 to 2017, mean coral cover declined less within Open Areas than within areas closed to commercial aquarium collection (though the difference was not statistically significant; DAR 2019a). The DAR (2019a) concluded that commercial aquarium collecting is not having any measurable negative impact on percent coral cover or change in coral cover over time. In addition, Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.</p>

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Shannon (last name not provided)	N/A	1/7/2020	Our reefs are suffering and need the fish in the ocean to help preserve the symbiotic relationship needed for survival. I oppose issuing more permits for fish collections on Hawaii island. Thank you for your time, Shannon Velazquez	Your comment has been forwarded to the decision makers.
Sharon J. Langlois	N/A	1/6/2020	Please protect Hawaii's fish from the aquarium trade. Fish are sensitive, sentient beings and deserve to be allowed to swim free in the ocean. I have been to both the Big Island and Maui and have taken snorkeling trips on both islands. It was breathtaking beautiful. It was like being on a different planet. That is how fish should be viewed and enjoyed. Our oceans are dying due to exploitation. We need to keep ecosystems intact and thriving. Thank you for your time and attention.	Your comment has been forwarded to the decision makers.
Shayla Middleton	N/A	1/7/2020	The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue!	Your comment has been forwarded to the decision makers.
Shayla Middleton	HI	11/28/2019	<p>PIJAC is a lobbying group for the commercial pet trade . PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.</p> <p>This sneak attack on Hawaii reefs has a comment period that spans Thanksgiving, Christmas and New Years. When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, aquarium collector. When the Intermediate Court of Appeals ruled for the aquarium trade, DLNR Director/Nature Conservancy Director Suzanne Case said, "It's been litigated!" She scoffed the Supreme Court ruling. She met with aquarium collectors to advise on speech and behavior in the legislative season. These meetings are in the public record. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, Case prevailed again on Governor Ige to veto the bill. Ige knows nothing of ocean species or habitat.</p> <p>The Hawaii Supreme Court ruled that no further permits should be issued until Environmental Assessment, with injunctive relief to SHUT IT DOWN NOW! DLNR Director Suzanne Case trumped that ruling with: permits are no longer required, for aquarium collecting. It takes only a commercial fishing license. Many Kona aquarium collectors never stopped collecting, with tacit support from Kona DAR and Hawaii DLNR. When an aq collector attacked a woman with a GoPro camera at at Keawaiki, DLNR visited Kona to comfort the aquarium collectors. Now DLNR Director/TNC Director Emeritus Suzanne Case promotes the TNC agenda, deferring to Big Fishing. The aquarium</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Legal commercial aquarium collection has continued outside of the WHRFMA using gear/methods other than fine mesh nets, which do not require an Aquarium Permit. No collection has been allowed in the WHRFMA since the supreme court ruling..</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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			<p>trade is not fishing. It's a devastating commercial enterprise that trashes nearshore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater.</p> <p>Spirit and intent in the Supreme Court ruling is clear. The PIJAC PROMO piece claims a surge in recovery to justify a new wave of reef carnage. The PIJAC PROMO piece notes a catch limit on Achilles tangs of 5 per collector per day, down from 10 per day. Few people have seen 5 Achillies tangs in a single day in many years. This PIJAC Promo piece is not an environmental review but a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people of iconic, endemic and economic treasures, to support a mainland amusement industry, to condemn reef wildlife in a vicious cycle of replacement. THAT is what the aquarium trade calls "sustainable." Enough!</p>	
Shelby Serra / Pacific Whale Foundation	HI	1/6/2020	<p>I left a message on your office phone regarding submitting comment so please let me know if you are not the right person or place. I am submitting comment on behalf of Pacific Whale Foundation (PWF) regarding the Issuance of Commercial Aquarium Permits for the WHRFMA. It is listed on the DEIS as HRS Chapter 343 Entry #622. You are the contact listed on this DEIS. Please let me know if there is an online portal that this needs to be uploaded to. Tomorrow (Jan 6) marks 45 days since the DEIS was published to public comment, and therefore the deadline for comment. Please find our attached comments.</p>	Your comment has been forwarded to the decision makers.
Shelby Serra / Pacific Whale Foundation	HI	1/6/2020	<p>Pacific Whale Foundation (PWF), a 501 (c)(3) nonprofit organization has a mission is to protect the ocean through science and advocacy and to inspire environmental stewardship. The objective of the proposed action is for the Department of Land and Natural Resources (DLNR) to issue 14 Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA). I am testifying in opposition of the issuance of the 14 aquarium permits and support a No Action Alternative, where no commercial aquarium collection would occur within the WHRFMA.</p> <p>Hawai'i's DLNR Division of Aquatic Resources has approved the Pet Industry Joint Advisory Council (PIJAC) to apply for the issuance of Commercial Aquarium Permits for the WHRFMA. This project involves review of both the use of state lands and the use of conservation districts that are involved in the proposed permitting areas.</p>	Your comment has been forwarded to the decision makers.

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Shelby Serra / Pacific Whale Foundation	HI	1/6/2020	The Preferred Alternative includes the issuance of 14 aquarium permits for the WHRFMA, and implementation of a reduced bag limit for Achilles Tang of 5 per day. Implementation of the Preferred Alternative, according to this DEIS, would ensure the lawful, responsible, and sustainable commercial collection of 40 fish species deemed "White List Species" from the WHRFMA. It is unclear why there is only a bag limit for Achilles Tang. Without a complete understanding of a sustainable catch limit, imposing a limit on one species leaves room for excessive take of all other species. Without a verification system to ensure accuracy of self-reported data, there is no way to know what the sustainable catch limit is. This draft outlines a large range for sustainable catch limits, capped at a high percentage (25%). Using the precautionary approach, the lowest estimated percentage of sustainable take should be applied (5%).	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative has been revised to include issuance of 10 permits. Existing bag limits on other species are explained in Section 1.2.3.2 of the EIS, and would be implemented under any of the alternatives analyzed.</p> <p>Collection under the Preferred Alternative in the FEIS is below 2% for all of the 38 White List Species with a population estimate. The two species which do not have a population estimate, the Flame Wrasse and the Longfin Anthias, have been collected on average less than 175 individuals per year, even when the number of Aquarium Permits was unlimited.</p> <p>Furthermore, the DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was at a higher rate than what would occur under the Preferred Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.</p>
Shelby Serra / Pacific Whale Foundation	HI	1/6/2020	Pacific Whale Foundation acknowledges that the best available science indicates less than significant direct and indirect impact on reef fish populations with the preferred alternative outlined in this DEIS. Although the Coral Reef Ecosystem Program (CREP) data are the most comprehensive data publicly available in fish populations estimates, certain limitations of the surveys may lead to an underestimate of some populations. Short period of survey effort, exclusive survey zone and the misidentification of fish disallow this survey from collecting accurate fish population numbers. Determining actions based on these numbers can lead to an overestimating population numbers and misidentifying take limits.	<p>Your comment has been forwarded to the decision makers.</p> <p>The best available science was used in preparation of the EIS, and the limitations of both the CREP and WHAP survey methods are described in Section 4.4.7.</p> <p>If CREP populations are an underestimate, then actual impacts to the population will be even lower than anticipated.</p>
Shelby Serra / Pacific Whale Foundation	HI	1/6/2020	In review of this DEIS, it is unclear who are the interested parties involved in the issuance of these permits. A better understanding of interested parties within PIJAC would shed light on the intentions of this application. This draft outlines calculated economic benefits based on a 17 year time frame between 2000 and 2017 and created a 5-year analysis period, inflation-adjusted, to these permits which under the Preferred Alternative, work out to be approximately 0.01% of	<p>Your comment has been forwarded to the decision makers.</p> <p>See Section 2.0 of the EIS for the purpose and need of the proposed action. The EIS discloses impacts of the proposed action (regardless of magnitude), including socioeconomic impacts.</p>

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			Hawai'i's ocean economy, and an even smaller percentage of the overall economy in the State. With such a minute economic benefit, the purpose of this permit issuance is unclear.	
Shelby Serra / Pacific Whale Foundation	HI	1/6/2020	<p>There are a number of impacts outside of aquarium fisheries that are effecting coral reefs, including recreational aquarium fish collection, non-aquarium fishing, tourism and climate change. Under the climate change umbrella there includes additional stressors such as coral bleaching and ocean acidification, which lead to coral death. We believe that these cumulative impacts outweigh a single stressor. Using the precautionary principle, without a complete understanding of the environmental stressors on reefs in relation to climate change and other impacts, there should be no introduction of additional stressors to the reef ecosystem.</p> <p>Due to the near negligible economic benefit and the introduction of a new stressor on a currently stressed ecosystem, we oppose the issuance of the 14 aquarium permits and support a No Action Alternative, where no commercial aquarium collection would occur within the WHRFMA.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The commercial aquarium fishery has existed in Hawai'i since the 1940's, and does not represent a new stressor. Collection under the Preferred Alternative is anticipated to be lower than conditions prior to the October 2017 supreme court ruling.</p>
Sheryl Weinstein	N/A	1/7/2020	Please, please, please do what you can to help stop tropical fish collection in Hawaii—especially West Hawaii. As a scuba diver, I've seen a sad decline in reef fish populations everywhere I dive in the last 19 1/2 years.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Shirley Spencer	HI	1/6/2020	<p>My name is Shirley Spencer. . I have lived on the Big Island for 45+ years and have enjoyed snorkeling and diving since moving here. The massive decline in marine life, mostly fish has declined immensely since then. I can compare underwater coral reefs/marine life from the 1970's- 80's to now and the change is incredible.</p> <p>I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish.</p> <p>Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawai'i's Reefs is counter-</p>	Your comment has been forwarded to the decision makers.

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			productive. Thank you for your time	
Sierra Club	HI	N/A	See separate spreadsheet	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>EXCERPT: GENERAL COMMENTS</p> <p>Sierra Club comments in this document are indicated in italics. We concur and uphold DLNR's mission to 'Enhance, protect, conserve and manage Hawai'i's unique and limited natural, cultural, and historic resources held in public trust for current and future generations of the people of Hawai'i nei, and its visitors, in partnership with others from the public and private sectors.'</p> <p>The legislature has decreed it the "policy of the State" that DNLR and other agencies must "[c]onserve natural resources . . . by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics . . ."1 The Agency must also "[e]ncourage management practices which conserve . . . all natural resources," and encourage all individuals "to fulfill the responsibility as trustees of the environment for the present and succeeding generations."2 In enacting HEPA, the State legislature found "that the quality of humanity's environment is critical to humanity's well-being, [and] that humanity's activities have broad and profound effects upon the interrelations of all components of the environment . .</p> <p>1 Haw. Rev. Stat. § 344-3(1). 2 Haw. Rev. Stat. § 344-4(2)(A), (10)(A).</p> <p>Sierra Club concurs with the DEIS analysis submitted collectively by For the Fishes, The Humane Society of the United States, Moana Ohana, and the Center for Biological Diversity. We ask that their response be incorporated into our comments and responded to in the succeeding draft of the EIS.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Responses to the comments from For the Fishes, The Humane Society of the United States, Moana Ohana, and the Center for Biological Diversity are provided in the FEIS.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>We find that this DEIS fails to provide adequate baseline data from which to analyze the risks posed by cumulative factors, such as unregulated collecting, under-reporting of catch, failure to monitor and take enforcement actions when violations occur, changes to habitat from natural and human perturbations historically, and the effect proposed alternative(s) would have on traditional fishing practice and diminishment of our clean and healthful environment. The DEIS fails to offer appropriate mitigation for anticipated impacts, regulation and reporting of all collection, sales records and export data, and it fails to address the cruelty to which the collected animals are exposed. The complier of this DEIS failed to consult with citizen groups and communities who are affected, and dismissed the significant input provided by those with whom it did consult. The DEIS did not address our specific issues and concerns raised in the earlier environmental assessments, nor did it appropriately disclose adverse</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			effects to the biological and cultural resources that are part of the public trust the State of Hawaii has the responsibility to protect. Future serious impacts to the coastal near-shore habitat due to climate change are ignored in this document, and the proposed action alternatives do not address mitigation for the anticipated loss of coastal habitat. The DEIS preferred alternative proposes to exploit a public resource for the economic benefit of a few, (who have been non-compliant with past rules and regulations), at the expense of the subsistence communities, the resident public, the visitors, and the health of the state as a whole. Absent the documentation needed for a complete and accurate analysis, we ask that at the very least, a No Action Alternative be implemented.	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	Executive Summary p. ii Even if the collection rates of the 40 White List Species were closer to the maximum collection by the 14 fishers from 2000-2017, the annual collection of all species would be less than 3.5% of the island-wide population. Research suggests collection of between 5%-25% is sustainable for various reef species similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish). Based on the low percentage of the overall populations collected annually by commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection likely has minimal impacts on populations in general. <i>Explain why the research is reliable if it is only based on similar species, not actual species.</i> <i>Calculations and evaluation of impacts should include catch of food fish which are also caught for aquarium collecting.</i>	Your comment has been forwarded to the decision makers. The sustainable thresholds provided by Ochavillo and Hodgson (2006) represent the best available science, as specific thresholds for the 40 White List Species (or for Hawai'i) are not available. Nevertheless, as concluded in the EIS, collection under the Preferred Alternative is below the lower limit of 5% for all 38 of the White List Species for which population estimates are available. The cumulative impacts of other fishing are discussed in Section 5.4.3 of the EIS.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p.iii Loss of the fishery would result in the loss of income, tax revenue, and jobs. <i>Recommendation by cultural practitioner Pelika Andrade was that the aquarium industry should invest in aquaculture, which would teach them how to grow and spawn their own supply and make contributions to replenishing the fish removed from our waters.</i> <i>Income tax revenue, and jobs from sustainable aquaculture could replace that of aquarium fish collecting from the ocean.</i>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	2.0 PURPOSE AND NEED p. 15 The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods.. <i>The resources of the ocean and the nearshore waters are a component of the Public Trust held for the benefit of Native Hawaiians and the general public. When the public trust resources are "mined" for the</i>	Your comment has been forwarded to the decision makers.

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			<i>benefit of a few commercial collectors to enhance the pleasure of a few aquarists keeping open ocean animals in a closed and artificial environment, the sustainability of the habitat on which traditional practitioners depend is altered. The livelihoods of local fishers (and their families) for subsistence is a need that outweighs the needs of the applicant.</i>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	2.2 NEED FOR APPLICANT'S ACTION <i>Using fish for food meets a basic human need. Using fish for aquariums only provides pleasure, but there are many other options which do not involve animal cruelty and are more environmentally friendly.</i>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 16 2.5 SCOPE OF ANALYSIS p. 16 Regarding biological resources, this DEIS focuses primarily on the effects of aquarium fishing on wild populations of White List Species, as it is at the population level that DAR measures changes in White List Species and makes management decisions (e.g., issuance of harvest permits, implementation of bag limits). Therefore, because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population. <i>The focus should be on impacts on specific West Hawai'i locations, not on the entire population around the island of Hawai'i.</i>	Your comment has been forwarded to the decision makers. While the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring, has been added as Appendix B of the FEIS for comparison purposes. Because all alternatives include impacts in East Hawai'i (either collection using Aquarium Permits, or continued collection without the use of fine mesh nets), the impacts to the island-wide populations needed to be disclosed for all alternatives.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	2.5.1 Resources Evaluated and Dismissed from Further Consideration pp. 16 - 17 This DEIS evaluates the impacts of five commercial aquarium fish collection alternatives on the nearshore habitat (0-600 feet; 0-100 fathoms) in which commercial aquarium fishing (or lack thereof) would take place over a 5-year period. During the evaluation process, it was determined that some resources typically evaluated in an EIS would not be impacted by any of the alternatives under consideration. The evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s. Because a significant increase in commercial aquarium fishing is not anticipated during the 5-year assessment period evaluated in this DEIS, and in fact a decrease when compared to historic conditions is anticipated due to the issuance of only Aquarium Permits, this DEIS does not anticipate a significant change in the current baseline condition of these resources. <i>It is not clear that the DEIS examines the condition set forth by DLNR to examine "The adequacy of the analysis presented in the DEA, including but not limited to removal and replenishment rates for vulnerable species; specifically, how is the estimated sustainable range of 5% to</i>	Your comment has been forwarded to the decision makers. The sustainable thresholds provided by Ochavillo and Hodgson (2006) represent the best available science, as specific thresholds for the 40 White List Species (or for Hawai'i) are not available. Nevertheless, as concluded in the EIS, collection under the Preferred Alternative is below the lower limit of 5% for all 38 of the White List Species for which population estimates are available.

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			25% annual take of the estimated total population arrived at, and should the threshold be 5% or 25%."	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>The DLNR's issuance of 14 Aquarium Permits is not anticipated to result in significant beneficial or adverse impacts to water and air quality, geology and soil resources, aesthetics, noise, vegetation, terrestrial wildlife and avian species, threatened and endangered species, land use, public health and safety, communications, transportation, utilities, or population and demographics from the current baseline condition, therefore, these resources will not be evaluated further.</p> <p><i>In light of Judge Wilson's dissenting opinion on the Thirty Meter Telescope, which is incorporated by the reference below, identify any Federal and State laws which state that if resources are degraded, it's acceptable to degrade them further.</i></p> <p>https://www.courts.state.hi.us/wp-content/uploads/2018/11/SCOT-17-0000777disam.pdf</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>These resources were eliminated from further evaluation because the proposed action (issuance of Aquarium Permits) is not anticipated to result in significant impacts (beneficial or adverse). Therefore, there would be no further degradation. See Section 5.0 of the FEIS regarding the effects of the action on the environment.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>The DEIS states...it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population. <i>The trade as proposed in DEIS violates Hawaii's Cruelty to Animals statute. The disclaimer on the scope to exclude what happens to these creatures after caught is inappropriate and omits critical information needed to evaluate alternatives. If all of the captured individuals died, under this analysis, it would not be considered, because it would be outside the scope.</i></p> <p><i>Fish may be brought up from reefs so quickly they suffer immediately. If their swim bladders are not punctured they can die. In several instances, fish have been found dead in trash cans (note the 500 dead at the harbor). Several Hawaiians interviewed complain that they see bags of dead reef fish and this is not pono. What measures are taken to ensure fish are treated humanely? We understand they are deprived of food at warehouses before shipping. Their fins are trimmed. What agency is charged with DOH and DLNR regulating care of fish? The effects on individual fish removed from the population matter. The manner of capture and care should be included in the analysis! These fish are not used for subsistence, they are used for ornamentation and fleeting pleasure. The impacts of trapping, finning, starving, enclosure in confined packaging, transporting and eventual placement of remaining live "specimens" in artificial conditions must be considered in the DEIS analysis.</i></p> <p><i>Hawaii Cruelty to Animals Statute</i> <i>§711-1109 Cruelty to animals in the second degree. (1) A person commits the offense of cruelty to animals in the second degree if the person intentionally, knowingly, or recklessly:</i> <i>(a) Overdrives, overloads, tortures, torments, beats, causes substantial</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The indirect impact of post-collection mortality has been added to Section 5.4.2 of the FEIS.</p>

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			<p><i>bodily injury to, or starves any animal, or causes the overdriving, overloading, torture, torment, beating, or starving of any animal;</i> <i>(b) Deprives a pet animal of necessary sustenance or causes such deprivation;</i> <i>(c) Mutilates, poisons, or kills without need any animal other than insects, vermin, or other pests; provided that the handling or extermination of any insect, vermin, or other pest is conducted in accordance with standard and acceptable pest control practices and all applicable laws and regulations.</i></p>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>3.0 ALTERNATIVES p. 18 3.1 NO ACTION ALTERNATIVE No Action Alternative does not meet the Applicant's purpose and need to continue fishers' livelihoods participating in lawful, responsible, and sustainable commercial collection of approved fish species from nearshore habitats <i>Include the fact that collectors can pursue alternate livelihoods raising aquarium fish in captivity, working in commercial aquariums, fishing for food fish, and running boat and dive tours.</i> <i>In order to protect and ensure the sustained health of the reef and subsistence fishing practices of native communities, the Sierra Club requests that the DLNR accept the No Action Alternative.</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, under the No Action Alternative commercial aquarium fishers may no longer find it feasible to target aquarium fish and may begin to participate in other fisheries, but this is not possible to quantify at this time</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>3.5 LIMITED PERMIT ISSUANCE (PREFERRED) ALTERNATIVE This Alternative is based on the best available science, supports the DLNR's purpose to ensure Applicant's Actions do not lead to degradation of fish populations and the habitats in which they occur in the context of commercial aquarium collection. <i>The problem continues to be that DLNR/DOCARE do not demonstrate the capacity, funding or commitment to enforce the regulations as proposed. This statement is corroborated by the numerous interviews conducted in the cultural impact statement appended as Appendix A. Quotes from the Cultural Impact Assessment include the following:</i> [quotes omitted here, see comment letter or CIA] (Summary) As voiced by many of the consulted parties, the lack of support and funding have hampered DNLR- DAR's ability to fulfill its fiduciary responsibility, namely to enhance, protect, conserve, and manage Hawai'i's unique and limited resources, which are supposed to be held in public trust for the current and future generations of the people of Hawai'i nei, and visitors alike. (CIA P 135-6)</p>	<p>Your comment has been forwarded to the decision makers.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>1.2.3.2 HAR 13-60.4 (p 13) In addition to applying any other penalties provided by law, the DLNR may revoke any West Hawai'i Aquarium Permit for any infraction of these rules or the terms and conditions of the permit, and any person whose permit has been revoked shall not be eligible to apply for another West Hawai'i Aquarium Permit</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>(commercial or recreational) until one year from the date of revocation. <i>How has DLNR implemented enforcement to date? Have permits been revoked?</i> <i>If, under the preferred alternative, each of 14 permittees were assessed at least \$50,000 annual fee to cover the cost of a dozen enforcement officers, the boats and equipment to monitor the commercial collection activities, and staff to conduct population assessments in the collection areas, such a system might be within reason, but the institutional will and funding are not evident. For this and many other reasons, this is not a practical or sustainable alternative.</i></p>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>4.1.1 Socioeconomic Aspects of the Commercial Aquarium Fishery</p> <ul style="list-style-type: none"> • In 2017, the commercial aquarium fishery on the island of Hawai'i reported landings near \$1.4 million, with more than \$1.29 million coming from the WHRFMA (DAR 2018a). For the 14 fishers requesting commercial Aquarium Permits under the Proposed Action, 3 to 11 fishers reported catch in any given year between 2000 and 2017, contributing from 22.3% to 69.1% to the total overall WHRFMA fishery value (Table 4-1). (Emphasis added) • • In addition to incorporating Act 306 into the Hawai'i Administrative Rules, HAR 13-60.4 identified West Hawai'i Aquarium Permit Terms and Conditions by implementing the following provisions: <ul style="list-style-type: none"> • Aquarium collectors must submit each month's daily aquarium fishing trip reports before every 10th day of the following month. (Emphasis added) <p><i>According to table 4.1, barely 47 percent of permittees provided required reports, and of the 14 proposed permittees in the Preferred Alternative, only 3 to 11 provided reports during 2000-2017, so how does the DLNR expect to collect meaningful data, if those with permits are historically non-compliant?</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS in Section 5.2.1, to avoid duplicate fish catch reporting, only a principal diver is required to report the catch and effort for the dive team (DAR, pers. comm., 2018). This process ensures that reported catch data are not duplicated in the State's system. However, this reporting mechanism can lead to confusion by outside observers, as the total number of permit holders is higher than the number of permit holders reporting data (Table 4-1), giving the appearance of under reporting.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>4.2 CULTURAL RESOURCES</p> <p>P 29 Commercial aquarium fish collection is not a part of Native Hawaiian culture; however, Native Hawaiians do participate in and support the fishery and Hawaiian culture has been a significant aspect of the fishery's management since the 1970's. Although the process has been contentious at times, the WHFC has been successful. <i>This section fails to acknowledge the significant impact of aquarium collecting on lawei`a (fishing and gathering) and its effect on Hawaiian traditional culture, contemporary practice and way of life.</i> Quoting a few passages from the Cultural Impact Statement: [quotes omitted here due to length, see comment letter or CIA]</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A Cultural Impact Assessment was completed that includes a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.</p>

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Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>4.4 BIOLOGICAL RESOURCES</p> <p><i>The cultural significance of White list species are under-reported throughout the DEIS; for example, the DEIS section on Cultural Significance of the Achilles Tang states (p 36)</i></p> <p>The yellow tang, called lāʻī pala or lauʻī pala in Hawaiʻi, although small was considered a delicacy and also involved in healing rituals. It fails to provide this significant information:</p> <p>P117 of CIA, Kehau Springer stated that "Through her interactions with various communities in West Hawaiʻi, and in speaking with kamaʻāina of the areas, certain harvesting and fishing practices have changed due to a decrease in fish population and environmental changes as exemplified by the pākuikui (Achilles tang). Kehau shared that this is a favorite delicacy in South Kona. Elders of the area shared that this fish was highly favored for parties and gatherings. However, according to oral interviews with various community members, in the last decade, there has been a major population decline. As a researcher, she confirmed that she has observed a very small population of pākuikui in these areas and in comparing scientific monitoring data, statistics, and literature reviews, their numbers have decreased significantly over the years. She does contend that there are other factors that may affect the population, such as their monogamous behavior, urbanization, pollution, and overharvesting."</p> <p><i>While a decline in the abundance of Achilles Tang is described in the DEIS on p 76, the loss of the cultural resource is not addressed:</i></p> <ul style="list-style-type: none"> • Commercial aquarium landings of Achilles Tang have declined in West Hawaiʻi over the past two decades in association with a recent dramatic increase in its value (192% since 2008). This is strongly suggestive of declining availability (i.e., abundance). (Addressed in Section 5.4.1.2 – Achilles Tang). • Achilles Tang have declined significantly in FRAs and Open Areas over the last 20 years. Open Area populations have usually been higher than FRA populations in the past decade. Achilles Tang has had low levels of recruitment over the past two decades, and because of its popularity as a food fish as well as an aquarium fish, this species is harvested both as juveniles and adults. 	<p>Your comment has been forwarded to the decision makers.</p> <p>The decline in commercial aquarium landings for Achilles can be associated with the implementation of the current bag limit of 10 per day, enacted in 2014. The EIS agrees with the commenter that significant cultural resource impacts would be significant for the 12 White List Species that are declining. This significant impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>A Cultural Impact Assessment was completed that includes a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>4.4.2.1 Red Pond Shrimp</p> <p><i>Opae ʻula, referred to in the DEIS as Red Pond Shrimp, are in a group known to be endemic to the Hawaiian Islands. The Center for Biological Diversity(CBD) has sued the US Fish and Wildlife Service(USFWS) for not designating critical habitat for all endangered species recently designated for Hawai'i and this Red pond shrimp is one. The suit claims that by not designating critical habitat, USFWS is violating the Endangered Species Act because 14 of 15 of species recently designated are not protected. Max Phillips of CBD says"These special</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Red Pond Shrimp are not on the White List, and in addition, invertebrates can not be collected from the WHRFMA. In East Hawaiʻi, invertebrates can be collected, but do not require an Aquarium Permit. Therefore, collection of red Pond Shrimp is not anticipated to differ between alternatives, including the No Action Alternative.</p>

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			<i>species are found nowhere else...so if they disappear from here they'll be lost forever. Anchialine pool shrimp and the rest of the group needed habitat protection years ago but there not getting it from the anti-wildlife Trump administration. Species with habitat protections are twice as likely to be in recovery as those without".</i>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	4.4.3 Hawai'i Species of Greatest Conservation Need pp. 67-68 ...three White List Species occur on Hawai'i's SGCN list: 1. Psychedelic Wrasse 2. Tinker's Butterflyfish 3. Fisher's Angelfish <i>Since there is cause for concern about these species, they should not be collected.</i>	Your comment has been forwarded to the decision makers. As concluded in the EIS, the collection of any of these species is less than 5% of the island-wide population estimates, and all three species likely have larger population estimates than predicted due to their deep-water habits (beyond the area surveyed by CREP or WHAP). Therefore, actual collection is likely an even smaller portion of the populations.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 69 Ecosystem indicators related to benthic reef community integrity indicate a shift in West Hawai'i towards lowered reef accretion and reduced structural complexity. <i>Given the observations of cultural practitioners, over-fishing, pollution, damaged habitat, coral bleaching and climate change have all led to significant changes in the habitat for reef fish. There is no discussion in this section to address the significant degradation of the habitat both historically and contemporaneously.</i>	Your comment has been forwarded to the decision makers. The EIS does address the degradation of habitat. The sentence following the one quoted by the commenter states that hard coral declined from 44% to 31% between 2003 and 2014, and that the ratio between calcifying to non-calcifying organisms also declined.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	4.4.5 Reef Habitat Due to Hawai'i's extreme isolation, an estimated 25% of the coral reef species are found nowhere else...The ratio between the cover of calcifying to non-calcifying organisms – an indicator of coral reef community dynamics and the extent to which a given system is dominated by organisms that contribute to coral reef development and persistence – declined across West Hawai'i since 2003... <i>Removing herbivorous aquarium fish will not help in mitigating the decline of coral reef health. Reef fish from larval through juvenile stages have an extremely high natural mortality rate, this natural order is important to the life on the reef as well as the mid water feeders and even the pelagic predators An abundance of invasive algae will occur in a un-healthy ecosystem. A recent DAR announcement appealed to subsistence and recreational reef fishers to refrain from taking herbivorous fish off the reefs. This tacit recognition of the vital symbiotic service they perform in this delicate ecosystem is overdue and yet completely absent in the DEIS. The 'preferred alternative' in the document would allow (with one exception) for unlimited takes of many of these same important organisms.</i>	Your comment has been forwarded to the decision makers. It is acknowledged that herbivore conservation is important; however, please note the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.

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				<p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>4.4.7.1 West Hawai'i Aquarium Project (WHAP) Surveys The 2010 and 2014 Hawai'i Island aquarium catch report validation did not indicate substantial underreporting of catch by aquarium collectors. <i>This statement is not consistent with tables 4-1 and 4-2 that detail significant underreporting by permittees and proposed permittees over a multi-year period.</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS in Section 5.2.1, to avoid duplicate fish catch reporting, only a principal diver is required to report the catch and effort for the dive team (DAR, pers. comm., 2018). This process ensures that reported catch data are not duplicated in the State's system. However, this reporting mechanism can lead to confusion by outside observers, as the total number of permit holders is higher than the number of permit holders reporting data (Table 4-1), giving the appearance of under reporting.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>Table 4-5. West Hawai'i Open Area population estimates... <i>Some catches as a percent of population seem high (30' -60' open area) This may indicate past mismanagement by DLNR. So perhaps DEIS assumptions that DLNR will enforce regulations are unfounded.</i> Achilles Tang 32.70% in 2013 – 2014 39.67% in 2017 – 2018 Yellow Tang 17.26% in 2013 – 2014 Black Surgeonfish 11.66% in 2013 – 2014 Shortnose wrasse 18.07% in 2017 – 2018 Psychedelic wrasse 55.78% in 2017-2018</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, around the island of Hawai'i, there is connectivity abetween FRAs and Open Areas, with fish from protected FRAs being documented to seed unprotected areas, highlighting the effectiveness of protected areas (Christie et al. 2010). Therefore, evaluating impacts on just the Open Area populations is not representative of the actual impact. Nonetheless, this analysis has been added to Appendix B for reference.</p> <p>Regardless, of the five species noted by the commenter, as shown in Table 5-4 and Table 5-8 of the EIS, two (Yellow Tang and Black Surgeonfish) have had significant increases in population between 1999/2000 and 2017/2018, in all areas (Open Areas, FRAs, and MPAs). The Psychedelic Wrasse and Shortnose Wrasse populations have stayed stable (no significant increase or decrease), and the Achilles Tang is the only species with a significant decline.</p> <p>For the Achilles Tang, WHAP transects are not located in all collection</p>

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				<p>zones found within the WHRFMA (Figure 4), including the two zones (100A and 108) with the highest percentage of the Achilles Tang collection, suggesting that the population of Achilles Tang in the WHRFMA is likely higher than estimated by the WHAP. This is supported by CREP (2018) data which show approximately 43% (approximately 79,000 individuals) of the island of Hawai'i Achilles Tang population (approximately 184,000 individuals) resides in collection zones 100 and 108.</p> <p>Lastly, under the Preferred Alternative, the number of Aquarium Permits would be limited to 10, and a reduced bag limit would be imposed on the Achilles Tang, decreasing impacts to this species.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>p. 76 Achilles Tang have declined significantly in FRAs and Open Areas over the last 20 years. Open Area populations have usually been higher than FRA populations in the past decade. Achilles Tang has had low levels of recruitment over the past two decades, and because of its popularity as a food fish as well as an aquarium fish, this species is harvested both as juveniles and adults. <i>Pressure on food fish that are declining in numbers should not be increased by aquarium collecting.</i></p>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>p. 77 The Psychedelic Wrasse, Tinker's Butterflyfish, and Fisher's Angelfish are all listed as SGCN in Hawai'i...Adequate population estimates based on WHAP data (30-60 feet depth) are not available to assess the impact of continued aquarium collection on these three species due to their deeper water habitats. However, based on deep diver observations, Tinker's Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs). Commercial aquarium fishers generally do not fish in the deeper waters in which these species occur. In 2017, there were 599 Psychedelic Wrasse, approximately 290 Tinker's Butterflyfish (n.d. in East Hawai'i), and 288 Fisher's Angelfish collected by aquarium fishers on the island of Hawai'i <i>See comments re. 4.4.3. Since two of the species seem to thrive when protected, they should not be collected. In particular, the wide range (5% -25%) of claimed 'sustainable' takes for a range of 'white list' species is never fully backed up with studies of the subject areas. Nor does this gross margin of 'sustainability' cohere with statements elsewhere such as, "The DAR (2019a) has noted significantly declining populations in one or more management area for 12 of the White List Species. However, as noted above and in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Collection under the Preferred Alternative would be up to 1.06% of the Psychedelic Wrasse population, up to 0.87% of the Tinker's Butterflyfish population, and up to 0.04% of the Fisher's Angelfish population, all under the lower limit of the 5% to 25% threshold (Ochavillo and Hodgson 2006). In addition, as shown in Table 5-8 of the EIS, the Psychedelic Wrasse population has remained stable between 1999/2000 and 2017/2018, and the Fisher's Angelfish population has significantly increased within Open Areas. No population trend data are available for the Tinker's Butterflyfish, but as stated above, collection is less than 1% of the estimated population.</p>

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			<p>one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.."</p> <p><i>We observe that any declines whether driven by or contributed to by the trade are simply not justified by the logic and necessity of sustainability. It is the larger abiding responsibility of DLNR, as specified in the State constitution, to preserve in abundance this resource.</i></p>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>4.4.7.3 WHAP and CREP Survey Comparison p. 81</p> <p>...due to the larger spatial coverage and greater range of depths surveyed by the CREP, CREP data were considered to be a better estimator of island-wide fish populations, and therefore serve as the primary basis for the impact analysis found in Section 5.0.</p> <p><i>See comments re. 2.5. WHAP should be used because it is specific to West Hawai'i.</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the FEIS maintains that the CREP population offer the best estimate to analyze impacts, the impact of collection on the WHAP Open Area populations, where collection would be occurring, has been added as Appendix B of the FEIS for comparison purposes.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>5.2 SOCIOECONOMIC RESOURCES 5.2.1 Direct Impacts p. 84</p> <p>Total ex-vessel value (i.e., price received by a fisher for the catch) for the 14 fishers in the WHRFMA ranged from a low of \$164,040 in 2001 to a high of \$1,162,964 in 2016, with an average of \$793,352 (inflation- adjusted 2019 dollars...)...The 2017 ex-vessel inflation-adjusted value for the 14 fishers within the WHRFMA was \$932,735...It should be noted that the dollar value of these fisheries represents only the ex-vessel value, what the fishers are paid for their catch, and does not include the value which would be generated by additional dealer and retail sales.</p> <p>p. 21</p> <p>In 2001, Cesar et al. documented the annual recreational value of the coral reefs of the Hawaiian reefs for snorkelers and divers was estimated to be \$281 million and \$44 million, respectively. Although the direct expenditure per diver is much larger than the direct expenditures of snorkelers, the overall value related to the latter group is much larger due to their large numbers.</p> <p><i>The value of the coral reef ecosystem for tourism (snorkeling) appears to be is several orders of magnitude greater than the value of the reef-sustaining fish for "esthetically pleasing" aquaria on the continent. In addition, the process of collecting and transporting reef fish for sale on the continent constitutes animal cruelty and a waste of resources (fish die in transport or within a year many die in tanks. This) is detrimental to society in the long term.</i></p>	<p>Your comment has been forwarded to the decision makers.</p>

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Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 85 Analysis by the DAR (2019a) has shown that actual underreporting of catch is small, with a 3.5% difference between the number of animals reported caught and sold in 2010 and a 0.4% difference in 2014, which likely represent live releases and mortality. <i>How reliable are reports of numbers caught and reports of numbers sold? The reporting process should be more fully described to back up the statement that "underreporting of catch is small".</i>	Your comment has been forwarded to the decision makers. The EIS used the best available science, which in this instance was information from the DAR (as cited).
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 85 The number of non-reporting permit holders is actually an indicator of industry growth and direct socioeconomic benefits. <i>The DEIS should explain this incongruous assertion. More information should be provided to explain and back up this statement.</i>	Your comment has been forwarded to the decision makers. This statement has been deleted from the FEIS.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.2.1.1 No Action Alternative p. 85 An increase in the East Hawai'i commercial aquarium fishery value may offset some of the loss from the WHRFMA fishery under the No Action Alternative, but the fishery as a whole would still add approximately \$6.3 million less to the economy over the 5-year analysis period than under the Pre-Aquarium Collection Ban Alternative, or \$1,250,611 less per year (on average). <i>The EIS should evaluate how much of this would be offset by an increase in populations of aquarium fish that are also caught for food, and by collectors changing to jobs catching food fish, doing boat and dive tours, working at public aquariums, and other employment.</i>	Your comment has been forwarded to the decision makers. As stated in the EIS, under the No Action Alternative, commercial aquarium fishers may no longer find it feasible to target aquarium fish and may begin to participate in other fisheries, but this is not possible to quantify at this time. There are no publicly available data that the Applicant is aware of indicating that catch of the White List Species as food fish would increase if commercial aquarium collection were halted.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.2.1.5 Limited Permit Issuance (Preferred) Alternative p. 87 <i>The analysis should factor in costs to collectors for boats, equipment, gas, insurance, maintenance, etc.</i>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 88 The Limited Permit Issuance (Preferred) Alternative would have a minimal, but beneficial direct impact on Hawai'i's overall and ocean socioeconomic resources... <i>Explain how removing fish from the ocean has beneficial direct impact on ocean socioeconomic resources.</i>	Your comment has been forwarded to the decision makers. As stated in the EIS, this would be through the addition of \$1.8 to \$3.7 million over the 5-year analysis period to the economy.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.2.2 Indirect Impacts p. 88 Indirect socioeconomic impacts of the commercial aquarium fishery would primarily involve the additional profits from the aquarium fish market (including freight and packaging), as well as other tourist businesses such as snorkel and dive operations that rely on seeing and interacting with a healthy reef ecosystem. The presence of a healthy reef ecosystem may also impact overall land/home values on the island of Hawai'i.	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i; however, available data do not suggest that the historical collection has impacted the tourism industry or land values in Hawai'i. Tourism has set new records, and the average sale price of homes has steadily increased. The impacts of collection on reef habitat is described in Section 5.4 of the EIS.

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			<i>Explain how removing beautiful fish helps snorkel and dive operations. Explain how taking herbivores off the reef makes the reef healthy. See comment re. "scientific data" in 5.2.2.1</i>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.2.2.1 No Action Alternative p. 88 ...approximately \$31 million in indirect economic benefits of this fishery would not occur over the 5-year analysis period... <i>See comment re. p. 87.</i>	Your comment has been forwarded to the decision makers. See response to previous comment.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 88 No scientific data exist to suggest that in the absence of aquarium fishers an increase in other tourist operations would occur. <i>The EIS does not rely on scientific data to make assumptions about tourist businesses in 5.2.2 (see above)</i>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 88 The loss of funding for reef fish conservation likely would impact the ability of the DAR to monitor and protect reef fish. <i>The DEIS does not explain how the No Action Alternative would lead to a loss of funding. What mechanisms are in place to currently to provide funding for monitoring and enforcement? How are reef fish protected currently? How much of this would be offset by the reduced need for monitoring with no collecting allowed in West Hawai'i?</i>	Your comment has been forwarded to the decision makers. This statement has been deleted from the FEIS.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.2.2.5 Limited Permit Issuance (Preferred) Alternative p. 91 The Limited Permit Issuance (Preferred) Alternative would have a less than significant impact on Hawai'i's tourist industry, and a minimal, but beneficial indirect impact on Hawai'i's overall economy through re-investment efforts in terms of equipment, maintenance, supplies, and personnel. <i>The DEIS does not explain how the Preferred Alternative would impact funding for equipment, maintenance, supplies, and personnel. What mechanisms are in place to currently to provide funding for monitoring and enforcement? How are reef fish protected currently?</i>	Your comment has been forwarded to the decision makers. The fishers would directly fund their own equipment, maintenance, supplies and personnel using income received from their collection activities, just as any business is run. The statement regarding the indirect funding of research and monitoring has been removed from the FEIS.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	P 125 of CIA Both Greg (Asner) and Gail confirmed fish population crashes at Pāpā Bay and have recorded collectors walking on and damaging coral, which they expressed is key to maintaining a healthy marine ecosystem. The group stated that they have seen aquarium collectors day after day collecting fish from the same areas and feels that this intensive harvesting does not give the fish and the ecosystem a chance to recuperate from previous biological removals. Greg believes that the destructive methods used by certain aquarium collectors are dismantling this integrated system. <i>Describe the economic impacts from reef degradation from loss of herbivores and collectors damaging coral.</i>	Your comment has been forwarded to the decision makers. It is acknowledged that herbivore conservation is important; however, please note that the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.

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Commenter	State/ Location	Date Received	Comment	Response
				<p>Breaking or damaging coral will remain illegal under state law (HAR 13-95-70 and HAR 13-95-71) under any of the alternatives under consideration.</p>
<p>Sierra Club, Hawai'i Island Group</p>	<p>HI</p>	<p>1/7/2020</p>	<p>5.3 CULTURAL RESOURCES 5.3.1 Direct and Indirect Impacts p. 92 As concluded in the CIA, cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts. P115 of CIA The Kailapa Community members and those from the Kohala Estates spoke openly against the collection of reef fish to supply the aquarium industry. Many stated that the practice of catching fish without intending to consume it goes against traditional belief and that this act is not pono (proper, morally fitting, beneficial). They expressed that all fish are part of the public trust and that removing fish to supply a "lucrative" industry undermines traditional practices and beliefs associated with the ocean. They urged people to view fish in their natural environment where their colors are bright and brilliant. Several community members expressed concern for the high mortality rates of aquarium fish. They believe that removing any part of the ecosystem alters the natural balance and that removing small fish disrupts the natural food chain. <i>Even if collecting does not cause a decline, cultural impacts occur because of aquarium industry practices and attitudes towards natural resources. Removing beautiful fish that consume algae threatens coral reefs that support many forms of aquatic life and protect the islands from storms...inflicting suffering for the animals and the people that love them for the convenience of the industry (fizzing, finning, starving, confining in tiny bags).</i> <i>Missing from the DEIS is an analysis of species are considered 'Aumakua (family guardians) the Native Hawaiian religious significance of each and every species collected must also be included in the EIS analysis and impact statement.</i> <i>Missing from the DEIS is graphical and other analysis of the socio-economic impact on native Hawaiian communities with high incidence of commercial aquarium trade and trafficking in their area, nor is there an Ahupua'a or place-based analysis. For example, and analysis of the impact this industry has on traditional Hawaiian communities such as Miloli'i.</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>A Cultural Impact Assessment was completed that includes a detailed analysis of cultural effects, and the complete report is provided in Appendix A of the EIS. The EIS summarized the conclusion of the CIA with regard to the impact of aquarium fishing. The rest of the cultural analysis is disclosed in Appendix A.</p>

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Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>5.3.3 Mitigation Significant cumulative [cultural resource] impacts are anticipated; however, commercial aquarium collection is a less than significant factor in the cumulative impact. Therefore, no mitigation is required or proposed. <i>This statement is not substantiated, and every incremental impact is additive to cumulative impact. See comments re. pp. 16 – 17.</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As concluded in the CIA, a significant cultural impact would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.</p> <p>As detailed in Section 5.4 of the EIS, populations of the White List Species are not anticipated to significantly decline under any of the five alternatives under consideration. Therefore, direct and indirect impacts to cultural resources as a result of commercial aquarium collection under any of the five alternatives under consideration would be less than significant.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>p 134 Several White List and non-White List Species are endemic to the Hawaiian Archipelago (including Johnston Atoll) and therefore may be impacted when faced with changes in climate over time (e.g., warming temperatures, habitat loss due coral bleaching, etc.). The extent and severity of impacts to White List Species from climate change have been ongoing for decades and are expected to increase in the foreseeable future. If environmental fluctuations resulting from climate change (e.g., tropical storms, coral bleaching episodes, acidification, etc.), or other natural or human factors, change habitat conditions, fishing mortality may present a higher risk to some White List and non-White List Species and SGCN." <i>Cumulative impact is, by definition, caused by numerous factors; if the impact of climate change affects reef and fish mortality, then mitigation of fish mortality through collection and removal from the reef must be proposed and required.</i></p>	<p>Your comment has been forwarded to the decision makers.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>5.4 BIOLOGICAL RESOURCES 5.4.1 Direct Impacts p. 94 According to data presented in DAR (2019a), the number of collected fish in the WHRFMA has increased by 29% between 2000 and 2017, growing from a collection of 252,290 in 2000 to a collection of 324,565 in 2017 (DAR 2019a)8, representing an annual growth rate of 1.49%9. <i>Informants to the Cultural Impact Assessment (CIA) reported significant reductions in fish traditionally used for subsistence. P102 of CIA Throughout the early part of the 20th century, the participation of Japanese in Hawai'i's commercial fishing continued to increase, while Kānaka Maoli participation gradually waned (Glazier 2007). As the commercial fishing industry continually expanded to meet the demands of the growing consumer population in the islands,</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

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			<p>the fish and other marine resources became more scarce. With the shift to a market economy and a commercial fishery these marine resources were valued mostly for their economic potential, and little to no regard was paid to the myriad of traditional values and more that emphasized the spiritual, cultural, familial, and ecological importance of the fish and other marine species. Maly and Maly (2003:ix) contend that “this trend has continued through the present-day and fostered the decline in health and well-being of the broad range and diversity of Hawaiian fisheries.”</p>	
<p>Sierra Club, Hawai'i Island Group</p>	<p>HI</p>	<p>1/7/2020</p>	<p>5.4.1.1 No Action Alternative p. 95 <i>Explain why it is not harmful to remove herbivorous aquarium fish, even though DLNR recently urged fishers to refrain from taking herbivorous food fish.</i> <i>“Avoid fishing for parrotfish, surgeonfish, and other herbivores.” coral_card.pdf dated November 2019</i> <i>Consider impacts on larger predator fish, commonly of high-value, when prey fish numbers are reduced by collecting.</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>
<p>Sierra Club, Hawai'i Island Group</p>	<p>HI</p>	<p>1/7/2020</p>	<p>5.4.1.5 Limited Permit Issuance (Preferred) Alternative p. 124 The 14 fishers requesting Aquarium Permits collected up to a maximum of 293,845 fish in the WHRFMA in a single year during the period from 2000-2017 (see Table 5-2). Conservatively assuming collection in the first year of the 5-year analysis period started at this maximum, and then grew at 1.49% per year, a total of 1,513,665 fish would be collected over the 5-year analysis period, or an average of 302,733 per year. Impacts to individual species in the WHRFMA are shown in Table 5-11, using both the average and maximum number of each of the White List Species collected in the WHRFMA by the 14 fishers annually between 2000 and 2017, and what percent of the CREP population estimates those values represent. The impacts on individual species' populations is less than 2% for all species when looking at average collection rates, and less than 3% when looking at maximum rates. <i>As noted in Tables 4-1 and 4-2, permittees failed to report catches 47% of the time.</i> <i>Instead of only using averages, state what would happen for each species in the 5th year--how many fish would be collected at maximum rates, what percentage of the population would be collected, and whether this appears sustainable. How would the 5 year analysis be conducted?</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS in Section 5.2.1, to avoid duplicate fish catch reporting, only a principal diver is required to report the catch and effort for the dive team (DAR, pers. comm., 2018). This process ensures that reported catch data are not duplicated in the State's system. However, this reporting mechanism can lead to confusion by outside observers, as the total number of permit holders is higher than the number of permit holders reporting data (Table 4-1), giving the appearance of under reporting.</p> <p>Maximum annual collection rates are used in the analysis on populations provided in Section 5.5.1.</p>

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Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 124 ...the bag limit for Achilles Tang would be implemented... <i>See comments re. Table 4-5, p. 74. The statement regarding impacts to individual species populations does not seem to correlate with the data presented.</i>	Your comment has been forwarded to the decision makers. See response to previous comment.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.4.2 Indirect Effects 5.4.2.1 No Action Alternative p. 125 ...data do not exist that would allow for a thorough analysis of such effects ... <i>Interviews should be done with people who frequent specific areas to help research changes in abundance of fish in these areas.</i>	Your comment has been forwarded to the decision makers. The EIS uses the best available science, including information on population trends within Open Areas and MPAs. Given that the No Action Alternative is a closure of the WHRFMA to commercial aquarium collection, the only data which would be relevant would be trend data since the October 2017 closure.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.4.2.5 Limited Permit Issuance (Preferred) Alternative p. 127 It is anticipated that collection of approximately 1.5 million fish would occur in the WHRFMA... <i>For all numbers in this section—do they cover one year, or the 5-year analysis period?</i>	Your comment has been forwarded to the decision makers. The 1.5 million value is based on the cumulative total over five years, as explained in the direct effects section in 5.4.1.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.4.3 Cumulative Impacts 5.4.3.1 Recreational Aquarium Fish Collection p. 128 The DAR collected recreational aquarium fish catch information from 1975 until 1985, after which, data collection was discontinued, and currently no reporting of catch is required for recreational aquarium permit holders. Historic recreational catch data were not digitized or processed into a database, and therefore, are not available for analysis (DAR 2018a). <i>Can DLNR do adequate enforcement without the ability to collect and store data?</i>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 129 ...studies conducted by Tissot and Hallacher (2003) found that aquarium collecting had no significant impact (beneficial nor detrimental) on reef habitat. In addition, 15 years of coral reef data collected and analyzed by the DAR (2018b) found no significant difference in coral cover in areas open to commercial aquarium fish collection. <i>Photo documentation and careful observation by community members indicate that coral damage is occurring regularly on the reef. More collecting photos at: https://www.atdarock.photography/Big-Island-Aquarium-collecting</i>	Your comment has been forwarded to the decision makers. Tissot and Hallacher (2003) statistically analyzed coral in areas open to collection versus areas closed to collection for signs of damage, and did not find a difference.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.4.3.2 Non-Aquarium Commercial and Non-Commercial Fishing (Non-Aquarium Fish) p. 130 ...unlike the aquarium fishery which targets mostly immature fish, the	Your comment has been forwarded to the decision makers.

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			commercial and recreational fisheries selectively target the larger breeding portion of the population which has profound implications for the sustainable usage of the resource (DAR 2019a). <i>Little fish taken by collectors cannot grow up to become the big fish sought by fishers. The ideal time to take fish sustainably may vary among species. With this in mind, review studies analyzing the impacts of taking each of the species collected in West Hawai'i at various points in their life cycle.</i>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 130 ...on the island of Hawai'i, commercial aquarium fish collection constitutes 25% of the total catch and 11% of the biomass (when excluding Yellow Tang...) <i>For West Hawai'i, how many fish, and how many pounds of fish, are taken on average per year, based on the last five years, by</i> <ul style="list-style-type: none"> • One commercial aquarium collector • One commercial non-aquarium fisher • One recreational non-aquarium fisher 	Your comment has been forwarded to the decision makers. The Applicant does not have all this data. Average collection of commercial aquarium collectors is included in the EIS.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.4.3.5 Climate Change p. 134 The extent and severity of impacts to White List Species from climate change have been ongoing for decades and are expected to increase in the foreseeable future. If environmental fluctuations resulting from climate change (e.g., tropical storms, coral bleaching episodes, acidification, etc.), or other natural or human factors, change habitat conditions, fishing mortality may present a higher risk to some White List and non-White List Species and SGCN. <i>Cite evidence that climate change will NOT put White List species at risk by changing habitat conditions.</i> <i>This DEIS is significantly deficient regarding impacts of climate change in coral systems and reef wildlife, as well as climate change impacts on run off, water diversion for development or and impacts when added to pollution and contamination for all run off sources; including golf courses, hotels, housing development and other projects that contribute to the destruction and or contamination of the reef and near shore eco-systems. All of these perturbations will have a cumulative impact on coral reef habitat and fish populations.</i>	Your comment has been forwarded to the decision makers. The EIS does not state that climate change will not impact these species, in fact, the EIS specifically says that impacts are expected to increase in the future. Furthermore, the EIS does not claim that climate change impacts, when combined with other cumulative impacts and the Preferred Alternative, will be less than significant. The EIS does say the following: "When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species. However, the Preferred Alternative is not a significant contributor to the cumulative effect upon the environment. " Collection under the Preferred Alternative is less than 2% of any population of White List Species .
Sierra Club, Hawai'i Island Group	HI	1/7/2020	5.4.3.6 Cumulative Impact Conclusion pp. 134 - 135 The DAR (2019a) has noted significantly declining populations in one or more of the management areas for 12 of the White List Species, and cumulatively, all of the factors discussed above likely contribute to the declines...while commercial aquarium collection does contribute to the cumulative impact, it is a less than significant factor in the observed declines.	Your comment has been forwarded to the decision makers. The concept of "unlimited" collection is speculative and not reasonably foreseeable. Analyzing extreme possibilities is not helpful (and not what the law requires). The law requires an assessment of the "expected consequences" of a proposed action. The Preferred Alternative in the FEIS limits the number of permits to be issued to 10 permits, and limits the permits to the WHRFMA. The FEIS uses the

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			<p><i>Since aquarium fish are only used for pleasure, relaxation and entertainment, not for food, and the economic benefits of aquarium collecting amount to less than 0.01% of the economic benefits of commercial marine activities, why add to the impacts?</i></p> <p><i>The DEIS fails to adequately address the interviews/testimony of Hawaiians and therefore dismisses the wisdom and observations of the culture. The DEIS claims there will be no significant loss of fish numbers with unlimited catch. Baseline should be before trade began, not 2018. Why should Hawaiians be denied the abundance their grandparents experienced? This is continued discrimination against indigenous people in order to profit from marine resources, and is evidence of a Western colonial mindset, and does not address social justice.</i></p>	<p>best available data (past commercial aquarium collection) to predict the reasonable outcome of issuance of permits for five additional years, and applies a reasonably foreseeable increase in collection each year of the analysis period.</p> <p>The Proposed Action is issuance of 10 Aquarium Permits within the WHRFMA. Within the WHRFMA, unlimited collection is not feasible for the following reasons: (1) Only the 40 White List Species may be collected by commercial aquarium fishers. No commercial aquarium collection of other fish species or invertebrates is allowed within the WHRFMA. (2) No commercial aquarium collection is allowed within the FRAs and MPAs (see Figure 1 of the EIS). Collection is only allowed within Open Areas, which are not a closed population. (3) The level of effort to collect all individuals of the 40 White List Species from the Open Areas is not reasonable, as collection by the 10 fishers who would receive Aquarium Permits under the Preferred Alternative would need to increase by 240% to 1,718,200% (depending on species) over the historic maximum collection that has occurred when the fishery was open to all collectors in order to take 100% of the Open Area population.</p> <p>The proposed action in the EIS is the issuance of 10 aquarium permits in the WHRFMA. Therefore, the proper baseline that reflects pre-project environmental conditions (i.e., conditions prior to issuance of the 10 permits) and is spatially relevant is harvest data and population data for the past 20 years since the creation of the FRAs and MPAs and bag limits along with the most recent population estimates available for these fish (2016 CREP population estimates and 2017/2018 WHAP population estimates).</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>5.5 SUMMARY OF IMPACTS Table 5-13. Summary of direct and indirect impacts by alternative over the 5-year analysis period. p. 136 Limited Permit Issuance (Preferred)...Collection of 1.5 million White List Species fish from the WHRFMA <i>How would the removal of 1.5 million juvenile eherbivorous fish from the ecosystem result in no loss of abundance?</i></p>	<p>Your comment has been forwarded to the decision makers.</p> <p>Since collection under the Preferred Alternative would collect less than 2% of any White List Species population, which is below the lower end of the 5% to 25% sustainable threshold, removal of these individuals is not anticipated to cause population declines.</p>
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>5.6 EVALUATION OF HEPA SIGNIFICANCE CRITERIA Significance Criteria #1: The Preferred Alternative (i.e., Limited Permit Issuance Alternative) does not involve an irrevocable commitment or loss or destruction of any natural or cultural resource. Reef Habitat p. 139 ...the DAR (2019a) reported that herbivore biomass has not changed</p>	<p>Your comment has been forwarded to the decision makers.</p>

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			<p>since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time . <i>The use of an improper baseline, the minimization of potential collection rates under the proposed alternatives, and an expanded area to which the impacts would apply provide inaccurate and unverifiable data from which to make proposed actions and mitigations.</i></p>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p><i>Paul Cox took this photo of two aquarium fish collectors right out front of the Miloli'i subdivision in Papa Bay, South Kona March 18, 2014. The primary targeted fish are the juvenile fish that use the finger coral as protection from predation. By the way, finger coral (Porites Compressa) is endemic to Hawaii, found nowhere else in the world. The collectors set a fine mesh net in the shape of a V onto the coral. He has seen anywhere from 15' to 200' of net for this process. As you can see in this photo the net is acting as a wall due to the floats on its upper ridge, what you don't see is the net it is anchored to the reef with an equal amount of lead sinkers. Some collectors do not use lead instead they tie or pin the net to the reef. The next step is to herd the fish from out of their sanctuary that is in the depths of the finger corals towards the apex of the V in the net. This is accomplished by the use of the white sticks that you can see lying under the collector's feet. The sticks are poked into the corals aggressively as the collectors push and crawl on the coral themselves. The idea is to make this fish sanctuary a place for the fright-or-flight response. Why don't the fish just swim over the top of the net? these little guys have a hard time ascending rapidly due to their internal air bladders (the fish do use buoyancy control). The collectors do not use a buoyancy control vest, to keep themselves negatively buoyant which helps to stabilize themselves onto the reef itself while they work.</i></p>	Your comment has been forwarded to the decision makers.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>P 141 Significance Criteria #4 The Preferred Alternative does not substantially affect the economic welfare, social welfare, and cultural practices of the community or State... <i>MLG Sierra Club members have supported the Hawaii County Council resolution passed in 2008 to asking for a ban on the aquarium trade. We have been active since leading West coast hikes, snorkeling and kayak outings, and talking to residents about fish numbers. We had</i></p>	Your comment has been forwarded to the decision makers.

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			<p>successful program "Where have all the Fishes Gone?" with attendance over 70. Speakers included Mike Nakachi, legislator Rep. Nicole Lowen, and Paul Cox. Members and leaders report seeing more reef fish on the West side decades ago.</p> <p>Members met with several Pebble Beach residents who reported more fish since Ka'ohē bay protected after prolonged fight. Some are divers and photographers. A small kayaking group going south from pebble beach about 2003 remarked how few fish could be seen under water. A friend, local to the area, said angrily that they were being taken by AQ collectors. This was during the time Pebble Beach community was fighting to stop collection in their area. They did get some protection but only about 1,000' right in front of their bay. They asked for 1 mile or so.</p> <p>We met with Kaimi Kaupiko in Miloli'i who is from subsistence fishing family. They oppose the trade and succeeded in getting the area designated FRA. They are teaching keiki cultural practices. A few were in the trade but they are trying to work that out. The culture is corrupted by money system but they want to preserve culture. I see mention of community involvement in DEIS but not since 1999. We also have met with Paul Cox, underwater photographer who presented at the program with photographs of many instances of violations of collectors damaging reef, unmarked buckets and equipment and using illegal nets as they walk on coral and rocks. We snorkeled with him at Papa Bay. He has made complaints that were ignored by DLNR or summarily dismissed.</p> <p>Democratic Party resolution drafted on 4/5/2018 states "The taking of reef wildlife purely for commercial purposes cannot be reconciled with the 'precautionary principle' nor the 'hierarchy of priorities' policy guidelines of Hawai'i State Department of Land and Natural Resources". They also affirm the resolution based on Public Trust doctrine as stated in Article XI, Section I of constitution. Furthermore "the Democratic Party calls for State legislation to end commercial harvesting of coral reef wildlife".</p> <p>The DEIS fails to address the concerns of the communities that are impacted by the actions of the aquarium collectors.</p>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<p>p. 142 Significance Criteria #8: The Preferred Alternative does not involve a commitment for larger actions. When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species...commercial aquarium collection does contribute to the</p>	Your comment has been forwarded to the decision makers.

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			cumulative impact... <i>See comment re. pp. 134 – 135.</i>	
Sierra Club, Hawai'i Island Group	HI	1/7/2020	p. 143 Significance Criteria #9 The Preferred Alternative does not affect threatened or endangered species or their habitats nor does it have a significant impact on rare species. p. 77 The Psychedelic Wrasse, Tinker's Butterflyfish, and Fisher's Angelfish are all listed as SGCN in Hawai'i...Adequate population estimates based on WHAP data (30-60 feet depth) are not available to assess the impact of continued aquarium collection on these three species due to their deeper water habitats. However, based on deep diver observations, Tinker's Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs). Commercial aquarium fishers generally do not fish in the deeper waters in which these species occur. In 2017, there were 599 Psychedelic Wrasse, approximately 290 Tinker's Butterflyfish (n.d. in East Hawai'i), and 288 Fisher's Angelfish collected by aquarium fishers on the island of Hawai'i <i>See comments re. 4.4.3. Since two of the species seem to thrive when protected, they should not be collected.</i>	Your comment has been forwarded to the decision makers. See responses to previous comments.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	P 143 No significant adverse effects would occur as a result of the Preferred Alternative. Therefore, mitigation for impacts is not warranted and no mitigation measures would be implemented. <i>The document states, "The Preferred Alternative does not substantially affect the economy but plays an important role as a nearshore fishery in the state." What role? We maintain the role is largely negative as evidenced by the history of conflicts, dissension and general retreat of the trade throughout the state.</i> <i>Elsewhere it states, "No scientific data exist to suggest that in the absence of aquarium fishers an increase in other tourist operations would occur." We say, although you can't prove a negative, the outspoken claims and concerns of recreational competitors such as Snorkel Bob would certainly beg to differ! And the disappointment registered by recreational users we regularly interact with on our Sierra Club snorkel outings is something we have noted as well.</i>	Your comment has been forwarded to the decision makers. The EIS acknowledges the importance of tourism in Hawai'i; however, available data do not suggest that the historical collection has impacted the tourism industry or land values in Hawai'i. Tourism has set new records, and the average sale price of homes has steadily increased. The impacts of collection on reef habitat is described in Section 5.4 of the EIS.
Sierra Club, Hawai'i Island Group	HI	1/7/2020	<i>Sierra Club Conclusion: Under the No Action Alternative issuance of Aquarium Permits would not occur and commercial aquarium fishing would not be permitted in the WHRFMA. Therefore, collection of all White List Species in the WHRFMA would be zero and reef habitat would not be affected.</i> <i>In the WHRFMA, where no fish would be collected, a minor, although</i>	Your comment has been forwarded to the decision makers.

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			<p><i>unquantifiable, increase in number of White List Species, non-White List Species, and SGCN may occur over the 5-year analysis period, which may provide additional viewing opportunities for tourists, an increase in the prey base, additional individual herbivores to maintain the reef, and increased competition between species for available resources."</i></p> <p><i>Our constituency finds the 'No Action Alternative' to be logically and integrally the most compelling. This is clearly the superior plan! We urge decision making authorities to adopt this alternative. Thank you for the opportunity to comment.</i></p>	
Steve Moore	HI	1/7/2020	<p>Please just say no to the aquarium trade. All the critters on the planet are under enough duress due to the myopic vision of our species. There is no need to add insult to injury.</p>	Your comment has been forwarded to the decision makers.
Sulara James	HI	1/6/2020	The aquarium trade is devastating our sea life! Please end it now!	Your comment has been forwarded to the decision makers.
Susan Douglas	HI	1/6/2020	The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue!	Your comment has been forwarded to the decision makers.
Susan Stoll	N/A	1/6/2020	<p>Please work to protect the fish that swim in the water that surrounds your islands. Your tourist trade depends on maintaining the natural beauty of your unique environment.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Susie Cysewski	HI	12/9/2019	<p>I have been out of town a couple weeks, but see in the newspaper articles suggesting you are considering lifting a ban to allow commercial collection of Yellow Tang. I am completely against this! Fourteen collectors will deplete our yellow tang population in no time. DO NOT allow collection of our Yellow Tang. Leave them where they live. They are a beautiful part of Hawaii ecosystem and we need to preserve this treasure for future generations.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2019a) stated that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. Additionally, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p>

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Susie Jenkins	N/A	1/7/2020	<p>I've lived in Kona since 1970 off and on - on the beach & there used to be so many fish near the shore it looked golden. Please do not issue any more permits. The bad guys still do it illegally & who is check the permitted fish when they come in. We could see them from our house.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>An analysis of the cumulative impact of poaching and underreporting has been added to the FEIS.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>
Suzanne Lahl	HI	1/5/2020	<p>Extinction is forever—it's that simple. It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade. Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting. The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood. But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists. PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The EIS was prepared using the best available science. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p> <p>PIJAC respectfully disagrees with the characterization of its organization and membership. PIJAC's Mission is to represent the experience and expertise of the responsible pet care community to legislative, regulatory, and governing bodies in order PROMOTE animal well-being and responsible pet ownership; FOSTER environmental stewardship; and ENSURE the availability of healthy pets. For more information on PIJAC, please see https://pijac.org/</p>

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			retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal. I implore you to do the right thing.	
Tanya T. Power	HI	1/7/2020	I am writing to let you know that I do NOT support the continued aquarium fishing on the Big Island. The Kona Coast from my childhood was called the "Gold Coast" because of all the beautiful yellow tangs that were in the waves. We missed them for years. And recently over the past year or so, they are beginning to return. It is such a treat. Please do not allow the aquarium fishing to start again on the Big Island!	Your comment has been forwarded to the decision makers.
Tina Jensen	HI	1/8/2020	I am a resident of the Big Island since 2003. I am writing to oppose issuing permits to collect Hawaiian reef fish. Our reefs in Hawaii have never been under more stress and need every single herbivore to help maintain their health. We need these reef fish to keep not only sustainable fishing but tourism. Long ago I was an avid aquarist. Then I learned how fish were collected and how unlikely they were to survive. We have a moral responsibility to preserve what we have. Aquarium collecting is not helping the island.	<p>Your comment has been forwarded to the decision makers.</p> <p>It is acknowledged that herbivore conservation is important; however, please note that as stated in the EIS the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). These trends occurred even with the pressure of commercial aquarium collection, which was occurring over the same time period.</p> <p>The EIS acknowledges the importance of tourism in Hawai'i and that Hawai'i tourism industry achieved new records in total visitor spending and visitor arrivals in 2017, marking the sixth consecutive year of record growth in both categories. Total spending by visitors to the Hawaiian Islands increased 5.6% to a new high of \$16.81 billion (HTA 2018). This occurred in the presence of commercial aquarium collection.</p>
Todd Naidl	N/A	1/6/2020	Please take care of our fish! The fish need to be taken care of and insure propagation. I don't believe fish should be taken out of our waters for an aquarium. Please help!	Your comment has been forwarded to the decision makers.
Traci Blezek	N/A	11/25/2019	Please do not go through with this. The area is already struggling r/t the increased warm of the ocean water. Do not allow permits for commercial aquarium fishing. We enjoy snorkeling and seeing all the fish, there, in their natural environment. There are no benefits to the ecosystem in this.	Your comment has been forwarded to the decision makers.
Valerie Weiss	HI	12/2/2019	I write requesting we deny marine aquarium fishing in our state until our reefs stabilize from the effects of overfishing and a warming ocean. With more coral bleaching than in the past, we are in dire need of our reef fish to help rehabilitate our reefs and keep our coral healthy.	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between</p>

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			Taking the fish for the aquarium trade helps deplete our stocks and leaves less fish for us all to enjoy including our many visitors who enjoy snorkeling and seeing the fish we have remaining. Let's not sell our natural environment out for the gain of a few, when our reefs and the reef fish belong to us all.	1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
Veda Stram	WA	1/6/2020	Please do not hesitate to use everything at your disposal to save the wild/native FISHES in your waters. Your constituents will appreciate your positive efforts on this. And your constituents will remember if you fail to use your office to save the fishes.	Your comment has been forwarded to the decision makers.
Vera Deryabina	N/A	1/6/2020	My name is Vera Deryabina. I work in a seafood industry in Alaska, and often visit Big Island for a vacation. I have been in love with the island since my first visit and have been lucky to be a part of such a breathtaking, unique and beautiful place that is clean and full of life which is so rare nowadays. I have met many people who call the Big Island their home and witnessed how they care for their island, its wild life and its nature. Working in seafood industry showed me how fishing can be harmful for the environment and how much Alaska has been suffering from it. The decline in many species has been so massive that the state had to close multiple fisheries - crab, herring, salmon, cod and other white fish. The ocean sustainability is in danger. The only thing that keeps Alaskan salmon runs is hatchery program. And we've seen a huge decline in the run of wild fish. Please, don't let it happen to Hawaii. It's one of the not many places in the world that is treasured by their residents and people from all over the world who admire it. Please, consider not issuing these fishing permits.	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
William Bennett	HI	1/6/2020	I have seen the number of reef fish decline drastically since 1975, when I first started snorkeling here. Please stop that practice now!	Your comment has been forwarded to the decision makers. While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.
William Graham	HI	1/2/2020	This draft EIS is clearly intended to assess the environmental impacts of resuming the aquarium fishery business in West Hawaii using fine	Your comment has been forwarded to the decision makers.

Comments and Applicant Responses to All Other Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
			mesh nets. The applicant is not a fisherman but a mainland based trade industry group. The DEIS describes its scope in this manner: "Regarding biological resources, this DEIS focuses primarily on the effects of aquarium fishing on wild populations of White List species." That is understandable but the DEIS is extremely deficient when it comes to looking at anything beyond those particular populations. The bulk of my comments will speak specifically to this deficiency.	
William Graham	HI	1/2/2020	We also need to better understand the aquarium fishing permitting rules in order to evaluate the reasonableness of future oriented assumptions employed in the DEIS. In particular, the permitting rules appear silent on issues of scale that seem very important. Must the permittee be an individual or could it be a corporation? May the permittee employ multiple boats for collecting the fish? Is there any limit on the number of divers that may deploy from a single collection boat? Above all, there is no present limit on the number of fish that can be taken with a single permit. I attach a copy of the aquarium fishing permit form used by the DLNR.	Your comment has been forwarded to the decision makers. Existing bag limits are described in Section 1.2.3.2 of the EIS. The Preferred Alternative includes a reduction in the Achilles Tang bag limit from 10 individuals per day to 5.
William Graham	HI	1/2/2020	Finally, the underlying structure behind this HRS 343 related program undertaken by the applicant is very confusing. This makes it difficult for myself and for the community to participate in a properly focused manner. The Pet Industry Joint Advisory Council was not initially applying for any permit. Rather, according to its environmental assessment, it was engaging in a "program" which is intended to facilitate the permitting process (for the apparent benefit of itself and others.) The activity of the Pet Industry group within this program was ostensibly to prepare this EIS. Was there a discretionary approval being sought? However the draft EIS now takes a different stance, and the discretionary approval sought is for "Commercial Aquarium Fishing Permits." That is a very consequential change. It would seem that the Pet Industry group now plans further actions beyond this EIS? Any forthcoming EIS or revised DEIS must prominently explain these matters in a thorough manner.	Your comment has been forwarded to the decision makers. The Proposed Action has changed between the EA and EIS process, and comments received during the EA process were taken into account, including a new Preferred Alternative with a limited permit issuance. PIJAC proposes the issuance of 10 Aquarium Permits, along with other required authorizations (CMLs and WHFMP permits), subject to the limitations described in the EIS. Any addition Aquarium Fishing permits beyond the proposed 10 permits would require further analysis under HEPA. See Section 3.0 of the FEIS for a description of the proposed action.
William Graham	HI	1/2/2020	My best guess is that the PIJAC recruited these 14 individuals to add on the ground substance to its decision to fund an EIS so that the aquarium trade worldwide could benefit. The 14 agreed provided that they remain anonymous. Of course I cannot substantiate this guess. But it surely fits the process we now see, which is a mess.	Your comment has been forwarded to the decision makers.
William Graham	HI	1/2/2020	1. Impacts on our coral reefs Today the primary ocean related concern in Hawaii should be the survival of our coral reefs. It is well-known that the ongoing and increasing threat is the warming and rising acidity of the oceans. Therefore coral survival is a worldwide problem but it's especially acute here in Hawaii where we depend so much on our ocean environment. When we discuss the populations of the inshore fishes	Your comment has been forwarded to the decision makers. As stated in the EIS, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in

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Commenter	State/ Location	Date Received	Comment	Response
			<p>our focus must turn to their role in maintaining the health of our coral reefs. The DEIS tells us that the overwhelming majority of aquarium fish collection in Hawaii has been of fishes in the surgeon fish family, about 90% of the total take. We know that these fish are herbivores which graze on algae. And without sufficient grazing, algae will overtake coral colonies that have been killed or weakened by adverse ocean conditions. This unwelcome algae growth then eliminates the chance for coral polyps to recover or repopulate when ocean conditions improve. Plus, once getting a foothold in one location, algae and seaweeds tend to spread. The bottom line is that we must do whatever we can to maintain strong populations of all the herbivores on our reefs. How can removing large numbers of surgeonfish align with that goal? The DEIS must address this squarely.</p>	<p>herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p>
William Graham	HI	1/2/2020	<p>It is certainly not my conjecture that without aquarium fish collection the reefs would be able to maintain good health in the future. But the additional negative impact stemming from aquarium fish collecting will accelerate the loss of healthy reef. This is common sense reasoning. The Draft EIS presents no forward looking analysis of future reef health or herbivore populations. The herbivore populations will in turn be impacted by the prevailing condition of the reefs. Here is part of the DEIS response when the Humane Society asks for a more lengthy look into future effects: "While it is correct that individuals are removed from the population annually, it is also true that new individuals are added during that period, and therefore it is not certain that losses will accumulate over time." That is hardly reassuring. The DLNR needs to be certain that losses will NOT accumulate. The DEIS keeps its focus on population levels, whereas EIS law requires reporting on indirect and cumulative impacts, such as the coral reefs where the fish reside.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time.</p> <p>The DAR (2019a) has noted that 24 of the 40 White List Species have remained stable or significantly increased between 1999 and 2017, when commercial aquarium collection was occurring at the rates anticipated under the Pre-Aquarium Collection Ban Alternative. For the 12 White List Species which had significant declines, as noted in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.</p> <p>Finally, indirect effects and cumulative effects (including the cumulative impacts of commercial aquarium collection, or accumulation of impacts over time) are both addressed in Section 5.0 of the EIS. In addition, the EIS applied a growth rate for socioeconomic and biological consequences based on historic trends.</p>
William Graham	HI	1/2/2020	<p>Prior to the massive 2015 bleaching event our most notable coral reef bleaching had occurred back in 1998. That was the time when the</p>	<p>Your comment has been forwarded to the decision makers.</p>

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Commenter	State/ Location	Date Received	Comment	Response
			<p>world truly became aware of the fragility of the coral reef ecosystem. More recently during the latter half of 2015, and again during September and October of 2019 we have sustained major damage to our reefs here in Hawaii. The draft EIS only briefly mentions this situation and does not address it in any depth. Addressed on pages 116-117 it simply states that overall mean coral cover in West Hawaii declined 19.6% in closed areas and 17.6% in the open areas between 2014 and 2016. On page 133 the draft EIS indicates that after the bleaching event of 2015 there was an average coral cover loss of 49.7% in the leeward reefs of Hawaii Island. I won't try to reconcile the divergent numbers offered, but the magnitude of the problem is most apparent. Since the 2019 bleaching is too recent to be reflected in the DEIS I refer readers to the website hawaiiicoral.org to visualize the magnitude of this most recent setback.</p>	<p>The difference in the numbers in the EIS is because these are two separate studies, looking at different reefs. Therefore, the numbers are not directly comparable.</p> <p>As stated in the EIS, the DAR (2018c) has statistically evaluated coral cover over time between Open Areas and areas closed to commercial aquarium collection, but has not found any statistically significant difference.</p>
William Graham	HI	1/2/2020	<p>It is commonly acknowledged within the research community and the general public that coral bleaching events will occur more frequently in the future, and with increasingly stressful water conditions. The impact of aquarium fishing on future reef health must be examined in full. A look at other reefs in other countries should also be included for developing a better understanding of forward looking prospects in Hawaii. On page 133 the DEIS does say that Great Barrier Reef studies conclude that fishing pressure had minimal effect on bleaching. First off there is very little fishing pressure on that reef which has lots of protections. Furthermore, any pressure specifically due to aquarium fishing would be next to nothing compared to the intensity of aquarium fishing that we have had in West Hawaii. For reading on impacts to the Great Barrier Reef I suggest Reef Life, chapter 13 by researcher Callum Roberts, published in 2019.</p> <p>I think it also should be acknowledged that numerous individuals have been involved for many years since 1998 in establishing and protecting the sizeable Fish Replenishment Areas in West Hawaii where aquarium fishing with fine mesh nets has been prohibited. This effort has been extremely valuable in my opinion. But we are now in a new era when the survivability of our coral reefs is clearly in dire jeopardy.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, the DAR (2018c) has statistically evaluated coral cover over time between Open Areas and areas closed to commercial aquarium collection, but has not found any statistically significant difference.</p>
William Graham	HI	1/2/2020	<p>2. From the ocean to the pet shop With its narrow focus on population levels the DEIS shows minimal attention to the fishing activity itself or the handling of the fish which follows. Others have brought attention to the direct effects of the collection process on the reef, coming from both the anchoring and the actions of the divers. I'd like to look at the effects on the fish while in the ocean and thereafter.</p> <p>To begin with, the most common fish collected is the yellow tang, and they run in tight schools of perhaps 20 to 40 fish as a rule. I dive and photograph in leeward North Kohala where yellow tang are still</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>By law invertebrates cannot be collected in the WHRFMA. Invertebrate collection in East Hawai'i is addressed in the EIS, but is not part of the proposed action (since it does not require an Aquarium Permit).</p>

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Commenter	State/ Location	Date Received	Comment	Response
			<p>common. Once I closely watched an aquarium collector doing his job on a school of yellow tang off Mahukona. I don't have any particular criticism of how he comported himself, he seemed careful to me. The boat anchored further offshore where it could find a sandy bottom. But I want to put attention on the fish and how things went for them. The DEIS on page 32 describes succinctly and accurately the usual process for collection in just three paragraphs. Much more information must be provided, including the collection methods used with species that do not readily school and also with any invertebrates that are collected. To that last point, is the collection of invertebrates so negligible as not to be included in the DEIS? Otherwise we expect to find data on the quantity and types of invertebrates collected along with the environmental consequences. I have no sense that there is a problem here, but it should be addressed in the DEIS.</p>	
William Graham	HI	1/2/2020	<p>Regarding the yellow tang collection which I witnessed, not all the fish in the school got trapped in the net. Some broke away and were free, and scattered. But not enough to form a new school, apparently. What happens to all those fish, who by nature want to be in a school? There were no other schools nearby to join and I have no idea if they would be accepted in a new school anyway. Are they out of luck, will they become easy prey? Or will little groups form and eventually join to make a new school? And how about those fish that were captured. The rules say that no more than 5 individuals longer than 4.5 inches can be taken in a single day. From my experience, only looking, I'd say adult yellow tang are generally maybe 6 inches long. And the schools do appear to contain fish that are of similar size. Does the collector make off-the-cuff judgments as to which to keep and which to release right away, due to size? Probably one develops a rather accurate eye with experience. Still I wonder about those that are perhaps too large. Do they get released after netted? Or do they arrive back at the boat and perhaps get released on the surface at that point? How do they fare thereafter? These are all issues that I think do not get addressed in the EIS. Specifically, is there loss of life of fish while in the collection activity that does not show up in any reporting?</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>As stated in the EIS, DAR (2019a) found that, since the FRAs were established, the population of Yellow Tang has increased 165% in the FRAs and 101% in the Open Areas (areas fished by commercial aquarium fishers), compared to 74% in the MPAs. Overall Yellow Tang abundance in the 30-60-foot depth range over the entire West Hawai'i coast had increased 150% (over 3.4 million fish) from 1999/2000 to 2017/2018 to a population of approximately 5.7 million fish. In addition, there were no significant differences in the abundance of adult Yellow Tang in open vs. closed areas in shallow water (10-20-foot depths). Total estimated coastwise population of adult Yellow Tang in this depth range was estimated to be >2.5 million individuals. West Hawai'i had a significantly greater percent change in Yellow Tang density within its planned networked MPAs (and Open Areas) as compared to two non-networked sites on Maui.</p> <p>In addition, a statement regarding incidental mortality has been added to the EIS, stating "it is acknowledged that, in addition to the number of fish collected, incidental mortality may occur in fish released. However, while there are no data available to analyze these impacts, it is assumed that the magnitude of these impacts would not change from what has historically been occurring, and thus these impacts are already accounted for in the analysis of population trend data."</p>
William Graham	HI	1/2/2020	<p>And then, how about the treatment of the fish once they arrive at the boat, come to the dock, go into storage, get prepared for shipping, get shipped. On page 16 in the scoping analysis the DEIS informs us: "Therefore, because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The impacts of post-collection mortality have been added to Section 5.4.2 of the EIS.</p>

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Commenter	State/ Location	Date Received	Comment	Response
			<p>are removed from the population." I would disagree, and I strongly believe the DEIS should not be so constrained. As evidence, consider state law in the matter of granting permits, HRS 188-31. Paragraph b reads: "Except as prohibited by law, the permits shall be issued only to persons who can satisfy the department that they possess facilities to and can maintain fish and other aquatic life alive and in reasonable health." Although the DLNR may not even be able to properly enforce this provision, clearly the welfare of the fish is important to the department. Furthermore, the Pet Industry Joint Advisory Council (which is the applicant) has expressed their Mission Statement on their website, pijac.org/who-we-are. The first mission is to "PROMOTE animal well-being and responsible pet ownership." In this DEIS, by choosing to neglect any consideration of the well-being of the animals caught, PIJAC doesn't conform to their professed mission.</p>	
William Graham	HI	1/2/2020	<p>3. Absence of meaningful alternatives My understanding is that the role of alternatives within the EIS process is one which pertains to possible courses of action by the applicant. Alternatives are not proposals for possible changes in agency rules, although they can be useful towards that end. I believe this is an accurate understanding. In the DEIS I found there to be no alternatives of any consequence under consideration. It is also notable that the DLNR chairperson explicitly called out this failure in her letter of July 26, 2018 to the OEQC. That letter was referring to the alternatives considered in the Environmental Assessment, and it specifically suggested three consequential alternatives that might be analyzed. None of those three alternatives are examined in this DEIS. A look at the subject matter of the 5 alternatives that are considered in the DEIS should reinforce my conclusion.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative in the EIS is actually based on one of the alternatives recommended by the DLNR, with a limited number of permits being issued.</p>
William Graham	HI	1/2/2020	<p>First, reducing the Achilles Tang daily take limit down from 10 to 5 is a very modest change to just one of the forty species open to aquarium fishers. A second minimal alteration would limit collection by permit to just the West Hawaii area, designated as WHRFMA. It is already understood that the WHRFMA is where most aquarium fishing now occurs and is the primary area of environmental concern. Probably this is where the 14 proposed permittees have fished in the past. So that potential offering is of minor importance. Finally, limiting requested permits to just 14 individuals is not representing an alternative, it's just the scope of action related to the current application. That plus the alternative of no action essentially completes the alternatives considered.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>The Preferred Alternative is limited to the WHRFMA. The Applicant has no control over the continued collection of aquarium fish using other methods in East Hawai'i.</p>
William Graham	HI	1/2/2020	<p>The applicant could easily present and evaluate meaningful alternatives that might lessen the environmental impact of the proposed issuance of permits to the 14 seeking to use fine mesh</p>	<p>Your comment has been forwarded to the decision makers.</p>

Comments and Applicant Responses to All Other Comments Received on the DEIS

Commenter	State/ Location	Date Received	Comment	Response
			<p>netting for fish collection. The applicants might agree to conditions like the following: A sizeable subset of the 40 species could be considered off limits to their collection activity. They could abide by a closed season of some duration. They could offer further cooperation to ensure accurate reporting of fishes collected as well as survival statistics. They could constrain themselves to annual limits on the total take of any one licensee. The presentation of such alternatives is not detrimental to the interests of the potential licensees, it merely looks more broadly before recommending the preferred alternative. This also gives the DLNR valuable information towards determining how it might handle its licensing task in the future.</p>	
William Graham	HI	1/2/2020	<p>Hawaii's EIS rules suggest the range of alternatives which are sought in a Draft EIS. Referring to 11-200-17, after citing the no action alternative the rule goes on to suggest: "Alternatives requiring actions of a significantly different nature which would provide similar benefits with different environmental impacts." I find the DEIS unacceptable since no significantly different alternatives for the proposed activities of the 14 are presented or evaluated.</p>	Your comment has been forwarded to the decision makers.
William Graham	HI	1/2/2020	<p>4. Underlying structure of this application It is important to keep in mind the process by which this DEIS has arisen. First Hawaii's court system ruled in early 2018 that current aquarium permits are invalid and new permit issuance must await a full study of the environmental impacts of collecting for aquariums. Obviously it is too expensive for a single fisherman to bankroll the preparation of an environmental impact statement. However, worldwide the aquarium industry is sizeable, with retailers and wholesalers and shippers all involved. So a trade group, the Pet Industry Joint Advisory Council located in Alexandria, Virginia has chosen to proceed with the environmental impact statement. Keeping things in perspective, it would be a net positive for Hawaii residents to get a comprehensive, fair minded environmental impact study of aquarium fishing and our reef life without spending taxpayer dollars. Let us hope that is forthcoming. However there are striking oddities involved in the current process. The draft EIS (DEIS) lists the Pet Industry Council as the applicant who has initiated the EIS process. But the "applicant" hasn't applied for any aquarium permits yet, although I believe that the DLNR is not currently accepting applications. It's not clear that the Council has officially applied for anything. But within this DEIS the Project Summary section reads: "Proposed Action: issuance of 14 Commercial Aquarium Permits" Note that HRS343-2 defines applicant thus: "Applicant means any person who, pursuant to statute, ordinance, or rule, officially requests approval for a proposed action." Clearly there is a mismatch here, the proposed action cited by the applicant is not</p>	<p>Your comment has been forwarded to the decision makers. PIJAC is the applicant who is officially requesting approval of the proposed action, which is issuance of 10 Aquarium Permits.</p>

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Commenter	State/ Location	Date Received	Comment	Response
			being officially requested by the applicant. Furthermore, this DEIS action is a big change from the original "program" as described in the EA of March 13, 2018 under the section entitled "Project Summary". These are not mere housekeeping issues. Perhaps the HRS 343 process should be restarted with a clearly defined action maintained throughout.	
William Graham	HI	1/2/2020	There are 14 specific individuals who form the basis for significant parts of the data cited in the DEIS. Yet those 14 individuals have not been identified publicly nor have they applied for new permits. The Humane Society asked the DEIS authors for identification of the 14 applicants by name and business name after the issuance of the Environmental Assessment. Here is the response they received: "Comment noted. The applicant information is provided in the DEIS." This is a clear example of how the irregular situation here has brought about unnecessary confusion. We should hear in a forthright manner why the 14 are not identified. I can imagine reasons why those individuals might not want to be publicly singled out and I can respect their decision. But the DEIS itself suffers without full disclosure. In fact the permit application form used by the DLNR specifically asks for the name of the applicant and much more. See attached AquariumPermit.pdf. Furthermore one finds that some of the data within the EIS is purportedly based upon the historical records of those 14 specific individuals. Examples would include tables 5.2 and 5.11 in the DEIS. Absent specific disclosure of the 14, why should the public have confidence in the accuracy of that data when commenting on the DEIS? No verification is possible.	Your comment has been forwarded to the decision makers.
William Graham	HI	1/2/2020	Also, the DEIS attempts to make use of the ambiguity that revolves around the 14 individuals and their role in the current application for which the DEIS has been prepared. On one hand, page 19 in section 3.5 Limited Permit Issuance (Preferred) Alternative, one reads: "Under the Limited Permit Issuance Alternative, the DLNR would issue Aquarium Permits to 14 aquarium fishers in the WHRFMA,"). Note that it does not say anything about any constraint on the DLNR from also issuing permits to other applicants. Then on page 135 in section 5.44, Mitigation, the second paragraph reads as follows: "Nevertheless, the Preferred Alternative includes mitigative measures (see section 5.0) such as a reduction in the number of Aquarium Permits that would be issued, ..." So here the ambiguity is clearly exposed. Nowhere is the DLNR asked to limit its overall issuance of permits to only 14, since that is clearly not the proper role for the applicant. (Why would these 14 qualify as preferred over others, anyway?) The EIS must either explain how their proposal constrains the DLNR from further issuance of permits or else discontinue using the 14 number as a valid alternative to unlimited issuance.	Your comment has been forwarded to the decision makers. The EIS is not an application for a permit. It is only disclosing the effects of issuing 10 permits. If additional fishers wish to apply for an Aquarium Permit beyond the 10 permits that would be issued under the Preferred Alternative they would need to complete their own HEPA review before additional permits could be issued. PIJAC would not act as an agent of the DLNR. Permits would still be issued by the DAR, PIJAC is simply requesting approval for the issuance of 10 Aquarium Permits.

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Commenter	State/ Location	Date Received	Comment	Response
			<p>With this EIS, if the PIJAC plans to get an approval of some nature which allows it to act as an agent of the DLNR insofar as issuing permits, that would be unusual. There is no indication that these 14 individuals are current applicants for permits. If this so-called application for 14 permits constrains the DLNR in any manner from deciding to whom it will choose to issue permits (such as to these 14) if and when the DLNR resumes issuance of permits, the public should be made aware of that right now, in this document.</p>	
William Leisk	HI	1/4/2020	<p>The Hawaii reef fish populations are in decline. Adding commercial net collection of those same fish is obviously bad policy. Aquarium fish collection is like selling the seed before planting.</p>	<p>Your comment has been forwarded to the decision makers.</p> <p>While the EIS acknowledges that reefs and reef fish face many threats, the DAR (2019a) concluded that 24 of the 36 White List Species with population trend data have remained stable or increased between 1999/2000 and 2017/2018, when commercial aquarium collection was occurring. For the 12 species that have had significant declines, this impact would occur under any of the alternatives, including the No Action Alternative, as the DAR (2019a) has noted that these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline.</p>

From: [David Hunt](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] "Aquarium Fish" DEIS
Date: Sunday, December 15, 2019 8:13:28 PM

"Aquarium Fish" DEIS
Comments Due 1/7/2020

Approving agency
Hawaii DLNR
Agency contact name
David Sakoda
Email address or URL for receiving comments
david.sakoda@hawaii.gov
Agency contact phone
(808) 587-0104
Agency address
1151 Punchbowl Street Room 330
Honolulu, Hawaii 96813

RE: Submittal Form for HRS Chapter 343 Publications in the Periodic Bulletin : Entry # 622

http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf

December 15, 2019

I read with genuine sadness and horror, this application and DEIS.

This application should be DENIED, and our public employer & employee time (and thusly, our tax dollars) should not (now or ever again) be wasted entertaining similar inhumane, immoral, unethical applications.

These are NOT "aquarium fish" these are indigenous fellow residents of our shared island home. I am one of MANY who would be harmed by allowing this permit to be approved. Like others, I swim and snorkel frequently, to simply be amongst these beautiful creatures. It is an important part of my personal, recreational, and spiritual experience where I live and work.

Using a more accurate and appropriate name, the "tropical fish enslavement industry" has a HORRIBLE history and record of capturing our indigenous, native tropical fish, and enslaving those FEW that survive capture, packaging, shipping, and wholesale and retail sales into foreign environments.

Our Native Hawaiian tropical fish BELONG in Hawaii, in their native habitat - NOT LIVING A MISERABLE EXISTENCE ENSLAVED IN FISH TANKS FOR THE CRUEL "ENTERTAINMENT" OF HUMANS who somehow think they have a RIGHT to freely enslave others.

WHO and WHAT gives ANYONE this right to enslave our beautiful, innocent, fellow indigenous island inhabitants?

There is NOTHING “Sustainable” about this practice. It is narcissistic, selfish enslavement of our fellow creatures who have an inherent right to live free in their habitat - all in the perpetual lust for dollars.

This is the EXACT same barbaric ENSLAVEMENT scenario played out throughout human history: Capture the indigenous innocents,
Destroy their connection with family, community, home, and steal their freedom,
Force those innocents into inhumane conditions for the rest of their once beautiful - now brutally cruel, exploited lives,
and IF they survive capture, packaging, transportation, wholesale and retail “sale” -
End their lives enslaved in an unknown foreign containment.

With Hawai'i's history of colonization and stolen freedoms, lands and culture - does the reality of this cruelty - this theft and enslavement - not effect your conscience...? There is a very sick irony here.

For too long, our standard EIS (and DEIS) protocols and process has looked at ONLY a narrow and limited number of “factors” upon which decisions are manipulated and rendered.

Therefore, I formally ask that you correct this shortsighted error, and that the MORAL and ETHICAL DIMENSIONS AND CONSEQUENCES of this proposal, application, permit request, deliberation and decision NOW BE ADDED AND INCLUDED IN THIS EIS process and decision.

Hope for human survival on our ailing earth will remain questionable at best until we recognize our past mistakes and our arrogantly presumed dominion mentality - and change our behavior. I can think of no better opportunity than now - this decision - to change our destructive course determining our collective future.

We need gratitude and respect for the lives of all beings with whom we share our home, island, and planet - in this decision.

, , &
Aloha, Peace, Love, & Music

David Hunt, Honokaa, Hawaii
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davidjameshunt@gmail.com
(208) 660-8498

From: [Richard Marks](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aloha please stop the stealing of tropical aquarium fish from our reefs!
Date: Monday, January 6, 2020 9:10:08 PM

Aloha David,

I swim in the ocean every day and have been shocked by the rapid decline of small tropical fish in our reefs.

I understand they are being harvested commercially to be sold for aquarium fish.

Is there anything that can be done about this on your side?

Mahalo in advance!

With warmest aloha,

Richard

Richard Marks, MA

O Ke Aloha Ka 'iu

~ Love is paradise ~

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**10% of your photography package payment will be donated to feed and house homeless children and their families on Maui, via The Church On The Go run by Pastor Laki Ka'ahumanu, the Great-Great Grandson of Queen Ka'ahumanu.*

From: [Bob Flatt](#)
To: [Sakoda, David](#); [Bob Flatt](#)
Subject: [EXTERNAL] AQ EIS comments
Date: Friday, December 13, 2019 8:01:07 PM

1) The EIS contains disingenuous use of averages. For example "% of their overall island of Hawaii populations", the sample population size is arbitrary, why not local (collection area) populations (that would look overly extractive) or Pacific populations (that would look obviously misleading).

2) The EIS contains disingenuous use of generalities "minimal impacts on populations in general". Nicely hiding that aquarium collecting is an economic activity biased towards higher priced (less common) species. The decimation of uncommon species does indeed have little short term impact on the population in general, but destroys species diversity - a key indicator of ecosystem health.

3) As a society we try to limit anthropogenic stresses on the reef, such as pollution. It would be inconsistent to allow an anthropogenic stress such as fish collection. If a polluter said the pollution is only 1% of what they could pollute we would not accept this as a justification, if a fish collectors says it is 1% of what they could collect we should not treat this as a justification.

4) No Aquarium Permits is the only practical solution.

--



From: [gregg blue](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] aquairium stop please
Date: Monday, January 6, 2020 2:48:04 PM

Aloha,

Please leave the fish alone...no more shipping or capturing.

Gregg Blue

Haiku Maui 808 575-9477

From: [Jim Ward](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium collection licenses for west hawaii
Date: Monday, January 6, 2020 5:15:48 PM

Aloha David,

I'm writing to voice my concerns regarding the possible reversal of the tropical fish collection ban that's been in place for a few years. As a scuba diver in the south Kona, Captain Cook area over the last 11 years I've seen first hand how some species were decimated, particularly in the Milolii area where some of the collectors operate. Since the ban went into effect I've noticed some of the species start to appear in juvenile form. As the tropical fish population starts to recover, it seems an odd time to lift the ban. The argument that 14 licenses won't hurt isn't valid, as many divers can operate under one license. Also determining which collectors are legitimate and which are not will be impractical given DNLRs limited resources. While I personally think a permanent ban is the right thing, certainly leaving the ban in place for the next few years only makes sense as the reef fish are only starting to recover. The reef fish are also vital to the health of the coral reefs which have been struggling due to bleaching. Further stressing the coral at this time doesn't make sense. As someone who worked in the tourism industry until this year, I received many comments from visitors that they don't see as many fish (yellow tang, clown fish, butterfly fish etc) as they used to. Knowing how important tourism is to this island, it seems foolish to deplete what keeps visitors coming back for snorkel adventures. Even if you remove the moral element to this situation, it seems like taking from the many to benefit the few financially. Again, having seen the collection operations of the past first hand, I'm quite sure bringing them back will be very harmful to our ecosystem and our livelihoods.

I appreciate you time

Mahalo

James Ward 808-895-9656

Sent from my iPad

From: [Tina Jensen](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fish collecting
Date: Wednesday, January 8, 2020 2:06:07 AM

I am a resident of the Big Island since 2003. I am writing to appose issuing permits to collect Hawaiian reef fish. Our reefs in Hawaii have never been under more stress and need every single herbivore to help maintain their health. We need these reef fish to keep not only sustainable fishing but tourism. Long ago I was an avid aquarist. Then I learned how fish were collected and how unlikely they were to survive. We have a moral responsibility to preserve what we have. Aquarium collecting is not helping the island.

Tina Jensen
Holualoa Hawaii

Sent from my iPhone

From: mauimarie2016@gmx.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium Fish collecting
Date: Tuesday, January 7, 2020 6:04:33 PM

Dear Sir,

I have been actively diving and snorkeling in Hawaii for over twenty years and I know that the aquarium trade most definitely has a VERY negative impact on the reefs. I produced a documentary in 2005 about Hawaii's near shore reefs and the animals that live there, and it is devastating to me to STILL see a steady decline in the health of ALL Hawaii's reefs.

Our native fishes need and deserve effective legal protection, and should be left in the wild!

Please help make the PONO choice! NO MORE FISH COLLECTING! If you'd like to view my film, you can find it here: <https://www.youtube.com/watch?v=9NciCVLt3nY>

Mahalo and Aloha,

Marie Le Boeuf
Kihei, Maui
808.495.7222

From: ggrabows@chaminade.edu
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fish environmental impact statement
Date: Wednesday, January 8, 2020 1:01:47 AM

Aloha David,

I have followed the aquarium fish issue for over 15 years now, conducted fish counts with my students, taught many classes on climate change, and done research on the effects of the removal of aquarium fish as revealed by the scientific literature. I am currently the interim dean of the school of natural sciences and math at Chaminade University. I would like to make testimony on the environmental impact statement re the aquarium fish industry.

As I am sure you are aware, coral reefs all over the world are being lost and degraded by increasing water temperatures and polluted runoff that causes algae to grow. Most of the fish that are removed from the ocean for the aquarium trade are algae eaters, so they help defend the reef. We are now at a point with climate change so severe that most of the worlds reefs, including Hawaii's, have bleached multiple times recently and we are at risk of losing the keystone species that defines them - the coral.

Because of this we need to leave all of the variables that help protect and defend the reef intact and the aquarium fish are one of those. I know it is sad that some will lose their jobs but there are many jobs right now and there is much room for new careers in aquaculture. I find that the EIS is just another statement allowing further use of a resource that the reef cannot afford to lose.

Please opt for the cessation of the collection of these important fish that have nothing to do with food and are only about money. They may make some money in the short term but they will cost us all in the long term when we lose our Reefs and all of the food fish and eco tourism and aesthetic value that they create.

Thank you for your time and consideration.

Gail Grabowsky, PhD
Environmental programs director
Interim dean of the school of natural sciences and mathematics
Chaminade university
808-735-4834

Sent from my iPhone

From: [GARY JOHNSON](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fish THEFT
Date: Wednesday, January 8, 2020 11:10:58 AM

HI David,
I am a bit surprised ..actually shocked that our
baby fish are being allowed to be sold to die in aquariums.
Please make this stop immiediately or as quickly as possible
I think you can really help out here David.
Gary Johnson

From: [Boisvert-Jorgensen](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium Fish Trade EIS Comments
Date: Wednesday, December 18, 2019 1:11:29 PM

Dear DLNR:

Accepting the EIS with its obviously skewed manipulation of data in order to find 'no significant impact' would be an insult to all the Native Hawaiian cultural practitioners who oppose the permits for commercial reef fish collections.

I am strongly OPPOSED to the Draft EIS for commercial reef fish collections because healthy reefs depend on the fish that live on them, and because commercial fishing of reef fish is a wasteful, destructive, and unnecessary industry.

One has to wonder why those who wrote the EIS purposefully chose to manipulate the data, and what connection there may be to the proponents of such a destructive industry.

Thank you for your kind consideration of rejecting the EIS.

Denise Boisvert
Waikiki

From: [Big Island VIP](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium Fishing Permits
Date: Tuesday, January 7, 2020 3:59:38 PM

Aloha Mr. Sakoda
I strongly object to the extraction of Hawaiian Reef fish by Aquarium fisherman.
The fish need to be allowed to live on the reef where they belong.
On many parts of the Big Island Reef fish are scarce please do not allow the permits.

Mahalo
Robert Kitsell
Owner/Operator Big Island VIP
808-747-4394

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From: [Abby Normal](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fishing
Date: Tuesday, January 7, 2020 11:31:02 AM

To whom it may concern,

I am writing to say that I think that working on repairing & building up healthy coral reefs is MUCH MORE important than supporting the aquarium fishing industry. If we continue to take and damage and not replenish then in the future this will be a moot point because we will have no reef or fish left. I do not think ANY aquarium collecting permits should be issued until our reefs ecosystem is fully replenished to a point of over abundance. Any taking before that point will be harmful.

Thank you for taking time to read and consider this.

-Christina

From: [Tanya Power](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fishing
Date: Tuesday, January 7, 2020 1:52:13 PM

I am writing to let you know that I do NOT support the continued aquarium fishing on the Big Island. The Kona Coast from my childhood was called the "Gold Coast" because of all the beautiful yellow tangs that were in the waves. We missed them for years. And recently over the past year or so, they are beginning to return. It is such a treat.

Please do not allow the aquarium fishing to start again on the Big Island!

Warmest aloha,

Tanya

Tanya T. Power, Realtor(S)-55044, Premier Property Director,
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From: [Lisa Thomas](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fishing
Date: Saturday, January 4, 2020 3:16:25 PM

Dear Mr. Sakoda,

I am a Hawai'i resident since 1995. As an ocean swimmer and scuba diver, I have noticed a remarkable decrease in the numbers of colorful reef fish in the 30 years I have been utilizing our beautiful waters. Most of my ocean swimming has been on the south shores of Maui, on a weekly basis, over these years. The quantities of fish used to take my breath away, now I can do a 1 1/2 hour swim and sometimes see less than 20 fish total. Please do not allow aquarium fishing in our fragile waters.

Thank you for your attention to this matter.

Sincerely,

Lisa Thomas

26 S. Laelua Pl.

Paia, HI 96779

808-283-1536

Sent from my iPad

From: [Julie Usinger](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium fishing
Date: Tuesday, January 7, 2020 12:26:32 PM

Aloha Sir,

Please vote against the rights for aquarium fishing in Hawaiian waters. I find it sad that the fish populations have dwindled since I first snorkeled here 30 years ago. Now “snorkel beach” (Kahalu’u) has hardly any fish. I remember swimming around schools of all types of fish.

Please stop the fishing.

Mahalo

Julie Usinger

Kona resident

Jules Usinger

Marketing Consultant

Resonate Hawaii

From: [Alan Breese](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium Harvesting
Date: Sunday, January 5, 2020 7:26:18 PM

Mr. Sakoda!

As a fairly recent home owner on Maui, I do not understand allowing the local reefs to be harvested of fish with very little benefit to the Hawaiian islands and the Hawaiians. The Islands' main industry is tourism and this needs to be protected. Most tourists enjoy snorkeling and scuba diving to see the local colorful fish population. Loss of numbers and varieties of fish could negatively impact the tourism industry.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to ban aquarium collecting in Hawaii.

Many Thanks
Alan Breese

Alan Breese
BreeseConsult

From: [Mike Essner](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium NO Trade
Date: Sunday, December 15, 2019 2:03:35 PM

David, the aquarium trade that you are supporting is removing all the fish from the reef the people come here to see!

Please the remove your head from your a***** he mediately!

Keep fish in the water we will keep people coming to Hawaii

How much money are you receiving privately???

TAKE NO REEF FISH
BAN SALT WATER AQUARIUMS

[Sent from Yahoo Mail on Android](#)

From: [Heather Rosmarin](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium Trade - Oppose
Date: Saturday, December 28, 2019 6:26:59 AM

As a frequent visitor to Hawaii, I strongly oppose the collection of wildlife from reefs to supply the aquarium trade.

It is unsustainable and unethical, especially when there are alternatives such as farmed fish for the trade.

We cannot continue to exploit and destroy our reefs.

I want to bring my children and grandchildren to Hawaii to see the reefs. Please protect them.

Heather Rosmarin
hrosmarin@mac.com
Pleasant Hill, CA

From: [Karima Morgan](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium trade collecting
Date: Friday, January 3, 2020 9:17:19 PM

Attention Mr Sakoda

I am a resident of Maui and want to express my strong opposition to the way that the aquarium trade has been given so much access to the wildlife on our reefs, depleting them in ways that are absolutely unacceptable.

The aquarium trade is a devastating commercial enterprise that trashes near-shore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater.

The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Karima Katharyn Morgan

From: whalemail@waypt.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] aquarium trade
Date: Friday, December 27, 2019 6:25:42 PM

David,

I am a fish biologist and though I live in western Washington, I've spent many years snorkeling and fishing over on Kauai. I've also had the honor of doing research out on Midway with NOAA, The US Fish and Wildlife and the State of Hawaii. In addition, I write Hawaiian nature books for keiki.

In my experiences observing and counting reef fish for more than 30 years, I've seen a sad decline in many species. I know there are many causes for population declines, but I've seen aquarium harvest and know many species are actually disappearing from our reefs due to the collecting of yellow tangs and many other fish valued by the aquarium trade.

I urge you to ban the trade or greatly limit ability to collect our fish so that future generations can enjoy the diversity of fish once present when I first came to the islands.

Sincerely,

Ron Hirschi
PO Box 22
Poulsbo, Washington 98370
whalemail@waypt.com

From: [Moore Steve](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium trade
Date: Tuesday, January 7, 2020 1:13:04 PM

Please just say no to the aquarium trade. All the critters on the planet are under enough duress due to the myopic vision of our species. There is no need to add insult to injury.

Respectfully,
Steve Moore
Captain Cook, HI

From: [Haley van Noord](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium trade
Date: Friday, January 3, 2020 6:15:23 PM

The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Wildlife is best left in the wild.

Sincerely,

Haley Van Noord

7th grade life science teacher and former marine naturalist

[Sent from Yahoo Mail for iPhone](#)

From: [Corina Young](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium trade
Date: Sunday, January 5, 2020 12:03:24 PM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing.

Corina Young
Kihei HI

From: [Corina Young](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium trade
Date: Sunday, January 5, 2020 12:02:44 PM

Aloha, Mr. Sakoda!

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I implore you to do the right thing.

Corina Young
Kihei HI

From: [gloria snyder](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Aquarium
Date: Sunday, January 5, 2020 7:56:12 PM

Aloha Mr Sakoda!

Extinction is forever—it's that simple.

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I implore you to do the right thing.

Gloria snyder
Kihei

Sent from my iPhone

From: [Barbara Steinberg](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] David Sakoda Oppose aquarium trade
Date: Sunday, January 5, 2020 11:53:07 AM

To David Sakoda

I am a maui resident for 35 years and a voter that long .

I oppose the aquarium trade.

For 10 years I've taught animal kindness club art class to children age 6-16 and they always paint Hawaii's tropical fish and we all oppose the aquarium trade for future of Hawaii and future generations.

Thank you

Barbara steinberg BFA
Kihei Maui 808-369-6845

Sent from my iPhone

From: [Barbara Steinberg](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Art work to back my opposition to the aquarium trade
Date: Sunday, January 5, 2020 12:05:42 PM
Attachments: [IMG_0324.jpg](#)
[IMG_5821.JPG](#)
[IMG_0208.jpg](#)
[IMG_0118.jpg](#)
[IMG_0117.jpg](#)
[IMG_0113.jpg](#)
[IMG_0112.jpg](#)
[IMG_0108.jpg](#)
[IMG_0104.jpg](#)
[IMG_0100.jpg](#)
[IMG_0099.jpg](#)
[IMG_0098.jpg](#)

To David sakoda

Here are some of my children and adult students art to back my opposition to the aquarium trade . I sent my opposition email minutes ago and now I'm sending this art work under separate cover





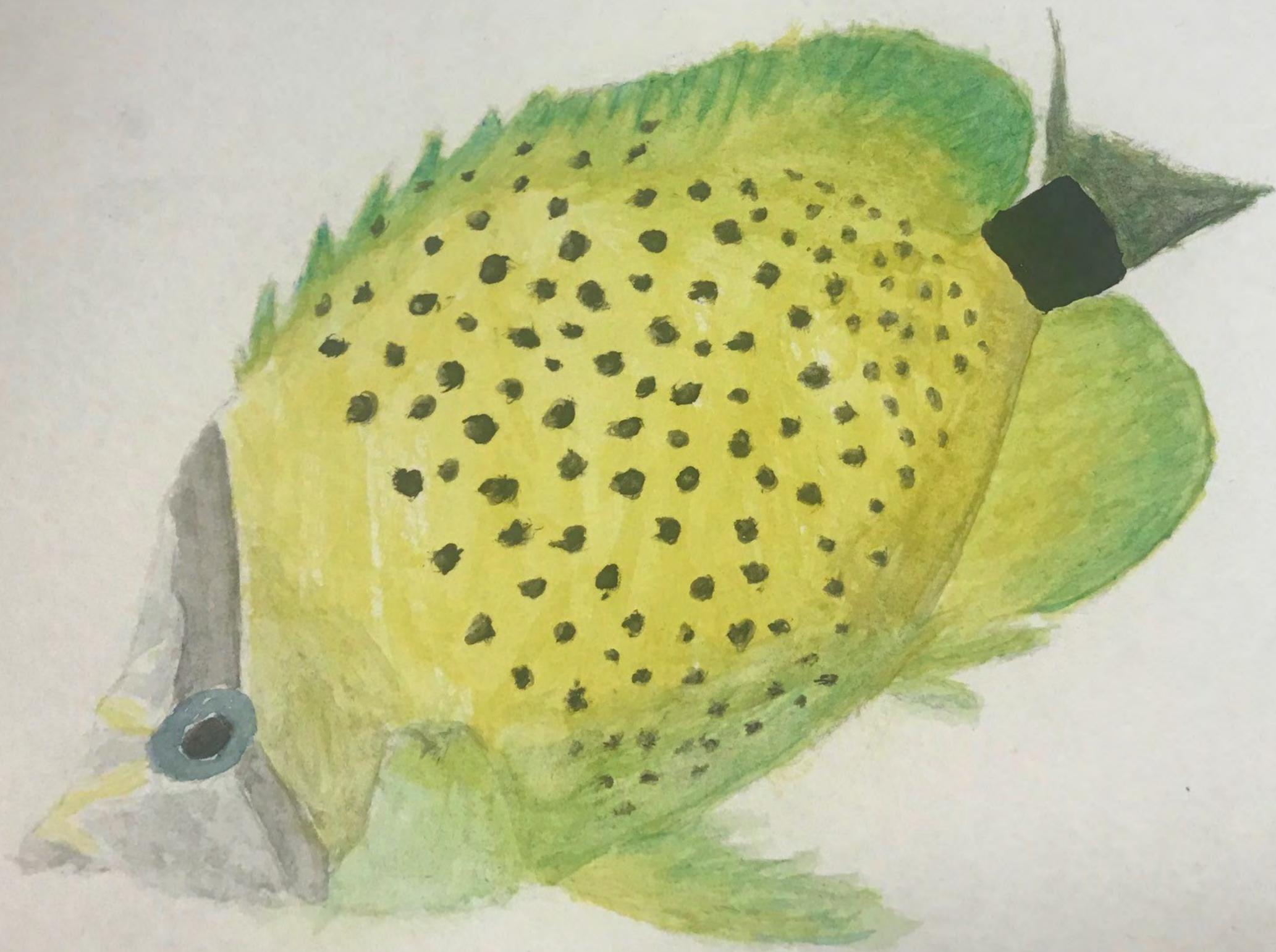
Sent from my iPhone



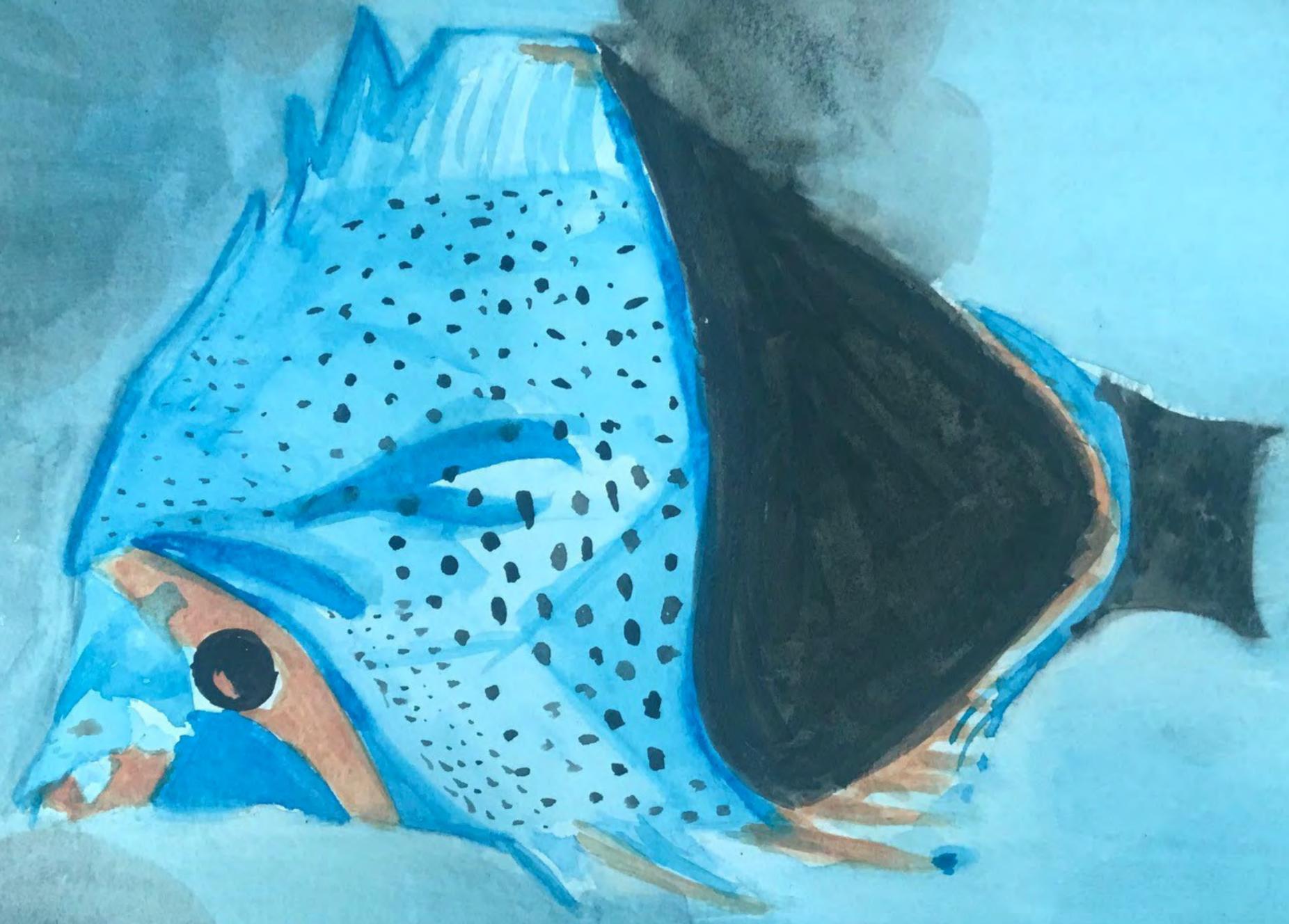
...one of the world's most ext
...spill is not a question
...ice for wa



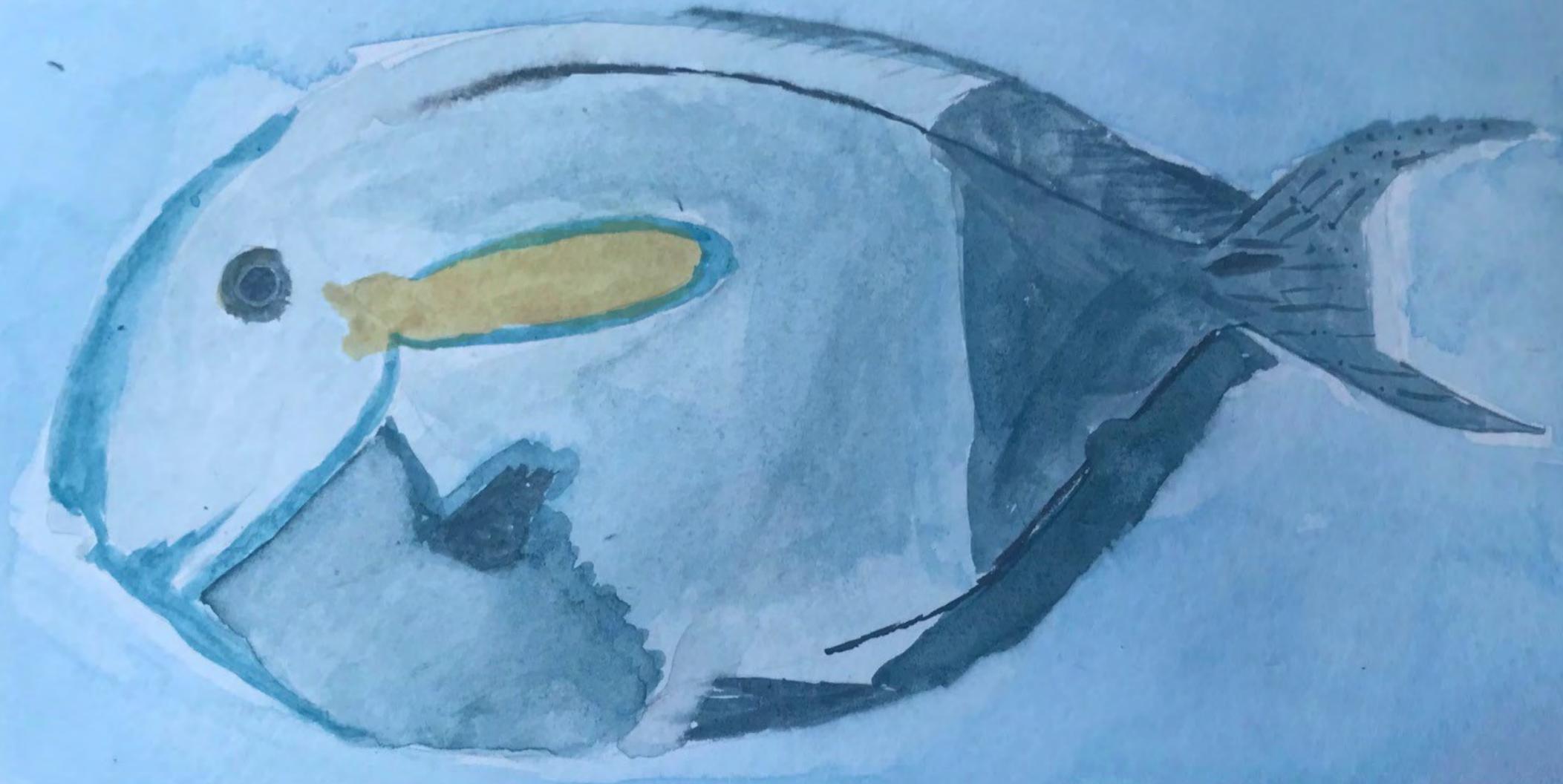




SADIK LIPP



02



Life!



SAVE OUR MARINE

LIVES



Save our reefs

Save our butterflyfish

Save our marine
life





SAVE OUR MARINE

LIVES



SAVE OUR SEALIFE

Save our
fish ★



From: [Jessica Wooley](#)
To: [Sakoda, David](#)
Cc: [Segundo, Leslie](#)
Subject: [EXTERNAL] attached comments on West Hawaii PIJAC proposal for 14 Aquarium Permits
Date: Tuesday, January 7, 2020 8:58:03 PM
Attachments: [DEIS 14 permits.pdf](#)

Aloha David,

I tried to give you a call today and would love to chat.

Malama Pono,

Jessica

January 7, 2020

David Sakoda
Hawai'i Department of Land and Natural Resources
Division of Aquatic Resources
1151 Punchbowl Street, Room 330
Honolulu, HI 96813-30813

Submitted via email to david.sakoda@hawaii.gov

RE: Proposed Draft Environmental Impact Statement for Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area.

Respectfully, please accept my comments on this proposed Draft Environmental Impact Statement (DEIS), which totally fails to meet the legal requirements specified by HRS Chapter 343.

It's difficult to comment on this document because almost nothing was done properly and the underlying assumptions and status quo are simply wrong.

For one, the consultation process was incomplete and is invalid, because many people, organizations and agencies were not consulted or notified of the proposed action. There is information that was not considered as a result. For example, regularly beach goers, park users and many Native Hawaiians who access the beaches and nearshore waters in West Hawai'i were not given notice or consulted. I wonder who is advising PIJAC and if anyone on the Hawai'i State Environmental Council was notified of this issue. I personally was not made aware, given notice or consulted even though I have been publicly outspoken and actively involved in the aquarium collection policy and regulatory compliance issues for more than 5 years and, as the former Director of the Office of Environmental Quality Control (OEQC) agency, authored the October, 2015 letter advising the Governor and DLNR that it was critical to put an immediate moratorium on commercial collection of reef wildlife until the HEPA process could be completed. In addition, the proposed DEIS treats the action as being relevant to people and interests on the island of Hawai'i in West Hawai'i only, yet there are statewide implications.

Two, there is no clear applicant - just a commercial trade association that profits off of trafficking Hawai'i reef wildlife, asserting that it represents 14 unnamed permittees; nothing and nobody, not even a corporation connected to Hawai'i, is identified as having a role or responsibility.

The “applicant” tries to assert all alternatives are similar and there is no significant difference between any alternative, including the illegal activities occurring under the status quo,¹ and so no mitigation is necessary.²

There is no valid regulatory system for a West Hawaii, 14 permittee option. The old, illegal regulatory system (that was in place prior to the Hawaii Supreme Court ruling in *Umberger*) is a statewide and unlimited permit system that does not fit the proposed action (to allow exclusive use by 14 West Hawaii unnamed “permittees” to collect nearly unlimited reef wildlife for the aquarium industry in West Hawai‘i using small mesh nets). There is so much missing. What is the system? What are the rules? What are the limits? How is anything enforced? Who profits? Who pays?

Perhaps most offensive, the proposed DEIS asserts that the no alternative and baseline is essentially the continued unlimited collection of reef wildlife. There is no alternative evaluated that does not include unlimited collection of reef wildlife.³ The alternatives are a wish list of the options PIJAC would like, not the options that are legal or available, and no option examines “no action alternative” as in, no commercial collection of reef wildlife by aquarium profiteers.

The document is totally incomplete in myriad ways. It’s as if someone got about 1/50th of the way through a final exam then hurriedly turned it in. Essentially, the document does not evaluate environmental impacts but simply claims there are none and proposes no mitigation.

When it comes to data, the document includes references and charts with some remnants of some data collected but it’s not clearly sourced, accurate or peer reviewed and is admittedly incomplete in many circumstances. It’s as if the authors’ shrugged their shoulders, looked around real quick, found most data was missing or scarce, and conclude it’s not important to know much, including numbers and habitat availability as climate change impacts increase for each species, cumulative impacts, effects on subsistence fishers, economic costs and benefits or interactions and impacts on

¹ The proposed DEIS explains as follows: “Given the long history of commercial aquarium collection in Hawai‘i, it is reasonably foreseeable that commercial aquarium collection will continue. Based on available data regarding species abundance and yearly commercial aquarium catch over the past 18 years, it is expected that in the reasonably foreseeable future, commercial aquarium collection will proceed generally at the same rate and have the same level of impact as in the past 18 years. To the extent new data regarding the impacts of commercial aquarium collection on biological resources becomes available in the future, DLNR may consider those data and, to the extent necessary, supplement this impacts analysis.

² This is so indicative of the larger problem here, the applicant has no concept of “give back”, “take care” or “respect” (e.g., *malama aina*).

³ For example, the applicant states “During the evaluation process, it was determined that some resources typically evaluated in an EIS would not be impacted by any of the alternatives under consideration. The evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s. Because a significant increase in commercial aquarium fishing is not anticipated during the 5-year assessment period evaluated in this DEIS, and in fact a decrease when compared to historic conditions is anticipated due to the issuance of only 14 Aquarium Permits, this DEIS does not anticipate a significant change in the current baseline condition of these resources.”

commercial food fishing (just some examples). Also, the limited scope in time (5 years) is too short, the document does not analyze the alternatives, impacts on corals or climate change implications, for example.

The document ends with the Cultural Impact Statement, which was clearly tacked on in the end of the proposed DEIS when it should have been relevant from the beginning. The DEIS itself needs to incorporate what was described in the CIA from the start. It is impossible to conclude the proposed action would have no significant impacts. The cultural and environmental (and economic) impacts are inextricably intertwined and they were not analyzed in this document.

The application for 14 unnamed permittees to be able to obtain a permit to use a small mesh net to collect reef wildlife, presumably for the trade organization PIJAC, if granted, would result in a total incoherent management philosophy that permits the use of small mesh nets in West Hawaii and prohibits them everywhere else, and prohibits the use of small mesh nets everywhere but West Hawaii. This bizarre outcome is the result of the wacky illegal activities still occurring outside West Hawaii that the State Executive branch has sanctioned.

In summary, this DEIS is a total sham and throughout reveals what appears to be an illegal deal between the Executive Branch and the applicant, PIJAC, the trade association for the reef wildlife trade (now trafficking) industry. As the recent Hawai'i Supreme Court in the 2016 *Umberger v. DLNR* decision, the Hawaii Environmental Policy Act (HEPA), the OEQC and EC letter make clear (in addition to numerous statutes and the Hawai'i State Constitution Sections 11.1, 11.2, 11.6, 12.4 and 12.7), the state government cannot allow unlimited collection of reef wildlife until and unless the environmental review process under HRS Chapter 343 is complete, if at all.

It's almost impossible to further comment on this document because every aspect of it is devoid of relevant facts and information. The focus is generally on the benefits of aquariums and zoos, for example, not on the environmental impacts due to removal of reef wildlife from nearshore waters. I can't help but want to elaborate and provide some examples.

Despite the very clear rule of law that there should be no commercial aquarium collection of reef wildlife absent compliance with HEPA, an illegal scheme to get around the review and disclosure laws was devised once again. So at this moment, unlimited numbers of collectors continue to be able to capture unlimited numbers of reef wildlife from our islands' nearshore waters (except in West Hawai'i due to specific permit rules, Maui due to County prohibitions based on cruelty to animals and a few small protected areas).⁴ One irony is commercial collectors are collecting plenty of

⁴ Under the new illegal scheme and status quo, any person can apply and receive a commercial license to sell (export) reef wildlife, with no limits. There are no regulations, limits or boundaries save a few tiny geographically excluded areas (e.g., Hanauma Bay) and the requirement that you report what you catch. There is no enforcement or it is miniscule. Any person with a license can use any technology they want except a small mesh net to capture the native and wild reef animals, bring them to the surface and, if they survive, export them to make some money.

animals and being told they can use any kind of technology except a small mesh net. So under the current administration, during these most important times to be paying attention to coral reefs, wildlife and climate change challenges, the most harmful collection techniques for capturing our underwater wildlife are proliferating, hurting reef wildlife and habitat.

Who knows what is happening? No one, is the answer, because anything goes.⁵ It appears to be a policy and goal to take what can be taken to maximize profits regardless of the law, people, animals, bigger economy and long-term consequences; hurry up, before numbers drop, someone realizes the wild populations are in jeopardy, climate changes make collection impossible for whatever reasons (e.g., the reefs are dead) or some group figures out how to more cheaply raise captive bred animals for aquariums.

Although the commercial aquarium collectors were permitted to exploit the reef wildlife resources all these decades in violation of the law as HEPA (authorized in 1970) was never even initiated, the trade industry and apparently the Executive Branch continue to operate like the illegal activity is legal. In addition, the applicants are trying to say the the nearly 50 years of illegal activity that occurred and the status quo of unlimited collection is now the baseline for all studies moving forward. The applicants are trying to normalize the illegal activity of unlimited collection by claiming it is the status quo.⁶

This proposed DEIS is a sham,⁷ like the regulation of the industry itself for the last 50 years. It reveals the applicant's total misunderstanding of reef wildlife issues as well as the State Executive branch's willingness to collude with corporate commercial interests to evade environmental review requirements. Does DLNR continue to claim that there is

⁵ Please note that now, like previous years, the DLNR has been non transparent and developed an ad-hoc system for the aquarium industry to be able to collect as much as collectors can get, of any and all species (except live corals and rock). This can make it difficult to explain how it's possible that the State Executive allows unlimited, unmonitored and unstudied commercial collection of all reef wildlife species (save corals and rock). It makes the description of what's happening a little vague and unbelievable.

⁶ Let's say there have been a minimum of 50 million Hawaii animals removed from our reefs over about 50 years without ever having the impacts on the economy, the environment, the culture or the animal abundance itself studied or potential impacts discussed or disclosed with the public. And this year, about a million more animals will be found, removed from their reef homes, brought to the surface and sold, if they survive the journey. At the same time, *kupuna* describe how 50 years ago, the reefs provided dinner to families throughout the islands. Not so long ago, there was reef wildlife abundance like you still see in the Northwest Hawaiian Islands. Now, not only is there no dinner to find, the commercial fishermen themselves are barely able to find fish for the market. There is just not much left. Now the aquarium collection trade industry group PIJAC wants all of us to believe that there is no significant socioeconomic, environmental or cultural impact when the collectors are allowed to take unlimited reef wildlife— never has been a significant impact and never will be? 50 million animals don't matter? How many would it take to matter?

⁷ In this bizarre world, the rule of law appears meaningless — just words thrown around, as the Executive Branch will do whatever it takes to accommodate commercial corporate profiteers; in this instance, reef wildlife traffickers. Despite the ruling by the Hawaii Supreme Court, the Hawaii Constitution, agency and board urgings and official letters, legislative action and grave public concern for decades, the Executive Branch has totally ignored the rule law, the public trust and well being of our island people.

no problem with unlimited commercial collection of reef wildlife because the commercial collectors are not complaining?

How does this document comply with HRS Sections 1 - 853, HRS Chapter 342, 343, 344, 345 in particular? What are the agencies tasked with prioritizing natural resources, the public trust or protecting the environment? Who are the Governor's Cabinet members, who advise him on environmental issues? Is there no agency funded and tasked with advising the Executive Branch or advocating primarily for the protection of environmental resources?

Even if all the illegal issues were ignored and the government were to accept this Draft EIS on its face, as being accurate, what are the consequences for violations? What happens when we discover various species populations have been depleted, perhaps beyond recovery? We could be there already. Are there any penalties for violations? Is there any plan for enforcement?

For there to be a valid draft EIS to evaluate potential environmental impacts from commercial aquarium collection, there must be a state program in place that ensures cumulative impacts are evaluated before individual permits are granted or the applicant must provide that cumulative analysis. There has yet to be a programmatic evaluation of actions by the Executive Branch to grant permits and/or licenses so the applicant must do it themselves to meet the statutory requirements. Where is that?

There is no legal permit system for commercial aquarium collection of reef wildlife. The State has the authority to set up a permit program, similar to the program the Hawaii Supreme Court found illegal, after the program goes through the environmental review process. This is an important point to understand. Based on this proposed DEIS, it appears PIJAC wants to be a quasi-agency, pre-determining government actions statewide. It appears PIJAC is proposing to be the exclusive applicant throughout the state, e.g., this is an application for PIJAC to get sole use and control over all nearshore water permits. Please explain the concept envisioned here.

This is the use of conservation land adjacent to county and state parks. Have all park users been notified if the proposed actions by PJAC in the conservation district and associated activities in the shoreline area? Are any county shoreline access authorizations relevant and do they need to be applied for?

How is a pet association trade group planning to be responsible for the actions of the collectors? Are they employees? Why are their names not revealed? What is being hidden? Are there any other situations where an environmental review process has been complied with that are similar, e.g., with a trade association acting as the agent for collectors? Has there ever been an environmental review document with such anonymity?

What PIJAC business interests and in-state business addresses exist and where locally can the applicant be found? Does the applicant have any experience, responsibilities, connections or obligations in the State of Hawaii? If so, please list and specify all.

Does the consultant preparing the draft EIS have any experience, responsibilities, connections or obligations in the State of Hawaii? If so, please list and specify all.

Is Section 1.2.3.1, a complete list of opportunities provided throughout the history of the commercial aquarium fishery for citizen participation, as alleged?

The action summary is “to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats” by getting 14 permits. However, there is no definition of what is lawful, responsible or sustainable for any species. And again, under what program do these definitions exist?

Please explain when and how the State Executive has been working with PIJAC, to try to explain the regulatory system and/or figure out ways around it. The DEIS states “The DLNR has been working with stakeholders (e.g., public, various fishing and tourism industries, local governments) since the 1970’s, and continues to work with them to ensure the commercial aquarium fishery is environmentally sustainable and prevents degradation of fish populations and the habitats in which they occur. “ When has the DLNR worked with the public, environmental groups or Native Hawaiians? When has the DLNR worked with the various fishing, snorkeling, scuba diving and tourism industries? When has the DLNR worked with local governments? What are the actions that have been taken for all of the above?

Table 3-1 demonstrates how PIJAC and DLNR are trying to present a false sense of choices — alternatives — the choices PIJAC would like, and has dictated in the past. These are not the legally allowable choices.

What, if any, of the data and studies referred to in this proposed DEIS have been peer reviewed? Please provide details if there is any data or are any such studies. For the data that is not peer reviewed, are there alternative data or studies that have been evaluated? If not, why not?

What ethical, transparency or accountability rules or limits exist to ensure the state government employees are not making money from the industry or being paid by the collectors and/or trade industry agents or given gifts or, at least if they are, there is public disclosure?

In a footnote, the proposed DEIS acknowledges there is very little information on 4 unique species that the proposed action would allow to be collected in unlimited numbers. Like so often in this document and Executive agency documents, the authors of this document rely on what commercial collectors reported they were able to catch to conclude that not much would be collected. In other words, because collectors

could not find very many, we shouldn't worry about the impacts, despite the fact that this very information is an indication that the species is unusual, rare, perhaps it should be an endangered species but we don't know much. Please explain and, I hope, prove me wrong.

It's difficult to make comments or ask questions of this document, so please go ahead and put a "why" before each statement, so that it is read as a question. For example, when I state "The document totally fails to meet the legal requirements specified by HRS Chapter 343." Please read it as "Why does this document totally fail to meet the legal requirements specified by HRS Chapter 343?" ⁸

I'm hopeful PIJAC will see the light and stop selling Hawai'i reef wildlife and begin to invest in captive-bred options to create reef wildlife abundance and a world-class aquarium industry in Hawai'i that is respectful and gives back to Hawaiian culture and the environment.

Sincerely,

Jessica Wooley

⁸ Here is a conclusion I agree with but it looks like a typo, FYI. "Given that Open Areas did not see a more severe decline than areas closed to commercial aquarium collection, **it is not anticipated that commercial aquarium collection has a less than significant impact on coral declines.**"

From: [Red Rox](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] ban aquarium fishing in HI, period
Date: Tuesday, January 7, 2020 2:48:33 PM

Mr. Sakoda, DLNR staff, HI legislature,

Considering:

unwarranted culling native populations of fish in a challenged and changing finite reef resource area;

aquarium fishing mortality is such a high percentage of catch;

aquarium fishermen are highly unsupervised;

extremely limited HI employment base propped up by aquarium fish;

It should be apparent that this activity is not in the public's, nor in the malama-aina interest

and should not be allowed in Hawaiian waters.

mahalo,

Philip Hayward,

puako resident,

wildlife biologist

Puako cess-pool replacement advocate

From: [Ed Dowling](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] collection of wild fish
Date: Friday, January 3, 2020 5:38:07 PM

I am against taking live fish for the Aquarium trade.

From: [Fish Feel](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Comment Submission Re: Commercial Fishes Collecting (Aquaria)
Date: Tuesday, January 7, 2020 5:54:42 PM

David Sakoda, Program Specialist
Division of Aquatic Resources
Department of Land and Natural Resources
1151 Punchbowl Street, Room 330
Honolulu, HI 96813-3088

Dear Mr. Sakoda,

Fish Feel is a 501(c)3 organization that promotes respect and consideration for fishes and other animals. The following comments are submitted on behalf of our thousands of constituents, and in regard to the Pet Industry Joint Advisory Council (PIJAC)'s draft environmental impact statement.

Hawaiian wildlife is invaluable, and among the state's greatest treasures. Hawaii's native fishes are cherished by many residents, and the ability to see them in their natural habitat is a great attraction to many others, too. Public perceptions of nonhuman animals are increasingly improving, and many people now recognize that these fellow beings deserve consideration as individuals with their own lives to live, which should be free from gratuitous human interference and cruel exploitation. Science has shown what many people have intuitively realized: that fishes are sentient beings who can suffer fear and pain: <http://fishfeel.org/resources/facts/#accordion-1-3> Their well-being is deserving of our moral consideration.

Taking animals from the wild to be kept in captivity for human amusement is increasingly recognized as an inhumane and unethical thing to do. Removing them diminishes wild populations and disrupts social structures. Even the largest zoos and aquariums cannot truly replicate natural conditions, let alone for home aquariums to do so. Few people will seek veterinary care for an ailing fish, and there are relatively few veterinarians who can capably treat fishes, especially exotic fishes. Many wild-caught fishes perish before even arriving at their final destination, and many if not most perish within their first year there.

No one needs to collect or keep wild-caught fishes, instead it is a luxury pursuit. They should not be caught for private profit and pleasure but instead left in nature to be enjoyed by all and perform the invaluable ecological services they provide there. It is absurd for PIJAC to claim that continued removal of fishes as it has proposed will not affect species populations, and it is insulting to the intelligence of any reasonable person. They should not be removing *any*, for the sake of the fishes, the other animals who are genuinely dependent on them, and of the public. This is all the more important given the grim state of flux the oceans are in, and the hardships that coral reefs are experiencing – environmental changes which are only expected to worsen.

Thank you for your consideration of these comments. Please act in the best interests of Hawaiian wildlife and the public by upholding the ban on commercial aquarium fishing.

Respectfully,
Mary Finelli
President, Fish Feel
(301) 625-9321
Info@FishFeel.org
<http://www.FishFeel.org>

From: [Paul Moss](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Comments about native reef fish
Date: Monday, January 6, 2020 10:26:35 AM

Mr. Sakoda,

I am very concerned about the impact of fish collection for the aquarium trade on Hawaii's wild fish populations. I don't feel that the Pet Industry Joint Advisory Council's environmental impact statement is accurate in "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem".

Hawaii's native fish need and deserve effective legal protection and should be left in the wild. Please don't allow these fish to be collected.

Thank you for your consideration of these comments.

Sincerely,

Paul Moss
White Bear Lake, MN

From: [Waikiki - Hawaii Condo](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Comments on Aquarium Fish Trade EIS
Date: Wednesday, December 18, 2019 12:52:06 PM

To whom it may concern:

I am OPPOSED to the Draft EIS for commercial reef fish collections. Commercial aquarium fish collection permits are detrimental to our reefs and the survival of the populations of fish that care for them.

Please do not accept this flawed EIS that suspiciously finds no significant impact caused by commercial fishing of reef fish. It is a wasteful and destructive industry, and anyone who truly cares about our reefs will not exploit the fish for their own financial gain, or allow it to happen.

Sincerely,
Kim Jorgensen
Honolulu

From: [Robert Culbertson](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Comments on Aquarium Fish Trade EIS
Date: Friday, December 6, 2019 11:24:23 PM

Dear Mr. Sakoda,

I am writing to urge DLNR to select the "NO ACTION" alternative listed in the draft Environmental Impact Statement. Nothing in this report should convince an unbiased person that it is in the best interest of the people of this state to continue the wasteful and destructive Aquarium 'fishery' for the sake of just 14 recalcitrant collectors. Indeed, fishery it is not! It is a highly lucrative criminal enterprise that happens to specialize in our all too important reef maintaining organisms.

Furthermore, it is highly ironic and the height of hypocrisy to ask, as DAR has recently, recreational and subsistence fishers to refrain from taking herbivorous reef fish while encouraging a select few collectors, the applicants of this report, to gain special license for the unlimited taking of many of the same species of fish!

How sad is it that your agency tasked with conserving vital and imperiled resources such as still exist, would even entertain the perpetuation of this abominable business?

Shall we bring back shark-finning while we are at it?

Ua Mau Ke Ea O Ka Aina I Ka Pono!

 Sincerely and sorrowfully,

Mark Tang
Hilo, Hawaii

From: ahuntemer@aol.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] Comments on the Aquarium Trade EIS
Date: Tuesday, January 7, 2020 12:49:49 AM

Aloha Mr. Sakoda,

DLNR made a serious mistake in engaging the Pet Industry Joint Advisory Council to assess the environmental impacts of the aquarium trade in Hawaii. It was a huge mistake to engage a lobbying group for the commercial pet trade and not a professional group dedicated to the study of coral reef ecosystems. This grave miscalculation has unfortunately left the Department susceptible to contested cases and even more. This is a shame because I am personally a huge supporter of the mission of DLNR and truly appreciate some of the heroic efforts made by some of your employees. This particular issue has, as far as I can see, not been given the important consideration it deserved. An anthropocentric view point has regrettably obscured what is the duty of DLNR and all of us that are fortunate enough to call Hawaii home.

Frankly, the "livelihoods" of wildlife collectors are not an environmental impact. Livelihoods, are, by their own definition, a business impact. The few people employed in the taking of wildlife from our reefs are well equipped with material, skills, technology and experience to be able to repurpose themselves to a more positive "livelihood" related to the ocean. That is the "win win" solution here.

Arguments of an educational value to privately held aquariums are false. Animals in tanks and cages engage in very little of their natural behavior and what is the educational value of that? As a teacher I can confidently tell you - none.

There are obviously reasons why the Supreme Court closed the taking of wildlife from our reefs. We should be following in the footsteps of forward thinking jurisdictions such as Palau and ban commercial fishing or harvesting of any kind, in our territorial waters. We do not allow the taking of coral, why would it be OK to take other animals from the reef? In an era of overfishing, ocean warming, sea level rise, changing currents, habitats, and acidification why would we allow any more stressors to our reefs? Any taking of reef wildlife out of their habitat to die, without reproducing is an impact that cannot be entertained in 2020.

I have reviewed many EISs over the years. Many are poor efforts. Nearly all comments are routinely "dealt with". However, this particular EIS egregiously disregards the importance of the diverse array of animals that would be affected by their trafficking to isolation tanks (if they survive long enough to get to them).

The results of this "review" are not only biased and inadequate, the whole document is largely irrelevant and misses the point completely. The removal of wildlife from coral reefs to be sold as decorations has no place in Hawaiian culture or ecosystems.

Thank you,

Angela Huntemer M.Ed.
Kuilima Estates East,
Kahuku HI 96731

From: [William Leisk](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Commercial Aquarium Fish collection
Date: Saturday, January 4, 2020 2:53:02 PM

The Hawaii reef fish populations are in decline. Adding commercial net collection of those same fish is obviously bad policy. Aquarium fish collection is like selling the seed before planting.

Sincerely, William Leisk
North Kohala, Hawaii

From: [Charlie Humphrey](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] commercial aquarium fishing trade in West Hawai'i
Date: Tuesday, January 7, 2020 11:54:27 AM

Dear Mr. Sakoda,

I am writing this letter to oppose the aquarium fishing trade in West Hawai'i.

For many years of my life I kept marine fish as pets and also worked at a fish store which specialized in marine corals and fish. I can tell you from first hand experience that most of the fish that are shipped off the reefs die premature deaths. Even if the fish survive the shipment process, many are not adequately cared for by the individuals that buy them.

I do support marine fish and coral aquaculture which has made many break throughs in recent years. It is my belief that the marine fish and coral industry needs to move in this direction and create jobs through aquaculture and not through harvesting wild marine fish and coral.

As an avid snorkeler here in West Hawai'i, I can say without a doubt that the collection of marine fish species would have a deleterious impact on our coral reefs. As an example, a popular aquarium fish, *Arothron meleagris*, the spotted or guinea fowl puffer, doesn't appear in large numbers on our reefs. When my wife and I snorkel for a few hours over a reef we may see one. Should a commercial aquarium company remove that one puffer from the reef, it would leave a huge hole in that ecosystem. Each species plays a part and is integral to the health of the reef.

My wife and I worked for Sea Shepherd Conservation Society and so we have seen this issue play out in many other countries around the globe. If Hawaii does not protect its reefs and the creatures that inhabit it, tourism will soon wane. I have snorkeled extensively in the Caribbean and I have seen coral reefs that have been devastated by overfishing and a lack of protection. Once the fish are gone, the corals suffer and the algae takes over. Once the algae takes over it becomes an alternate stable state, and the reef cannot recover.

It is my sincere hope that no fish collection permits will be issued for West Hawai'i, or at any reef in the Hawaiian Island chain. Our reefs are delicate enough with the pressures of climate change, and removing key species from our reefs would only precipitate their demise.

Thank you,

Charles Humphrey
Waikoloa, HI

From: [Bruce Cohen](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Commercial Fishing
Date: Monday, January 6, 2020 8:26:43 PM

Please. Do not allow our reef fish to be removed for commercial fishing interests. They are our precious resource and belong to all of us who call the islands home. Visitors want to see them as well. Healthy and abundant. The fish they desire can be found nearby uninhabited islands as well. They should go there.

Mahalo

Bruce Cohen

From: [jacqui wessel](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Coral reef destruction
Date: Monday, January 6, 2020 7:34:03 PM

Good evening

I am writing to you to say that here at Earth Warrior Project we are devastated to learn about the 14 new permits for fish collection in Hawaii. This is unacceptable since the coral reef is already being destroyed due to the current environmental issues which is plaguing our oceans. Action like this is like taking 10 steps in the opposite direction , we must move forward and help life on this planet flourish. I hope you consider the long term effects of what this will do to not only Hawai'i but the world.

Jacqueline Wessel
Earth Warrior Project

[Sent from Yahoo Mail for iPhone](#)

From: [Joan Lloyd](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Defend Hawaii's Reefs from Aquarium Collecting
Date: Friday, December 27, 2019 5:30:53 PM

Aloha Mr. Sakoda,

In October 2017, when the Hawaii Supreme Court issued injunctive relief and shut down all aquarium collecting pending environmental review, it was disturbing to see Kona aquarium collecting persist with support from Kona DAR and Hawaii DLNR. Hawaii's people have spoken, but no one's listening.

And now, the "environmental review" supplied by DLNR with heavy support from PIJAC (Pet Joint Advisory Council) advocates for aquarium collectors' livelihood. This isn't an environmental review, it's a transparent lobby for Big Island and Oahu collectors who believe Hawaii's reefs are their private reserve, to trash and sell for personal gain. Aquarium collecting isn't fishing, it's a debilitating commercial enterprise ravaging Hawaii reefs.

Don't sell out Hawaii reefs to the a handful of collectors and mainland interests. Stand firm and defend Hawaii reefs for Hawaii reef wildlife, Hawaii people, and Hawaii's economic future which has far more to gain by preserving this public trust.

Thanks and Aloha,
Joan Lloyd
Marketing Director
Snorkel Bob's
(808)879-8575, mobile (808)269-0102

From: [Diane Ware](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] DEIS Aquarium fish collection Hawai'i island in support of No Action Alternative
Date: Monday, January 6, 2020 3:19:44 PM

Dear Mr Sakoda,

I urge you not to side with the special interest industry over the welfare and rights of the Hawai'i people and reef fish.

I first snorkeled in the islands before statehood and have visually noted the continued decline of reef fish until present. I am a concerned member and outings leader of the Sierra Club on Hawai'i island. We received numerous reports from members on coastal hiking, kayaking, and snorkeling outings that reef fish numbers were declining. We weren't sure why but in 2003 kayaking off Pebble beach a resident of the area advised us aquarium fish collectors were taking many fish. So much so that we weren't seeing them from land or in the water as abundantly as we had years before. The Gold Coast was gone. The beautiful under water view plane was gone. Subsistence fishing for native Hawaiians was impaired. Our Group supported a successful resolution by County Council asking the State to ban the trade in 2008. We have continued to support a ban on the trade and sponsored a program, 'Where Have All the Fishes Gone' one year ago. We met with Kaimi Kaupiko down in Miloli'i to learn how the trade affected his fishing village and were told they supported a ban. We snorkeled Honomolino, Puako, 2 step, and Papa Bay with Paul Cox. Rarely do we see more than 20-40 Tang at a time whereas we remember seeing large schools of Tang decades ago.

We invited Mike Nakachi, Rene Umberger and Paul Cox to our program. Paul Cox showed photos of collectors damaging the reef, Mike Nakachi had me in tears as he spoke of the taking and selling of black coral and other species. This trade is unnecessary and profit based for a Pet industry mostly off island. It does not benefit local residents who have shown time and again they do not support the trade. It violates the Public Trust Doctrine, Article XI of the constitution and precautionary rule.

The trade is inhumane and violates Hawaii State Cruelty Statute: [711-1109 Cruelty to animals in the second degree](#). (1) A person commits the offense of cruelty to animals in the second degree if the person intentionally, knowingly, or recklessly:

- (a) Overdrives, overloads, tortures, torments, beats, causes substantial bodily injury to, or starves any animal, or causes the overdriving, overloading, torture, torment, beating, or starving of any animal;
- (b) Deprives a pet animal of necessary sustenance or causes such deprivation;
- (c) Mutilates, poisons, or kills without need any animal other than insects, vermin, or other pests; provided that the handling or extermination of any insect, vermin, or other pest is conducted in accordance with standard and acceptable pest control practices and all applicable laws and regulations.

The trade as proposed in DEIS violates this statute. Is this why Stantec has made a disclaimer on the scope to exclude what happens to these creatures after caught? Truth is, many are brought up from reefs so quickly they suffer immediately. If their swim bladders are not punctured they can die. I suspect that is why they are found dead in trash cans (the 500 dead at the harbor). Several Hawaiians interviewed complain that they see bags of dead reef fish and this is not pono. We can ask what measures are taken to ensure fish are treated humanely. They are deprived of food at warehouses before shipping. Their fins are trimmed. Is the DOH and DLNR regulating care of fish? My sister is a vet tech and says they are susceptible to disease and handling by humans. If treated humanely maybe not so many would be taken. They are sentient beings, not a commodity. Sierra Club members met with Keith Dane from Humane Society USA. I notice plaintiffs are not named in DEIS

d) For each of the 14 applicants, please note which collectors engage in the following practices in contradiction to HRS 711-1109:

- withholding of food (starvation) and for what period of time;
- fizzing or puncturing of the swim bladder;
- cutting of spines or dorsal fins;
- body compression (squeezing animal to force out ejection of fecal matter

DLNR has called for food fishers to reduce the take of herbivorous fish species but has remained silent on the hundreds of thousands of herbivorous animals the aquarium trade takes for commercial purposes.

"except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state," said Earthjustice attorney Kylie Wager Cruz. "It's common sense that this level of unrestricted take can't be sustainable."

The DEIS was prepared by Iowa-based Stantec Consulting, the same consulting group that dismissed the protests of Native Americans and claimed that the Keystone Pipeline would similarly have minimal environmental impacts.

"The DEIS is based on the false premise that aquarium collecting doesn't impact fish populations on the reefs where the trade operates," said Inga Gibson, policy director of Pono Advocacy. "Nothing could be further from the truth. This false premise lays the foundation for this extremely flawed study, and prevents DLNR from ultimately accepting the DEIS." The DEIS skews data by comparing catch numbers to estimates for fish populations on the entire island and concludes that the trade would be taking just 1%, which misleadingly minimizes impacts to localized reef ecosystems.

For years, DLNR has allowed the trade to pillage Hawai'i's treasured coral reef wildlife, in violation of HEPA.

The DEIS dismisses testimony from dozens of Native Hawaiian cultural practitioners, and

instead summarily concludes that collection for the aquarium industry has no cultural impact as long as the populations of the reef animals are not substantially reduced from current numbers in spite of advocating for unlimited take of all but one fish, Achilles Tang.

“We participated in this process in good faith, hoping for change by sharing our deeply personal, spiritual and cultural histories and concerns with this destructive trade. Instead, we’ve been slapped in the face—summarized into a one-liner that the trade has no significant cultural impact. The truth is, this industry harms our ability to gather the food we’ve relied on for generations, and it’s time for the state to protect these resources from commercial exploitation,” said Kaimi Kaupiko of Miloli‘i.

page391image1172



Diane Ware
808-967-8642
P. O. Box 698
99-7815 Kapoha
Volcano HI 96785

From: [Rachel Verizon](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] DEIS Aquarium fish collection permit comment
Date: Thursday, December 5, 2019 11:07:46 PM

Aloha David,

I have been swimming and snorkeling with my husband and daughter on our beautiful coral reefs, in the last six years we have seen two major bleaching events in Hawaii. More than 80% of cauliflower coral colonies have died due to warmer temperatures caused by climate change. The White List fish species are all dependent on the health of the reef as it is their birthplace, nursery, and home. Just as the fish depend on the coral, the coral depends on the fish to help fight off the ever encroaching algae. We have seen the reef habitat for the fish, that this DEIS proposes we start collecting again, shrink and contract. The reef needs a healthy balance and right now there are so many factors that are impacting it that it would be harmful to the continued efforts to protect these vital habitats in West Hawaii. Our main industry is tourism, and harming this potential revenue stream for the benefit of a small number of people actually in Hawaii is inappropriate and reckless. Please leave the aquarium fish collection ban in place and protect these vulnerable resources for our communities and keiki!

Mahalo, Rachel Silverman
Teacher and Resident of Kailua Kona

Sent from my iPhone

Sent from my iPhone

From: jason@jasonswatergardens.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] DEIS Aquarium Fish Trade Comment
Date: Thursday, December 5, 2019 11:39:17 PM

Aloha,

I am an avid snorkeler, underwater photographer and I snorkels every chance I get. Over the last 6 years I have watched many coral populations along the Kona coast die due to climate change and a warming ocean. These corals that are stressed need every fish they can to help keep them clean of the onslaught of ever growing algae. It does not make any sense to sell these fish for novelty pets so a few people can make a buck. These islands make money from tourist dollars, people come here to see these essential, beautiful, native fish.

Last night I read the passage below on an underwater photography guide for travelers to Kona and it made me very sad.

"Hawaiian Fish Life

Some people report that the aquarium trade has taken its toll on the fish life here, and the reef fish around Kona do tend to be on the smaller side. However, there are still plenty of fish to see,

especially on the less-dived sites south of Kona."

The word is out. Fish collection takes it's toll. Please leave the aquarium collection ban in place and move to stop the collection of reef fish in all of Hawaii. This does not line up with the pono practices of caring for the 'aina in Hawaii. You would never sell a I'iwi or Nene to a pet store, these fish are our native wildlife as well, and they deserve protection.

Mahalo

Jason Murray

Small business owner and Kailua Kona Resident

From: [Judith Graham](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] DEIS Comment, West Hawaii Commercial Fish Collection
Date: Wednesday, January 1, 2020 5:51:41 PM

January 1, 2020

Dear Mr. Sakoda:

I appreciate the opportunity to comment.

Applicant Seems Ineligible

The Applicant, Pet Industry Advisory Council, is named only once in the DEIS on an unnumbered page at the start. This page scarcely seem to be included in the document. Other EISs submitted in Hawaii, for example "The Village at Aina Lea,"(September 2010) which I checked, describe the Applicant in at least some detail. The cause in this instance may be that the Applicant is inappropriate for this Action.

The statutory definitions in HRS 343, the state's environmental law, of Applicant and Action appear to be somewhat circular but in any case show the two to be inseparably linked. The Applicant undertakes the Action which in turn is a project or program undertaken by the Applicant. But in this case the two appear not to be so linked unless the Action is construed to be preparation of an EIS. But the effects described in the DEIS concern the collection of reef fish. This activity will not be undertaken by the Applicant, which appears to be a trade industry advocacy group. Thus, this EIS submittal does properly represent a portion of its membership--aquarium industry wholesalers, retailers, etc. Information about the PIJAC is readily available on its main web site and a handful of related sites such as that for its Aquatics Committee, where a FAQ about donations is partly answered in this manner:

"If you are a PIJAC member, consider the connection between ensuring access to live organisms and the success or failure of your enterprise."

This appears closer to the purpose for PIJAC's involvement in the EIS preparation than the frequently cited purpose of ensuring the livelihood of 14 fish collectors.. Hawaii's Supreme Court had stopped commercial aquarium fishing in West Hawaii as of 2018. Yet the DEIS acknowledges that West Hawaii is among the state's richest sources of reef fish for collection. In any case, in this instance the Applicant does not undertake the Action. The Action may not properly be seeking the issuance of 14 permits from the DLNR. If the DNLR undertakes that action, it is an agency action and this instance is not an agency EIS process.

Probable Consequences for Yellow Tang

Yellow tang are a pleasing yellow in color and according to saltwaterfish.com, a retail dealer with web pages very similar to Amazon's, "is among the most popular of all marine species" for aquariums. Its prices per individual, depending on size from 1.5 to 4.5 inches, vary on this site from \$62.99 to \$162.99. These high prices will drive up collection rates. According to the DEIS, about a quarter million individuals were collected in 2013-14 and again in 2017-18, some recent years for which figures were cited (page 74). Further, the West Hawaii commercial aquarium fishery depends over 80% on yellow tang collection (page 74)..

Actually, the take may have been higher, one reasons, because according to a table on page 24, the percentage of statewide collectors who submitted the DLNR-required monthly reports of their takes was about 30% in 2017, about 40% in 2016 and about 42% in 2015. (I have interpolated figures given.)

The DEIS describes all sales in Hawaii after collection as valued at about \$5 million annually while noting in the same sentence that most sales are to the US mainland, Europe and Asia (pages 24-25). It becomes clear that this market is very large, and for the popular yellow tang, quite overbearing. In 2017 the chair of PIJAC's board of directors described it thus:

"Ninety-three percent of the world's Yellow Tangs found in aquariums come from Hawaii. This is at risk thanks to ... the Hawaii court decision."

(reef2rainforest.com/2017/11/09/aquarium-industry-under-siege)

The commercial aquarium take from other islands--Maui, Kauai, Oahu--has not been described in the DEIS, so what proportion of total collection is yellow tang could not even be inferred .. The DEIS does say Hawaii Island represents well over half of State of Hawaii collection. Given the relatively high retail price for yellow tang, and the apparent size of the market relative to the West Hawaii grounds, it is unreasonable to suppose this species will survive the five-year period envisioned in the DEIS without serious depletion. Serious depletion *can* occur and can be attributable to commercial aquarium collection as stated in the Humane Society's comment herein pertaining to the loss of butterfly fish off Oahu.

In one instance, the DEIS has used an island-wide CREP count of the yellow tang base population, instead of a regional West Hawaii count, to infer no significant diminishment (page 100). But that is erroneous, and in this instance collection would be augmented by the factors mentioned above--beauty, price, size of market. It is hard to see how the DLNR, given its mandate, could accept a program or project that did not clearly address this jeopardy to yellow tang. The current DEIS unfortunately does not address it,

A Question

Would a conservation district use application be required?

Sincerely,

Judith Graham

From: [Connie Rohal](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Do Not Let The Pet Industry Joint Advisory Council (PIJAC) Bamboozle You!
Date: Sunday, January 5, 2020 3:35:04 PM

Dear Honorable David Ige,

Most people of Hawaii, and the millions of people from around the world that visit our most unique and amazing state, are worried about the health and viability of our reefs.

The reefs are suffering. There are many reasons why. Some are out of the control of one person to fix, but there is one reason that one person can affect, and that person is you.

You are a smart man, Governor Ige, so you know I am talking about shutting down the aquarium trade people.

Your constituents depend on you to do what is best for the state. To do what will ensure a healthy ocean for the livelihood of all who live here and also for those who spend millions and millions of dollars to come here and enjoy the biggest draw our state has to offer, our island reefs.

I appeal to your love of the state and your desire to do the right thing, to stop the ravage of the reefs. The reefs will not survive without the fish and without the reefs our biggest tourist attraction will disappear along with the tourists.

The state is not benefiting from the aquarium trade and it is not in our best interest.

When the fish are gone, and the aquarium trades people you are working to protect move on to other Polynesian islands...when our reefs are dead and barren because the fish have been scooped up and shipped away, when tourism declines, and the livelihood of Hawaii's people is impacted, they will look to you and ask why you didn't stop it when you had the chance.

This is your time Governor, to make a difference, to impact in a most positive way, the future of Hawaii's tourism, and the future of the aina and kai, and to live up to the righteous way that you swore to uphold, according to our state motto "Ua Mau ke ea o ka Aina i ka pono." The eyes of the people of your state look to you to stop the destruction of the reef caused by aquarium trade desperados.

Do not be misled, manipulated or fall for the smoke and mirrors of the PIJAC. When you entered politics, did you want to serve the people, make a change, make a difference? Be that guy, Governor, be the hero you always wanted to be. Let your legacy reflect you took a stand and did the right thing, for your people and the land of your birth.

Please stop the aquarium trade. Please stop every advantage they currently have. Please end this wanton destruction to our reefs once and for all.

Most respectfully.

Connie Rohal

Oahu Resident and Avid Snorkeler

From: [Mary Beth Witzel](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Do not want to see more fish collection permits
Date: Tuesday, January 7, 2020 12:39:34 PM

Aloha David,

I am a local resident who is concerned about our fish population. There is a decrease in the fish we can see when snorkeling along the shore. Please STOP giving out permits of the profit of a few!

Mary Beth Witzel
Kailua Kona

From: [Jeanne Schaaf](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Don't export Hawaii reef wildlife to feed the aquarium trade
Date: Sunday, January 5, 2020 6:25:47 PM

Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue ! Mahalo nui loa
Jeanne Schaaf
3150 Wailea Alanui Drive #27-4, Kihei, HI

From: [Dan Dolaptchieff](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Draft eis
Date: Wednesday, January 8, 2020 10:35:40 AM

Hi David,

My name is Dan Dolaptchieff.

Im a liscensed tropical fish collector. It unconstitutional for only 14 persons to fish that water in west hawaii,

I have fished. On Big island for most of my 28 years here for tropical fish in west hawaii and on hilo side.

My Boat shop burnt down in 2006 due to Mac. Nut operation next door. I was diving west hawaii. I had to sell my house and move to east side , it was all i could afford with my family.

I was eagerly waiting for the west side to open so i could make a good living again. I could never afford to give the 14 guys 20 k to help with the lawsuit. I did give funds to PIJAC.
(Im a disabled Veteran)

I humbly request that the council looks at my situation and acts appropriately.

U would be excluding many already liscensed trop divers already
Living and working on the big island.

Not a very good situation. How can a small group of fisherman have exclusive rights to fish one area. What is the hawaiian trop divers gonna say? Discrimination against hawaiians?

Aloha

Dan Dolaptchieff

Hilo

From: [david balfour](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] End Aquarium trade now!!!
Date: Tuesday, January 7, 2020 3:47:16 PM

Aloha Mr Sakoda,

The aquarium trade is being used to denude our reefs and destroy the irreplaceable habitats around our islands.

While Australia is battling wild fires destroying millions of acres of timber and marsupial animals unique to only that country we have an obligation to preserve what is natural and best for our island state.

Please discontinue this harmful practice.....We can not relent on this critical threat to our island habitats.

--

In peace and friendship,
David

From: [karen bret harte](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] end aquarium trade now!
Date: Tuesday, January 7, 2020 3:46:43 PM

Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue! Stop using wildlife for profit. How would you like to be placed in a glass home for all to see and never be able to get out? Want to see the fish, try watching videos or go to an aquarium!

From: [Chris Mentzel](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] End Aquarium Trade Now!
Date: Tuesday, January 7, 2020 3:21:29 PM

Aloha Mr. Sakoda,

The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands.

Please discontinue this practice immediately. We are watching closely and will not relent on this issue!

Mahalo,

Chris Mentzel

From: [Shayla Middleton](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] End Aquarium Trade Now!
Date: Tuesday, January 7, 2020 4:40:32 PM

Aloha Mr. Sakoda,

The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands.

Please discontinue this practice immediately. We are watching closely and will not relent on this issue!

Mahalo nui loa,
Shayla Middleton

From: [Nancy Haag](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] end the aquarium trade that is damaging our reefs
Date: Wednesday, January 8, 2020 1:00:23 AM

Please do not let a lobbying group representing commercial interests influence your decisions. The reef fish are needed here in Hawaii for the enjoyment of our local community and tourists. We as a state have more to lose than the commercial enterprises that want to continue. I have been snorkeling here since I came to live in Maui in 1975 and I have seen a real decline in reef fish populations. Let the aquarium collectors find another method to make money and not jeopardize one of our state's treasures that will also have a negative impact on our tourist economy.

Thank you, Nancy Haag
Kihei, HI 96753

From: [Sulara James](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] end the aquarium trade!
Date: Monday, January 6, 2020 2:47:54 PM

The aquarium trade is devastating our sea life! Please end it now!

Sulara James, Kihei

From: [Susan Douglas](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] End the Aquarium Trade
Date: Monday, January 6, 2020 2:03:21 PM
Attachments: [B3DF5277-163C-4982-95B5-0BF4563AAC72\[12\].png](#)

Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue!

See <https://www.instagram.com/p/B66lqQZFs7s/?igshid=1bybz0ksoky3c>)concerning

Warmest Mahalo and Aloha!

Susan Douglas
Healthy Life Coach
Temple of the Spirit
Kihei, Maui, HI 96753
808 879 1112
(You can call 24/7, if you get my machine leave a long message.
NO texts please.)
sd3@hawaii.rr.com



From: [Jack](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] End the the reef fish trade
Date: Friday, December 27, 2019 5:53:52 PM

Stealing the reef fish from Hawaii is a crime and must Stop.
We have enough pressure on our ocean reefs
Home salt water aquariums are another selfish way to destroy Hawaii's ocean beauty

This must Stop. Jack Lavin Maui Hawaii Voter

Sent from my iPad

From: [ellen.robbins](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Environmental Review
Date: Monday, December 9, 2019 1:48:32 PM

Dear Mr. Sakoda:

Hawaiian Supreme Court made their decision clear two years ago, regarding precious marine life, but it has been circumvented.

Those of us here on the mainland, tourists, divers, lovers of Nature and Beauty ask that the Hawaiian Paradise be protected. The aquarium trade is sadly voracious and greed driven.

I ask that the long term lure of dollars from tourists, such as myself, take priority over destructive short term dollar gains to be made by plundering precious Hawaiian reefs for the aquarium trade.

From: [Ali Manesh](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] FEIS Public Comment
Date: Tuesday, January 7, 2020 1:22:31 PM

Aloha, Mr. Sakoda.

My name is Ali and my wife and I moved to the island of Hawaii about two years ago. The driving motivation for us to leave our corporate jobs behind and move here was to learn from the Hawaiian's peoples' perspective and relationship with nature to help us reconnect with the land and the natural resources that the island has to offer. So I was a bit dismayed when I learned that there was a push to reinstate the practice of catching fish from the ocean waters here to place in aquariums. I'm sure that you've received many comments regarding the potential impact that this type of activity can have on natural and cultural resources so I want to bring up the unjustified idea that we as men feel that we have the right to capture and remove any living beings from their homes solely for the purpose of our enjoyment and profit, even if some try to disguise it as for educational purposes. It's one thing, although almost just as appalling, that we've become ok with breeding various animals in captivity to accommodate a very inhuman pet industry. But the thought of capturing creatures who have known nothing but freedom in the beautiful open waters of Hawaii and to all of a sudden place them in small closures to be transported and placed in even smaller closures for our enjoyment is just heart wrenching for me. Regardless of what your views on animals may be and whether they can feel emotions like fear and sadness, do you honestly feel that we should have the right to remove and displace any free roaming beings from their natural habitats for our enjoyment?

I feel that this is not only a cultural and environmental issue but also an important moral issue. We need to be honest with ourselves and re-evaluate how we view the vast natural beauty that surrounds us and our place within that environment. Do we want to see ourselves living in balance and harmony within this place that we all call home or do we view ourselves as more important than the other creatures around us and therefor giving us the right to remove and displace any creatures that we see fit?

Since moving here, my wife and I have learned much about the idea of kuleana, particularly when it comes to the land and natural resources. Im sure that you and your colleagues at DLNR will agree that it is everyone's kuleana to appreciate and protect what is here. And I hope that you also agree with me that removing and displacing any creatures from their homes simple for our enjoyment and benefit definitely does not fit anywhere within the concept of kuleana.

I appreciate but certainly don't envy the tough decisions that you and your colleagues have to make from time to time. Thank you for taking the time to read and consider my comment on this particular issue.

Mahalo.

Ali M

From: [Bill Coney](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] fish collecting permits
Date: Tuesday, January 7, 2020 3:54:29 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Mr. Sakoda,

My name is Bill Coney, I am the co-founder of Legacy Reef Foundation, based on the Big Island at NELHA. We are a privately funded coral preservation and restoration lab dedicated to protecting and restoring our coral reefs here in Hawaii and around the world. I grew up here in Hawaii and have for over 50 years been actively involved in Hawaii's coral and marine life. After a long and successful career as a business entrepreneur, I retired 7 years ago and I decided to open the foundation. We now have some of the best scientists in the world working with us and I feel I have a good understanding of situation with the aquarium trade and its impact on our reefs.

First, let me say I am pro-business and would never want to stifle any one's ability to make a living. Having said that, finding a balance between the collector's interest and the coral reefs that supports their trade is key to the long term success of the aquarium trade. Proper limits need to be set and enforced. One option would be to have the state give out, or sell, a preset number of "AQ fish catch certificates" (like tax stamps on alcohol and cigarettes). These certificates could be given to the collectors monthly that specify what and how many organisms can be collected and shipped off island. This is a simple and easy to implement system that allows them to collect and earn a living and while creating a "managed" fishery. Compliance is critical to the success of any program, and this system facilitates enforcement. Your agency could task the shipping entities to ensure every shipment has a "AQ fish catch certificate" before they can accept and ship them. Large fines for allowing non-compliant shipments should keep the shippers in line. Since there are only a few companies that ship fish the burden on the state would be manageable.

I would suggest waiting two years to develop the "AQ fish catch certificate" program. This would give the corals some time to recover from the recent bleaching event. Our corals health depend on those same aquarium trade fish to recuperate and stay healthy. This year they are so stressed now, and we expect another bleaching event next summer. Our fear is if the coral loses any of the herbivores that keep them alive in the next year, the chances are high we will lose all our coral. They really need another 2 years to be safe. Without the corals to house, feed and act as nurseries, the aquarium fish will be endangered. Giving the ecosystem two years more years to stabilize, and time to establish a responsible and business friendly program, will result in ~~Then~~ an acceptable equilibrium between collectors and the reef that supports the fish of their trade, and all stakeholders win.

Thank you for considering this as an option. Please feel free to contact me with questions or assistance in building this program,

Aloha,

Bill Coney & Dr. Sussanne Otero

Legacy Reef Foundation

Founders

808.960.1223

bill@legacyreeffoundation.org

www.legacyreeffoundation.org

signature_1652709651



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From: [Michael Bell](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collection Objection
Date: Tuesday, January 7, 2020 12:46:40 PM

Aloha Mr. Sakoda,

My name is Michael Bell. I have been a resident of Hawaii Island for nearly 30 years. I am writing to you voicing my strong opposition to the issuance of reef fish collection permits.

I am a proud employee of Body Glove Cruises. We are an ocean adventure company that provides snorkeling, SCUBA, whale watching and historical dinner cruises. During my years living on the island and working in the ocean industry I have noticed fewer and fewer reef fish. Issuing permits for collections of our island's dwindling fish populations would negatively impact our fragile ecosystem. Not only have I personally noticed a decline in reef fish populations, we also have guests who complain about our dwindling populations.

Working for a company that provides island guests a safe, ecologically friendly opportunity to enjoy our island's natural resources is a great honor. Body Glove Cruises donates a portion of its proceeds towards the preservation, restoration and education of our coral reefs.

Please make your island's preservation contribution by not issuing fish collection permits. Making the "right" decisions now will make a huge difference in our future.

Mahalo for your consideration.



Michael Bell - Executive Strategy Coordinator
Body Glove Ocean Adventures
phone: [808.326.7122](tel:808.326.7122)
site: bodyglovehawaii.com
address: 75-5629 Kuakini Hwy.



From: [Margie Park](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collection Objection
Date: Monday, January 6, 2020 3:18:03 PM

Aloha Mr. Sakoda,

My name is Margie Park. I have been a resident of Hawaii Island for 30 years. I am writing to you voicing my strong opposition to the issuance of reef fish collection permits.

I am a proud employee of Body Glove Cruises. We are an ocean adventure company that provides snorkeling, SCUBA, whale watching and historical dinner cruises. During my years living on the island and working in the ocean industry I have noticed fewer and fewer reef fish. Issuing permits for collections of our island's dwindling fish populations would negatively impact our fragile ecosystem. Not only have I personally noticed a decline in reef fish populations, we also have guests who complain about our dwindling populations.

Working for a company that provides island guests a safe, ecologically friendly opportunity to enjoy our island's natural resources is a great honor. Body Glove Cruises donates a portion of its proceeds towards the preservation, restoration and education of our coral reefs.

Please make your island's preservation contribution by not issuing fish collection permits. Making the "right" decisions now will make a huge difference in our future.

Mahalo for your consideration.

--

Best Regards,



Margie Park - Sales & Marketing Manager
Body Glove Ocean Adventures
phone: [808.326.7122](tel:808.326.7122)
site: bodyglovehawaii.com
address: 75-5629 Kuakini Hwy. Kailua Kona, HI 96740



Body Glove Ocean Adventures creates life-long family memories by providing first-in-class ocean recreation activities that are fun, safe, educational and respectful of the environment and traditional Hawaiian culture.

From: [Maggie Brown](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collection Objections - Jan. 7th Deadline
Date: Monday, January 6, 2020 12:29:49 PM

Aloha Mr. Sakoda,

My name is Maggie Brown, I am owner of Body Glove Ocean Adventures. I have lived on the Big Island for 45+ years and have been operating commercial snorkeling and SCUBA diving tours since 1974. The massive decline in marine life, mostly fish has declined immensely since then. Between the Black Water run off along the West Coast of Hawaii Island and the recent coral bleaching, our reefs are in disrepair. I compare underwater pictures of our BI coral reefs/marine life from the 1970's- 80's and the devastating change would make a grown man cry.

I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish.

I invite you to view my page on TripAdvisor and see how many complaints we get, due to lack of fish and the condition of our coral reefs. We at Body Glove donate portion of our ticket sales to Legacy Reef Foundation and other non-profit organizations for the for the preservation, restoration and education of our coral reefs. Permitting those to collect Hawaii's Tropical Fish and take them from our Reefs is counter-productive.

Thank you for taking the time to read my comments.

Mahalo,

	<p>Maggie Brown President Body Glove Ocean Adventures</p> <p>phone: 808.326.7122 mobile: 808.895.5959 site: bodyglovehawaii.com address: 75-5629 Kuakini Hwy. Kailua Kona, HI 96740</p>	
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Our actions over the next 10 years will determine the state of the ocean for the next 10,000 years. -Sylvia A Earle

From: [Heather Howard](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collection Permits opposition
Date: Monday, January 6, 2020 4:41:52 PM

Aloha Mr. Kakoda,

My name is Heather Howard. I am the Co-Founder of the Coral Reef Education Institute located on the Big Island. I am in extreme opposition to issuing any permits for fish collection for the aquarium trade in the state of Hawaii and especially the Big Island. Our coral reefs are in extreme decline and allowing fish collectors to remove our herbaceous fish from our reefs is negligent. Coral reefs are stressed more than they have been from the ever more frequent bleaching events. The state's new initiative 30% by 2030 should never allow our reef fish to be removed for resale and should focus on MPA's to protect our reef fish so they may become geriatric and produce more spawns for rehabilitation.

Please do not allow the fish collection to restart in Hawaii.

--

Heather Howard
Coral Reef Education Institute
www.onecoralreef.org
808-987-3165



From: [Cynthia Urry](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] fish collection testimonials
Date: Monday, January 6, 2020 11:32:55 PM

Aloha David,

I was asked to write to you concerning fish collection in Hawaii. I thought that the ban on fish collecting was still in effect, but several people have contacted me saying that it was

coming up for discussion again. Already? It hasn't been very long since the ban went into effect and it took years to get it passed. There must be some fish collectors pressuring

someone to let them have free rein on our poor reefs. I am a longtime resident / scuba diver and I have seen a few more yellow tangs that were very much depleted just a couple of

years ago. They are trying to come back but the numbers are still low. There are still so many endemic species that we don't even see anymore. We desperately need our algae

eaters as with the coral bleaching we had this year (we really dodged a bullet with our rain we got that cooled the water temps just enough) . I swim, snorkel , and dive the whole

west side of Hawaii Island (with several others) . Our waters here are the best in the state for scuba diving and snorkeling . People that are relying on the businesses around the

waters are seeing less fish also.

Please don't let a few greedy fish collectors ruin the reefs for everyone . We need at least 10 more years of untouched reefs to get back to our old Hawaii. There is poaching going on

too and we realize that the DLNR can't be everywhere .

We are so far removed from the rest of the world that we can't replenish our fish like they can in Indonesia . Help us save what we have because once it's gone, there's nothing at all

we can do. If I can help you in any way , don't hesitate to call on me.

Mahalo Nui Loa ,

Cyndy Urry

cwurry@yahoo.com

From: [BOB CURRAN](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collection
Date: Tuesday, January 7, 2020 3:10:59 PM

Dear David,

Being a past Dive Charter operator, I may be biased. What is Hawaii thinking by still allowing fish collection in 2020? Look around the world. Even 3rd world countries have buoy anchorage systems in place and don't allow fish collection. Please help protect what's left.

Thanks,

Bob Curran

Sea Dreams Hawaii

1983 to 1995

From: [Sera Roman](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collections Permitting
Date: Monday, January 6, 2020 2:46:36 PM

Aloha Mr. Sakoda,

I am writing this email to inform you that I am opposed to the passing of the 14 new permits allowing the collection of Hawaiian reef fish on Hawaii Island.

As a diver and general lover of the ocean, I have seen so much reef damage occurring over the past few years alone. Our reefs are already suffering so much, and the reef fish are an integral part of reef survival. The removal of these fish upset the natural ecosystem that allow the reefs to grow and heal, which they already need so much.

Please take into consideration the state of the reefs, and the ocean at large, and do not pass the new fish collection permits.

Thank you for your time,
Sera Bell

From: [Jack Bevolo](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish collections policy
Date: Tuesday, January 7, 2020 10:50:01 AM

Hello,

I came across a public notice bringing light to policies concerning the removal of native fish from reefs in Hawaii for the aquarium trade which recommended contacting this email to urge that limitations on the policy be put in place. The Pet Industry Joint Advisory Council has apparently said that whatever extent of collection of these animals would only have a negligible impact on the ecosystem, but this is clearly a dismissal of the practically inevitable consequences virtually unrestricted collection will have. This is not a matter to take lightly simply at the first claim that it is "harmless".

Thank you for consideration,
Andrew John Bevolo IV

From: [Sheryl Weinstein](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish Collectors/aka Reef Rape
Date: Tuesday, January 7, 2020 3:18:24 PM

Aloha David:

Please, please, please do what you can to help stop tropical fish collection in Hawaii—especially West Hawaii. As a scuba diver, I've seen a sad decline in reef fish populations everywhere I dive in the last 19 1/2 years.

Thanks for all your support!

Sincere aloha,
Sheryl Weinstein

Sent from my iPhone

From: [Karin Nelson](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish protection
Date: Monday, January 6, 2020 11:24:01 AM

Hello. I am writing to ask and insist that Hawaii help work towards a change in human attitudes about keeping animals captive for their entertainment. Please protect the fish living in the reef systems around your islands for the aquarium trade and please take a position against the use of (especially) wild fish for the aquarium trade.

The bigger picture is of course that we have to end the industrial catch of all sea creatures in order to preserve the oceans. Please consider this in decisions going forward.

Thank you,
Karin Nelson
Edmonton, Alberta, Canada

From: [Renea Cooper](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish
Date: Monday, January 6, 2020 7:54:48 PM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium

[Sent from Yahoo Mail for iPhone](#)

From: DENZLER2370@twc.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish
Date: Monday, January 6, 2020 6:46:52 PM

No more permits to the fish collectors please.

Mahalo

From: [Sari Kala](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fish
Date: Tuesday, January 7, 2020 2:41:05 PM

Stop aquarium trade !!!!

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Sári

From: [Cindy Whitehawk](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] fisheries
Date: Wednesday, January 8, 2020 9:39:47 AM

It took years of individuals concerted efforts to stop the raping of our ocean by the pet fish aquarium industry. I have only lived here 14 years and have witnessed the decrease in our reef fish. Please do not give in and re-open our waters to the aquarium fish trade.

Cindy Whitehawk
PO Box 265
Honaunau HI 96726

From: [Hawaiian Energy](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Former tropical fish collector
Date: Tuesday, January 7, 2020 11:32:06 AM

Howz it aloha everyone
my name is Dane many in the business know who I'm those new divers will know who I'm by the end of this evening..

Before we begin I'd like to bring the public's attention to exactly who these divers are and some of the pet shops that are buying these fish...

Names:

I've seen a lot of divers come and go...most leaving damaged reefs and pure destruction in their methods...

Ahh the New divers
This is where problems began and has changed our reefs forever.

During my time or tenure as a collector I would consistently catch 200 to 400 yellow tangs several times a week. I've caught as many as 2000 yellow tangs in a day...I've caught tons of variety... for public knowledge variety is any fish but the yellow tangs...

These numbers are excessive, alarming and frightening.

I would dive a reef and leave it to recover 14 to 18 months... that's on a short window....New divers would come in and dive on reefs which I had just dove the day before claiming there we're still hundreds of fish still to be caught.

arguments would leave me with TRO's against me ... having to go to courts to continue my arguments...

These new divers collecting tropical fish are hunters, relentless predators with the fish as their prey

Today's diver are continuing to rape and pillage our reefs
They are now diving on prestine virgin reefs, untouched until now... over on the east side of our island.

Those Reefs I dove from upolu point north to south point, were prestine virgin and untouched... and now... gone... it's beyond recovery...it will take Mother Nature....all of her might to undo what we have done to her reefs... yes her reefs it's not ours... we're uninvited guests...

There are pet stores and divers who claim things are fine... those claims are false.

Fish Survival

Survival rate is zero

All fish I have caught have already died. Life expectancy less than a third in captivity.

Fish recognize vibration... they hear like deer... they can hear the motors of the tropical boat, this automatically triggers a stress response to survive...
from that exact moment, through the entire ordeal of swimming from capture to being caught in nets, then scooped... fins all the while being cut, scraped smashed and damaged... skin and scales removed
Causing sickness and fever to set in...

People we can't let this continue... we must all get involved and expose these divers names and pet companies... let our people know who they are and begin fighting back...

Please feel free to call me... I have a lot more stories to share about what is really going on with the industry...and

our reefs.

Dane Enos

From: mhussenbux@btinternet.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] from Animal Interfaith Alliance in Britain
Date: Tuesday, January 7, 2020 12:31:15 AM

Dear Mr. David Sakoda, Program Manager of Commercial Fisheries at the Division of Aquatic Resources - aloha!

I write on behalf of The Animal Interfaith Alliance, an international alliance of faith groups founded in Britain concerned about the welfare of animals. Our member organisations and individual members include Buddhists, Christians, Hindus, Jains, Jews, Muslims and Sikhs. We are all united by our common concern for animals, based on our various faiths. Our member organisations are listed below.

We send our compliments and refer to the report that Hawai'i is considering the impact that fish collection for the aquarium trade has on wild fish populations.

We read that The Pet Industry Joint Advisory Council has submitted an environmental impact statement "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem".

We cannot understand this complacent and dangerous assertion. On three occasions in 2017, when SB 1240 was on Governor Ige's desk for signing, we wrote to urge him to do so, fearing that unlimited fishing on the reef would decimate populations of native fishes and destroy the pristine marine environment of which you should be proud.

We read that Earthjustice attorney Kylie Wager Cruz states: "It's common sense that this level of unrestricted take can't be sustainable," and further notes that the state shouldn't ignore "that except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state."

Maxx Phillips, Hawai'i director with the Center for Biological Diversity, an excellent group some of our members support, says: "Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" -.

This is appalling and we hope that you agree. We are appealing to you to accept that your native fishes need and deserve effective legal protection, and should be left in the wild where they belong, not exploited for human amusement.

Best regards,

Marian Hussenbux, Secretary International Campaigns

Animal Interfaith Alliance
[https://urldefense.com/v3/_http://www.animal-interfaith-alliance.com_!!LIYSdFckKA!jY02nXtuwN_ezQS4MJHw5brqFjSIZ9qXCwn7cd16x63zxi1SSFoWWeByPgxj_vaic6am6Q\\$](https://urldefense.com/v3/_http://www.animal-interfaith-alliance.com_!!LIYSdFckKA!jY02nXtuwN_ezQS4MJHw5brqFjSIZ9qXCwn7cd16x63zxi1SSFoWWeByPgxj_vaic6am6Q$)

Faiths Working Together for Animals

Member Organisations:

Anglican Society for the Welfare of Animals
Bhagvatinandji Education and Health Trust
Catholic Concern for Animals
Christian Vegetarian Association UK
Christian Vegetarian Association US
Dharma Voices for Animals UK
Institute of Jainology
Islamic Concern
Jewish Vegetarian Society UK
Mahavir Trust
Oshwal Association of the UK
[https://urldefense.com/v3/_http://www.panorthodoxconcernforanimals.org_!!LIYSdFckKA!jY02nXtuwN_ezQS4MJHw5brqFjSIZ9qXCwn7cd16x63zxi1SSFoWWeByPgxj_va2uFg_kQ\\$](https://urldefense.com/v3/_http://www.panorthodoxconcernforanimals.org_!!LIYSdFckKA!jY02nXtuwN_ezQS4MJHw5brqFjSIZ9qXCwn7cd16x63zxi1SSFoWWeByPgxj_va2uFg_kQ$)
Quaker Concern for Animals
Sadhu Vaswani Centre
Young Jains

President - Dr Richard D. Ryder. Vice President - Dr Deborah Jones.

Patrons (in alphabetical order) - Rev. Christa Blanke, Joyce D'Silva, Kay, Duchess of Hamilton, Satish Kumar, Nitin Mehta MBE, Dr Andre Menache, Dr Alpesh Patel, Dr Matthieu Ricard, Anant Shah, Ajit Singh MBE, Charanjit Singh, Mohammad Safa.

From: [Mary Marvin Porter](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fw: draft EIS
Date: Tuesday, January 7, 2020 10:08:10 PM

----- Forwarded Message -----

From: Mary Marvin Porter <islandeyesvideo@yahoo.com>
To: "david.sakoda@hawaii.gov" <david.sakoda@hawaii.gov>
Sent: Tuesday, January 7, 2020, 2:36:29 PM HST
Subject: draft EIS

Dear Mr Sadota,

Review of: DEIS

As a resident and snorkeler on the island of Hawai'i for 25 years, I see a big decrease in the fish population. I have been snorkeling all around the island, Hilo, Kapoho, Kona, and Kohala, Before living here, I lived on Molokai for several years and there I had the wonderful experience of getting to eat small fresh fish, other than the few expensive varieties, available in grocery stores today. Fish is one of best food sources and should not be wasted as often happens in the aquarium fish capture, shipping off island, and then mismanagement in home aquariums resulting in early deaths.

Given the severe planetary climate crisis, "There Were More Than 100 "Billion Dollar" Climate Disasters in the Past Decade," we need to do all possible to become more sustainable in food and fish. The island of Hawai'i also had major fish losses with the recent lava flows in the Puna area covering beautiful Kapoho coral reef and covering the only boat ramp for Puna fishermen. We need to do all possible to protect and replenish our fisheries.

Although I am college graduate, getting through the draft EIS was a horrendous task and often seemed to make statements contradictory, confusing, and unclear. However the interviews with long time Hawaiian residents, was very interesting and they repeatedly spoke of how there used to be many more fish. I think that it should be our goal to do everything possible to increase fish populations.

The EIS seems to claim studies show we have not lost in fish population in last 20 years so no problem with continuing aquarium collection, but my personal observation does not indicate that. And certainly much of the coral has died in last few years and how that will affect the future of the fishes is unknown, but probably badly. I used to see schools of fish, I rarely see that now.

I do not find the draft EIS clear or acceptable. I oppose the continuation of aquarium collection other than for educational facilities that can care for the fish properly.

Mary Marvin Porter
Island Eyes Video Journalism
Kea'au, Hawai'i
808-982-9100

From: [Diane Ware](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Fwd: DEIS Aquarium fish collection Hawai'i island in support of No Action Alternative
Date: Monday, January 6, 2020 11:41:29 PM
Attachments: [image1.JPG](#)

Dear Mr Sakoda,

I urge DLNR not to accept the preferred alternative of the biased DEIS payed for by special interest industry trumping the welfare and rights of the Hawai'i people and reef fish.

For years, DLNR has allowed the trade to pillage Hawai'i's treasured coral reef wildlife, in violation of HEPA. I am a simple person with a deep connection to nature who values the Hawaiian ecosystems. I have volunteered 25 years on numerous including Hakalau, Mauna Kea Forest Project's Palila critical habitat to HVNP and also Kiholo Bay fishpond with TNC to preserve and restore habitats for future generations.

I first snorkeled in the islands before statehood and have visually noted the continued decline of reef fish until present. I am a concerned member and outings leader of the Sierra Club on Hawai'i island. We received numerous reports from members on coastal hiking, kayaking, and snorkeling outings that reef fish numbers were declining. We weren't sure why but in 2003 kayaking off Pebble beach a resident of the area advised us aquarium fish collectors were taking many fish. So much so that we weren't seeing them from land or in the water as abundantly as we had years before. The Gold Coast was gone. The beautiful under water view plane was gone. Subsistence fishing for native Hawaiians was impaired. Our Group supported a successful resolution by County Council asking the State to ban the trade in 2008. We have continued to support a ban on the trade and sponsored a program, 'Where Have All the Fishes Gone' one year ago. We met with Kaimi Kaupiko down in Miloli'i to learn how the trade affected his fishing village and were told they supported a ban. We snorkeled Honomolino, Puako, 2 step, and Papa Bay with Paul Cox. Rarely do we see more than 20-40 Tang at a time whereas we remember seeing large schools of Tang decades ago.

We invited Mike Nakachi, Rene Umberger and Paul Cox to our program. Paul Cox showed photos of collectors damaging the reef, Mike Nakachi had me in tears as he spoke of the taking and selling of black coral and other species. This trade is unnecessary and profit based for a pet industry mostly off island. It does not benefit local residents who have shown time and again they do not support the trade. It is in conflict with the Public Trust Doctrine, Article XI of the constitution and precautionary rule.



The trade is inhumane and violates Hawaii State Cruelty Statute: [711-](#)

1109 Cruelty to animals in the second degree. (1) A person commits the offense of cruelty to animals in the second degree if the person intentionally, knowingly, or recklessly:

(a) Overdrives, overloads, tortures, torments, beats, causes substantial bodily injury to, or starves any animal, or causes the overdriving, overloading, torture, torment, beating, or starving of any animal;

(b) Deprives a pet animal of necessary sustenance or causes such deprivation;

(c) Mutilates, poisons, or kills without need any animal other than insects, vermin, or other pests; provided that the handling or extermination of any insect, vermin, or other pest is conducted in accordance with standard and acceptable pest control practices and all applicable laws and regulations.

The trade violates this statute and looks the other way, not wanting to regulate just reap "socio-economic benefits" touted in the DEIS. Is this why Stantec has made a disclaimer on the scope to exclude what happens to these creatures after caught? Truth is, many are brought up from reefs so quickly they suffer immediately. If their swim bladders are not punctured they can die. I suspect that is why they are found dead in trash cans (the 500 dead at the harbor). Several Hawaiians interviewed complain that they see bags of dead reef fish and this is not pono. What measures are taken to ensure fish are treated humanely? They are deprived of food at warehouses before shipping. Their fins are trimmed. Is the DOH and DLNR regulating care of fish? My sister is a vet tech and says they are susceptible to disease and handling by humans. If treated humanely maybe not so many would be taken. They are sentient beings, not a commodity. Sierra Club members met with Keith Dane from Humane Society USA. I notice plaintiffs are not named in DEIS. Why?

DLNR has called for food fishers to reduce the take of herbivorous fish species but has remained silent on the hundreds of thousands of herbivorous animals the aquarium trade takes for commercial purposes.

"Except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state," said Earthjustice attorney Kylie Wager Cruz. "It's common sense that this level of unrestricted take can't be sustainable."

The DEIS was prepared by Iowa-based Stantec Consulting, the same consulting group that dismissed the protests of Native Americans and claimed that the

Keystone Pipeline would similarly have minimal environmental impacts. The most recent oil spill was over 300,000 gallons.

The DEIS skews data by comparing catch numbers to estimates for fish populations on the entire island and concludes that the trade would be taking just 1%, which misleadingly minimizes impacts to localized reef.

The DEIS dismisses testimony from dozens of Native Hawaiian cultural practitioners, and instead summarily concludes that collection for the aquarium industry has no cultural impact as long as the populations of the reef animals are not substantially reduced from current numbers in spite of advocating for unlimited take of all but one fish, Achilles Tang. Why should native Hawaiian fishers accept the diminished fish numbers after decades of the trade taking unlimited numbers of fish as a base line for sustainability? The cultural background provided is detailed and explains why Hawaiians have connections to places their ancestors frequented and fished. If that place is now diminished by the trade, they are deprived of the bounty their ancestors enjoyed. Thus the colonial overlordship of lands and ocean taken and regulated by the state continue to marginalize the people and the culture.

“We participated in this process in good faith, hoping for change by sharing our deeply personal, spiritual and cultural histories and concerns with this destructive trade. Instead, we’ve been slapped in the face—summarized into a one-liner that the trade has no significant cultural impact. The truth is, this industry harms our ability to gather the food we’ve relied on for generations, and it’s time for the state to protect these resources from commercial exploitation,” said Kaimi Kaupiko of Miloli‘i.

Finally, I have a great interest in protecting anchialine pond habitats. One or two of the DEIS so called "Red Pond Shrimp" are now endangered (*Vetericaris chaceorum* and *Procaris hawaiana*). *V. chaceorum* is found in Ka'u. The DEIS claims no endangered species are collected. Why? There is no limit on take of shrimp and the numbers taken are a "guess" but likely over 20,000 per year. Do the chosen collectors know the difference between the species of 'opae? Are endangered species caught and how many? The Center for Biological Diversity has another current lawsuit against USFWS for not designating critical habitat for anchialine ponds in violation of ESA. According to the Ka'u Calender (December 2019) Maxx Phillips of BCD says "These special species are found nowhere else...so if they disappear from here they'll be lost forever. Anchialine pool shrimp and the rest of the group needed habitat protection years ago but there not getting it from the anti-wildlife Trump administration. Species with habitat protection are twice as likely to be in recovery as those without". Dr. Scott Nelson researcher from Auburn University spoke at After Dark in the Park, 2011, stating they have found Hawaiian endemic 'opae'ula world wide, and "...has also garnered the interest of aquarists and companies in the pet trade industry. Over the last few years, closed ecosystems containing these shrimp have been marketed under a variety of trademarked names in retail stores and on the World Wide Web...Thus, habitat destruction and modification, as well as the potential for over-harvesting, could ultimately lead to the extinction of some *H. rubra* populations." Quote is from Molecular Ecology.

I have empathy for those who have depended on the trade for income as I was forced to change professions due to health concerns. There are many pono possibilities such as tours,

monitoring reef and fish or removing invasives which I believe the state could do to improve and protect the reefs.

With respect,

Diane Ware
808-967-8642
P. O. Box 698
99-7815 Kapoha
Volcano HI 96785

From: [Anne Wilson](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Hawaii fish-don't feed the mainland aquarium trade
Date: Monday, January 6, 2020 7:31:08 PM

David,

The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade. It is just WRONG!!

Anne Shaw
Kihei

From: [danielle chomel](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Hawaii reef wildlife
Date: Saturday, January 4, 2020 12:48:44 PM

Please stop the aquarium trade. Keep the fish on the reefs which are already so compromised. The aquarium trade is not fishing it's a devastating commercial enterprise that trashes near shore habitat and species don't export Hawaii reef wildlife to feed the mainland aquarium trade.

I have been swimming and snorkeling in Hawaii for 45 years, and have seen the devastation of our coral reefs and diminishing population of our reef fishes. The more fish on the reefs the healthier our reefs and coral will be. Keep the fish where they belong, at home, in Hawaii on their reefs. Mahalo, Danielle Chomel

Sent from my iPad

From: [Tumeria Langlois](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Hawaii's Fish
Date: Monday, January 6, 2020 10:05:57 AM

Dr. Mr. Sakoda,

Please protect Hawaii's fish from the aquarium trade. Fish are sensitive, sentient beings and deserve to be allowed to swim free in the ocean. I have been to both the Big Island and Maui and have taken snorkeling trips on both islands. It was breathtaking beautiful. It was like being on a different planet. That is how fish should be viewed and enjoyed. Our oceans are dying due to exploitation. We need to keep ecosystems intact and thriving. Thank you for your time and attention.

Sincerely,
Sharon J. Langlois

From: [Jonathan Boyne](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Hawaii's native fishes need and deserve effective legal protection, and should be left in the wild.
Date: Monday, January 6, 2020 4:28:55 PM

Dear Mr. Sakoda,

Hawaii is considering the impact that fish collection for the aquarium trade has on wild fish populations.

The Pet Industry Joint Advisory Council has submitted an environmental impact statement "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem"!

"It's common sense that this level of unrestricted take can't be sustainable," explains Earthjustice attorney Kylie Wager Cruz, who further notes that the state shouldn't ignore "that except for bag limits for a limited number of species, nothing prohibits these collectors from taking every single fish from every single reef in the state."

"Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" - Maxx Phillips, Hawaii director with the Center for Biological Diversity.

Hawaii's native fishes need and deserve effective legal protection, and should be left in the wild.

Sincerely,

Jonathan Boyne
96822

From: [Lila Sherman](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] hawaii's reef fish
Date: Tuesday, January 7, 2020 4:37:53 PM

Please! STOP the theft of Hawaii's
Reef fish. No reason for allowing it is a good reason

From: [Maggie Kahoilua](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Issue 14
Date: Monday, January 6, 2020 6:39:02 PM

Aloha Mr. Sakoda,

My name is Margaret Kahoilua. I am a Native Hawaiian, past Expedia Local Expert, member of The Coral Reef Alliance, Bail Bondsman, and a current participant on the Vibrant Hawaii Leadership Team.

I am concerned w/the condition of our coral reefs. In September of 2019, I joined some guests on a snorkeling tour to Kealekekua Bay. My heart was broken by the vast difference/depletion of diversity among our reef fish. Given the fact that this area is a conservation area, it was surprising to observed the devastation.

There are many factors already impacting the health of our local reefs. Allowing the collection/removal of our reef fish only exacerbates an existing crisis & may lead to the depletion of essential reef species.

Please ensure any decisions made regarding permits to collect fish are made with the sustainability of our coral reef ecosystems as TOP PRIORITY. Mahalo...

Best Regards,
Margaret Kahoilua

Bail Bond Agent #414221
Kama'aina Bail Bonds
PO Box 1134
Kailua Kona, HI 96745
Phone: (808) 443-3743
Email: maggiekahoilua@gmail.com

"If we want to change the community, all we have to do is change the conversation. The shift in conversation is one of problems, fear, and retribution to one of possibility, generosity, and restoration." Peter Block

From: [Kathy Boyd](#)
To: [Sakoda, David](#)
Cc: [Kaathy](#)
Subject: [EXTERNAL] Just say NO to fish collections permits!
Date: Monday, January 6, 2020 4:47:55 PM
Attachments: [Outlook-q0g3ady0.png](#)

Aloha Mr. Sakoda,

My name is Kathy Boyd, I am the Lead Concierge for our on Island Expedia Local Expert Team. I have lived on the Big Island for 12+ years and have worked in the travel industry since day one. Those of us that call the island home have sadly seen the massive decline in marine life. Between the Black Water run off along the West Coast of Hawaii Island, chemical spraying along the coastlines to keep golf courses green and weed free and the recent coral bleaching, our reefs are in disrepair.

I am writing to respectfully inform you, I STRONGLY oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish. I understand that some would argue that this would provide some jobs, but what about those of us that already work in the industry, and our past, present and future visitors. It seems very short sighted to not consider how you are impacting all our current ocean operators (and supporting resort staff like myself) that take people out to see our natural underwater wonderland.

Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawaii's Reefs is counter-productive. We tell our visitors to enjoy Hawaii here, don't take the lava rocks, the shells, the multi-colored sands from our beaches, why would you condone this? Our oceans are dependent on people like yourself to do what is Pono. Please choose to do the right thing, our community will be watching.

Thank you for taking the time to read my comments.

Mahalo,

Kathy Boyd

Lead Concierge, Expedia Local Expert®

E: kaboyd@expedia.com

T: +1 808.331.8111

How was your concierge experience?

Email us at mahalo@expedia.com



From: [Donna Marino](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Leave native fish in the wild
Date: Monday, January 6, 2020 10:04:45 AM

Please limit fish collection for the aquarium trade; this practice has enormous negative implications for wild fish populations.

Estimates predict that Hawaii is expected to lose 70% of its coral reefs in the next couple of decades and cannot afford to allow the aquarium industry to raid the reefs.

Thank you for your time.
Donna Marino

From: [Maureen Welch](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Leave the reef fish in the water
Date: Tuesday, January 7, 2020 5:55:21 AM

hello,

This is in regards to whether unlimited fish take should be allowed by the pet industries.

Look, with all that is going on with our planet, we need to be doing EVERYTHING we can to protect all it's beings. Allowing unlimited take of reef fish is not sustainable and not in the best interest of the reefs, Hawaii or the planet. Hawaii native fishes need and deserve effective legal protection, and should be left in the wild, not circling some tired fish bowl.

Thank you for taking my comment and concern in to consideration
Maureen Welch

From: boboloo@wavecable.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] Marine Life
Date: Tuesday, January 7, 2020 7:48:35 PM

Please respect marine life and leave it untouched. We should not be pulling fish out of their habitats to have glorified saltwater fish tanks.

Thanks for being a supporter for keeping marine life where it should be....in the ocean.

Louise Knop

From: [Katherine Green](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Native fish
Date: Monday, January 6, 2020 1:55:45 PM

Dear David,
Native fish need protection! Please make the best informed decision to help them.
Sincerely, Katherine

Katherine Green

From: [Nancy Kelley](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Native fishes
Date: Monday, January 6, 2020 10:37:47 AM

Mr. Sakoda,

I write to urge you to leave your native fishes alone. Provide them the legal protection they deserve and allow them their wild and free nature! The reefs are integral to the ecosystem in Hawaii. Do not permit them to be raped by careless people for the sake of entertainment. Really?

I will be watching. Would appreciate a reply to my request.

Thank you.

Nancy Kelley
Allentown, PA

From: [Shannon](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] No fish collection permits
Date: Tuesday, January 7, 2020 1:08:36 AM

Our reefs are suffering and need the fish in the ocean to help preserve the symbiotic relationship needed for survival. I oppose issuing more permits for fish collections on Hawaii island. Thank you for your time, Shannon Velazquez

Sent from my iPhone

From: [Elizabeth Parker](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] No legal, not Pono
Date: Monday, January 6, 2020 3:32:41 PM

NO to reef damage, please do what Is right

From: [Margot Bogdonavich](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] No more fish permits
Date: Tuesday, January 7, 2020 3:02:36 AM

I've lived in Kona since 1970 off and on - on the beach & there used to be so many fish near the shore it looked golden. Please do not issue any more permits. The bad guys still do it illegally & who is check the permitted fish when they come in.

We could see them from our house.

Mahalo,

Susie Jenkins

Sent from my iPad

From: [cindy.williams](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] No more harvesting of fish for aquariums please
Date: Monday, January 6, 2020 11:43:24 PM

Aloha Mr. Sakoda,

As I witness the decline of beautiful fish in the Hawaiian waters over the last 2 decades, my belief is that the fish need your help. People who profit from this industry can have guppies and other fish that reproduce well and aren't wild-harvested. It is your hands to protect the beauty and diversity of our tropical fish, and I urge you to please help. The DLNR needs to be directed to care for and protect our national treasures and preserve the fish for future generations of kama'aina and tourists to enjoy. Please help!

Mahalo nui loa,

Cindy Williams
685 Holua Dr
Kahului, HI 96735

562-879-6507

From: [Spear Diver](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] NO to Commercial aquarium fishing
Date: Tuesday, January 7, 2020 2:44:39 PM

Aloha Mr. Sakoda,

I'm a scuba instructor, I work in the ocean every day.

Commercial aquarium collection hurts Hawaii in so many ways. I'll list a few examples here:

People come to Hawaii to enjoy the ocean and see beautiful tropical fish. Eco-tourism is ever growing, but with no bright and beautiful reef fish (such as Tangs and all other herbivores) the reef will be dead, which means less people will travel to Hawaii to enjoy it.

Commercial aquarium fishing will bring irreversible damage to already harmed reef and its habitants. As we know from many studies reef is a very complex and precisely balanced system, with all links of the chain equally important in keeping that balance. All reef fish play major roles in keeping reef healthy and with recent coral bleaching events our reef needs to be left alone more than ever. Taking reef fish will only increase the damage which will lead to an end of the reef as we know it.

The riches of Hawai'i are in the ocean, please don't let them to be taken away. Especially knowing that about 80% of collected reef fish dies during the process and never makes it to aquarium.

Sincerely,

Mike Rudenko, North Kohala, Big Island

From: [Jeannine](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] "No" to reinstating Aquarium Trade
Date: Tuesday, January 7, 2020 1:17:31 PM

Please do NOT allow the 'Pet Industry' to start capturing fish in our Hawaiian waters again.

Too much damage has already been done - wildlife need our help, as does the Eco-system that now hangs in the balance.

Mahalo,

Jeannine Moore

From: [Marie Greene](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] NO!! Aquarium collecting
Date: Tuesday, January 7, 2020 2:45:15 AM

Dear Mr. Saduko;

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for over the past 20 years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point.

Sincerely,
Sandra Greene
Tradewinds99@gmail.com
KIHEI HI 96753

--A Hui Hou

From: [Robert Rutkowski](#)
To: [Case, Suzanne D](#); [Sakoda, David](#); [Neilson, Brian J](#)
Subject: [EXTERNAL] Ongoing Illegal Aquarium Collection Under Commercial Marine Licenses and Request for Meeting
Date: Wednesday, January 8, 2020 1:18:15 PM

Suzanne Case, Chairperson
State of Hawai'i Department of Land and Natural Resources
suzanne.case@hawaii.gov

Brian Neilson, Administrator
brian.j.neilson@hawaii.gov

David Sakoda, Commercial Fisheries Program Manager
david.sakoda@hawaii.gov

Division of Aquatic Resources
Kalanimoku Building
1151 Punchbowl Street Room 330
Honolulu, Hawai'i 96813

Re: Ongoing Illegal Aquarium Collection Under Commercial Marine Licenses
and Request for Meeting

Dear Chair Case, Administrator Neilson, and Mr. Sakoda:

A coalition of Native Hawaiians and conservation groups has warned the Hawai'i Department of Land and Natural Resources (DLNR) that the agency could end up back in court if it doesn't end a policy allowing the practically unlimited extraction of reef fish and other aquatic creatures for the aquarium pet trade without any environmental review, circumventing a court injunction halting such activities until the review process is completed.

The policy began after the Hawai'i Supreme Court ruled in September 2017 that aquarium collection under permits is an action subject to environmental review under the Hawai'i Environmental Policy Act (HEPA), and the circuit court subsequently voided all unexpired permits and placed a moratorium on renewing or issuing new permits pending the environmental review process.

Under the new policy, DLNR has been renewing and issuing new commercial marine licenses to aquarium collectors without also requiring aquarium collection permits or HEPA review, as long as collectors don't use fine-meshed nets and traps. Yet, the agency does nothing to verify the methods collectors claim to be using. It would be extremely difficult to gather the types and amounts of animals that the industry has continued to collect without using fine-meshed gear, which has always been the primary means for gathering aquarium fish. DLNR's policy has enabled the aquarium trade to harvest more than half a million marine animals without any environmental review during the past two years.

Instead of embracing the courts' rulings and ensuring that the environmental effects of aquarium collection are properly considered,

the agency has given the industry a free pass to continue collecting without any oversight. Deregulation for the benefit of private industry is completely contrary to DLNR's constitutional mandate to safeguard our marine life for present and future generations.

The policy violates HEPA, state aquarium collection laws, and the public trust doctrine under the Hawai'i Constitution.

I was shocked to learn that under the agency's watch, the industry has continued ravaging Hawai'i's reefs without any assessment of environmental harm, despite the courts' rulings. Taking hundreds of thousands of marine animals for private profits obviously requires vetting under the environmental review process.

The collected animals are primarily herbivorous reef-dwellers that serve important functions in the coral reef ecosystem, such as helping to control algae growth. Studies have shown that reducing the abundance and diversity of reef fish and important invertebrates affects a reef's ability to respond to stresses or disturbances.

Telling the aquarium trade it no longer needs permits or HEPA review to continue operating makes a mockery of the agency's duty to conserve and protect our reefs and fish populations so that they can support public purposes, including traditional and customary practices such as subsistence fishing.

Hawai'i's reefs are the lifeblood of kanaka maoli and their communities.

The agency's decision to deregulate the aquarium trade threatens Hawai'i's precious reef ecosystems, which are already at risk due to climate change.

DLNR is overseeing the ongoing court-ordered environmental review process, currently underway for West Hawai'i and O'ahu. But unless this policy is changed, the industrial-scale extraction of marine animals purportedly using non-fine-meshed gear will continue without any environmental review under HEPA.

Yours sincerely,
Robert E. Rutkowski

cc:

Representative Steny Hoyer
House Majority Leader
Legislative Correspondence Team
1705 Longworth House Office Building
Washington DC 20515
Office: (202) 225-4131
Fax: (202) 225-4300

[https://urldefense.com/v3/https://www.majorityleader.gov/content/email-whip-!!LIYSdFfckKA!!YvYDrwcYT7t39zZyh3rJXKxc4IE1Z_n5ePkZesrIByDSc2up-DvAb4S1J3QxCz4HYTHXA\\$](https://urldefense.com/v3/https://www.majorityleader.gov/content/email-whip-!!LIYSdFfckKA!!YvYDrwcYT7t39zZyh3rJXKxc4IE1Z_n5ePkZesrIByDSc2up-DvAb4S1J3QxCz4HYTHXA$)

2527 Faxon Court
Topeka, Kansas 66605-2086
P/F: 1 785 379-9671
E-mail: r_e_rutkowski@att.net

From: [Laci Waters](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] OPPOSE issuing permits to collect Hawaiian Reef Fish
Date: Tuesday, January 7, 2020 5:50:21 PM

Mr. Sakoda,

I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. Why would you even consider this?

Protect your island don't help destroy it!

Laci Waters

From: [Kim](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Opposed to issuing of more fish collecting permits
Date: Tuesday, January 7, 2020 12:01:51 PM

Aloha Mr. Sakoda,

I was born and raised in Kona, and have seen significantly less fish on our reefs in my lifetime. I have also seen the drastic, irreparable damage to our coral reefs that the reduction of herbivorous fish greatly exacerbates. No Hawaiian reef fish should be taken to supply the mainland pet trade. This is wildlife trafficking.

Mahalo,

Kim

From: [Amanda Cash](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Opposition to aquarium collecting in Hawaii
Date: Friday, January 3, 2020 11:02:58 PM

Hawaii is my favorite vacation destination. I was very alarmed at the lack of beautiful wildlife during a recent snorkeling trip off the coast of Maui. It was vastly different compared to years past. I vehemently oppose aquarium collecting in Hawaii! This is destroying our reefs!

Sincerely,
Amanda Cash

Sent from my iPad

From: claudia@tcomputer.net
To: [Sakoda, David](#)
Subject: [EXTERNAL] Opposition to new fish collection permits
Date: Monday, January 6, 2020 2:15:43 PM

Aloha Mr. Sakoda,

I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish.

Thank you for your consideration.

Claudia Kane

Tradewind Consulting

808.640.8669 cell

808.217.9324 office

claudia@tcomputer.net



Please consider the environment before printing this email

From: [David Pettus](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Opposition to Submittal Form for HRS Chapter 343 Publications in the Periodic Bulletin : Entry # 622
Date: Monday, December 16, 2019 4:52:04 PM

Dear David Sakoda,

Places as near as Waipio Valley and as far away as the Mediterranean sea are dealing with unintended consequences arising from cultivating tropical fish and other non-native aquatic species and relocating them, inflicting damage that no one yet seems able to ameliorate,

The “neat idea” of growing escargot snails in Waipio has left taro farmers dealing with a nightmare infestation of snails that has increased farmers expenses and workloads, and diminished their harvests and profits. The Mediterranean is clogged with underwater flora flushed down toilets from home aquariums, seriously damaging native aquatic plant and fish species.

The project under consideration is laden with risks of similar and worse catastrophes, not to mention the fact that few of the fish captured here for marketing elsewhere can survive the ordeal. We urge you to oppose this project.

In Gratefulness,

David Pettus
Sharon Pettus

davesherry@hoolea.com
47-391 Velez Rd.
PO Box 1405
Honokaa, HI 96737
(808)775-1234

From: [Laura Roberts](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Ornamental Fish Trade in Hawaii
Date: Tuesday, January 7, 2020 1:11:25 PM

Aloha Mr. Sakoda,

I am an avid diver and also volunteer for coral restoration in Kona. The ornamental fish trade should NOT be allowed. Hawaii needs to keep its waters healthy, beautiful and bountiful. Without a healthy reef and fish to look at. The tourists will stop coming and that would be detrimental to the entire economy. The negative environmental impacts should be obvious. The waste is horrendous in the collection process. The dumpsters at Honokohau Harbor used to have giant trash bags full of dead yellow tangs that didn't survive collecting. That absolutely must STOP.

Mahalo for your time,

Laura Roberts
PADI professional of 10 years
Kona Hawaii

From: [Dominic Romer](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Ornamental fish trade.
Date: Tuesday, January 7, 2020 10:48:07 AM

Good Morning,

I'm writing asking you to please keep the ban on the West Hawaii ornamental fish trade active. I first moved to the Big Island in 2001. Before that I was living in Oahu. When I moved to the big Island I was amazed at the variety and numbers of fishes and coral compared to what I'd seen on Oahu. I got my scuba certification and began to dive almost every day after work. After a few years I moved to the mainland for a job opportunity. I just move back to the Big Island in July 2019. I began snorkeling my 2nd day off the plane. I was shocked at what I saw. There was so much dead coral. The fish life was nothing like it was, In fact I can name specific fish..Since I've been back I've seen 3 scrawled file fish...I used to see numerous scrawled file fish every dive. The amount of parrot fish is also down an immense amount. Tinkers butterfly fish used to be common in large swarms all over the reefs. Now due to fish collection the only place to see them is either in south point or on very deep reefs well beyond the recreational diving limits.

So what I'm asking is to please to not allow ornamental fish collection in West Hawaii. The reefs are in trouble and need the herbivores to keep them clean and healthy, the tourists comes to see the reefs and the fishes. There is only one West Hawaii there will be a tipping point where the fish populations are too small to reproduce effectively and like the Tinkers butterfly fish they will disappear. The science that the fisherman are using does not take into account the coral bleaching events of 2015 and 2019 and future events. Please don't let the greed of a few individuals ruin the precious underwater environment of West Hawaii.

Dominic Romer
Tel. 727-505-1821
Check out our blog at [Roaming with the Romers](#)

From: [DSR Photography](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] ornamental fish trade
Date: Tuesday, January 7, 2020 12:39:54 PM

Good Morning Mr. Sakoda,

I am writing to you today to encourage you & your team in the complete & final banning of fish collection (for ornamental purposes).

I see no reason why the state of HI and the coastline of West Hawaii in particular should be such a source for aquarium fish around the world.

Anyone who has spent time in the waters off HI will tell you about the dramatic decrease in the amount of fish life here. The excitement on various Facebook groups when a fish such as a Tinkers Butterfly fish is spotted while diving, should be enough of a sign that this collection industry is causing untold harm to our marine species.

We need all these fish to have a complete functioning ecosystem...each creature plays it's part...now, we need to play ours & support those without voices.

Collecting for home aquariums and to line the pockets of mainland sellers is not a valid use of any HI governmental permit. Surely, we should restrict collecting to only those needed for public/scientific aquaria. This can then be the inspiration for generations of fish lovers & marine enthusiasts.

Thank you for your efforts, Sandra Romer.

From: [Rebecca Canright](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Our state's fish are precious.
Date: Monday, January 6, 2020 6:57:17 PM

Hi there!

As a college student who cares deeply about Hawaii's wild marine life, I recently learned that our state is considering the impact that fish collection for the aquarium trade has on wild fish populations.

I ask you respectfully to strongly limit the amount of native fishes that can be caught for the aquarium pet trade.

Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, thus it is our duty to steward and protect our state's incredible marine diversity from exploitation and over-harvesting.

Have a wonderful day,
Rebecca Canright

--



Compassion for all creatures great and small.

Did you know that Crested Auklets, birds living in the Bering Sea region, bark like dogs and smell like oranges (they naturally produce a tick-repelling substance)?

From: [Shelby Serra](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Pacific Whale Foundation comment - Aquarium permit issuance
Date: Monday, January 6, 2020 8:32:33 PM
Attachments: [PWF comment DEIS.pdf](#)

Aloha David,

I left a message on your office phone regarding submitting comment so please let me know if you are not the right person or place.

I am submitting comment on behalf of Pacific Whale Foundation (PWF) regarding the Issuance of Commercial Aquarium Permits for the WHRFMA. It is listed on the DEIS as HRS Chapter 343 Entry #622. You are the contact listed on this DEIS. Please let me know if there is an online portal that this needs to be uploaded to. Tomorrow (Jan 6) marks 45 days since the DEIS was published to public comment, and therefore the deadline for comment.

Please find our attached comments.

Thank you,
Shelby

Shelby Serra

Conservation Coordinator

Pacific Whale Foundation

Office Phone: (808) 856-8344

Mobile Phone: (503) 422-9483

300 Ma'alaea Rd., Suite 211, Wailuku, HI 96763

Hawai'i Department of Land and Natural Resources
Division of Aquatic Resources

Pacific Whale Foundation
300 Ma'alaea Road, Suite 211, Wailuku, HI 96763

Tuesday January 7th 2019
RE: Issuance of Commercial Aquarium Fishing Permits for the West Hawai'i Regional Fishery
Management Area
HRS Chapter 343 Entry #622

Pacific Whale Foundation opposes the issuance of commercial aquarium fishing permits for WHRFMA outlined in HRS Chapter 343 entry #622

Pacific Whale Foundation (PWF), a 501 (c)(3) nonprofit organization has a mission is to protect the ocean through science and advocacy and to inspire environmental stewardship. The objective of the proposed action is for the Department of Land and Natural Resources (DLNR) to issue 14 Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA). I am testifying in opposition of the issuance of the 14 aquarium permits and support a No Action Alternative, where no commercial aquarium collection would occur within the WHRFMA.

Hawai'i's DLNR Division of Aquatic Resources has approved the Pet Industry Joint Advisory Council (PIJAC) to apply for the issuance of Commercial Aquarium Permits for the WHRFMA. This project involves review of both the use of state lands and the use of conservation districts that are involved in the proposed permitting areas.

The Preferred Alternative includes the issuance of 14 aquarium permits for the WHRFMA, and implementation of a reduced bag limit for Achilles Tang of 5 per day. Implementation of the Preferred Alternative, according to this DEIS, would ensure the lawful, responsible, and sustainable commercial collection of 40 fish species deemed "White List Species" from the WHRFMA. It is unclear why there is only a bag limit for Achilles Tang. Without a complete understanding of a sustainable catch limit, imposing a limit on one species leaves room for excessive take of all other species. Without a verification system to ensure accuracy of self-reported data, there is no way to know what the sustainable catch limit is. This draft outlines a large range for sustainable catch limits, capped at a high percentage (25%). Using the precautionary approach, the lowest estimated percentage of sustainable take should be applied (5%).

Pacific Whale Foundation acknowledges that the best available science indicates less than significant direct and indirect impact on reef fish populations with the preferred alternative outlined in this DEIS. Although the Coral Reef Ecosystem Program (CREP) data are the most comprehensive data publicly available in fish populations estimates, certain limitations of the surveys may lead to an underestimate of some populations. Short period of survey effort, exclusive survey zone and the misidentification of fish disallow this survey from collecting accurate fish population numbers. Determining actions based on these numbers can lead to an overestimating population numbers and misidentifying take limits.

In review of this DEIS, it is unclear who are the interested parties involved in the issuance of these permits. A better understanding of interested parties within PIJAC would shed light on the intentions of this application. This draft outlines calculated economic benefits based on a 17 year time frame between 2000 and 2017 and created a 5-year analysis period, inflation-adjusted, to these permits which under the Preferred Alternative, work out to be approximately 0.01% of Hawai'i's ocean economy, and an even smaller percentage of the overall economy in the State. With such a minute economic benefit, the purpose of this permit issuance is unclear.

There are a number of impacts outside of aquarium fisheries that are effecting coral reefs, including recreational aquarium fish collection, non-aquarium fishing, tourism and climate change. Under the climate change umbrella there includes additional stressors such as coral bleaching and ocean acidification, which lead to coral death. We believe that these cumulative impacts outweigh a single stressor. Using the precautionary principle, without a complete understanding of the environmental stressors on reefs in relation to climate change and other impacts, there should be no introduction of additional stressors to the reef ecosystem.

Due to the near negligible economic benefit and the introduction of a new stressor on a currently stressed ecosystem, we oppose the issuance of the 14 aquarium permits and support a No Action Alternative, where no commercial aquarium collection would occur within the WHRFMA.

Thank you,

Shelby Serra

Conservation Coordinator

From: [Jennifer H.](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Paradise Fish
Date: Monday, January 6, 2020 11:40:30 AM

Dear Hawaii,

paradise on earth, your native fishes need and deserve effective legal protection and should be left in the wild.

"Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" - Maxx Phillips, Hawaii director with the Center for Biological Diversity.

More info is at: <https://www.thegardenisland.com/2019/12/02/hawaii-news/comment-now-on-aquarium-fishing-impacts/>
<https://www.hawaiinewsnow.com/2019/11/27/input-sought-proposal-resume-commercial-aquarium-fishing-off-west-hawaii/>

The Dark Hobby is a film about this cruel industry: <https://thedarkhobby.com/index.html>

Thank you for your time.

Sincerely,
Jennifer Hagens

From: [Smith](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Permit to Collect Fish for Aquariums
Date: Sunday, January 5, 2020 1:43:14 AM

Dear Mr Sakoda

I was given your name to email and I assume you work with DNLR. I will try to call your office this week.

As a taxpayer who pays your salary, I really don't appreciate you selling our natural resources.

I snorkel on Maui everyday and even though if I understand correctly the permit is for the Big Island, I can only assume the waters and fish populations are somewhat similar.

There are not abundant fish in our waters. You rarely see schools of fish or huge varieties so I find it hard to believe that someone could do a multi page study and come up with the notion that there are so many fish in Hawaiian waters that we can sell them off to who ever is paying you.

I hear from many visitors, " where are the fish". It's depressing.

Please tell me:

1. Your telephone number so I can discuss with you.
2. How this benefits the tax payer and the visitor.
3. What exactly is in it for the state.

Sincerely,
Robert B. Smith

From: [vera.deryabina](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Permits for fish collection
Date: Monday, January 6, 2020 10:38:26 PM

Aloha Mr. Sakoda,

My name is Vera Deryabina. I work in a seafood industry in Alaska, and often visit Big Island for a vacation. I have been in love with the island since my first visit and have been lucky to be a part of such a breathtaking, unique and beautiful place that is clean and full of life which is so rare nowadays. I have met many people who call the Big Island their home and witnessed how they care for their island, its wild life and its nature.

Working in seafood industry showed me how fishing can be harmful for the environment and how much Alaska has been suffering from it. The decline in many species has been so massive that the state had to close multiple fisheries - crab, herring, salmon, cod and other white fish. The ocean sustainability is in danger. The only thing that keeps Alaskan salmon runs is hatchery program. And we've seen a huge decline in the run of wild fish.

Please, don't let it happen to Hawaii. It's one of the not many places in the world that is treasured by their residents and people from all over the world who admire it. Please, consider not issuing these fishing permits.

Regards,

Vera Deryabina

Envoyé de mon iPhone

From: [Betty White](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Permits for Fish Collections
Date: Tuesday, January 7, 2020 3:30:14 AM

Mr. Sakoda,

Please do not issue any more Permits for Fish Collections....

I worked on the Spirit of Adventure dive boat off Kailua Kona in 1978.

I returned as a passenger in 1985 and saw a huge difference underwater.

My brother, sister and I went to Hawaii in 1985 and went out on the Body Glove Hawaii boat.

I was devastated by the lack of fish and the terrible condition of the coral...

Issuing more Fish Collections permits will only make the situation worse...

It appears to me that Hawaii cannot continue to be a dive destination if even more fish are gone.

PLEASE do not issue any more permits....

Thanks for your time

Betty White

360 535 3408

From: [Shirley Spencer](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Permits
Date: Monday, January 6, 2020 3:38:00 PM

Aloha Mr. Sakoda,

My name is Shirley Spencer. . I have lived on the Big Island for 45+ years and have enjoyed snorkeling and diving since moving here. The massive decline in marine life, mostly fish has declined immensely since then. I can compare underwater coral reefs/marine life from the 1970's- 80's to now and the change is incredible.

I am writing to respectfully inform you, I oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish.

Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawai'i's Reefs is counter-productive.

Thank you for your time

Mahalo,
Shirley Spencer

Shirley Spencer
Shirley@akamaiart.com
Akamai Art Supply, Inc
73-4976 Kamanu St. #108
Kailua Kona, Hawaii 96740
808.334.0292

From: [Paul Kohman](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Pet Industry Joint Advisory Council environmental review
Date: Tuesday, January 7, 2020 9:59:00 AM

An environmental review done by an organization with the sole purpose of financial gain by its members should not be considered to be valid for environmental conservation purposes. Please do not allow this review to influence your decisions regarding the operation of the reef fish collecting trade trade in Hawaii. Reef wildlife is in dire need of protection by laws and enforcement.

Thank you for your consideration,
Paul Kohman

From: [Kerry Beane](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] PIJA Review Concerns
Date: Sunday, January 5, 2020 7:31:27 PM

Aloha, Mr. Sakoda,

I am very concerned about losing most of our reef fish to the pet trade. To quote Snorkel Bob, "It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing."

Please do not facilitate this trade in our marine heritage!!

Mahalo!

Kerry Beane
Kihei

From: [Ilene Harrington](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please do not allow any more permits to collect tropical fish
Date: Tuesday, January 7, 2020 12:49:42 AM

Aloha Mr. Sakoda,

My name is Ilene Harrington and I am absolutely confused why you would consider issuing 14 permits to allow our beautiful and unique tropical fish to be collected. Sometimes it not about the money but about what's right for our oceans and earth.

I own and operate two million dollar businesses and two non-profits in Kona and Waimea. I have lived on the Big Island for 14+ years and I snorkel up and down the North and West Hawaii coastline. I have sadly seen the massive decline in marine life. Between the Black Water run off along the West Coast of Hawaii Island, chemical spraying along the coastlines to keep golf courses green and weed free and the recent coral bleaching, our reefs are in disrepair.

I am writing to respectfully inform you, I STRONGLY oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish. I understand that some would argue that this would provide some jobs, but what about those of us that already work in the industry, and our past, present and future visitors. Its seems very short sighted to not consider how you are impacting our natural underwater wonderland.

Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawai'i's Reefs is counter-productive. Shouldn't we tell our visitors to enjoy Hawaii here, don't take the lava rocks, the shells, the multi-colored sands from our beaches, why would you condone this? Our oceans are dependent on people like yourself to do what is Pono. Please choose to do the right thing, our community will be watching.

Thank you for taking the time to read my comments.

Ilene Harrington
Kailua-Kona, HI

From: [Suzanne Lahl](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please do the right thing. Thank you!
Date: Sunday, January 5, 2020 6:58:49 PM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

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But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists.

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Suzanne Lahl
Kihei resident and homeowner

#808-284-2859

From: [WTWhale](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please end all aquarium reef fish collecting!
Date: Monday, January 6, 2020 3:21:58 PM

Aloha David,

I have seen the number of reef fish decline drastically since 1975, when I first started snorkeling here. Please stop that practice now!

William Bennett

1787 Kai Maka Place,

Kihei, Maui, Hawaii 96753

(808) 283-0404

From: [Bill or Bobbie Best](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please End Aquarium Trade Now!
Date: Monday, January 6, 2020 3:29:12 PM

Aloha Mr. Sakoda, The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. This is for the environment, tourists, locals & being pono.

People are watching closely and will not relent on this issue!

Mahalo,

Bobbie Best

280 Hauoli

Wailuku HI 96793

From: [carol anderson](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please leave your native fishes in the WILD!
Date: Tuesday, January 7, 2020 12:46:37 PM

Dear Mr. Sakoda,

As you are probably aware, The Pet Industry Joint Advisory Council has submitted an environmental impact statement "surmis[ing that] the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem"!

I am aghast at that statement - when everywhere we have continued to prove that our "use" of the wild has ended miserably and not just for them- but for US too.

According to what I read, "Hawaii is expected to lose 70% of their coral reefs in the next couple of decades. There is not time nor reasonable cause for the aquarium industry-sponsored justifications for raiding the reefs.

Your native fishes and reefs deserve effective legal protection, and should be left wild. Please do all and everything you can to ensure that legal protection is given to this majestic area and its inhabitants.

Respectfully,

Carol Lynn Anderson
Animal and Planet Advocate
Greensboro, NC

From: [Angelina Misseri](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please no permits to collect reef fish
Date: Monday, January 6, 2020 6:27:37 PM

Aloha Mr. Sakoda,

My name is Angelina Misseri, I have had the privilege to live, work, and most importantly, grow infinite respect and appreciation for the Big Island for 6+ years. Those of us that call the island home have sadly seen the massive decline in marine life. Between the Black Water run off along the West Coast of Hawaii Island, chemical spraying along the coastlines to keep golf courses green and weed free and the recent coral bleaching, our reefs are in disrepair.

I am writing to respectfully inform you, I **STRONGLY** oppose issuing permits to collect Hawaiian Reef Fish. I'm having a hard time understanding that this subject is even a topic. This is so wrong, in so many ways. Our Hawaiian coral reefs live symbiotically with tropical fish to nurture and flourish. I understand that some would argue that this would provide some jobs, but what about those of us that already work in the industry, and our past, present and future visitors. It seems very short sighted to not consider how you are impacting all our current ocean operators that take people out to see our natural underwater wonderworld.

Permitting 14 more companies to collect Hawaii's Tropical Fish for entertainment and take them from Hawai'i's Reefs is counter-productive. We need to find 14 more companies willing to put their efforts towards rejuvenating the reef, giving back to it; not taking more precious life from it. We tell our visitors to enjoy Hawaii here, don't take the lava rocks, the shells, the multi-colored sands from our beaches, why would you condone this? Our oceans are dependent on people like yourself to do what is Pono. Please choose to do the right thing, our community will be watching and the future generations are depending on you to aloha 'aina. I urge you to take action to protect our precious reef and life systems here in Hawaii.

Thank you for taking the time to read my comments.

From: [Zinnia Cardamomum](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] please protect fish.
Date: Monday, January 6, 2020 7:00:17 PM

Greetings! We are a mother and father who cherish our region's fish. Please do not allow native Hawaiian fishes to be harvested for the aquarium pet trade. It's essential to protect our marine biodiversity, which is an irreplaceable treasure. Thank you for your time, and take good care.
Mark and Zinnia C.

From: [Kathryn Lezenby](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please Protect Hawaii Fish From Pet Trade
Date: Tuesday, January 7, 2020 10:13:58 PM

Dear Mr. Sakaoda,

As an animal and nature lover, I urge you to keep the fish who live in reefs off Hawaii's coast in their natural habitat where they belong. They are adapted to live in these reefs and are integral to them.

Hawaii's reefs nurture life as well as protect its coasts from erosion. Over 500 species of plants and animals are found only in Hawaii coral reefs. These coral reefs depend on fish to eat algae that, left unchecked, can smother coral, rob it of nutrients or promote the growth of harmful algae that may kill it.

Marine biologist Mike Gil has observed that fish only feel comfortable entering risky feeding grounds abundant with algae when they see other fish doing the same and, that, when fewer fish are present, fish are more risk averse and eat less which can allow algae to grow unchecked. Thus, removing fish from a reef ecosystem threatens the reef itself.

And fish are living, feeling creatures, not commodities. Allowing them to be torn from their natural home to live in the confines of a tank at the mercy of humans is cruel as well as environmentally unsound.

As someone who oversees Hawaii's natural heritage, please protect its fish and the reefs they protect from unnecessary exploitation.

Thank you for considering my concerns.

Kathryn Lezenby
3718 Baring Street
Philadelphia, PA 19104
kathrynlezenby@gmail.com

From: nina.groll
To: Sakoda, David
Subject: [EXTERNAL] Please save Hawaiian Reefs
Date: Sunday, December 15, 2019 3:51:32 AM

Dear Mr. Sakoda,

I am from Germany and unfortunately never visited your beautiful country yet. From the Internet I learned, that your reefs are in danger due to fish and marine wildlife are captured from the sea for the pet / aquaristisque industrie. I am very sad to hear this and hope you can help to end this threat.

It was suggested to write to you directly to comment on this until 7 January 2020.

I hope you can do all in your power to protect the reefs and wildlife in your beautiful country. Please help as much as you can. Thank you.

Respectfully,
Nina Groll

Von meinem Samsung Galaxy Smartphone gesendet.

From: [E. Hoffman](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please say NO to aquarium trade
Date: Tuesday, January 7, 2020 10:29:06 PM

To: David Sakoda, Program Specialist at State of Hawaii
Department of Land and Natural Resources

Dear Mr. Sakoda:

Please do not allow native Hawaiian fish to be caught for the aquarium trade. It is wrong for so many reasons. Bad for the coral reefs, and a nightmare for the fish.

Thank you.

Sincerely,
Elizabeth Hoffman

From: [Kurt Lieber](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Please STOP the Aquarium fish collectors!
Date: Friday, December 27, 2019 7:21:57 PM

Dear Gov. Ige,

I have been diving the beautiful reefs of Hawai'i since 1979. I used to go there at least 3 times a year because it was a short jaunt from my home in California. I stopped going there altogether around 1996, because the once abundant reef fish were mostly gone. I started visiting again in 2014 because my organization was asked by Hawaiian's to help clean up the reefs of all the fishing gear that is smothering the reefs. While I still don't see the fish in the abundance I once did, protected areas like Hanauma Bay, remind me of what wonders Hawai'i could still hold if we just STOPPED letting the aquarium trade remove the fish. Please put a stop to it NOW!! The tourism industry will reap the rewards, which bring much need money into the local economy AND the government gets all the taxes that come with it.

Kurt Lieber

President: Ocean Defenders Alliance

www.oceandefenders.org

From: [Micholene O"HAHER](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] PROPOSAL TO RESUME COMMERCIAL AQUARIUM FISHING OFF WEST HAWAII
Date: Monday, January 6, 2020 10:13:09 AM

To whom it may concern.

As a touring family wanting to visit Hawaii we strongly object our family will not visit if this proposal goes a head this is a cruel industry and must be stopped.

Our intention is to visit this year. 2020.

We will be keeping a close eye on this proposal

Thank you tourists for South Africa.

Save Water

From: [Patricia Harmon](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protect fish
Date: Monday, January 6, 2020 1:48:19 PM

Dear Sir,

Please protect the fish. The Pet Industry Joint Advisory Council is wrong in their statement re environmental impact of unlimited collection of Hawaii's reef animals. Common sense will tell you that unrestricted access and taking of fishes will lower the numbers. Nature is not infinite and these sentient being should be protect. You have a beautiful coral reef ecosystem. Please don't let them spoil it.

Sincerely,

Pat Harmon

From: [Roz Downing](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protect Hawaii's Fish
Date: Monday, January 6, 2020 5:53:23 PM

Dear Mr. Sakoda:

Native fishes need and deserve legal protection, and they should be left in the wild. Please do not cater to the self-serving aquarium industry.

Thank you,
Roz Downing
Pawcatuck, CT

Sent from my iPhone

From: [Alexandra Riggle](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protect Hawaii's Fishes from Exploitation by the Aquarium Industry
Date: Tuesday, January 7, 2020 1:10:27 PM

Dear Mr. Sakoda,

One of the most memorable experiences of my life was snorkeling in the Kapoho tide pools on the Big Island. The tide pools are gone now--not because of human exploitation, but due to natural forces.

The aquarium industry, by contrast, takes Hawaii's native fishes and turns them into toys for aquarium hobbyists and a profit center for businesses. This is wrong.

Even with take restrictions, people can and will break the rules. This planet is facing unprecedented environmental crises, including the loss of coral reefs. Hawaii can't afford to let the aquarium industry plunder its reefs.

Hawaii's fishes need and deserve real legal protection. They should be left in the wild.

Please do the right thing and help create real, substantive protection for Hawaii's treasures.

Sincerely,

Alexandra Riggle
818-442-1511 (mobile)

From: [Dr. Will Tuttle](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protect Hawaii's Fishes
Date: Monday, January 6, 2020 10:29:41 AM

The Pet Industry Joint Advisory Council has submitted an environmental impact statement surmising that " the unlimited collection of Hawaii's reef animals has a minimal impact on the state's coral reef ecosystem" - This is self-serving and patently false! Please do all you can to protect the fishes on Hawaii's reefs from capture for the pet industry!

Sincerely,

Dr. Will Tuttle

From: [John Appler](#)
To: [Sakoda, David](#)
Cc: [Diane Appler](#)
Subject: [EXTERNAL] Protect our reef species and habitat
Date: Saturday, December 14, 2019 8:05:14 PM

Aloha Mr. Sakoda,

We are concerned that the aquarium trade is being protected by DLNR at the expense of our reef species and habitat here around our islands.

Please do all you can to discontinue this practice. We will be watching this issue closely.

Mahalo Nui Loa,
- John & Diane Appler

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John & Diane Appler
3418 Kuaua Place
Kihei, HI 96753
Email: johnappler@gmail.com
www.DianeAppler.com
Cell: 808-298-0976

From: [Veda](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protecting wild FISHES from the aquarium trade
Date: Monday, January 6, 2020 3:53:58 PM

Dear Governor Sakoda!

Please do not hesitate to use everything at your disposal to save the wild/native FISHES in your waters.

Your constituents will appreciate your positive efforts on this.

And your constituents will remember if you fail to use your office to save the fishes.

Veda Stram
Camano Island Washington

From: [Manu S-M](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protection for fish
Date: Monday, January 6, 2020 10:33:14 AM

Aloha Kakahiaka,

Please do everything in your power to ensure that native fishes gain effective legal protection, and are left in the wild to live their lives in peace.

Mahalo nui loa no ko oukou manawa,
Manu

From: [Lacey](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Protections for fish
Date: Monday, January 6, 2020 6:58:59 PM

As an American, I believe native fishes deserve effective legal protection and should be left in the wild. Please protect them and their habitat.

Sincerely,

Lacey Levitt, Ph.D.

From: [L.Bowles](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Public Comment Regarding Aquarium Trade
Date: Tuesday, January 7, 2020 4:21:45 PM

Dear Mr. Sakoda,

Thank you for the opportunity to comment on this issue. Recently, on a visit to Two Step I had the wonderful opportunity to see how much the beloved yellow tangs have recovered since the ban on the aquarium trade went into effect. The last time I had been there, I saw hardly any at all. We should keep in place efforts to protect these creatures in their homes, and not allow them to be taken away to be used as a ornament in someone's living room in Kansas. Folks who live and visit Hawaii deserve to see these creatures in their homes in the ocean. We should be using each opportunity we have to protect Hawaii's resources from further degradation, especially considering climate change.

Do we truly believe that Hawaii's sea life will be able to battle both aquarium trade collectors and warming temperatures, not to mention trash and people who don't always know the rules to respect the reefs? In short, our planet--including the oceans--is in crisis, as we are all aware. If we believe that allowing a trade to continue taking fish is going to help our fragile planet, we are sadly wrong. We have to keep our priorities logical. It's not logical to allow this trade to wreak further havoc on Hawaii's wildlife. There are plenty of people who live and visit here to scuba dive and snorkel who contribute much more to Hawaii's economy than an aquarium owner ever will. What happens when there's nothing left to see scuba diving or snorkeling? Will we have to start planning vacations to go visit Hawaii's sea life in aquariums on the mainland, or to some other islands where they loved their natural resources instead of taking them for granted? Let's focus on supporting the trades that boost the economy while leaving nature intact.

Sincerely,

Leigh Bowles
Hilo, HI

From: [savelolitap](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Question Re: State Law
Date: Monday, January 6, 2020 1:16:00 PM

Native fishes must receive protection from the state. They are highly intelligent and sentient individuals and should be left wild.
Diane and Syd Marcus

Sent from my Verizon, Samsung Galaxy smartphone

From: [Christine Collins](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Raiding the oceans for tanks
Date: Monday, January 6, 2020 11:49:34 AM

Dear David Sakoda,

Please make protecting Hawaii's native fishes a priority and grant them the legal protection that they deserve.

"Hawaii is expected to lose 70% of our coral reefs in the next couple of decades, so we don't have time for aquarium industry-sponsored justifications for raiding the reefs" - Maxx Phillips, Hawaii director with the Center for Biological Diversity.

Thank you
Christine Collins

From: [Jack Zimmerman](#)
To: [David Hunt](#)
Cc: [Sakoda, David](#)
Subject: [EXTERNAL] Re: "Aquarium Fish" DEIS
Date: Monday, December 16, 2019 1:27:41 PM

I share your feelings and will make a the phone call...
Jack

On Sun, Dec 15, 2019 at 4:13 PM David Hunt <davidjameshunt@gmail.com> wrote:

"Aquarium Fish" DEIS
Comments Due 1/7/2020

Approving agency
Hawaii DLNR
Agency contact name
David Sakoda
Email address or URL for receiving comments
david.sakoda@hawaii.gov
Agency contact phone
(808) 587-0104
Agency address
1151 Punchbowl Street Room 330
Honolulu, Hawaii 96813

RE: Submittal Form for HRS Chapter 343 Publications in the Periodic Bulletin : Entry # 622

http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf

December 15, 2019

I read with genuine sadness and horror, this application and DEIS.

This application should be DENIED, and our public employer & employee time (and thusly, our tax dollars) should not (now or ever again) be wasted entertaining similar inhumane, immoral, unethical applications.

These are NOT "aquarium fish" these are indigenous fellow residents of our shared island home. I am one of MANY who would be harmed by allowing this permit to be approved. Like others, I swim and snorkel frequently, to simply be amongst these beautiful creatures. It is an important part of my personal, recreational, and spiritual experience where I live and work.

Using a more accurate and appropriate name, the "tropical fish enslavement industry" has a HORRIBLE history and record of capturing our indigenous, native tropical fish, and enslaving those FEW that survive capture, packaging, shipping, and wholesale and retail sales into foreign environments.

Our Native Hawaiian tropical fish BELONG in Hawaii, in their native habitat - NOT LIVING A MISERABLE EXISTENCE ENSLAVED IN FISH TANKS FOR THE CRUEL "ENTERTAINMENT" OF HUMANS who somehow think they have a RIGHT to freely enslave others.

WHO and WHAT gives ANYONE this right to enslave our beautiful, innocent, fellow indigenous island inhabitants?

There is NOTHING "Sustainable" about this practice. It is narcissistic, selfish enslavement of our fellow creatures who have an inherent right to live free in their habitat - all in the perpetual lust for dollars.

This is the EXACT same barbaric ENSLAVEMENT scenario played out throughout human history: Capture the indigenous innocents, Destroy their connection with family, community, home, and steal their freedom, Force those innocents into inhumane conditions for the rest of their once beautiful - now brutally cruel, exploited lives, and IF they survive capture, packaging, transportation, wholesale and retail "sale" - End their lives enslaved in an unknown foreign containment.

With Hawai'i's history of colonization and stolen freedoms, lands and culture - does the reality of this cruelty - this theft and enslavement - not effect your conscience...? There is a very sick irony here.

For too long, our standard EIS (and DEIS) protocols and process has looked at ONLY a narrow and limited number of "factors" upon which decisions are manipulated and rendered.

Therefore, I formally ask that you correct this shortsighted error, and that the MORAL and ETHICAL DIMENSIONS AND CONSEQUENCES of this proposal, application, permit request, deliberation and decision NOW BE ADDED AND INCLUDED IN THIS EIS process and decision.

Hope for human survival on our ailing earth will remain questionable at best until we recognize our past mistakes and our arrogantly presumed dominion mentality - and change our behavior. I can think of no better opportunity than now - this decision - to change our destructive course determining our collective future.

We need gratitude and respect for the lives of all beings with whom we share our home, island, and planet - in this decision.

, , &
Aloha, Peace, Love, & Music

David Hunt, Honokaa, Hawaii
davidjameshunt@hotmail.com
davidjameshunt@gmail.com
(208) 660-8498

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From: nawahine_kahoopii
To: [David Hunt](mailto:David_Hunt)
Cc: [Sakoda, David](mailto:Sakoda_David)
Subject: [EXTERNAL] Re: "Aquarium Fish" DEIS
Date: Monday, December 16, 2019 12:07:26 AM

beautifully expressed

On Sun, Dec 15, 2019 at 4:13 PM David Hunt <davidjameshunt@gmail.com> wrote:

"Aquarium Fish" DEIS
Comments Due 1/7/2020

Approving agency
Hawaii DLNR
Agency contact name
David Sakoda
Email address or URL for receiving comments
david.sakoda@hawaii.gov
Agency contact phone
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LIVING A MISERABLE EXISTENCE ENSLAVED IN FISH TANKS FOR THE CRUEL "ENTERTAINMENT" OF HUMANS who somehow think they have a RIGHT to freely enslave others.

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Aloha, Peace, Love, & Music

David Hunt, Honokaa, Hawaii
davidjameshunt@hotmail.com
davidjameshunt@gmail.com
(208) 660-8498

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From: [Support Oceanpro](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Re: Information
Date: Wednesday, January 8, 2020 9:48:10 AM

Aloha David,

Once again, I want to express that my position hasn't changed regarding Commercial Aquarium Reef Fishing. I still believe that Aquarium Reef Fishing along Hawaii coastal reefs should be prohibited, and I provide two reasons.

First, the largest economic industry is tourism. It is estimated the tourism industry led to over \$16Billion in visitor spending ("[Annual visitor report](#)" (PDF). [files.hawaii.gov](#). 2017.) Tourist come to our islands to see all the beauty of the land and her oceans. Risking this industry for the sake of an industry est. to be under a \$1Million, lacks common sense and proper stewardship.

Second, ornamental reef fish contribute to the overall health of our reefs and waters. Further, collection methods have inadvertently damaged the reefs. As we deal with water quality and safety issues for our residents and visitors, it would seem neglectful to allow potential damage to our reef balance.

While I know the EIS discusses sustainability, I caution trusting in the data that benefits the parties with a vested interest.

An additional point I will make regards the aquarium fish industry. As I'm sure you are aware. They had a similar fight in Florida regarding taking of fish off the coastal Florida waters. They claimed that it would have a devastating impact to the aquarium industry and that the fish in question COULD NOT BE farmed economically. But, the truth was they never needed to try because they were getting the fish for free off the coast. When Florida denied their request and shut down the removal of this species, they figured out a way to farm them and, over time, it was actually cheaper and safer to do so. So, they have a track record of fighting to take from the wild and environment risking an eco system, when a potential safer and more lucrative solution is in front of them. It is common knowledge that the closer the fish are raised to the potential customer / market, the more likely of survivability of the fish. So, if you can farm the fish on the mainland, where the market is, you will save the long shipping and potential harm to the fish.

I'm sure I don't need to tell you any of this. As someone in your position, I'm sure has seen the decline in ornamental fish and water quality over the years on our reefs and in our waters. You know, first hand the reality and while we can discuss legal fishing, there is another issue of illegal fishing.

The issue is fundamental. When we wake up in the morning and look at our families, and ourselves in the mirror, we only have one real responsibility. It is to be true in our convictions and responsibilities. We know what is right. We know we want a better future for our keiki. They deserve, especially from the DLNR, to have their lands, waters, reefs, and fish, protected.

Aloha,

Eric Moreno

On Aug 16, 2018, at 10:40 PM, Sakoda, David <david.sakoda@hawaii.gov> wrote:

A person is required to have a Commercial Marine License to take marine life for commercial purposes. Commercial Marine Licensees are required to submit monthly reports of all fishing activity and marine life harvested. This applies both to food fish and aquarium fish.

There is a state law that generally prohibits the use of fishing nets with a mesh of less than 2 inches stretched mesh.

HRS 188-31 allows the Department to issue permits to use fine meshed traps and nets for the taking of marine life for aquarium purposes. The Court recently ruled that the "actions" authorized by these permits (i.e., the use of fine meshed traps and nets to take marine life for aquarium purposes) are subject to environmental review requirements under HEPA. To comply with this ruling, a group of aquarium collectors completed a pair of Draft EAs and then Final EAs, which assessed the significance of the impacts of the "actions" on the environment. After reviewing the Final EAs, the Department determined that there may be a significant impact, and the preparation of EISs is required. Until this requirement is met, the Department cannot issue any Aquarium (fine mesh net) permits.

There are no other restrictions on collecting marine life for aquarium purposes using other gear, such as larger mesh nets (2" or greater), slurp guns, or by hand harvest. Although the EAs and EISs primarily focus on the fine mesh net "activity," they do consider aquarium collection using these other gears as part of the cumulative impact analysis.

There are no restrictions under the CML regarding the numbers of licenses issued or number of marine life that can be taken.

I know it can be confusing, so let me know if you have any more questions.

Aloha,
David

From: Support Oceanpro [<mailto:support@oceanpro.org>]

Sent: Thursday, August 16, 2018 3:44 PM

To: Sakoda, David <david.sakoda@hawaii.gov>

Subject: Re: Information

David it helps but doesn't answer what other gear/methods are allowed under this "Commercial Marine License".

I did not see an article published today, so I don't know about the misleading info and that's why I'm trying to understand it directly from the source.

If I understand you, this license was always available to them as another option, but requires a different method of catching. If this is true, then it would seem there EA misrepresented the amount of fish potentially collected and didn't account for numbers taken under this type of license.

Either way, wouldn't you consider it an end around the DLNR intent to study with an EIS?

What restrictions are they under with the "Commercial Marine License" if any for collection numbers and are these licenses capped by number?

Thanks again for your answers. I understand I'm asking a fair amount, but I want to support your efforts and want to make sure I have a clear understanding.

Aloha

On Jun 8, 2018, at 2:51 PM, Sakoda, David <david.sakoda@hawaii.gov> wrote:

The Final EA and comments will be officially published by the OEQC in the Environmental Notice, which is published on the 8th and 23rd of each month. We will most likely also post it on our DAR website.

From: Support Oceanpro [<mailto:support@oceanpro.org>]

Sent: Friday, June 8, 2018 6:54 AM

To: Sakoda, David <david.sakoda@hawaii.gov>

Subject: Re: Information

Thank you for the update. Will the final and the comments be provided via pdf on your website or elsewhere? Or, will it be part of the DLNR published findings?

On Jun 7, 2018, at 3:09 PM, Sakoda, David

<david.sakoda@hawaii.gov> wrote:

Hi Eric,

Nothing to update at the moment. DLNR is currently reviewing the Final EAs submitted by the applicants. We are looking at all the comments and responses to those comments. Within the next week or two, we should be ready to publish our findings, either a "Finding of no significant impact" or an finding that an EIS is required.

From: Support Oceanpro [<mailto:support@oceanpro.org>]

Sent: Thursday, June 7, 2018 9:01 AM

To: Sakoda, David <david.sakoda@hawaii.gov>

Subject: Re: Information

Good Morning David,

Has there been any update on the status of the issue?

Aloha,

Eric

On May 8, 2018, at 11:04 PM, Sakoda, David
<david.sakoda@hawaii.gov> wrote:

Received. Thanks.

David Sakoda
Program Specialist
Division of Aquatic Resources
State of Hawaii, Department of Land & Natural
Resources
Kalanimoku Building
1151 Punchbowl Street, Room 330
Honolulu, HI 96813
Tel: (808) 587-0104
Fax: (808) 587-0115

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recipient, any dissemination, distribution or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via email immediately and destroy all electronic and paper copies.

From: Support Oceanpro
[<mailto:support@oceanpro.org>]
Sent: Tuesday, May 8, 2018 5:03 PM
To: Sakoda, David <david.sakoda@hawaii.gov>
Subject: Re: Information

David,

Here are my comments. Mahalo for your support and information.

Please reply that you have received and let me know if anything is incorrect that I might need to change.

Aloha,

Eric Moreno

> On May 7, 2018, at 12:04 PM, Sakoda, David
> <david.sakoda@hawaii.gov> wrote:

>

> Aloha Eric,

>

> Yes, you can email your comments to me.
> Deadline is tomorrow.

>

> David Sakoda

> Program Specialist

> Division of Aquatic Resources

> State of Hawaii, Department of Land &
> Natural Resources

> Kalanimoku Building

> 1151 Punchbowl Street, Room 330
> Honolulu, HI 96813
> Tel: (808) 587-0104
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>
> -----Original Message-----
> From: Support Oceanpro
> [<mailto:support@oceanpro.org>]
> Sent: Monday, May 7, 2018 12:02 PM
> To: Sakoda, David
> <david.sakoda@hawaii.gov>
> Subject: Re: Information

>
> Aloha David,
>
> I'm a bit new to this process... Are comments due tomorrow regarding the two EA's? Can I email my comments to you or is there a better email contact?

>
> Mahalo,

>
> Eric

>
>
>> On Apr 25, 2018, at 4:43 PM, Sakoda, David
>> <david.sakoda@hawaii.gov> wrote:

>>
>> Aloha Eric,
>>
>> At this point, it is too early to say whether

DLNR will agree with the Preferred Alternative. DLNR is currently accepting comments on the DEA. At the close of the 30-day comment period, the applicant will compile and respond to the comments received and prepare a Final EA. Based on the comments, DLNR will make a determination whether to accept the Final EA with a finding of no significant impact, or to require the applicant to prepare an EIS.

>>

>> To obtain a recreational aquarium permit, an applicant would have to comply with the requirements of HRS chapter 343. This means either preparation of an EA, preparation of an EIS, or demonstrating that the permitted activity qualifies under an exemption.

>>

>> David Sakoda

>> Program Specialist

>> Division of Aquatic Resources

>> State of Hawaii, Department of Land & Natural Resources Kalanimoku

>> Building

>> 1151 Punchbowl Street, Room 330

>> Honolulu, HI 96813

>> Tel: (808) 587-0104

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>>

>> -----Original Message-----

>> From: Support Oceanpro

>> [<mailto:support@oceanpro.org>]

>> Sent: Tuesday, April 24, 2018 4:58 PM

>> To: Sakoda, David

<david.sakoda@hawaii.gov>

>> Subject: Information

>>

>> Aloha David,

>>

>> A copy of the "draft environmental assessment and finding of no significant impact (DEA-AFONSI) for the Commercial Aquarium Fishery...on the island of Oahu" has come across my desk.

>>

>> I have a couple of questions.

>>

>> 1. Is it DLNR's position to agree with the "Preferred Alternative" recommendation of the draft?

>> 2. What's the next step?

>> 3. What is the procedure for getting a recreational aquarium permit?

>>

>> Thanks,

>>

>> Eric Moreno

>>

>>

>

From: [Danielle Bunnell](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Reef Fish Collection
Date: Wednesday, January 8, 2020 2:32:43 PM

Dear Sir,

My name is Danielle Bunnell, and I have been a Captain and submarine pilot with Atlantis Adventures for 17 years. I see approximately 25 acres of reef several times a day as part of my job. We must do EVERYTHING POSSIBLE to protect this fragile resource for generations to come. I realize that our dive site has been in a protected area, and that no fish collection has been allowed there since the year 2000.

Reef fish belong on the reef. It is very difficult to monitor the take from permitted activities. DLNR simply does not have the resources to oversee this program. Period. I see egregious behaviors on the water on a weekly basis that go unchecked due to lack of resources and personnel. This will be no different. I do support the traditional and cultural practices of subsistence fishing, but that certainly does not apply here. The only people benefiting are the ones with the permit.

I respectfully request that we continue to ban reef fish collection from the Island of Hawaii. Thank you very much for your time and consideration.

Danielle Kaleinani Bunnell

Sent from my iPhone

From: [SurfHawaii](#)
To: [Sakoda, David](#)
Cc: [Maggie Brown](#)
Subject: [EXTERNAL] Reef Fish Permits
Date: Tuesday, January 7, 2020 12:41:05 PM

I completely support Maggie Brown in her concern for the coral reefs and indigenous fish in Kona waters.

It seems almost criminal to further deplete our reefs for the benefit of a few collectors. I'm sure there are other places to collect fish with far less impact. Let's protect the local businesses that support the reefs, instead of supporting the businesses that exploit them.

Richard Farnham
richard@surfhawaii.net

Farnham Associates Marketing Solutions
PO Box 3380
Hualalai Colony #10
75-5608 Hienaloli Rd.
Kailua Kona, HI 96745

Office: 808-334-0344
Cell: 808-896-0314

www.FarnhamAssociates.com

From: [kristina kahl](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Reef fish permits
Date: Monday, January 6, 2020 9:20:22 PM

Dear Mr. Sakoda,

It has come to my attention that the DNLR is set to issue 14 more permits for Fish Collections on the Big Island within areas Ka'u to Kohala West Shores.

With the unprecedented climate changes occurring globally, allowing "reef raping" of Hawaii's natural sealife will undoubtedly create even more instability of our natural global world. For what? Money?

The short term focus on monetary gain is what has produced the overwhelming climate and environmental problems we are seeing today and what will occur in the future.

It is time to fully embrace Hawaii's Aina and reject profit and honor the land.

My family has lived on the islands for over 50 years and I want the land and ocean to thrive, flourish, and be preserved for future generations.

Do not issue any permits for Fish Collections.

Mahalo,

Kristina

From: [dotti branch](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Reef fish
Date: Sunday, January 5, 2020 11:45:45 AM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing

Thank you,
Dorothy Branch
Resident, Taxpayer,
and Active Voter

Sent from my iPhone

From: [michael gilbert](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Reef Fish
Date: Wednesday, January 8, 2020 1:07:10 AM

Aloha David

Lived on Maui for thirty years and active diver and many years with Earthtrust

I watched in Makena as off shore boats docked in our shallow reef and raped our reef fish

It's disgusting short sighted and stupid. For want decimate reefs for a few commercial folks who give nothing back

Are you kidding we met a few years back as I serve on the Board of our Hawaii State Art Museum. I know you understand so please stand up and be counted help do the right thing

Aloha

Michael Gilbert MA.CR

Sent from my iPad

From: [kristy knudsen](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Reef fish
Date: Tuesday, January 7, 2020 1:45:38 AM

Aloha Mr Sakoda,

I have lived on the Big Island for 43 years. The ocean has always been a big part of my life. Working on boats over the years I was able to observe the “trop collectors” always with disdain. My belief is that there are too many people and visitors who live and vacation here to spend their time in our beautiful ocean. I have witnessed firsthand the decline of our reef fish.

I ask you to please consider this before granting more permits for tropical fish collectors.

Thank you,

Kristy Knudsen

Sent from my iPad

From: [Penny Niederer](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Reef fishing permits
Date: Monday, January 6, 2020 5:27:16 PM

Please, do NOT allow the reef fishing permits!!! I swim the Kailua pier, down at Magic Sands, and around Kua Bay. For 30 years, I've swum these waters and the changes are so devastating between the coral bleaching and the lack of fish. We need these reef fish, not more people fishing these reef fish. Please, please do NOT allow more permits. I'm completely opposed to any more permits so we can keep the few reef fish we have left to help balance our ecosystem.

Thank you for listening, and a bigger thanks if permits are NOT issued

Penny Niederer

From: derntootin@gmail.com
To: [Sakoda, David](#)
Subject: [EXTERNAL] removal of reef fishes
Date: Tuesday, January 7, 2020 6:06:04 PM

Mr. Sakoda,

Please, if it is in your power, do not go along with the commercial exploitation of this limited beautiful resource. I have lived here in West Hawaii for 15 years and have seen the drastic decline of reef fishes here.

Please do not allow the decimation of this beautiful resource, for the financial benefit of the commercial fish industry. The fish count is just too low and too slow to recover from this kind of threat.

Sincerely,
Dan Swenson
Captain Cook Hawaii

From: [Adrian R Fourie](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Save Hawaii's Reefs
Date: Monday, January 6, 2020 12:30:00 AM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing.
Aloha!

Sent from my iPhone

From: kstover@maui.net
To: [Sakoda, David](#)
Subject: [EXTERNAL] Save Hawaii's reefs from the aquarium trade
Date: Tuesday, January 7, 2020 12:13:25 AM

Aloha Mr. Sakoda,

The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. Please discontinue this practice immediately. We are watching closely and will not relent on this issue!

Mahalo nui loa,

Ken Stover
Kihei, HI

From: [Madolin Wells](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Save Hawai'i's Reefs!!
Date: Sunday, January 5, 2020 12:35:28 PM

Dear Mr. Sakoda,

I urge you to right action for saving Hawai'i's reefs!

A 500-page lobbying piece does not deserve the title "Environmental Review" - a false and misleading designation. "Environmental impact review" is the term used for PUBLIC REVIEW AND HEARINGS on a proposed project, allowing typically at least 6-12 months for input from concerned citizens and relevant scientists in the public interest. (Which includes environmental interest.)

The way this type of review was initially conceived was NOT to give equal time to the developer; it was to allow all necessary time for citizen input especially local, plus research developed in the public interest to consider potential hazards. The onus was on the developer/commercial interest to prove the project was safe, or to make changes that adequately addressed safety, quality-of-life, and environmental considerations. Failing that, the project would not be permitted to proceed. The "need" of any commercial interest to make profits is utterly bogus.

Yours sincerely,

Madolin Wells, Kihei

From: [Judith Culler](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Say no to the aquarium trade
Date: Monday, January 6, 2020 11:59:24 PM

Dear Mr. Sakoda,

Please, do the right thing, ban aquarium collecting on Hawaiian reefs.

Judith Culler

From: [Matthew Gurewitsch](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop aquarium collecting in Hawaii!
Date: Saturday, January 4, 2020 9:20:33 PM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The

interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing.

m.

Matthew Gurewitsch
3415 Kuaua Pl.
Kihei (Maui) HI 96753

t/+1 (808) 874-8925
fx/+1 (212) 656-1647

on the web: beyondcriticism.com
on skype & twitter: mg1228

From: [MauiMercer](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop Aquarium Collection
Date: Monday, January 6, 2020 3:31:50 PM

Aloha David,

I have been swimming almost daily in the water off south Maui for over 30 years. During that time I have seen a huge decline in the tropical fish population and the degradation of the coral reef. Now I know that the aquarium trade is not solely responsible for the decline in tropical fish but it has been a contributing factor. How can it not be? With the aquarium trade removing tropical fish from the ocean, they are also removing all the future fish those collected fish would have created. The math just doesn't add up to 'no-impact' which the aquarium trade would like us to believe.

As a long term resident of Maui County and an avid ocean swimmer, I urge you to reject any Environmental Review which supports aquarium collection. Please protect Maui's fish and thus our ocean.

Mahalo,

Janet Mercer

From: [Elizabeth Hird](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop aquariums from collecting reef fish, please!
Date: Sunday, January 5, 2020 5:59:04 PM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

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I implore you to do the right thing.

Beth

*Beth Hird
3491 B Kehala Drive
Kihei, HI 96753*

Ring the bell that still can ring. Forget the perfect offering. There is a crack in everything. That's how the light gets in.

LEONARD COHEN

From: [debye leong](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop Commercial Pet stores from depleting out shores!!
Date: Monday, January 6, 2020 9:38:45 PM

Mr. Sakoda,

Extinction is forever—it's that simple.

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Sincerely,
Debye Leong
Kihei

From: [Madolin Wells](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop Fish & Reef Raiding by Pet Industry!!
Date: Monday, January 6, 2020 10:06:19 PM

Dear Mr Sakoda,

NOTHING justifies stealing critical parts of Maui's fragile ecology for commercial profits. This is stealing the birthright of the Hawaiian people. It is a crime against nature.

It is extremely short-sighted financially as well. Without the fish and the reefs, Maui - or any other part of the state - would lose a significant part of the tourist trade.

I urge you and the advisory council to block this massive theft by the interests represented by PIJAC and by their so-called "Environmental Review."

Madolin Wells, Kihei

From: [Anne Allison](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] stop raping the reefs!!!!
Date: Sunday, January 5, 2020 7:49:26 PM

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple. It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade. Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting. The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood. But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists, PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop

retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing.

Anne Allison, Hawaii resident and snorkel enthusiast

From: [Oralea Starr Astrology](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] STOP the aquarium trade!!!!
Date: Tuesday, January 7, 2020 11:08:12 AM

What next?

Enough already!

Why is our government and DLNR allowing people to purge our reefs to ship dish (half of which die along the way) to the mainland for people to keep in aquariums. It's barbaric!

Money? When will all of this greed stop?!

From: [John Naylor](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop the aquarium trade
Date: Monday, January 6, 2020 2:32:53 PM

Aloha Mr. Sakoda,

The aquarium trade is being protected by DLNR at the expense of the reef species and habitat around our islands. I've been observing our Maui reefs for over 37 yrs. It's shockingly different now than when I started! Please cease the aquarium trade and all netting immediately. I am watching closely and will not relent on this issue!

Sincerely,

John Naylor
PO Box 1749
Makawao

From: [David O. Baldwin](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Stop trip fishing
Date: Tuesday, January 7, 2020 1:54:03 PM

No to tropical fishers. We need to recover not retreat.
No no no!

Thank you & Aloha,
David

David O. Baldwin Photography - Hawaiiiphotoman

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Sent from David O.'s iPhone

From: [Matt](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Submittal Form for HRS Chapter 343 Publications in the Periodic Bulletin : Entry # 622
Date: Sunday, December 15, 2019 8:48:55 PM

Dear Mr. Sadoka,

I would like to submit this letter from my friend, David Hunt, as my testimony, as it expresses my own feelings as well.

Thank you,

Matt Binder
Waimea, Big Island

I read with genuine sadness and horror, this application and DEIS.

This application should be DENIED, and our public employer & employee time (and thusly, our tax dollars) should not (now or ever again) be wasted entertaining similar inhumane, immoral, unethical applications.

These are NOT “aquarium fish” these are indigenous fellow residents of our shared island home. I am one of MANY who would be harmed by allowing this permit to be approved. Like others, I swim and snorkel frequently, to simply be amongst these beautiful creatures. It is an important part of my personal, recreational, and spiritual experience where I live and work.

Using a more accurate and appropriate name, the “tropical fish enslavement industry” has a HORRIBLE history and record of capturing our indigenous, native tropical fish, and enslaving those FEW that survive capture, packaging, shipping, and wholesale and retail sales into foreign environments.

Our Native Hawaiian tropical fish BELONG in Hawaii, in their native habitat - NOT LIVING A MISERABLE EXISTENCE ENSLAVED IN FISH TANKS FOR THE CRUEL ”ENTERTAINMENT” OF HUMANS who somehow think they have a RIGHT to freely enslave others.

WHO and WHAT gives ANYONE this right to enslave our beautiful, innocent, fellow indigenous island inhabitants?

There is NOTHING “Sustainable” about this practice. It is narcissistic, selfish enslavement of our fellow creatures who have an inherent right to live free in their habitat - all in the perpetual lust for dollars.

This is the EXACT same barbaric ENSLAVEMENT scenario played out throughout human history: Capture the indigenous innocents,

Destroy their connection with family, community, home, and steal their freedom,
Force those innocents into inhumane conditions for the rest of their once beautiful - now
brutally cruel, exploited lives,
and IF they survive capture, packaging, transportation, wholesale and retail “sale” -
End their lives enslaved in an unknown foreign containment.

With Hawai'i's history of colonization and stolen freedoms, lands and culture - does the
reality of this cruelty - this theft and enslavement - not effect your conscience...? There is a
very sick irony here.

For too long, our standard EIS (and DEIS) protocols and process has looked at ONLY a
narrow and limited number of “factors” upon which decisions are manipulated and rendered.

Therefore, I formally ask that you correct this shortsighted error, and that the MORAL and
ETHICAL DIMENSIONS AND CONSEQUENCES of this proposal, application, permit
request, deliberation and decision NOW BE ADDED AND INCLUDED IN THIS EIS process
and decision.

Hope for human survival on our ailing earth will remain questionable at best until we
recognize our past mistakes and our arrogantly presumed dominion mentality - and change our
behavior. I can think of no better opportunity than now - this decision - to change our
destructive course determining our collective future.

We need gratitude and respect for the lives of all beings with whom we share our home,
island, and planet - in this decision.

From: rtlivefish@gmail.com
To: [Sakoda_David; jim.lynch@klgates.com](mailto:Sakoda_David:jim.lynch@klgates.com)
Subject: [EXTERNAL] Support Comment for EIS aquarium fishery.
Date: Sunday, January 5, 2020 11:37:33 AM

Aloha David Sakoda,

From Ron Tubbs B.S. N.D. Oahu

I am asking DLNR for the complete renewal of all aquarium small mesh permits for Hawaii. The 490 page environmental review and past DLNR fish counts have already proved the sustainability of the fishery at past full fishing takes.

It was unfair for the fishery to be the only fishery or DLNR permitted ocean user to have to do an EIS. Please correct this by reinstating the issuance of all permits.

This year has seen another large fish drop and ocean fish populations are very healthy. Any change in fish populations will be address by DLNR and the fishery. We strongly believe in a fluid ocean management approach.

We did work with DLNR and West Hawaii Fishery Council in the past to create new rules in 2015 to ensure sustainability and health fish populations. We will continue to do so if any global warming issues need to be addressed in the future.

Right now Hawaii fish populations are increasing, and reefs are healthy. Links below with the facts:

<http://hawaiitropicalsaltwateraquariumfish.com/index.html>

The Environmental review concludes that the fishery can reopen and it is not only sustainable but a model fishery!

The link to the full 490 page environmental review:

http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf

Those who oppose the fishery say we are unlimited in catch and the fishery can deplete the reefs, this is not true we are limited by many laws, catch limits, size limits, closed areas, limited holding on boats, limited to dive deco times, and recent 2015 rules were passed with even more laws to ensure sustainability of the fishery.

Link to those laws:

<https://dlnr.hawaii.gov/dar/fishing/fishing-regulations/>

The fishery is so well regulated and studied it is considered a ***model fishery*** because it has been proven sustainable.

Thanks for your time and more info for your review:

Hawaii's Fish Populations Increase (it is happening again this year 2019 and into 2020)

Videos show tropical fish swarming state's reefs

HONOLULU (HawaiiNewsNow) -

It's being called a spawning event of "Biblical" proportions -- a summer swarm of fish over Hawaii's reefs. Aquarium fisherman and underwater photographer Ron Tubbs shot video off Oahu's coastline showing the population explosion.

I made a special trip last week to see it and video it myself. It really is unlike anything anyone has ever seen," Rene Umberger said. Even **dive shop owner**, anti fishing activists agree there

lots tons of reef fish right now all across Hawaii.

"In 35 years this is the most fish I have ever seen. For most species, it's just incredible. It's just amazing. Areas where you see hundreds of fish normally, that's a lot of fish for an area, you're seeing thousands of fish," Ron Tubbs said "This year the numbers are just exceptional."

What about Aquarium fishing in Hawaii?

January 2014 saw the new Kona aquarium fish rules go into law. Aquarium fishermen and Kona DLNR scientists created stricter laws for an already sustainably fishery. Dr. Bill Walsh now advocates for these fishermen due to their cooperation and efforts to maintain fish populations.

The same thing has been done on Oahu with the DLNR researchers there. The Oahu DLNR scientists also believe we are already sustainable but agree further regulations can help to protect our reef fish. The Oahu rules should go in to effect sometimes in 2015. As a result we have wide spread support from many members of Hawaii's legislature, DNLNR and UH scientists and even private eco groups who once opposed us. Aquarium fishermen continue to work with researchers to make it the greatest sustainably fishery in the world. The oceans belong to all and to protect them and preserve it wonders is the job of all ocean users.

What do Hawaii's ocean researchers say about aquarium fish collecting?

Here are some shortened quotes from Public testimony Hawaii County Council testimony 2014, Hawaii news now and West Hawaii Today news excerpts.

Dr. Bill Walsh October 2014:

In my capacity as the West Hawai'i Aquatic Biologist for the Division of Aquatic Resources I have been involved in the management and biological monitoring of the West Hawai'i aquarium fishery for over 15 years.

I would like to share with you some of the results of our latest monitoring efforts as they relate to the issue at hand. Two species, the Yellow Tang and Kole make up over 93% of all aquarium fish caught in West Hawai'i. Since the no-aquarium collecting Fish Replenishment Areas (FRAs) were established in 1999 (protecting 35% of the coastline), the numbers of Yellow Tang have increased in the FRAs by almost 65% while not significantly decreasing in the remaining Open Areas. In the 30'-60' depth range alone, the numbers of Yellow Tang in West Hawai'i have increased by 1.3 million fish. Similarly Kole populations have increased not only in the FRAs (by 24%) but also in the Open Areas as well (by 28%). Kole populations in the same depth range have increased by over 2 million fish! Clearly resource management efforts are working in West Hawai'i.

Scientific studies which have indeed found high levels of mortality among aquarium fishes have typically been conducted in remote areas with poor handling capabilities. That is clearly not the case in Hawai'i.

~ Dr. William Walsh

**Division of Aquatic Resources
State of Hawaii DLNR**

Dr. Dan Polhemus:

It is a good thing for folks to scrutinize and ask questions about what's going on in our fisheries and on our reefs. These are important to all of us. A realistic perspective does need to be maintained however. Let me elaborate. On Maui in 2009 there were a total of 16,300

aquarium animals caught, representing 82 different species. Yellow tangs accounted for 69% while Kole was 7% of the catch. During that same year non-aquarium commercial fishers captured (and killed) 319,491 reef fishes of 75 species. While yellow tangs weren't caught to any degree there was considerable overlap in a number of the other species. To the commercial food catch one can add another 480,000 reef fish taken by recreational/subsistence fishers (extrapolated from 2006 NOAA Rec Fishing Survey data). So, in the grand scheme of things, the aquarium take on Maui is literally a drop in the bucket, representing less than 2% of the total mortality of reef animals that year. This serves to point out that undue focus and hyperbole about aquarium collecting and its impact on the reefs is dangerously shortsighted and counterproductive. We need to think and act holistically.

Hope I didn't overwhelm you with numbers. (as of 2014 no aquarium fish collectors were taking fish on Maui and the number of collectors state wide have decreased and so has catch.)

~ Dr. DAN A. POLHEMUS
Division of Aquatic Resources
State of Hawaii DLNR

Emily S. Munday, M.S.

For my master's research at Washington State University, I studied the West Hawaii aquarium trade from 2010-2012. Part of my study focused on holding and transport of live yellow tang in the West Hawaii aquarium trade.

My research on fish holding and transport indicated that the practices implemented by Hawaiian fish exporters do not cause mortality in yellow tang. In June of 2012, I collaborated with fishers and exporters in Kona, and caught 60 yellow tang from the reef, held them in a working export facility, and shipped them from Kona, HI to Portland, OR. The fish were then transported to the Hatfield Marine Science Center in Newport, OR where they resided for 6 months. My study shows 100% survival rate of these tangs during collection, holding in the export facility, air transport, and after a 6-month holding period. In fact, the fish have now become part of an exhibit at the Hatfield Marine Science Center about sustainability in the aquarium trade and I have received no reports of mortality after 2.5 years.

~Sincerely,
Emily S. Munday, M.S.
Washington State University

As far as aquarium related mortality in Hawaii goes here's a quote from a Cesar 2002 study "Mortality rates of aquarium fish are low and have gone down considerably since the last survey in 1984. Currently, mortality rates from collection to wholesaler are estimated at 0 to 1 percent. In the wholesaler's tanks, mortality rates range from close to 0% up to 2%. During shipment, rates range from 0.75% to 2%. This give a current total of between 1% and 5%, down from a range of 5% to 8% in the early 1980's (van Poolen and Obara, 1984; estimates of wholesalers and collectors, own study).

~ Dr. DAN A. POLHEMUS

These studies quoted are old and much better technology and care techniques now exist so we are sure it is an even lower rate today. Decreased transport times due to better roads and

more airline flights make it even easier to ship shipments with no DOA at all. Life extension techniques are used by the hobbyist at all times. Customers demand such care. Life spans of fish can be greatly increased in captivity. Many aquarium fish hobbyists tout their ability to increase fish pets life spans. Several cases have pet fish owners keeping fish alive for 15 years.

Life span of the average fish in the wild can be very short. Without enough food and the predators eating many smaller fish survivability to adult breeding state is only 2%. In 2014 a much bigger percentage survived due to increases in plankton due mainly to changes in currents. If the food is there the 1-5 million fry per adult pair spawning can result in astronomical population growth. This has resulted in biblical increases in fish populations in fall of 2014.

A few species like Angels only produce 10,000 fry per spawning which is way below the norm for most reef fish. Even those species are doing great in population numbers. Fish are very efficient breeders.

**~ Ron Tubbs B.S. N.D.
University of Hawaii**

Tina Owens executive director of the LOST FISH Coalition, Member West Hawaii Fisheries Council says:

A great deal of the “sky is falling” news you’ve heard about the reef recently is just plain not true.

Try giving credit to the thousands of volunteer hours given by your neighbors to the West Hawaii Fisheries Council to get the gains you are now free to enjoy. (done with the help of Aquarium Fishermen on the council who agreed to the laws)

Lost Fish Coalition, through the venue of the West Hawaii Fisheries Council, has been working with many stakeholders to get a reasonable settlement to the long-standing problem of the aquarium industry harvest. In almost 16 years, we have accomplished the following management actions:

- We have 55-plus miles of coastline where reef fish cannot be taken. These areas allow the fish to grow large enough to be very successful breeders. These areas — Fish Replenishment Areas — are the nurseries for the reef fish to spread out to the rest of the reefs.*

Thanks to these measures, West Hawaii has more fish than most every other widely accessed reef in the state, especially the beautiful ornamentals that give tourists and residents so much delight. If someone says that nothing has been done in West Hawaii, they are either lying, unaware or are being duped by someone else’s lies about the situation. There are a few “outsiders,” by which I mean people who don’t live here, who have decided that West Hawaii doesn’t know what it’s doing. This group, headed by Maui resident Robert Wintner, and Wintner’s frontman Rene Umberger, decided it was going to be the ones to get aquarium collecting banned, to make themselves the “rescuers of the reef.”

Clearly if the goal is to get rid of the industry and management prevents that goal being reached, then discrediting the benefits and successes of management would seem the only way left to go. And so they have taken that path.

They have held community meetings and displayed a lot of false or twisted data, quoting from papers outdated by more than 15 years, and “re-interpreting” data from scientific papers. They have been telling people that “there are no fish left,” which is patently untrue. I once had a woman tell me with great passion and assurance that there are no fish left anywhere in West Hawaii. I asked her why she thought that, and she replied that everyone knew it. I asked if she swam in the ocean. No. Did she dive? No. Did she know anything about the management

strategies in place? No. She had, however, just come from an “information session” in which she heard these things from Wintner’s frontman Rene Umberger.

Which brings me back to the wide-screen TV. The TV runs a 90-minute loop of undisturbed, natural activity of fish on the reef. Apparently, the footage was filmed on West Hawaii reefs. The article states: “Wintner praised the videos. ‘It shows what abundance looks like,’ Wintner said.”

At least he got that right.

~ Tina Owens, executive director of the LOST FISH Coalition, Member West Hawaii Fisheries Council and resident of Kailua-Kona.

See for yourself News links:

<http://www.hawaiinewsnow.com/story/26454840/videos-show-tropical-fish-swarming-states-reefs>

<http://www.reef2rainforest.com/2014/08/29/biblical-spawning-event-on-hawaiian-reefs/>

<http://hawaiitropicalsaltwateraquariumfish.com/index.html>

From: [Liz Colwell](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] The Aquarium Trade and Reef Fish
Date: Friday, January 3, 2020 8:06:53 PM

Aloha,

I swim and paddle our reefs several times a week and the changes over the years is stunning. The Environmental Review by the Pet Industry Joint Advisory Council is not relevant, not accurate, not pono and not legal. The aquarium trade is not fishing, it's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Save our Reef fish!

Mahalo,
Elizabeth Colwell
Haiku

From: [Aliaska Brozen](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Theft of our
Date: Monday, January 6, 2020 5:33:02 PM

I am outraged by the decimation of our fish. How dare you allow businesses to come here and take our sea life? This is wrong on so many levels: this is their home and it is traumatic for them to be captured & transported. And did you know that fish are sentient beings? They have emotions & have families... And a good many of them never make it to their destination having died along the way. Not to mention the damage to our tourist industry here on Maui.

AND also, coral reefs and fish have a symbiotic relationship: coral reefs supply a home to the fish...& an algae food source...and w/out the fish eating the algae there would be overgrowth, preventing coral larvae from settling down to grow up...adding to the destruction of our reefs...just one of the forces that are attacking them, including global warming & pollution.

So it would be totally irresponsible & negligent & inhumane... (not to mention greedy -someone must be making money off this insane deal), to allow this theft to happen.

Thank you, (I hope),
Aliaska Brozen
Sent from my iPhone

From: [Deirdra Rogers](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] This is not an environmental review
Date: Wednesday, December 11, 2019 11:57:36 PM

Dear David Sakoda, This so-called environmental review is actually a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people of economic treasures, to support a mainland amusement industry, and to condemn reef wildlife in a vicious cycle of replacement.

PIJAC is a lobbying group for the commercial pet trade . This Environmental Review is not relevant, not accurate, and not legal.

When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, an aquarium collector. I see that as a conflict of interest. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, DLNR Director Suzanne Case prevailed on Governor Ige to veto the bill.

The Hawaii Supreme Court ruled that no further permits should be issued until Environmental Assessment, with injunctive relief to close it down. DLNR Director Suzanne Case trumped that ruling with: permits are no longer required, for aquarium collecting. It takes only a commercial fishing license. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes nearshore habitat and

species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who travel to Hawaii to relish the reef kingdom.. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater than the aquarium trade.

This environmental review is a farce.

Sincerely,

Deirdra Rogers

--

Deirdra Rogers

415-218-6783 (work and cell)

415-457-7474 (home)

www.fitnessdefinedmarin.com

deidrarogers@gmail.com

www.facebook.com/fitnessdefined

From: [Mark Joiner](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Time to End the Aquarium Trade in Hawaii
Date: Tuesday, January 7, 2020 2:07:43 PM

Aloha

I am a resident of South Maui and a frequent visitor to the reefs in our area. I have noticed a depletion of our beautiful fish over the years, especially the yellow tangs. The difference between protected Molokini Crater and our near shore reef is stunning, as one is teeming with fish and the other is scant at best.

Please take all steps necessary to stop this harmful practice, which I understand is being subsidized by my tax dollars through the DLNR. For the sake of the reefs and our tourism, this should have been addressed years ago.

Mahalo nui loa,

Mark Joiner
South Maui Homeowner

From: [Madolin Wells](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Time-Sensitive Advisory Council Issue
Date: Tuesday, January 7, 2020 2:55:23 PM

Aloha Mr Sakoda!

I hope it's not too late for my two cents about the Pet Aquarium trade. I'm very concerned about the disappearance of many species of beautiful local fish here in Maui and in these islands. Please do whatever is necessary to prevent any further losses, including stopping further losses that would result from supplying the pet trade outside Hawai'i. The reefs are dying and they too need the fish to keep them from disappearing faster.

I heard this was the deadline for testimony including emails. Please add my voice to the others you've heard from. A moratorium or permanent ban seems like what's necessary to protect the wildlife here.

Thanks for your consideration.

M.J.Wells
North Kihei, Maui

From: [C.C. Campbell](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Totally opposed to the disruption disturbances by the human impact of the Hawaiian Ocean marine ecosystem by the capture of tropical fish for pet trade profit.
Date: Tuesday, January 7, 2020 11:21:05 AM

Each species removed disrupt this ecosystem that is maintained by these species. Eventually, if there is no protection it will collapse. The web of life is disrupted enough by ocean warming with coral reefs dying right now in Hawaiian waters. The vanity of aquarium fish hunters collapsed many species in Amazonian waters. This industry is fueled by ignorance, vanity. Capturing these species that are in Hawaiian waters may bring a money flow to some, there is no value in captivity except for those who profit from this. Captivity, containment, and removal from waters where these species were born and adapted to subjects fish species to stress, for the ones that survive, removes the genetic pool from the natural environment. It will leave what reefs that are left in jeopardy and cause a collapse of the natural ecosystem which is valued much more for the natural beauty, even more than the aquarium trade. When you become aware of the biology and interdependence of these species remaining intact then you will understand that profiting by removing certain species will result in a serious impact on the entire ecosystem, and perhaps the eventual extinction of these species. It is disheartening to know that you support this in your position.

Charmaine Campbell
Box 1022
Kaslo BC VOG 1 M0

From: [Mendy Dant](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Tropical Fish collection- Oppose!
Date: Tuesday, January 7, 2020 12:55:05 AM

Aloha Mr. David Sakoda,

I am part of a third generation family owned snorkel business in Kona Hawaii that began in 1971. We have 50 employees and entertain over 80,000 customers each year. We feel privileged to be in the marine tourism industry where we share the natural beauty of Hawaii everyday. We have visited this topic of controlling aquarium fishermen's take many times before. The West Hawaii Fisheries Council worked to protect our coastline from the daily extraction of our critically important tropical fish. Prior to this aquarium fishermen were going out and bringing in igloo's full of yellow tangs, many different species of butterfly fish, moorish idols, etc. I've seen photographs of hundreds of fish lying dead near garbage cans at the harbor. These fish are part of an intrical reef system, all together making a reef that can help protect shoreline damage from storms, providing a healthy coral infrastructure and home for hundreds of marine life.

Educate people that these fish should be in the wild not in tanks. Tanks are prison for these fish, they have no space, no natural life. The high percentage of these fish that die in transit is horrendous and then the chance that they will survive in someone's home is not high either. Let's just realize we are better than this and should not decorate our homes with tropical fish in tanks. As many countries have stopped trophy hunting, people have learned not to put Zebra skins on our floors, or lion heads on walls. Hawaii needs to stop the collecting and killing of tropical fish. This is how a population evolves, little by little we learn and teach one another not to kill or be cruel to other living beings, especially when they are critical in our survival too. Fish keep the reefs healthy and coral reefs rival the Amazon in producing oxygen for the world.

We have seen a huge decline in the reefs here in Kona over the past decades and we all need to do our part to repair the damage and protect the reefs for our future generations. Please do not allow the fish collectors to make this trade their livelihood. It is time for them to find a new avenue for their living by not taking the lives of the fish and our reefs to oblivion.

Sincerely,
Mendy Dant

Mendy Dant
Executive Vice President
Fair Wind Cruises
Kona Sunrise Charters
78-6775 Box A Makenawai St
Kailua Kona, Hi 96740
O. 808-331-3119
C.808-345-6211
www.fair-wind.com

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From: [kailua bay charter](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] tropical fish collection
Date: Tuesday, January 7, 2020 12:34:04 AM

Aloha Mr. Sakoda:

I understand your office will be issuing permits for more fish collecting off the reefs here in Hawaii. In the early 70's, I witnessed the decline in reef fish population because of collection. I really do not see the reason why this has to continue to this day. There is so much conversation about the world's fragile reefs and the importance of them to civilization. Our glassbottom boat operation has witnessed a decline in tropical fish, over the last 20+ years. The 20 years before that, our snorkel operation saw the beginning of the decline, as a result of collecting, coral bleaching or other reasons. Permitting more destruction of the reef really does not make any sense, except for the companies that will take the resource away for their own profit. They will ship these fish elsewhere, where a huge percentage will die, even before they make it to a consumer's tank. Due to the decline, these companies only have a small window of operation and will eventually fold, as the resources disappear. What are you thinking? I wrote letters to the state in the early 70's and ended up being threatened by local collectors. The letter ended up landing in the hands of a individual who's son was a collector. This letter may simply land on deaf ears. I guess time will tell. I invite you, and your staff to join us on our tour, and see the reef now, and then come again in a year to see the change. This makes no sense. Please let me know why this is even considered. How about enforcing rules already in place. We see that enforcement is difficult as it is, and now you open up more need for enforcement. There is currently little enforcement to limits, or methods in collecting, or areas permitted. What are you thinking? Please reply.

Mahalo

Ralph Jewell

Kailua Bay Charter Company, Inc.
Glassbottom Reef Tours
P.O. Box 112
Holualoa, Hawaii 96725
glassbottom@hawaiiintel.net
808-324-0413
www.konaglassbottomboat.com

From: [luther waiwaiole](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Tropical fishes
Date: Tuesday, January 7, 2020 3:29:18 PM

If said permits will be allowed then you will be **REQUIRED** to also consider opening all fma-fish management areas to commercial bottom fishermen-it is an unfair practice to allow these permits and not allow bottom fishermen to do the same

In the case of a net versus a hook-there will be more collected by net-both legal and illegal-then any bottom fisherman can catch in a day by hook

In closing: you have not regulated the tropical fish industry as stringent as you have the commercial fish side-and unless regular inspectors are at the pier upon the return of these collectors-there will be irreparable damage to the reef fish and coral-if you can control the sunblock industry then this should be controlled and regulated also

Regards

Luther waiwaiole

Sent from my iPhone

From: [Sandra Bruce](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Unlimited take of reef fish for aquariums
Date: Tuesday, January 7, 2020 2:46:13 PM

I think take' should be kept at a sustainable level and not be unlimited

Sandra Bruce
Washington DC

From: [Kate Kenner](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] wild fish collection
Date: Monday, January 6, 2020 5:23:31 PM

Good day,

I am writing out of concern for wild fish populations there. I have received word that the Pet Industry Advisory council has submitted an environmental impact statement that states that the unlimited collection of Hawaii's reef animals will have little effect on the state's coral reef ecosystems. Of course they are going to say that because that means more fish thus more money for them. It is common sense that too much of something is never good. The ocean, like the rest of nature, has a balance and if too many fish are removed that balance will be upset and cause great harm to the coral reefs and there is an expected loss of those of 70% in the next couple of decades according to the Center of Biological Diversity. What is to stop the Pet Industry from practically depleting the amount of fish there? They do not care about the environment or fish but only about what they want. It is up to you to do what is right for Hawaii and the health of its ecosystems which includes not letting anyone have carte blanche for their own purposes. People who visit and want to see coral reefs and fish will be sorely disappointed when there are few to see.

I thank you for your time,

Kate Kenner
Guilford, VT

From: [Eatplants](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] Wild fish
Date: Monday, January 6, 2020 10:07:37 AM

Please keep wild fish in the wild. It is neither sustainable nor wise to collect them without limit for display in private when coral reefs and fish populations are in decline.

Patti Breitman, frequent visitor to Hawaii and a snorkel enthusiast from Fairfax, CA

Why not try a vegan meal today -- and nobody will be hurt.

From: [Lu Haner](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL] wild fishes
Date: Monday, January 6, 2020 10:48:43 AM

Please leave native fishes in the wild!

From: [Kea Clebsch](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL]
Date: Monday, January 6, 2020 7:23:56 PM

Aloha Mr. Sakoda,

My name is Kea Clebsch and I am a sophomore at Kealakehe High School and a frequent intern at Reef Teach; a program dedicated towards the education of our tourists and citizens about the importance of coral reef protection. Reef fish are an essential part of our marine ecosystems. We are already seeing the detrimental effects of overfishing, and our reefs are experiencing the consequences. Please keep in mind the severe environmental costs that will come as a byproduct of new fish collection permits. I — along with many in our community — am passionate about the wellbeing of our home and Hawaiian marine life. We hope that you keep this in mind when making your decision.

Thank you for your time,
Kea Clebsch

From: [Todd Naidl](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL]
Date: Monday, January 6, 2020 2:45:03 PM

Please take care of our fish! The fish need to be taken care of and insure propagation. I dont believe fish should be taken out of our waters for an aquariam. Please help!

From: [Pamela Small](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL]
Date: Tuesday, January 7, 2020 1:23:15 AM

To Mr. Sakoda:

I am writing to let you know that I am opposed to issuing any permits for aquarium collection on Hawaii Island. I am opposed for myriad reasons: the health of the reefs is foremost, the symbiotic relationship between coral and reef fish (ALL reef species) that lead to a healthy reef system, The fact that a healthy coral reef system leads to a healthy land environment, the tourism industry, the pleasure of scuba diving and snorkeling in a diverse marine environment with healthy coral and reef fish, abundant aquatic life, a pristine ocean, the list goes on and on...

You may not currently be aware, but the aquarium collectors did not stop their collecting under the current restrictions. The collectors began unlimited taking of fish from the east side of Hawaii Island and truck it to the west side where they ship it out. I have witnessed three collectors at a warehouse in Kona myself. They have no sign on their warehouse door and try not to let anyone know what they are doing. They show up with a truck full of tanks of fish and routinely get 20 foot containers of shipping materials delivered. Hawaii Island CAN NOT sustain this industry!

We are a state that relies on TOURISM. Tourists want to snorkel and scuba dive with fish. They want to see healthy coral reefs teeming with reef fish. When I tell guests at my house that Hawaii allows collections for the aquarium trade they are appalled. Utterly appalled.

It is your job to protect our oceans. Our reefs. Our aina. Our reef fish. I ask that you not give in to the demands of a few people here and on the Mainland who want to exploit our natural resource.

Mahalo,
Pamela Small
Kawaihae
808-315-7876

From: [Susan Stoll](#)
To: [Sakoda, David](#)
Subject: [EXTERNAL]
Date: Monday, January 6, 2020 11:23:58 AM

Dear Mr. Sakoda,

Please work to protect the fish that swim in the water that surrounds your islands. Your tourist trade depends on maintaining the natural beauty of your unique environment.

Thank you.

Susan Stoll

From: mak221@aol.com
To: [Sakoda, David](#)
Subject: "Aquarium fish" permits
Date: Tuesday, December 3, 2019 7:15:15 PM

I agree with all of the following.

Mark Koppel
Hawaii Island

Mahalo

Aloha,

Granting 14 people aquarium fish collecting permits, with loose rules, realistically policed by no one, is a terrible idea. 14 more people making a (potentially full-time) career out of stripping our reefs of “aquarium fish “ is detrimental to the health of the ocean, The west side of Hawaii Island and our own existence (loss of species on the planet has a domino effect that does in fact affect human beings).

There are already many challenges that wildlife on the Westside have had to endure: resort/golf course runoff, Gated community on cliffs’ landscape run off, Bloom which is said to be caused by Energy Lab that killed off Honokahau Harbor, and it is said that the Kawaihae harbor’s bad design has stifled the circulation in the region and sickened fish.

What is frustrating is, in the past, it seems that the state has sided with aquarium fish trade collectors and floun the doors wide-open for their collecting while regulating sustenance fishing of the same fish.

Aquarium fish trade collectors have already stripped other islands of the beautiful reef fish and coming to Hawaii Island to do the same, must not be allowed.

Hawaii’s resources should not be for sale. The County of Hawai’i has declared an emergency with the state of the climate (changing). And because we are experiencing extreme rains, run off, reef bleaching events, etc., I Believe that we need to give the ocean a well-deserved break. I cannot imagine that an EIS could be done with any accuracy if it says that it is an OK thing to have harvesting of reef fish happen at this

time.

From: [Ryan Christopher](#)
To: [Sakoda, David](#)
Subject: Aquarium Fish Bill
Date: Wednesday, December 4, 2019 11:38:03 AM

Aloha,

Granting 14 people aquarium fish collecting permits, with loose rules, realistically policed by no one, is a terrible idea. 14 more people making a (potentially full-time) career out of stripping our reefs of "aquarium fish " is detrimental to the health of the ocean, The west side of Hawaii Island and our own existence (loss of species on the planet has a domino effect that does in fact affect human beings).

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Imua aloha.
Aloha na aina.

Ryan Christopher
Honokaa HI

From: [Liysa Swart](#)
To: [Sakoda, David](#)
Subject: aquarium fish
Date: Sunday, December 1, 2019 11:50:36 PM

Please do not allow aquarium fish to be taken from Hawaiian waters. Already, the populations have declined to the point they look nothing like it did when I was young. Don't let greed and short sightedness destroy our fish populations.

Thank you
Liysa Swart

From: [Valerie](#)
To: [Sakoda, David](#)
Subject: Aquarium Fishing Impacts
Date: Monday, December 2, 2019 6:40:35 PM

Aloha Mr Sakoda.

I write requesting we deny marine aquarium fishing in our state until our reefs stabilize from the effects of overfishing and a warming ocean. With more coral bleaching than in the past, we are in dire need of our reef fish to help rehabilitate our reefs and keep our coral healthy.

Taking the fish for the aquarium trade helps deplete our stocks and leaves less fish for us all to enjoy including our many visitors who enjoy snorkeling and seeing the fish we have remaining. Let's not sell our natural environment out for the gain of a few, when our reefs and the reef fish belong to us all.

Mahalo
Valerie Weiss
Kapaa HI

From: [Keith Christie](#)
To: [Sakoda, David](#)
Subject: Aquarium Trade in Hawaii
Date: Friday, November 29, 2019 3:51:29 PM

For the record.

My name is Keith Christie and I am a 35 year resident of Maui and have been an active underwater sports enthusiast for that entire time.

I strong oppose the Aquarium Trade in Hawaii. It devastates the reefs by removing/extracting the very lives that are required to maintain a healthy and complete ecosystem for our reefs. The reefs are dying and we need all fish present and accounted for on our reefs, **NOT IN AQUARIUMS AROUND THE WORLD FOR ENTERTAINMENT.**

These are wild animals and are part of the larger ecosystem that requires all inhabitants to maintain balance and health.

The financial situation for the handful of these aquarium collectors is irrelevant to the health of our reefs. They can get other livelihoods and be retrained. The reefs cannot afford this very harmful practice.

I have seen the affects first hand and and hear to tell you that it must stop at all costs.

Please answer me this if you have the information: How is it that the trade has continued even in the face of a Hawaii Supreme Court ruling to halt all collecting? Who has allowed this?

Thank you,
Keith Christie
Maui Resident

From: [Lanny Sinkin](#)
To: [Sakoda, David](#)
Subject: Comment
Date: Tuesday, December 3, 2019 6:22:12 PM

To: David Sakoda

Aloha David.

As an attorney whose primary area of practice has been environmental law, I sometimes feel like really bad ideas impacting the environment surface almost every day.

As a broad context for any environmental discussion these days, we have to start with the tsunami of climate chaos that is already appearing now with fires, floods, "rain bombs," droughts, ecosystems collapsing,

Of particular concern are the changes taking place in the ocean. The temperature of the ocean is rising, contributing to coral bleaching. That temperature increase is causing the ocean to expand in volume, contributing to ever more destructive hurricanes and storm surge. Ocean acidification is steadily increasing.

The bottom line is that the ecosystems on Earth, and particularly the ocean, are under great stress. As one of the primary causes of that stress, humans have an obligation to those alive today and to future generations to take every possible step to reduce such stress.

Which brings me to the terrible proposal to issue commercial aquarium fishing permits. Having been in the waters around Hawai'i Island for more than 25 years, I see far fewer fish today than in the past. While I know my observations are anecdotal, they are at least suggestive that something is going on.

You will receive a number of comments that will detail the cruel and wasteful nature of the aquarium industry that is happy to strip mine our local fish population for private profit. That permit application highlights (again) the issue of why people come to our islands. There are those who come out of love and extend that love to protecting the 'Aina. Then there are those who come to exploit the 'Aina. The Hawaiian ways of sustainability have been supplanted by avaricious greed that apparently cares for nothing other than short term benefits not matter how destructive their actions are in terms of long term sustainability.

I urge you to deny the permits based on the need to protect what is left of wildlife populations.

Mahalo.

Lanny Sinkin
P. O. Box 944
Hilo, Hawai'i. 96721
(808) 936-4428

From: [Robert Wintner](#)
To: [Sakoda, David](#)
Subject: Comments against the "environmental assessment" prepared by the Pet Industry Joint Advisory Council
Date: Monday, December 2, 2019 6:17:32 PM

December 2, 2019

To Whom it May Concern:

THE AQUARIUM TRADE in cahoots with Hawaii DLNR appeals for livelihood in an "environmental review." DLNR commissioned this report from the Pet Industry Joint Advisory Council (PIJAC). Did Hawaii taxpayers fund this report? Or did the aquarium trade pay for it?

PIJAC is a lobbying group for the commercial pet trade and not in the best interests of Hawaii reefs or people. PIJAC FAILS to recognize the Hawaii Environmental Protection Act (HEPA) as required in the HAWAII SUPREME COURT RULING.

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, aquarium collector.

When the Intermediate Court of Appeals ruled for the aquarium trade, DLNR Director/Nature Conservancy Director Suzanne Case said, "It's been litigated!"

THEN the Hawaii Supreme Court ruled that no further aquarium permits should be issued until Environmental Assessment, with injunctive relief to SHUT IT DOWN NOW! DLNR Director Case trumped that ruling with a new rule of her own: permits are no longer required. Aquarium collecting now takes only a commercial fishing license. Many Kona aquarium collectors never stopped collecting, with tacit support from Kona DAR and Hawaii DLNR. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater.

DLNR Director Case scoffed the Supreme Court ruling and met with aquarium collectors to advise on speech and behavior in the 2017 legislative season. These meetings are in the public record. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, Case prevailed again on Governor Ige to veto the bill. Ige knows nothing of ocean species or habitat.

Spirit and intent in the Supreme Court ruling is clear. The PIJAC PROMO piece claims a surge in recovery, as if that should justify a new wave of reef carnage. Those claims are not based in reality. The PIJAC PROMO piece notes a catch limit on Achilles tangs of 5 per collector per day, down from 10 per day. Few people have seen 5 Achillies tangs in a single day in many years. All aquarium trade self-imposed catch limits are bogus, far beyond historical catch. This PIJAC Promo piece is not an environmental review but a commercial

appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people—especially its host culture—of iconic, endemic and economic treasures. The PIJAC PROMO piece supports a mainland amusement industry that condemns reef wildlife to a vicious cycle of replacement. THAT is what the aquarium trade calls “sustainable.” Enough!

Robert Wintner, President
Snorkel Bob’s Hawaii

From: [Jon Jokiel](#)
To: [Sakoda, David](#)
Subject: comments for Aquarium Reef Fishing moratorium
Date: Monday, December 2, 2019 6:36:34 PM

Of the listed alternatives, the **No Action alternative** is the most preferable . I think letting the reefs of Kona rest for another few years is a good idea to replenish the fish. It's been shown to work at Kahupulehu and other places in the state.

Mahalo

From: [Doug Perrine](#)
To: [Sakoda, David](#)
Subject: Comments on PIJAC DEIS for Hawaii Aquarium Fishery
Date: Monday, December 2, 2019 6:07:22 PM

Of the listed alternatives, the No Action alternative is preferable to any of the others as written. However, I would support the Limited Permit Issuance alternative with the following modifications: 1) Collecting is limited to the White List species statewide, not just in the WHRFMA only; 2) The following species are removed from the White List: flame wrasse, *Cirrhilabrus jordani*; psychedelic wrasse, *Anampses chrysocephalus*; longfin anthias, *Pseudanthias hawaiiensis*; Tinker's butterflyfish, *Chaetodon tinkeri*; These endemic (near-endemic in the case of *C. tinkeri*) species do not have sufficient population data to determine a safe level of take, while anecdotal evidence indicates that collection has severely reduced populations in waters shallow enough for recreational scuba diving.; 3) Collection of harlequin shrimp, *Hymenocera picta*, is prohibited statewide. The genetically distinct Hawaiian population segment of this species is an obligate commensal of the coral *Pocillopora eydouxi*, which suffered >90% mortality in the bleaching event of 2015-2015, followed by extremely high mortality of newly recruited colonies in the 2019 bleaching event. The loss of critical habitat severely threatens the survival of harlequin shrimp in Hawaiian waters.

Thank you for considering my comments.

Doug Perrine, M.A., marine biology & fisheries
76-223 Haoa St.
Kailua-Kona HI 96740 U.S.A.
+1 (808) 329-4523

please do not send any attachments larger than 1MB without advance permission

if your e-mail doesn't go through, try my travel account:
douglasperrine@yahoo.com

From: [Elizabeth McDermott](#)
To: [Sakoda, David](#)
Subject: Comments regarding commercial aquarium fishing permits for West Hawaii
Date: Monday, November 25, 2019 2:49:52 PM

I write in firm opposition to any new aquarium fishing permits being issued for West Oahu.

1. **CLIMATE CHANGE** Our islands just saw another serious bleaching event this summer which persisted with warmer than average ocean temps through the fall and winter. This is expected to continue and worsen in the years ahead. Our reefs are struggling under unprecedented pressure right now, and for the foreseeable future, with global warming ramping up *bleaching, ocean acidification, and more frequent and intense storms*. This is not the time to be taking fish off our reefs, fish that contribute to keeping our reefs healthy.

2. **OVERTOURISM** Our reefs also suffer from overtourism, with record numbers of tourists trampling our reefs, and coating and killing our reefs with toxic sunscreens. While some bans have been enacted on wearing sunscreens with ingredients like oxybenzone that we know cause damage, most visitors arrive with their own sunscreen and have no awareness of any ban. More people in the water means more harm to our fish and corals.

3. **OCEAN PLASTIC** Recent reports revealed that even the tiniest fish are consuming masses of plastic waste, micro plastics that mimic plankton and other foods. Their health and survival are now endangered in ways we can't foresee yet. 14 commercial fishers out grabbing fish, causing stress and upsetting feeding patterns is not what our marine keiki need

right now.

4. **LACK OF ENFORCEMENT** You can set all the bag limits you want, for yellow tang or other species, Fact is the state has proven unable to enforce these limits. Aquarium fishing often happens on weekends or at night when no one is watching. I've spoken personally to commercial aquarium fishers who told me they intentionally go out at night to avoid scrutiny. Without the capacity to enforce limits a permit becomes essentially permission to raid our reefs.

5. **NOT A NEED** Aquarium fishing takes fish purely for decoration, The vast majority of these fish die in transport and./ or have their lives cut short swimming endlessly in tanks that poorly replicate their ecosystem or meet their needs. These fish are not providing sustenance to families that survive on fish for food. This is purely for fun. With all the stress our fish are under now commercial aquarium fishing seems to me the place to cut back. Researchers are learning to breed certain fish in captivity. While I'm not a fan of that either this would be preferable to raiding our reefs.

I grew up in Hawaii, live on Oahu currently, and my parents lived on the Big Island for 11 years. I spend nearly every weekend snorkeling and diving and have seen first hand the deterioration of our reefs and drop in fish species. Please **DO NOT** issue 14 new aquarium fishing permits for West Hawaii.

Thank you for the opportunity to comment.

Beth McDermott

Honolulu HI 96822

From: [Peter Riva](#)
To: [Sakoda, David](#)
Subject: Oh, come on... this PIJAC group are seriously bad from Hawaii
Date: Monday, December 2, 2019 4:32:44 PM
Attachments: [image002.jpg](#)

PIJAC is a lobbying group for the commercial pet trade . PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

Peter Riva
President
International Transactions, Inc.
www.IntlTrans.com
imdb.me/peter.riva
Office: 1-845-373-9696 (MT time zone = NYC - 2 hrs.)
Email: PRiva@IntlTrans.com
Cell: 1-646-321-6207
Main Office: 28 Alope Way, Gila, NM 88038-0097, USA
Affiliates and Associated offices in Los Angeles, Munich and New York

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From: [Elizabeth McDermott](#)
To: [Sakoda, David](#)
Subject: Re: Comments regarding commercial aquarium fishing permits for West Hawaii
Date: Monday, November 25, 2019 3:13:30 PM

Oops, Meant to say West Hawaii not West Oahu. I am opposed to 14 commercial aquarium fishing permits being issued for West Hawaii in my first sentence.

On Nov 25, 2019, at 10:49 AM, Elizabeth McDermott
<bmcd50@hawaiiantel.net> wrote:

I write in firm opposition to any new aquarium fishing permits being issued for West Oahu.

1. **CLIMATE CHANGE** Our islands just saw another serious bleaching event this summer which persisted with warmer than average ocean temps through the fall and winter. This is expected to continue and worsen in the years ahead. Our reefs are struggling under unprecedented pressure right now, and for the foreseeable future, with global warming ramping up *bleaching, ocean acidification, and more frequent and intense storms*. This is not the time to be taking fish off our reefs, fish that contribute to keeping our reefs healthy.

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breed certain fish in captivity. While I'm not a fan of that either this would be preferable to raiding our reefs.

I grew up in Hawaii, live on Oahu currently, and my parents lived on the Big Island for 11 years. I spend nearly every weekend snorkeling and diving and have seen first hand the deterioration of our reefs and drop in fish species. Please DO NOT issue 14 new aquarium fishing permits for West Hawaii.

Thank you for the opportunity to comment.

Beth McDermott
Honolulu HI 96822

From: [Traci Blezek](#)
To: [Sakoda, David](#)
Subject: Commercial Aquarium Fishing Permits
Date: Monday, November 25, 2019 9:12:21 PM

Please do not go through with this. The area is already struggling r/t the increased warm of the ocean water. Do not allow permits for commercial aqarium fishing. We enjoy snorkeling and seeing all the fish, there, in their natural environment. There are no benifits to the ecosystem in this.

Thank You,
Traci Blezek

From: [Lizzy Laliberty](#)
To: [Sakoda, David](#)
Subject: Draft EIS Proposes 14 Commercial Aquarium Fishing Permits For West Hawaii
Date: Wednesday, December 4, 2019 3:05:20 AM

Aloha Mr. Sakoda,

I strongly oppose the granting of 14 aquarium collecting permits for West Hawaii for many reasons.

Currently Hawaii's coral reefs are under great strain. Agricultural runoff, boat traffic, heavy storms and climate change all damage the reefs and harm fish. If reefs are struggling to survive this means the fish which inhabit the reef are also under threat.

Among the threats to reef fish is the mass bleaching of their habitat, coral and in particular staghorn coral. Some estimates of bleaching in 2016-2017 are as high as 70% of corals on West Side.

Without a healthy coral reef habitat, many reef fish are already struggling to survive and don't need additional threats such as collecting.

With the loss of reefs along Kapoho coastline it's even more critical to protect the intact reefs and wild fish that remain.

The bottom line is that Hawaii has more to gain from conserving its ocean wildlife than it does from its short-term exploitation. I'm not advocating a reliance on tourist \$\$, but a large percentage of tourists want to dive/snorkel when they visit. Keeping our reefs healthy with plenty of reef fish is a draw for tourists and their revenue.

At the end of the day we must consider the greater good for our communities which comes from a healthy ocean ecosystem which sustains us in so many ways. Protecting jobs of aquarium collectors who exploit our oceans is foolish and short-sighted. Ban aquarium collecting on Hawaii island!

Aloha,
Liz Laliberte
Hilo, HI

From: [Dan L](#)
To: [Sakoda, David](#)
Subject: Fish collecting Hawaii island. EA
Date: Monday, December 2, 2019 8:33:06 PM

Aloha.

Please note my strong disapproval of any commercial reef fish collection in Hawaii.

Dan Lanterman
Kona Hawaii
808-756-0608

From: [Marie Aguilar](#)
To: [Sakoda, David](#)
Subject: Fish Collection Objections = Deadline January 7th - Hawai`i Island issue
Date: Monday, January 6, 2020 5:43:10 PM
Attachments: [DLNR- Letter Opposing Fish Collection.doc](#)

Aloha David Sakoda,

I am attaching my letter of objection to Fish Collection - Draft Environmental Impact Statement by Pet Industry Joint Advisory Council. with a deadline of January 7th.

I appreciate having you read my letter. Thank you

Aloha
Marie Aguilar
Kailua Kona Hawai`i

January 6, 2020

Marie Aguilar
P.O. Box 1874
Kailua Kona Hawai`i 96745

DLNR
David Sakoda
1500 Punchowl Street Room 330
Honolulu, Hawai`i 96813

Re: Draft Environmental Impact Statement - Pet Industry Joint Advisory Council

Aloha David Sakoda,

I am a long time resident of Hawai`i Island and know first hand on the conditions of the impact of fish collection on my island. First, the seriousness of the loss of our coral on the Hawai`i coasts are listed as severe and may not recover anytime soon. The State of Hawai`i has a responsibility to protect Hawai`i's natural resources. The tropical fish of Hawai`i are declining year after year. and I have seen the decline from 1988 through 2020. Yellow tang swam along the Kailua Pier and their visual presences created the name "Gold Coast" of the Big Island.

The effects of environmental conditions have to be taken into consideration for the future of maintaining the population of our tropical fish populations. The recent Draft Environmental Impact Statement from Pet Industry Join Advisory Council is completely flawed. First, there is an impact of collection of tropical fish collecting on the population. The population of reef fish is declining due to over collecting reef fish from past years. The damage was sever to our coral from the warm waters this summer and need to recover, if its possible. Our coral reef live symbiotically with tropical fish to flourish and nurture.

The Supreme Court in 2017 held that collection without environment review violates the Act, and DLNR later ordered to cease issuing further aquarium collection permits until the environment effects of aquarium collection is fully and publicly vetted through the HEPA process. The heaviest impact to our fish collection is the lack of holding the permit holders with a limit to their taking aquarium fish.

Today, the same permit holders want to be able to take aquarium fish with no limits. This most definitely will not support what the Supreme Court ruled. There is no management of the fish collection limits.

The most startling outcome of this Draft Environment Impact Statement written by Pet Industry Joint Advisory Council is this Council has a conflict of interest in presenting a proposal for the whole benefit for the retailing of our reef fish. They support aquarium fish pet stores throughout the mainland. Their impact statement is false, their statements do not prove the actual outcome of the fish population with fish collections with no limits. There is no study that would support their statements.

In their DRAFT, there is no mention of who the 14 permit holders are and who they represent. Are these permit holders, actual residents of Hawai`i. Are we seriously trusting this Council with what they will do when the permit holders gain access to our reef fish every day of the year. Our fish population will dwindle to a server depletion, and could not recover.

I oppose any fish collections on the Island of Hawai`i, especially as the Draft indicates from Ka`u to Kohala. Our island depends on economic sustainable tourism where tour operators bring visitors to snorkel, dive and swim and view our pristine waters. We can not have fourteen permit holders taking our natural resources for their economic benefit. Its true, third world countries protect the collection of their reef fish, and Hawai`i must continue the restriction on any fish collection for years to come.

Thank you for reading my comments and recording the receipt of this letter.

Mahalo

Respectfully,

Marie Aguilar

From: [DLNR.AR.AQ](#)
To: [Sakoda, David](#)
Subject: FW: [EXTERNAL] Fwd: Oppose Commercial Aquarium Permit-draft EIS
Date: Monday, January 6, 2020 5:05:09 PM

Maybe they sent the original email to the wrong David?

From: Jojo Tanimoto <guavaland622@gmail.com>
Sent: Monday, January 06, 2020 10:14 AM
To: DLNR.AR.AQ <aquarium@hawaii.gov>
Subject: [EXTERNAL] Fwd: Oppose Commercial Aquarium Permit-draft EIS

Sent from my iPad

Begin forwarded message:

From: Jojo Tanimoto <guavaland622@gmail.com>
Date: January 6, 2020 at 10:05:35 AM HST
To: Sakeda David <David.Sakeda@hawaii.gov>
Cc: Jim Lynch <Jim.Lynch@kigates.com>, terry.vanderwelle@stantec.com
Subject: Oppose Commercial Aquarium Permit-draft EIS

Aloha Mr. Sakoda

I am writing to oppose the draft EIS.

1. There is not enough DOCARE officers to check on infractions as is.
2. There is an unfair advantage to shoreline fishermen who fish for food sustenance. In South Kohala especially, there is a challenge to access favorite areas because of many gated communities and resort Limitations to shoreline fishing.
3. There is a disproportionate amount to catch from vessels versus from shore.
4. There is no acknowledgment of spawning seasons when collecting is prohibited. Much information about how the fish spawn, but nothing about replenishment and prohibited times to fish.

Even though the amount of Permits has been reduced, the amount of Fish and revenue seems more important than the responsibility of the State of Hawaii to protect, preserve and restore Hawai'i's natural resources. Please respond.

Mahalo

Ms. Jojo Tanimoto
Kawaihae

Sent from my iPad

From: [McDermott, Ryan D](#)
To: [Sakoda, David](#)
Subject: FW: [EXTERNAL] Yellow Tang protection
Date: Monday, December 9, 2019 5:45:25 PM

From: DLNR.AR.DLNR.Aquatics <dlnr.aquatics@hawaii.gov>
Sent: Monday, December 9, 2019 1:35 PM
To: McDermott, Ryan D <ryan.d.mcdermott.researcher@hawaii.gov>
Subject: FW: [EXTERNAL] Yellow Tang protection

From: Susie Cysewski <susiecyse@gmail.com>
Sent: Friday, December 6, 2019 7:45 AM
To: DLNR.AR.DLNR.Aquatics <dlnr.aquatics@hawaii.gov>
Subject: [EXTERNAL] Yellow Tang protection

Aloha,

I have been out of town a couple weeks, but see in the newspaper articles suggesting you are considering lifting a ban to allow commercial collection of Yellow Tang. I am completely against this! Fourteen collectors will deplete our yellow tang population in no time. DO NOT allow collection of our Yellow Tang. Leave them where they live. They are a beautiful part of Hawaii ecosystem and we need to preserve this treasure for future generations.

Mahalo,
Susie Cysewski
Kailua-Kona

Sent from my Samsung Galaxy smartphone.

**Analysis of the Draft Environmental Impact Statement
by the Pet Industry Advisory Council, Document Dated 12 November 2019**

**Gregory P. Asner PhD, Shawna A. Foo PhD, Rachel R. Carlson,
Roberta E. Martin PhD, Christopher S. Balzotti PhD**

ASU Center for Global Discovery and Conservation Science
Hilo, Hawai'i

3 January 2020

EXECUTIVE SUMMARY

The Pet Industry Joint Advisory Council submitted a Draft Environmental Impact Statement (DEIS) to the State of Hawai'i Office of Environmental Quality Control on their analysis of the ecological and cultural impacts of reissuing aquarium collection permits for West Hawai'i Island. Our review focuses on the scientific integrity and validity of data and conclusions provided in the DEIS as it pertains to West Hawai'i. We address three particular subject areas in Parts (I) Hawai'i ocean climate, (II) Fish resource trends and reporting, and (III) Coral reef damage.

Part I: A new ocean climate regime in the Hawaiian Islands renders the historical fish data collected by NOAA and State of Hawai'i Division of Aquatic Resources (DAR) scientifically unpredictable of the reef ecosystem in 2020 or into the future. NOAA and DAR fish count data span only one marine heatwave in 2014-2015, and the response of the ecosystem continues to evolve and is in strong disequilibrium. Subsequent marine heatwaves such as the 2019 event will continue to repeat, negatively impacting coral, fish and invertebrate communities, and these heatwaves will be increasing in frequency to near-annual events by 2035. A pivotal issue determining the ability of Hawai'i's coral reefs to persist in the new ocean climate rests in the abundance and diversity of the herbivore fish community under repeat heatwaves. Herbivore fish are primary determinants of reef algal cover, which competes directly with slow-growing corals for space during and between marine heatwaves. Reef science demonstrates that the probability of a marine heatwave generating a shift from coral to algal dominated reef is reduced to 20% - a key target threshold for management – at an herbivore fish biomass level of 250 kg per hectare. As of 2018, 74% of shallow coral reefs of West Hawai'i are near or below this threshold, and the biomass of deeper portions of the reef are insufficiently known. Beyond marine heatwaves, West Hawai'i development has rapidly expanded over the past two decades, resulting in numerous additional stressors to the reef ecosystem. A recent study of the shallow water fishery of West Hawai'i indicated that the two main sources of resource fish decline from 2008 to 2018 are nitrogen-rich effluent and commercial fishing. West Hawai'i's reefs are not well prepared for repeated marine heatwaves from an herbivore fish standpoint.

Part II: The DEIS utilizes two different datasets to estimate fish populations along the west coast of Hawai'i Island: (i) Division of Aquatic Resources (DAR) West Hawai'i Aquarium Project (WHAP) surveys and (ii) NOAA Coral Reef Monitoring Program (CREP) surveys. The WHAP data are not spatially representative of West Hawai'i because they are not taken from randomly selected sites. The majority of the WHAP survey sites lie within geographically-limited marine managed areas and thus these surveys do not accurately represent fish populations across all of West Hawai'i. The DEIS report bases the majority of its estimations using the WHAP surveys, even while acknowledging that the CREP data would be more representative. The DEIS should present both datasets similarly to understand if the same trends in fish populations seen at the WHAP long-term monitoring sites also agree with the island-wide CREP surveys. Our analysis suggests that the WHAP and CREP data tell different stories of aquarium fish trends over time, including weakening fish population trends in CREP compared to those reported for WHAP by the DEIS. Meanwhile, another State of Hawai'i DAR report indicates major declines in fish abundance, ranging from a small relative decline in Yellow Tang (-9%) to an enormous decline in Achilles Tang

(-97%). Additionally, State of Hawai'i DAR monitoring of shallow water reefs show major declines of certain herbivore fish species from 2008 to 2018.

The DEIS uses invalid estimates of percent catch from the aquarium trade to evaluate the impacts of alternative actions. In particular, the DEIS claims that percent catch should be based on island-wide population estimates for each species by citing evidence for habitat connectivity between protected and open fishing areas around all of Hawai'i Island. This is incorrect, and past studies using drifters, larval sampling, genetic analysis, and oceanographic modeling indicate high local retention of larvae, and juvenile and adult fish populations, in West Hawai'i. As a result of this major error in the DEIS, the reported percent catch is erroneously low. It should be based on relevant West Hawaii Regional Fishery Management Area sub-populations considering the realistic home ranges of each species, not on island-wide populations.

Part III: The DEIS makes several broad and unsubstantiated claims that aquarium collection does not negatively impact the reef ecosystem. A key question is whether or not aquarium fish collectors make physical contact with the reef via their equipment and their bodily movement. Reports from the public and the conservation community, combined with our own *in-situ* observations, broadly point to common and persistent issues of aquarium collector contact with the reef. The DEIS makes no recommendation to provide third-party oversight of collector activities, and goes as far as to suggest that there is no impact from collection on corals or reef structure. Physical, biological, and chemical damage needs to be documented and prevented. Prevention is the only scientifically sound pathway, either by strong *in-situ* oversight of the industry or via banning of collections.

INTRODUCTION

On November 12, 2019, the Pet Industry Joint Advisory Council submitted a Draft Environmental Impact Statement (DEIS) to the State of Hawai'i Office of Environmental Quality Control on their analysis of the ecological and cultural impacts of reissuing aquarium (AQ) collection permits for West Hawai'i Island. Our review focuses on the scientific integrity and validity of data and conclusions provided in the DEIS as it pertains to West Hawai'i, defined as the area spanning the west or leeward side Districts of N. and S. Kohala, N. and S. Kona, and Ka'u. We do not address cultural issues in our review of the DEIS.

Our investigation of the DEIS content required the focus and expertise of a panel of marine ecologists and biologists with a collective experience on West Hawai'i reef ecosystems of more than 50 person-years. Our review presented here is limited to three particular subject areas, two of which are directly addressed in the DEIS, and one that was not addressed in the document. These subject areas are organized into Parts (I) Hawai'i ocean climate, (II) Fish resource trends and reporting, and (III) Coral reef damage.

PART I: HAWAI'I OCEAN CLIMATE IN 2020 AND BEYOND

Like many regions of the world, the Hawaiian Islands have entered a new ocean climate regime that is less favorable to coral reefs as a whole. As a result, building resilient coral reefs must be a focal point for resource management to give reefs the best chance for persistence. One of the major limitations of the DEIS rests in its narrow analysis of the West Hawai'i coral reef ecosystem. Spanning a distance of about 180 km of coastline, the reef is extremely heterogeneous in terms of benthic substrate, coral cover, habitat condition, fish abundances, and accessibility by fishers. These issues alone raise serious concerns about the critically important limitations of an environmental impact study based solely on fish counts.

Adding the new ocean climate regime to the natural complexity of the West Hawai'i reef, historical fish data alone are not predictive of the reef ecosystem in 2020 or into the future, whether exposed to aquarium collection or not. Hawaiian reef ecosystems are part of the new ocean climate system that continues to rapidly expand in the Pacific and worldwide. In 2014 and 2015, the Main Hawaiian Islands underwent their first major system-wide ocean climate event, called a marine heatwave, that caused increased water temperatures resulting in large-scale coral bleaching and impacts on fish and invertebrate populations (Bahr et al. 2017; Couch et al. 2017). About half of the corals that bleached in 2015 ultimately died and became algal covered (Kramer et al. 2016). The 2019 marine heatwave again engulfed the Hawaiian Islands, causing up to 50% coral bleaching in some areas, and an average of 10% mortality in West Hawai'i (ASU GDCS 2019). Marine heatwaves are the new norm, and will be increasing in intensity and/or frequency in the years to come (Frolicher et al. 2018), putting enormous additional stress on coral reefs of Hawai'i.

Ocean temperature in West Hawai'i is projected to increase as a result of climate change. By the middle of the century, average monthly sea surface temperature will be $\sim 1^{\circ}\text{C}$ (1.8°F) warmer than present-day, and for about 6 months of the year will be warmer than the present-day summertime maximum (27°C ; 80.6°F). This increase in ocean temperature is projected to influence the frequency and severity of coral bleaching. For example, severe bleaching is projected to occur on an annual basis in West Hawai'i beginning as early as 2035 (van Hooijdonk et al. 2016).

A pivotal issue determining the ability of Hawai'i's coral reefs to persist in the new ocean climate rests in the abundance and diversity of the herbivore fish community. Herbivore fish are primary determinants of reef algal cover, which competes directly with slow-growing corals for space. Regular marine heatwaves not only cause coral bleaching and mortality, they also promote algal growth that colonizes dead coral and responds well to increased water temperature (Jessen et al., 2013; Graham et al., 2015). Herbivore fish biomass and diversity have become important combaters of algal growth during and between marine heatwave events.

In a scientifically-acclaimed global analysis and synthesis, Graham et al. (2015) found that the probability of a reef switching from a coral-dominated to an algal-dominated system was more than 50% when herbivore fish biomass dropped below 100 kg per hectare. Importantly, the probability of a regime shift from coral to algal domination decreased to 20% - a key target threshold for management - at an herbivore fish biomass level of 250 kg per hectare (**Figure 1**).

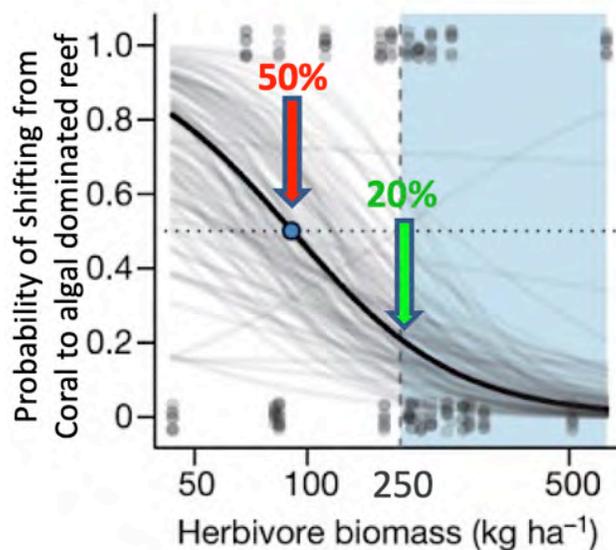


Figure 1. Effects of herbivore fish biomass on the probability of a reef switching from coral to algal dominated during and immediately after a marine heatwave (Graham et al. 2015).

Based on the State of Hawai'i Division of Aquatic Resources shallow water fish survey data, current herbivore biomass levels vary enormously along the coast of West Hawai'i (**Figure 2**). Among 72 sites included in this 2018 survey, 21% are near or below the super-critical 100 kg per hectare threshold for a 50:50 chance of coral-to-algal domination caused by a marine heatwave.

Approximately 64% of sites are currently near or below the critical 250 kg per hectare threshold for a 20% chance of coral-to-algal change from a marine heatwave. Only 19 of 72 sites (26%) are well above this guiding 250 kg per hectare minimum for good herbivore fish management. Numerous countries and jurisdictions are using the 250 kg threshold as the target for increasing reef resilience in the new ocean climate. However, West Hawai'i's reefs are not currently in such a state and are not well prepared for repeated marine heatwaves from an herbivore fish standpoint.

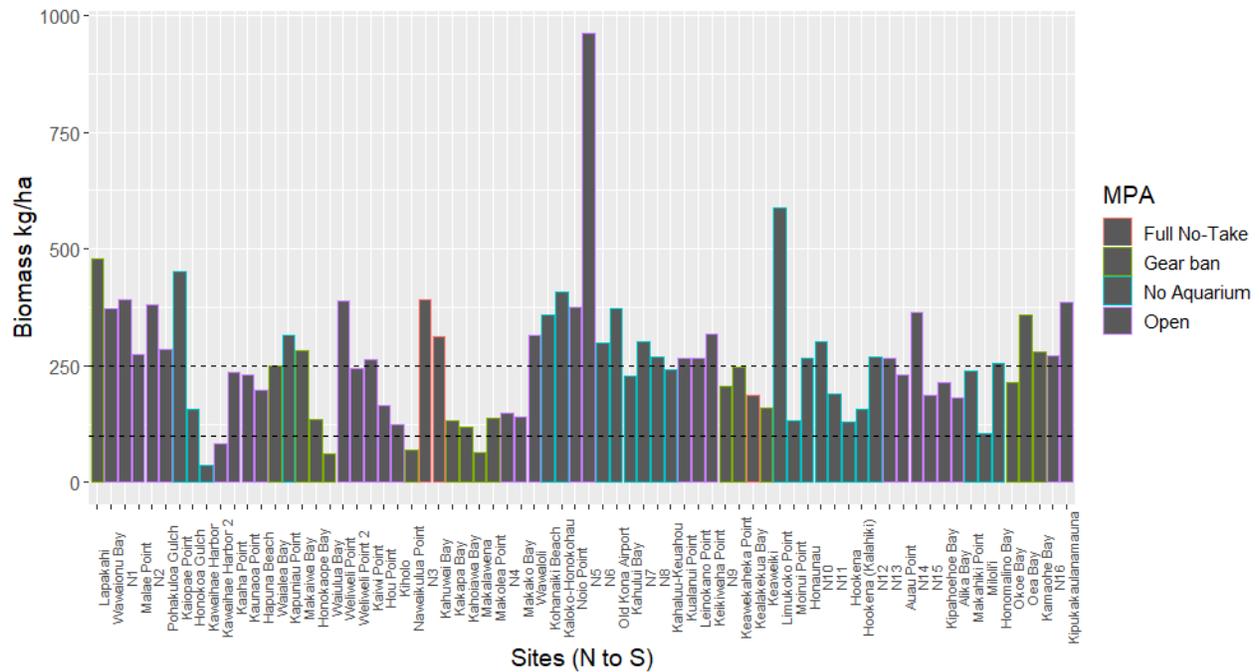


Figure 2. Herbivore biomass in kg per hectare across 72 sites surveyed in 2018 in West Hawai'i. The dashed lines indicate the 100 and 250 kg per hectare levels, the 50% and 20% probability thresholds that Graham et al. 2015 identified. The protection status of each site is indicated in the legend.

Beyond marine heatwaves, development in West Hawai'i has rapidly expanded over the past two decades, resulting in numerous additional stressors to the reef ecosystem (Gove et al. 2019). These include nitrogen-rich effluent from both commercial and non-commercial wastewater discharge and over-fishing. In 2017, West Hawai'i released a total of 680 million gallons of effluent per year and a total of 400,000 pounds of nitrogen per year (Gove et al. 2019). A recent study of the shallow water fishery indicated that the two main sources of resource fish decline from 2008 to 2018 (including four species on the aquarium White List) are nitrogen-rich effluent from onshore disposal sites and commercial fishing. Importantly, non-commercial fishing was not correlated with observed long-term declines in fish biomass in shallow water habitats (Foo et al. in review; *available upon request*). Only commercial fishing was statistically linked to herbivore fish declines.

In accounting for the new ocean climate regime with an increasing number of regional stressors, it has become clear that a new approach to the management of coral reefs in West Hawai'i, including the interactive role of herbivore fish and corals, is paramount to their near- and long-term survival. Whether the aquarium industry can guarantee that herbivore fish biomass levels remain above the critical 250 kg per hectare threshold is highly unlikely, but such levels of management will be needed moving forward to ensure that West Hawai'i reefs remain intact and biologically productive.

PART II: FISH RESOURCE TRENDS AND REPORTING

Assessment based on inadequate data coverage of West Hawai'i

The DEIS utilizes two different datasets to estimate fish populations along the west coast of Hawai'i Island: (i) Division of Aquatic Resources (DAR) West Hawai'i Aquarium Project (WHAP) surveys and (ii) NOAA Coral Reef Monitoring Program (CREP) surveys, which we will refer to as WHAP and CREP to distinguish between the two survey types.

The WHAP surveys represent the same 25 study sites surveyed annually from 1999 to 2018. These WHAP sites were originally established to monitor different protection levels – Marine Protected Area (MPA), Fish Replenishment Area (FRA), and Open or unprotected – in order to determine the effectiveness of protected areas on aquarium fish species. The WHAP data are not spatially representative of West Hawai'i because they are not taken from randomly selected sites. In fact, the majority of the survey sites lie within marine managed areas and thus WHAP surveys likely do not accurately represent fish populations across all of West Hawai'i, especially since FRAs and MPAs have very limited coverage (**Figure 3**, which is Figure 4 in the DEIS, page 79). The CREP data, on the other hand, represent randomly distributed fish surveys of Hawai'i Island, with 257 survey locations measured between 2010 and 2016. To ensure better representation of fish populations across West Hawai'i, both datasets should be considered equally. A strength of the WHAP surveys is that, because they are permanently monitored sites, the data can be used to track changes over time, but the fact that the data from these sites are not representative of West Hawai'i is not discussed in the DEIS. A comparison of the WHAP and CREP data is essential to document the ecological status of fish populations of West Hawai'i and needs to be included in the DEIS.

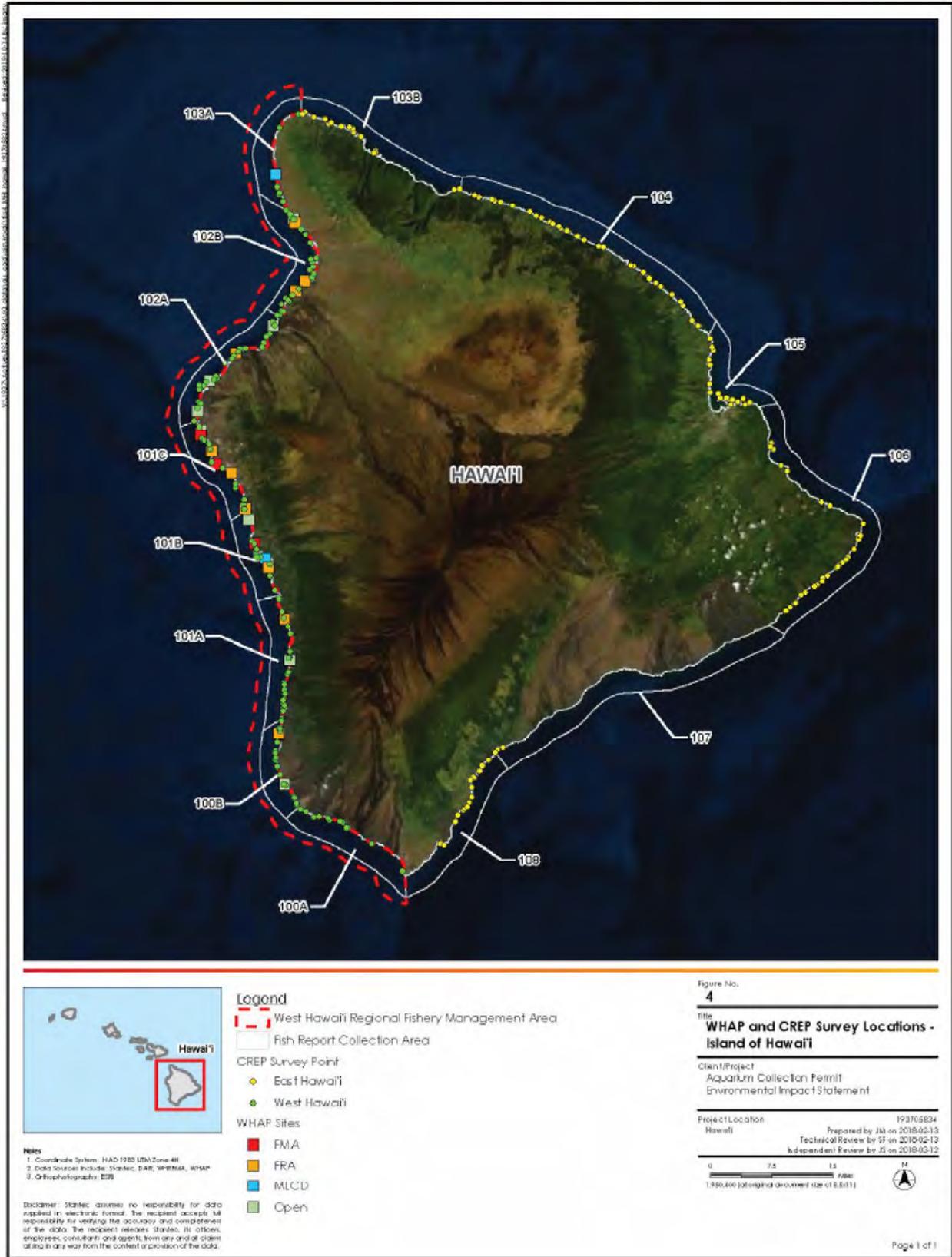


Figure 3. WHAP and CREP survey locations – Island of Hawai‘i. This is Figure 4 in the DEIS.

The DEIS report bases the majority of its estimations using the WHAP surveys, even while acknowledging in the executive summary of the report that the CREP data are more representative: “Both data sets are presented and analyzed in this DEIS. However, due to the larger spatial coverage and greater range of depths surveyed by CREP, these data are a better estimator of island-wide fish population size, and therefore serve as the primary basis for the impact analysis in this DEIS.” Herein lies the first problem with the data cited in the DEIS: The authors acknowledge the shortcomings of the WHAP surveys yet base the estimations and justifications for aquarium fishing limits mainly on the WHAP surveys.

The DEIS presents the trends in fish biomass for the WHAP permanent monitoring sites, summarized as percentage increases and decreases in fish biomass between the start and end of the monitoring time (**Table 1**, which is Table 5-4 in the DEIS, page 99). On the other hand, the DEIS only reports 2016 CREP surveys for each aquarium fish species, although surveys from 2010 to 2018 do exist and were available to the DEIS authors. The DEIS should present both datasets similarly to understand if the same trends in fish populations seen at the WHAP long-term monitoring sites also agree with the island-wide CREP surveys.

Presented here in **Figure 4** and **Table 2**, we have calculated the average number of aquarium species counted across surveys for each year of CREP data to facilitate the comparison with the WHAP data that was left out of the DEIS. Comparing **Table 1** (Table 5-4 from the DEIS), and **Table 2** provided here, CREP data show moderate overall changes in fish abundance, as well as important decreases in species abundances, which directly contradicts results from the WHAP data alone, which show mostly large fish abundance increases in protected areas. The DEIS had equal access to the CREP data yet decided not to provide these summaries. It appears that the DEIS data have been targeted to show only large increases in fish biomass.

Note also from **Figure 4** that there exists enormous variation in annual patterns of fish abundance. It would be more appropriate for the DEIS to consider annual trends rather than differences between the start and end of surveys, to assess whether long-term increases or decreases in fish populations occur or not.

Table 1. Change in the density of the top 10 collected species in the WHRFMA based on WHAP data. ‘Before’ = Mean of 1999-2000; ‘After’ = Mean 2017-2018. Young-of-year (YOY) not included. Bold = statistically significant t-test (DAR 2019a). Table 5-4 in the DEIS.

COMMON NAME	AREA	MEAN DENSITY (No./100M ²)		OVERALL % CHANGE IN DENSITY	p
		Before	After		
Yellow Tang	FRA	12.73	33.79	+165.4%	<0.001
	Open	10.24	20.53	+100.6%	<0.001
	MPA	23.08	40.07	+73.6%	<0.001
Kole (Goldring Surgeonfish, Yelloweye, Goldring)	FRA	28.38	52.60	+85.4%	<0.001
	Open	21.18	41.65	+96.6%	<0.001
	MPA	28.53	62.64	+119.6%	<0.001
Orangespine Unicornfish	FRA	0.81	0.67	-16.8%	0.26
	Open	1.12	1.59	+42.6%	<0.001
	MPA	1.59	2.88	+81.4%	<0.001
Achilles Tang	FRA	0.26	0.05	-82.7%	<0.001
	Open	0.31	0.09	-70.5%	<0.001
	MPA	0.42	0.22	-48.3%	0.05
Black Surgeonfish	FRA	0.18	0.76	+319.2%	<0.001
	Open	0.17	0.84	+402.1%	<0.001
	MPA	0.53	0.98	+83.7%	<0.001
Potter’s Angelfish	FRA	1.38	2.28	+66.0%	<0.001
	Open	1.65	2.47	+49.9%	<0.001
	MPA	1.54	2.39	+55.4%	<0.001
Ornate Wrasse	FRA	0.94	0.66	-30.1%	<0.001
	Open	2.20	1.83	-16.6%	<0.001
	MPA	1.24	1.59	+28.5%	<0.05
Goldrim Surgeonfish	FRA	0.04	0.09	+156.6%	0.46
	Open	0.01	0.06	+605.9%	0.42
	MPA	0.11	0.21	+102.4%	0.45
Orangeband Surgeonfish	FRA	0.13	0.22	+73.9%	0.24
	Open	0.31	0.50	+60.0%	<0.01
	MPA	0.56	0.87	+56.3%	<0.05
Brown Surgeonfish	FRA	8.57	13.90	+62.1%	<0.001
	Open	11.20	25.77	+130.1%	<0.001
	MPA	7.68	22.21	+189.3%	<0.001

Table 2. Change in fish abundance of the top 10 collected species based on CREP data. Increases are shown highlighted in green, and decreases are highlighted in red.

Common Name	Mean Density		Overall % Change in Density
	2010	2016	
Yellow Tang	32.1	40.8	+27.1
Goldring Surgeonfish	40.4	51.9	+28.5
Orangespine Unicornfish	4.4	3.8	-13.6
Achilles Tang	2.1	2.3	+9.5
Black Surgeonfish	4.5	3.4	-24.4

Potter's Angelfish	5.2	6.6	+26.9
Ornate Wrasse	4.7	3.6	-23.4
Goldrim Surgeonfish	3.4	2.7	-20.6
Orangeband Surgeonfish	4.5	5.4	+20.0
Brown Surgeonfish	29.9	50.4	+68.6

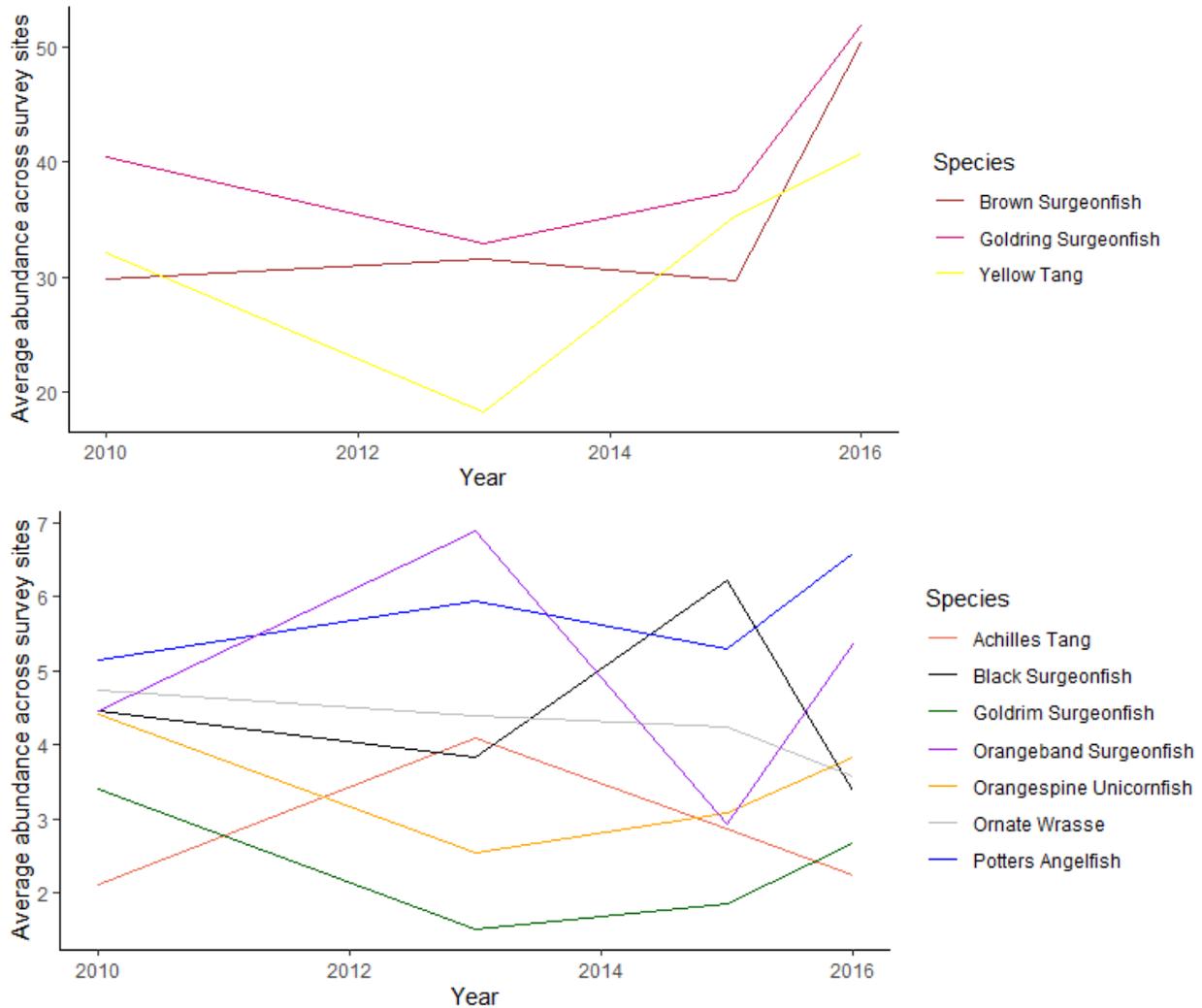


Figure 4. Summary plots of the average abundance across survey sites per year in the CREP surveys. The species are separated to facilitate interpretation as the top panel displays species with a much greater abundance.

There is also a multitude of reports of West Hawai'i fish biomass provided by the Division of Aquatic Resources, available online at <https://dlnr.Hawaii.gov/dar/reports/>. For example, one report by Walsh et al. (2018) presents the continued, long-term decline of coral reef biota and associated fauna at key sites in West Hawai'i. This report notes major declines in fish abundance between the two survey periods, ranging from a slight relative decline in Yellow Tang (-9%) to an

enormous decline in Achilles Tang (-97%); Both are two key aquarium fish species. The report also includes information on aquarium fish abundance. **Table 3** below (Table 6 in Walsh et al. 2018) shows major declines for most aquarium fish species.

Table 3. Abundance (#/100m²) of the top ten most abundant aquarium fish species at Puako and Pauoa. Collection rankings were based on FY 2009 aquarium data. The standard error for 2007-2008 surveys is included in Appendices 3 and 5. Δ is the numerical change in density and Δ (%) is the percent change between the two study periods. Species whose abundances have increased at one or both sites are shown in bold. Table 6 from Walsh et al. (2018).

Species	Puakō				Pauoa			
	1979-81	2007-08	Δ	% (Δ)	1979-81	2007-08	Δ	Δ (%)
<i>Zebrasoma flavescens</i>	9.89	9.01	-0.88	-8.9%	5.86	6.73	+0.87	+14.8%
<i>Ctenochaetus strigosus</i>	21.00	8.14	-12.86	-61.2%	29.04	8.53	-20.51	-70.6%
<i>Naso lituratus</i>	2.54	0.43	-2.11	-83.1%	0.91	0.29	-0.62	-68.1%
<i>Acanthurus achilles</i>	0.89	0.03	-0.86	-96.6%	0.36	0.06	-0.30	-83.3%
<i>Forcipiger flavissimus</i>	1.45	0.44	-1.01	-69.7%	1.24	0.21	-1.03	-83.1%
<i>Acanthurus nigrofuscus</i>	21.13	4.23	-16.9	-80.0%	31.68	5.63	-25.93	-82.2%
<i>Chaetodon multicinctus</i>	3.56	0.49	-3.07	-86.2%	4.22	0.46	-3.76	-89.1%
<i>Zanclus cornutus</i>	0.52	0.04	-0.48	-92.3%	0.52	0.05	-0.47	-90.4%
<i>Ctenochaetus hawaiiensis</i>	0.03	0.04	+0.01	+33.3%	0.00	0.03	+0.03	na
<i>Centropyge potteri</i>	2.68	0.18	-2.50	-93.3%	2.33	0.04	-2.29	-98.3%

Here, the top ten most collected aquarium fishes declined at both sites, except for Yellow Tang, and that aquarium fishing likely contributed to these declines. It is also stated that additional aquarium fish species are not included because of extremely low abundance and the inability to make any meaningful conclusions on changes in abundance over time.

Shallow water resource fish surveys from 2008 to 2018 conducted by DAR include four aquarium species. These data show very different trends in aquarium species population dynamics, all with much less biomass in 2018 in comparison to 2008 (**Figure 5**). As also seen in **Figure 4**, annual trends differ greatly, and whether a population is increasing or decreasing depends on which years are being compared. As discussed earlier, we advocate for the inclusion of annual trends in the DEIS to determine truly whether a species is increasing or decreasing over time.

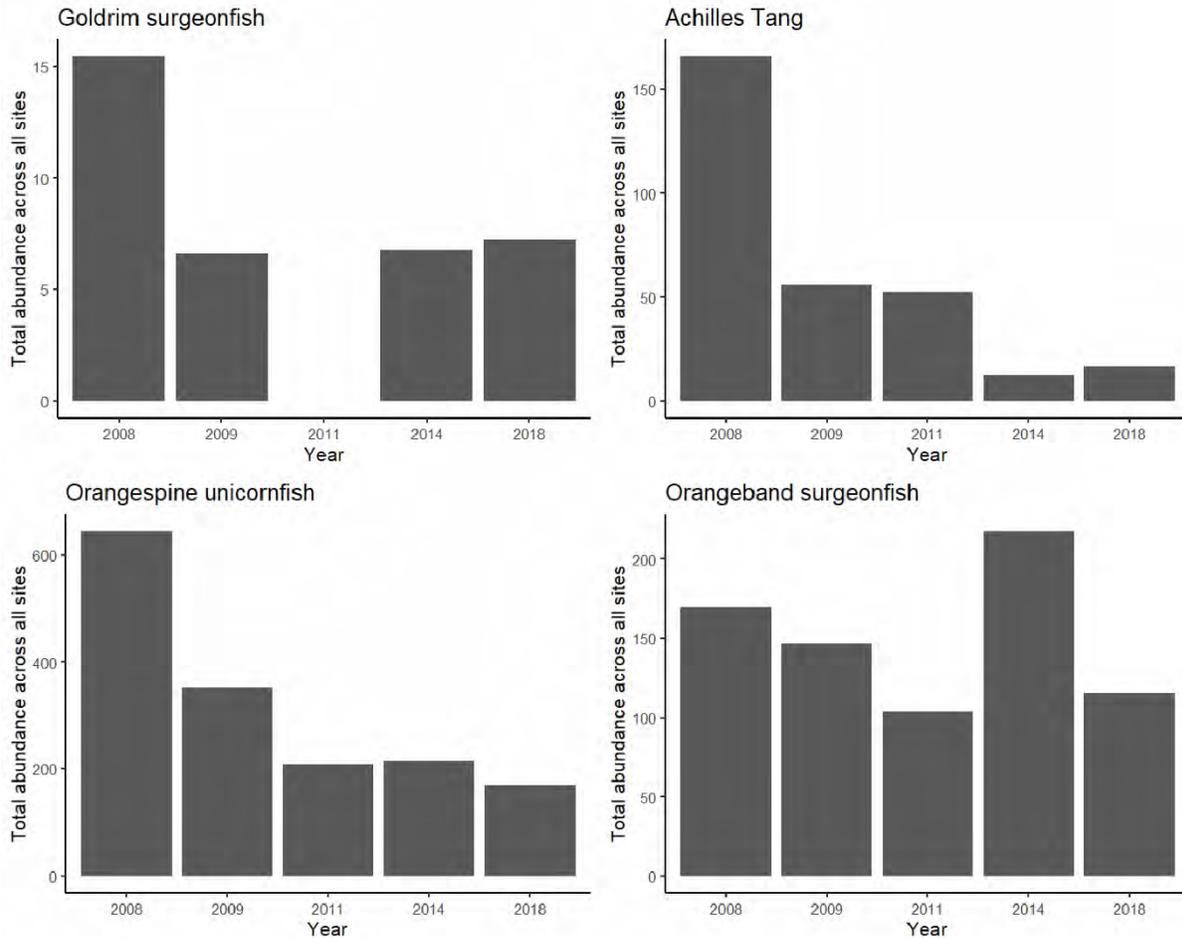


Figure 5. Fish biomass for four aquarium species surveyed between 2008 and 2018 in the shallow water resource fish surveys conducted by DAR.

Changes in aquarium fish populations differ between survey types, locality, and by which years are compared. We have presented two other datasets that show contrasting patterns to those presented in the DEIS. The DEIS should provide summaries of population dynamics for both CREP and WHAP data, as well as an analysis to assess whether individual species agree in the annual population trends observed across both datasets. It is crucially important to assess whether the WHAP long-term surveys at the 25 permanent monitoring sites show the same population patterns as those reported in CREP surveys. This will be key to determining whether the effects of an aquarium ban have only been effective locally, or across all of west Hawai'i.

If aquarium fish species show both a clear increase in abundance through WHAP's different management systems and also increases in abundance in the CREP surveys, an alternative to the proposed aquarium fishing plan could be a greatly reduced White List with strict limits on catch of certain fish species. If no data or not enough data exist, a species should not be included in the white list.

Fish populations are extremely variable in time and space depending on reef rugosity, depth, temperature, currents as well as population dynamics such as season, mortality and recruitment. Consideration of the full body of scientific literature available for West Hawai'i and then a systematic analysis is needed, instead of basing catch limits on 25 sites across the west coast. Cherry-picking scientific findings to support aquarium fishing will, in the end, lead to poor outcomes for the most extensive reef system in Hawai'i.

Assumption of connectivity of fish populations across West Hawai'i

The DEIS uses invalid estimates of percent catch from the aquarium trade to evaluate the impacts of alternative actions. In particular, the DEIS claims that percent catch (**Table 4**, which is Table 5-11 from the DEIS) should be based on island-wide population estimates for each species because “There is evidence for connectivity between FRAs and Open Areas around the island of Hawai'i (Christie et al. 2010).” This is incorrect: while neighboring FRAs and Open Areas may display high connectivity, the entire island of Hawai'i does not, and limited connectivity exists between East and West Hawai'i. The DEIS misinterprets Christie et al. (2010), which demonstrates connectivity across South/West Hawai'i. Past studies using drifters, larval sampling, genetic analysis, and oceanographic modeling indicate high local retention of larvae in West Hawai'i (Christie et al. 2010; Lobel 2011; Vaz et al. 2013). Critically, and as a result of this major error in the DEIS, the report's percent catch is erroneously low. It should be based on relevant West Hawaii Regional Fishery Management Area sub-populations considering the realistic home ranges of each species, not on island-wide populations.

Table 4. Summary of CREP (2018) population estimates, disclosed catch data from East and West Hawai'i since 2000 (DAR 2018a), and the impact of average and maximum annual collection by species for the 40 White List Species. n.d. = Not Disclosed (Section 5.1); NA = Insufficient data available. Table 5-11 from the DEIS.

Common Name	Island of Hawai'i Pop. Mean (lower-upper estimate limit) (CREP 2018)	East Hawai'i (DAR 2018a) (numbers from 14 fishers in parenthesis; DAR 2019b)				WHRFMA (DAR 2018a) (numbers from 14 fishers in parenthesis; DAR 2019b)				Island of Hawai'i (DAR 2018a) (numbers from 14 fishers in parenthesis; DAR 2019b)			
		Average Catch per year	Maximum Catch per Year	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year	Maximum Catch per Year ¹	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.	Average Catch per year ²	Maximum Catch per Year ²	Average Percent of Hawai'i Pop.	Max Percent of Hawai'i Pop.
Achilles Tang ³	231,377 (113,989-348,765)	703 (337)	1,525 (1,746)	0.30% (0.15%)	0.66% (0.75%)	5,600 (4,058)	5,757 (5,027)	2.42% (1.75%)	2.49% (2.17%)	6,303 (4,395)	7,282 (6,773)	2.72% (1.90%)	3.15% (2.93%)
Bird Wrasse	877,224 (686,135-1,068,313)	n.d. (1)	n.d. (6)	NA (<0.01%)	NA (<0.01%)	345 (146)	624 (224)	0.04% (0.02%)	0.07% (0.03%)	345 (147)	969 (230)	0.04% (0.02%)	0.11% (0.03%)
Black Durgon	1,354,454 (991,054-1,717,854)	n.d. (0)	n.d. (1)	NA (0.00%)	NA (<0.01%)	64 (25)	143 (86)	<0.01% (<0.01%)	0.01% (<0.01%)	64 (25)	207 (87)	<0.01% (<0.01%)	0.02% (0.01%)
Black Surgeonfish	549,462 (355,535-743-388)	n.d. (33)	n.d. (181)	NA (0.01%)	NA (0.03%)	3,535 (2,334)	8,598 (4,711)	0.64% (0.42%)	1.56% (0.86%)	3,535 (2,367)	12,133 (4,892)	0.64% (0.43%)	2.21% (0.89%)
Blacklip Butterflyfish	131,260 (53,712-208,807)	n.d. (0)	n.d. (4)	NA (0.00%)	NA (<0.01%)	72 (33)	129 (88)	0.05% (0.03%)	0.10% (0.07%)	72 (33)	201 (92)	0.05% (0.03%)	0.15% (0.07%)

The DEIS also fails to consider that connectivity between FRAs and Open Areas is not absolute. Some areas are more connected than others based on the strength and direction of ocean hydrodynamics (Vaz et al. 2013). Additionally, the DEIS does not mention where fishing will be allowed—if fishing occurs in “upstream” areas that are sources of fish larvae for downstream reefs, this can heavily deplete downstream fish stocks across large areas (Crowder et al. 2000). Lastly, referring back to **Figure 2**, we can see great variability across the different MPA types and across all of West Hawai‘i. The DEIS assumption that fish connectivity is high is flawed.

To evaluate the *Preferred Alternative*, the DEIS compares its aforementioned, invalid percent catch estimates to a study by Ochavillo and Hodgson (2006) that itemized Total Allowable Catch for reef fish species in the Philippines—species that do not correspond to Hawai‘i’s target aquarium species. However, Total Allowable Catch must always be based on the unique growth and mortality rates and reproductive traits of target species, in this case, for those in West Hawai‘i, not on non-target species in a distant region. It is an irresponsible false equivalency to base wide-reaching policy decisions on “rules of thumb” for non-target species. In sum, a complete evaluation of the life histories and sustainable catch limits of West Hawai‘i’s target species should underlie this DEIS, weighed against percent catch of relevant, connected populations.

Data analysis is incomplete and insufficient to support DEIS recommendation

In addition to the lack of and bias-selected data cited in the DEIS, the only statistical analysis presented are simple t-tests. The DEIS makes major claims and states multiple times that commercial aquarium fishing is not driving a decline in fish biomass or coral cover. However, the DEIS fails to back up these claims with statistically valid analyses. The DEIS fails to account for confounding variables, biases, tests of the strength and direction of relationships – critical factors that are not captured by bar and line graphs. For example, a generalized linear mixed model considering the abundance of specific aquarium fish species, and the collection of aquarium fish (with year and site as random factors), would show more conclusively whether aquarium fishing impacts fish abundance.

The DEIS biases its selection and use of data to very specific indicators of fish biomass, particularly from Gove et al. (2019) – a comprehensive report on West Hawai‘i. Specifically, the DEIS states from this report that herbivore biomass increased more in open areas than in FRAs (page 116, 139, 140 of DEIS). However, this was not a significant finding (J. Gove, NOAA, Pers. Comm., Gove et al. 2019) and is one of the instances that the DEIS vacillates between using statistical significance to support their messaging in some cases and then dismisses statistical significance in other instances.

Most importantly, if we examine the fish indicators from Gove et al. (2019), specifically Total Fish Abundance, Total Fish Biomass, Mean Adult Fish Length, and Juvenile Yellow Tang, each indicator had significant increases that were greater in FRAs compared to Open Areas from 2003 – 2017. This directly contradicts what was stated in the DEIS to support their statement that aquarium fishing does not impact fish abundance. These data that were specifically ignored from Gove et

al. (2019) strongly contradict the argument that aquarium fish collection had no impact on the fish community.

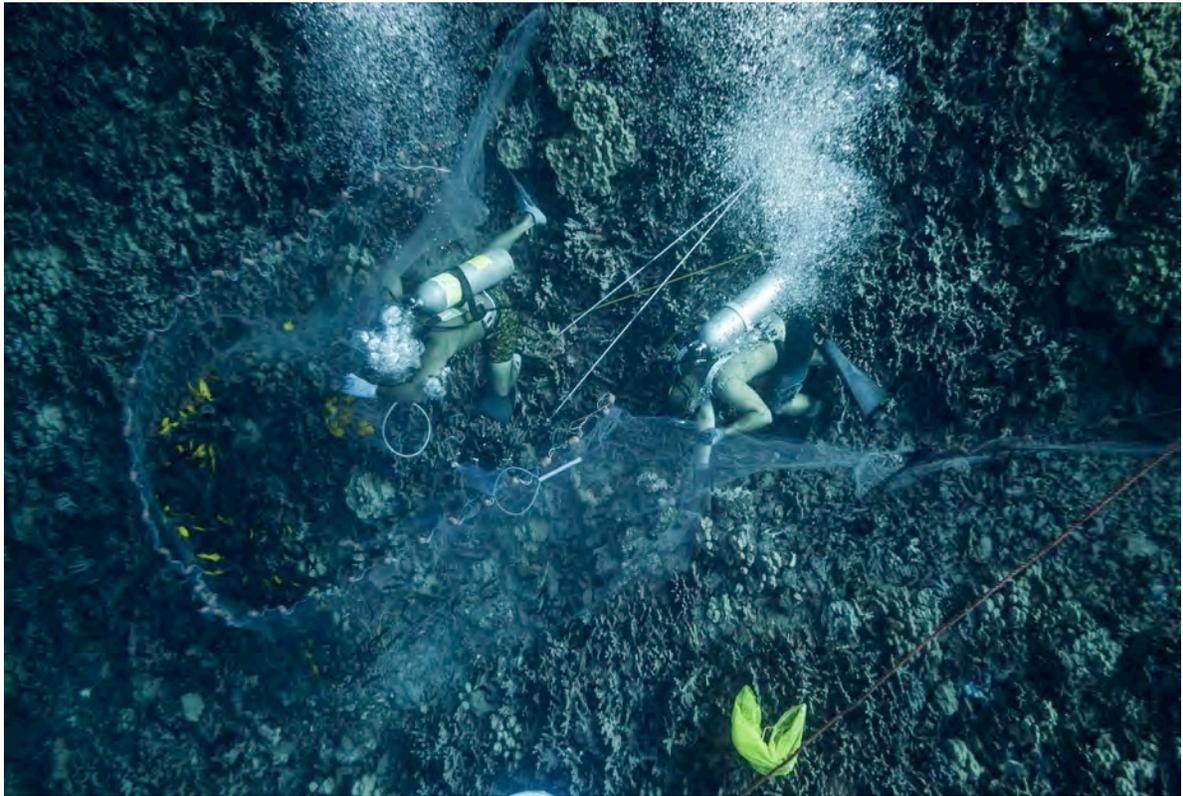
A failure to utilize other highly-available datasets for Hawai'i will result in inaccurate estimates of fish populations upon which the DEIS bases its claims. Misrepresentation and selective use of science is dangerous and has the potential to harm Hawaiian ecosystems. These very basic tenets of scientific analysis have not been considered properly in the DEIS.

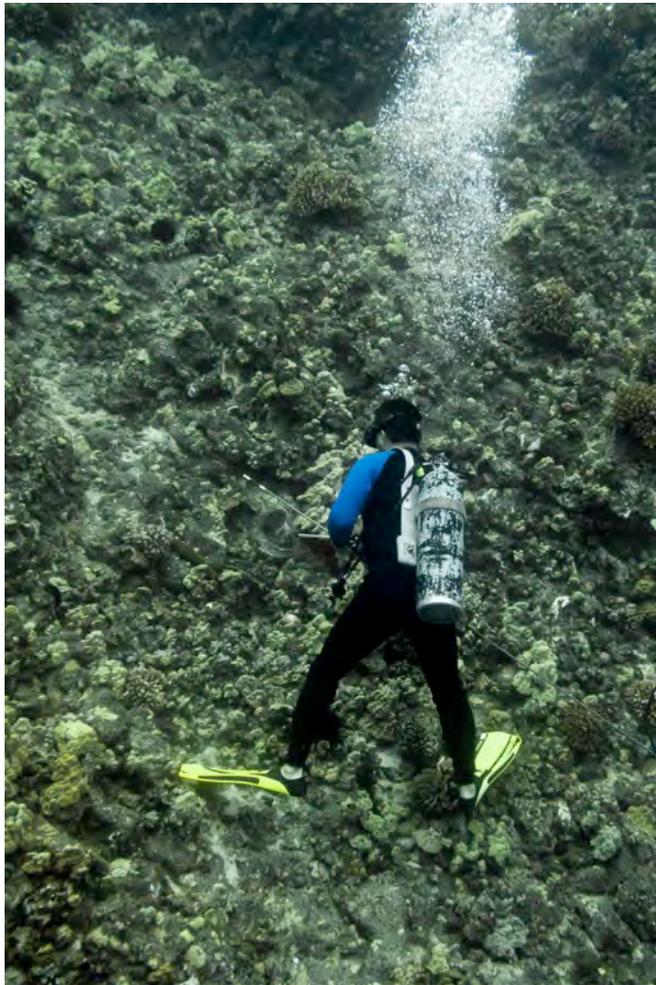
III. CORAL REEF DAMAGE

The DEIS makes several broad and unsubstantiated claims that aquarium collection does not negatively impact the reef ecosystem. However, a large body of scientific study indicates that making contact with the reef, especially its corals, generates major negative impacts on all aspects of reef condition (Rubec et al. 2001; Barclay and Berkes, 2017; Nichols et al. 2018; Gove et al. 2019). The question then becomes whether or not aquarium fish collectors make physical contact with the reef via their equipment and their bodily movement.

Reports from the public and the conservation community broadly point to common and persistent issues of aquarium collector contact with the reef. Our scientific observations of areas frequented by collectors also indicate areas of increased smashed coral, "troughing" for mesh fencing, staking, and finning. Hard data are challenging to generate since the aquarium industry maintains a semi-clandestine culture and does not offer opportunities for third-party oversight. Nonetheless, numerous photos have been taken of aquarium collector methods in West Hawai'i, which reveal divers making direct contact with live corals. The photos below provide a few examples taken from West Hawai'i embayments.

The DEIS makes no recommendations regarding third-party oversight of collector activities, and goes as far as to suggest that there is no impact from collection on corals or reef structure. Physical, biological, and chemical damage needs to be documented and prevented. Mitigation of reef damage after it occurs has proven to be both financially prohibitive or ecologically unviable (Jokiel and Naughton 2001). Prevention is the only scientifically and financially sound pathway, either by strong *in-situ* oversight of the industry or via banning of collections.





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From: [jreprs.](#)
To: [Sakoda, David](#)
Subject: Issuance of Commercial Aquarium Fishing Permits for the Island of Hawaii
Date: Tuesday, January 7, 2020 5:21:51 PM
Attachments: [Issuance of Commercial Aquarium Fishing Permits for the Island of Hawaii.docx](#)

Aloha David, I hope these comments made it time to be considered.

Mahalo,
John Replogle
jreprs@gmail.com

Issuance of Commercial Aquarium Fishing Permits for the Island of Hawaii.

David Sakoda.....Division of Land and Natural Resources

david.sakoda@hawaii.gov

Mission Statement: Enhance, protect, conserve and manage Hawaii's unique and LIMITED natural resources held in PUBLIC TRUST for current and future generations of the people of Hawaii Nei and its visitors in partnership with others from public and private partnerships.

This Mission Statement of the Division of Land and Natural Resources is in its essence from Hawai'i Constitution Article XI section 1. To promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of self-sufficiency of the State. Furthermore "All public natural resources are held in Trust by the State for the benefit of the people".

All this being said, when one considers what is happening climatically on our planet; our coral reefs are bleaching, there is sea level rise in evidence around our State (Hauula), unheard of rainfall events and to round it out, over 200 record High temperatures were broken around the State is past 2019 year. "Australia today is ground zero for the climate catastrophe. It's glorious Great Barrier Reef is dying, its world-heritage rainforests are burning, its giant kelp forests have largely

vanished, numerous towns have run out of water or about to, and now the vast continent is burning on a scale never before seen.” (The New York Times) It is no longer disputed within the scientific community that our current situation concerning the climate is Homo sapiens (man) induced (caused).

Our Hawaiian Reefs and its Species have evolved and developed over millennia in time. Do people think there were too many fish on the Hawaiian reefs before Kanaka first arrived? The first Kanaka had a good working knowledge of their nearshore reefs and species therein; through a system of Kapus and understanding of the species were able to maintain a very healthy reef and fishery. (in furtherance of self-sufficiency of the State) Our State has no fishing license requirement and no ocean/reef education program even though we are surrounded by reef and ocean. This however is on the people of Hawaii for accepting this situation. This then brings us to the handing out of 14 special permits for the collection of reef fish from west Hawaii waters. How does letting 14 special entities extract natural resources benefit the reefs first and the public trust? There are no Ecosystem Services Fees in place, Climate change is a real threat and our reefs may need all their components and species in tack to with stand the onslaught of climate change. Our State Dept. of Conservation and Resource Enforcement has but three people on duty at any one time on Hawaii

Island and they struggle to deal with that. So let us saddle them with monitoring and enforcement in reef collecting of 14 different permits. So it will turn to self-regulation and enforcement by the Aquarium industry itself and that is tantamount to the proverbial Fox guarding the Hen House. Public Trust will be broken. There will be no benefit or reward to the people of Hawaii or to the Natural Resource. (Hawaii Constitution Article XI section 1.)

We should not grant these permits. We do not have the capability of enforcing or monitoring. We should not grant these permits. We have no idea of what climate change will visit upon us way out here in the Pacific Ocean and what we may need to survive; We the people and our Natural Resources. [P]romote the development and utilization of these resources in a manner consistent with their CONSERVATION and in furtherance of SELF-SUFFICIENCY of the State. Hawaii Constitution Article XI, section 1; I in the strongest terms urge you to deny this Application for Commercial Aquarium Fishing Permit on Hawaii Island. I further encourage you to rescind all previously issued permits within the entire State at this time. Please look down the road to where we are heading and remember we are the most isolated place on the planet. We must look out for our collective best interests; the Public Trust is in your hands.

Sincerely,

John R Replogle

John R Replogle

PO Box 377407

Ocean View, HI 96737

Ph. 808-936-7161

From: [cory](#)
To: [Sakoda, David](#)
Date: Monday, January 6, 2020 12:25:24 PM

Please protect the native fish from being depleted largely from the actuarial industry. Thank you
Cory Bee

Sent from my iPad

From: [Lali Prince Music](#)
To: [Sakoda, David](#)
Date: Thursday, November 28, 2019 3:16:21 PM

I am a HI voter & resident. I am shocked and dismayed by this recent submission for permits. This is in violation of UN Development Rights Article 41/128 adopted in 1986 & affirmed by the 1993 Vienna Declaration and Programme of Action. This needs to be brought before the Hawaii Supreme court to obey the law.

Exploitation by greedy investors abound in Hawai'i. Our coral reefs and all animal life surrounding are dying or dead. No limu, kupipi, manini, kaunaoa, wana, gobi's, or hinalea to be found. Coral shelf at Kahalu'u beach is bleached out. Dive and see that this destruction is beyond tragic! This reef needs to be protected not pillaged. These sea life needs time to return to safe numbers. This area should not be allowed for permits.

From: [Noelle Prasada](#)
To: [Sakoda, David](#)
Date: Wednesday, December 4, 2019 9:57:27 PM

Dear friend,

Please stop permitting our fish for sale.

I have been snorkelling on big island for years. I have seen very sad declines in both creatures and corals.

Let's please put an end to this to help our seas recover

Thank you very much,

Noelle Prasada

VanDeWalle, Terry

From: pattimorton@aol.com
Sent: Monday, January 6, 2020 6:31 AM
To: Sakoda, David
Subject: [EXTERNAL] Unscrupulous Practice of Reef Fishing for Aquariums Abhorrent and Greedy Industry
obliterating and killing Hawaii's reefs and aquatic life

Aloha, Mr. Sakoda!

Extinction is forever—it's that simple.

It's my understanding that a so-called Environmental Review by the Pet Industry Joint Advisory Council has been put forward in support of aquarium collecting in Hawaii. This report is not relevant, not accurate, not pono, and not legal. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes near-shore habitat and species. Don't export Hawaii reef wildlife to feed the mainland aquarium trade.

Anyone who sees the near-shore reefs on a daily basis, as I have done for the past nine years, knows that the number of fish, the variety of fish, the size of fish are all in precipitous decline. It's truly heart-breaking. Many factors conspire in this tragedy. Maybe we can't combat global warming locally. But we bloody well can put a stop to aquarium collecting.

The so-called "Environmental Review" consists of 500 pages of soulless propaganda promoting the interest of aquarium collectors. It is in no sense an environmental review. In cahoots with Hawaii's DLNR (to that department's shame), the aquarium trade would now justify their theft of common property and depredation of the aina on the grounds of aquarium-collector livelihood.

But where is the traders' credibility? The Pet Industry Joint Advisory Council (PIJAC) is a lobbying group for the commercial pet trade. The interests of PIJAC are in no way aligned with those of Hawaii's taxpayers, whose quality of life and economic well-being depend in tremendous measure on the health of our near-shore reefs—as battered as they are at this point. The more we encroach on our near-shore reefs, the worse our quality of life becomes, and the less desirable Hawaii is as a destination for tourists,

PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

I implore you to do the right thing.

Sent from my iPhone
Aloha Patti. Sent from my iPhone

From: [Marta Barreras](#)
To: [Sakoda, David](#)
Subject: No fish aquarium collection on Kona coastlines
Date: Monday, November 25, 2019 12:46:28 AM

I strongly urge you NOT to allow the collecting and selling of West Hawaii's reef fish.

The reef is in dire need of protection.

A healthy reef is a huge money-maker in Hawaii as many tourists come to snorkel and view the coral and fish.

However the reef is very unhealthy presently due to the recent high temperatures of the sea (climate change), pollution, sunscreens and other damaging aspects of human disrespect and lack of education and knowledge. Taking the reef fish will hurt the reef even more.

A healthy reef is extremely important. The fish are an important part of the ecosystem.

The reef fish must be protected.

Please protect our beautiful reefs!

From: [Doug Perrine](#)
To: [Sakoda, David](#)
Subject: revised comments on PIJAC DEIS for Hawaii Aquarium Fishery
Date: Tuesday, December 3, 2019 2:51:46 PM

Please discard my previous comments (sent yesterday), which contained a factual error.

Revised Comments on PIJAC DEIS for Hawaii Aquarium Fishery.

Of the listed alternatives, the No Action alternative is preferable to any of the others as written. However, I would support the Limited Permit Issuance alternative with the following modifications: 1) Collecting is limited to the White List species statewide, not just in the WHRFMA only; 2) The following species are removed from the White List: flame wrasse, *Cirrhilabrus jordani*; psychedelic wrasse, *Anampses chrysocephalus*; longfin anthias, *Pseudanthias hawaiiensis*; Tinker's butterflyfish, *Chaetodon tinkeri*; These endemic (near-endemic in the case of *C. tinkeri*) species do not have sufficient population data to determine a safe level of take, while anecdotal evidence indicates that collection has severely reduced populations in waters shallow enough for recreational scuba diving.; 3) Collection of harlequin shrimp, *Hymenocera picta*, is banned statewide. The preferred habitat of the genetically distinct Hawaiian population segment of this species is the coral *Pocillopora eydouxi*, which suffered >90% mortality in the bleaching event of 2015-2015, followed by extremely high mortality of newly recruited colonies in the 2019 bleaching event. The loss of critical habitat severely threatens the survival of harlequin shrimp in Hawaiian waters.

Thank you.

Doug Perrine
76-223 Haa St.
Kailua-Kona HI 96740 U.S.A.
+1 (808) 329-4523

please do not send any attachments larger than 1MB without advance permission

if your e-mail doesn't go through, try my travel account:
douglasperrine@yahoo.com

From: [Shayla Middleton](#)
To: [Sakoda, David](#)
Subject: Stop the Madness!!!
Date: Thursday, November 28, 2019 4:07:01 PM

Aloha Mr. Sakoda-

PIJAC is a lobbying group for the commercial pet trade . PIJAC was recently in the news for lobbying Congress on puppy mills, because a ban on puppy mills would work a dire hardship on pet shop retailers. PIJAC uses the same tactic here, focusing on dire hardship for aquarium collectors, who claim Hawaii reefs as their private reserve. This Environmental Review is not relevant, not accurate, not pono and not legal.

This sneak attack on Hawaii reefs has a comment period that spans Thanksgiving, Christmas and New Years. When the Hawaii Circuit Court ruled on this issue, in favor of the DLNR Director's discretion, that director was William Aila, aquarium collector. When the Intermediate Court of Appeals ruled for the aquarium trade, DLNR Director/Nature Conservancy Director Suzanne Case said, "It's been litigated!" She scoffed the Supreme Court ruling. She met with aquarium collectors to advise on speech and behavior in the legislative season. These meetings are in the public record. When the legislature passed Senate Bill 1240 to phase out the aquarium trade, Case prevailed again on Governor Ige to veto the bill. Ige knows nothing of ocean species or habitat.

The Hawaii Supreme Court ruled that no further permits should be issued until Environmental Assessment, with injunctive relief to SHUT IT DOWN NOW! DLNR Director Suzanne Case trumped that ruling with: permits are no longer required, for aquarium collecting. It takes only a commercial fishing license. Many Kona aquarium collectors

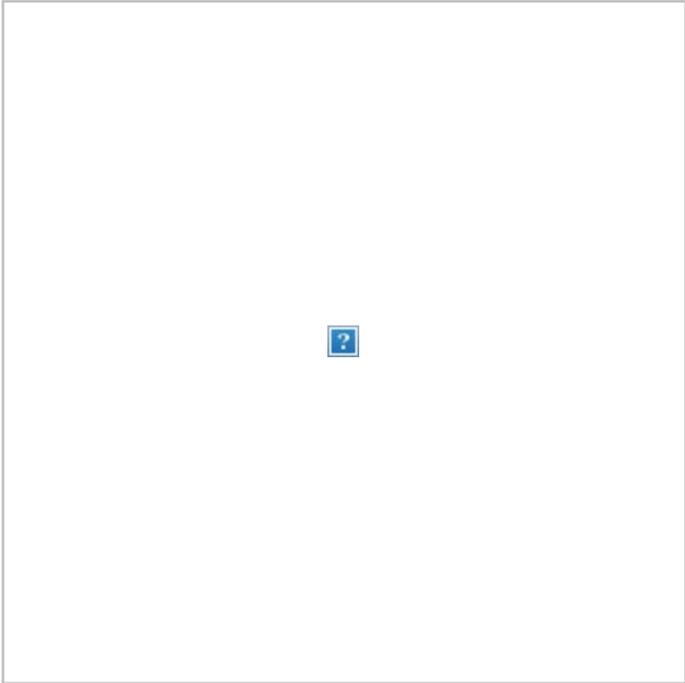
never stopped collecting, with tacit support from Kona DAR and Hawaii DLNR. When an aq collector attacked a woman with a GoPro camera at at Keawaiki, DLNR visited Kona to comfort the aquarium collectors. Now DLNR Director/TNC Director Emeritus Suzanne Case promotes the TNC agenda, deferring to Big Fishing. The aquarium trade is not fishing. It's a devastating commercial enterprise that trashes nearshore habitat and species. The vast majority of Hawaii people want the aquarium trade to end. And so do millions of visitors around the world, who hold Hawaii reefs in their hearts. Reef tourism supports many thousands more people, with revenue 400 (four hundred) times greater.

Spirit and intent in the Supreme Court ruling is clear. The PIJAC PROMO piece claims a surge in recovery to justify a new wave of reef carnage. The PIJAC PROMO piece notes a catch limit on Achilles tangs of 5 per collector per day, down from 10 per day. Few people have seen 5 Achillies tangs in a single day in many years. This PIJAC Promo piece is not an environmental review but a commercial appeal to convert Hawaii reef species and habitat to money, to deny Hawaii and its people of iconic, endemic and economic treasures, to support a mainland amusement industry, to condemn reef wildlife in a vicious cycle of replacement. THAT is what the aquarium trade calls "sustainable." Enough!

Mahalo,

Shayla Middleton

Kihei HI



From: [Lee Ann Donner](#)
To: [Sakoda, David](#)
Subject: The Reefs of Hawaii
Date: Tuesday, December 3, 2019 2:58:30 PM

Dear Mr. Sakoda,

I do not know where you stand on this issue, but I do know this: I come to Hawaii for one reason, and one reason only, to snorkel the reefs, to see the gorgeous reef fish of Hawaii alive and healthy in their natural habitat. The divers who vacation in Hawaii would say the same thing.

You must know that reef ecosystems are delicate. Hawaii is the tourist destination that it is, not only because of the beautiful beaches, but also because of the reefs off those beaches. It is absurd to posit that the ecosystems of the reefs can serve as a cash cow for the aquarium trade and survive. There is no such thing as "sustainable" harvest from the reefs. You cannot "harvest" from the reefs and expect them to survive. No reefs = no tourists. Please stop any and all permits, now and in the future. The aquarium trade has no business in Hawaii. Please protect the reefs and the creatures that call them home.

If you have any questions for me, please feel free to contact me:

Lee Ann Donner Hauenstein
617 480-8215

With great respect,
Lee Ann



January 7, 2020

David Sakoda
Hawai'i Department of Land and Natural Resources
Division of Aquatic Resources
1151 Punchbowl Street, Room 330
Honolulu, HI 96813-30813

Submitted via e-mail: david.sakoda@hawaii.gov

Re: Draft Environmental Impact Statement for Issuance of 14 Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area

Dear Mr. Sakoda:

For the Fishes, Center for Biological Diversity, The Humane Society of the United States, and the other undersigned individuals and organizations (collectively, "Commenters"), are conservation and animal protection organizations and individuals with strong interests in preserving the State of Hawai'i's natural resources and protecting its delicate coral reefs. Commenters submit these comments on the Pet Industry Joint Advisory Council's (PIJAC's, or "Applicant's") Draft Environmental Impact Statement (DEIS) purporting to analyze the environmental impacts of commercial aquarium fish collection by 14 permittees in the West Hawai'i Regional Fishery Management Area (WHRFMA).¹

The DEIS was required to fully analyze the environmental impacts of commercial aquarium collection in the WHRFMA and specifically address the significance criteria in HAR § 11-200-12, including, but not limited to:

¹ Office of Environmental Quality and Control, The Environmental Notice at 3 (Nov. 23, 2019), http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2019-11-23-TEN.pdf; PIJAC, Draft Environmental Impact Statement for the Issuance of Commercial Aquarium Permits for the West Hawaii Regional Fishery Management Area (2019), http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf.

- Involving an irrevocable commitment to loss or destruction of any natural or cultural resource;
- Curtailing the range of beneficial uses of the environment;
- Conflicting with the state’s long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;
- Substantially affecting the economic or social welfare of the community or State;
- Involving a substantial degradation of environmental quality;
- Cumulatively has considerable effect upon the environment or involves a commitment for larger actions;
- Substantially affects a rare, threatened, or endangered species, or its habitat;
- Affects or is likely to suffer damage by the activity/activities being located in an environmentally sensitive area such as a beach, erosion-prone area or coastal waters.

To this end, we expected the Applicant to comply with the requirement “to develop a fully acceptable EIS prior to the time the EIS is filed with the office, through a full and complete consultation process, and . . . not rely solely upon the public review process to expose environmental concerns.”² However, the Applicant failed to conduct the required early consultations prior to submitting its Draft and Final Environmental Assessments, despite the HEPA requirement that the application must “at the earliest practicable time, . . . consult with . . . those citizen groups and individuals which the approving agency reasonably believes to be affected.”³ In this case, it is clear from the long history of litigation that Commenters, at the very least, should have been consulted. The Applicant should also have consulted Native Hawaiian groups (outside of those contacted as part of CIA).

Further, we expected our substantive comments on the FEAs to be incorporated and consultation to be responded to in writing and incorporated into the DEIS by the Applicant prior to the filing of the DEIS with the Hawai’i Department of Land and Natural Resources (DLNR) and Office of Environmental Quality Control (OEQC). We also expected that the responses would not be merely self-serving recitations of benefits and/or rationalizations of the proposed actions. However, these expectations were not met. See Appendix 1 for a detailed description of how the Applicant’s responses to the questions we raised during consultation process were inadequate. As a result of this failure to abide by HEPA’s mandate of early consultation, the DEIS fails to adequately analyze all impacts, and is skewed toward a favorable result for the trade.

Most importantly, we expected the DEIS to accurately and adequately evaluate the HEPA significance criteria, to disclose any and all effects (beneficial and adverse) to biological, socioeconomic, and cultural resources and traditional cultural practices, stemming from the proposed alternatives, and, to propose mitigation measures to reduce impacts, as set forth in HAR § 11-200-17.

² HAR §11-200-15 Consultation Prior to Filing a Draft Environmental Impact Statement.

³ HAR § 11-200-9(b)(1).

However, serious, fundamental errors in various factors used to determine impacts render the DEIS fatally flawed. They include, but are not limited to: the use of an incorrect baseline, an expanded and exaggerated spatial scale, minimization of catch levels, overestimations of fish populations and other omissions in determining impacts. These missteps have contributed to erroneous conclusions and improper evaluations of HEPA significance criteria.

Finally, we also expected the DEIS to factor climate change into the analyses, as envisioned by HAR § 11-200.1-13 Significance Criteria, Criterion 11 (based on the December 2017 Climate Change Mitigation and Adaptation Commission report) to address concerns related to climate change adaptation, such as impacts from increased hurricane frequency and/or intensity, potential endangered species migration, impacts on areas likely to experience wave inundation, increased exposure to hurricanes, or flooding, and further impacts discussed below.

I. Introduction

DLNR has the authority to issue permits for the taking of fish and other aquatic life for aquarium purposes.⁴ While these permits are limited in duration to one year, neither the aquarium collection statute nor DLNR places any limits on the number of animals that can be captured per commercial permit, nor on the number of permits the Agency issues.⁵ In fact, prior to court mandated compliance with HEPA, DLNR automatically granted *every* commercial aquarium permit application, and allows the collection of *unlimited* numbers of animals under those permits.⁶ DLNR also automatically granted every recreational permit application, which effectively allowed for unlimited recreational collection of nearly 2,000 fish per year per collector.⁷ In addition, DLNR also automatically grants commercial marine licenses for aquarium collecting issued pursuant to HRS § 189-2, but does so without HEPA review as required by law. Furthermore, while commercial collectors are required to report their collections (but in practice, do so inaccurately), there is no similar requirement for recreational permits.⁸ Therefore, there are no definitive data on how many of each type of fish or other aquatic animal is taken from the State's delicate coral reef ecosystem each year, nor on what level of take would be sustainable.

The DEIS is entirely inadequate under the Hawai'i Environmental Policy Act (HEPA, Haw. Rev. Chapter 343) and its implementing regulations. The DEIS fails to address these and other notable flaws that we outlined in our prior comments on the Environmental Assessments:

- The DEIS fails to analyze the impacts of collection over time (i.e. the expanded 5-year scope of the analysis, beyond one year, is still inadequate);

⁴ Haw. Rev. Stat. § 188-31(a).

⁵ Haw. Rev. Stat. § 188-31(a); HAR § 13-75-14(4).

⁶ See *Umberger v. Dep't of Land and Nat. Resources*, 403 P.3d 225, 300, 304 (Haw. 2017).

⁷ HAR § 13-75-14(4); *Umberger*, 403 P.3d at 300, 304.

⁸ See Haw. Rev. Stat. § 189-3; *Umberger*, 403 P.3d at 283, 295.

- The DEIS fails to accurately analyze the environmental consequences (i.e. direct, indirect, and cumulative impacts) of unlimited collection of aquatic life to biological, cultural, and socioeconomic resources in the WHRFMA;
- The DEIS fails to accurately analyze the environmental consequences (i.e. direct, indirect, and cumulative impacts) of unlimited collection of aquatic life to biological, cultural, and socioeconomic resources in East Hawai'i and other parts of the State that may be connected via larval dispersal patterns;
- The DEIS fails to accurately analyze the cumulative impacts of commercial collection along with recreational collection;
- The DEIS fails to accurately analyze impacts on cultural resources;
- The DEIS fails to accurately analyze the alternatives presented;
- The DEIS fails to accurately analyze the impacts of collection practices harmful to corals;
- The DEIS relies on inaccurate, misleading, and incomplete data;
- The DEIS fails to propose and analyze mitigation measures; and
- The DEIS fails to adequately incorporate input of Native Hawaiian groups, experts, affected citizens and consulted parties.

The Applicant's Preferred Alternative does not ensure that commercial aquarium fish collection is lawful, responsible, and sustainable for any of the White List fish species from nearshore habitats in the WHRFMA nor for any species taken elsewhere in the state where collection is allowed under the current geographic scope of the aquarium permits. The DEIS's continued conclusion that the aquarium fishery in the WHRFMA has "no significant impact" on targeted reef fish species, coral reefs, and the human communities that rely on them is unsupported. The DEIS fails to accurately evaluate the true primary, secondary, cumulative, short-term and long-term effects of the Preferred Alternative and fails to propose any proper mitigation.

II. Reliance on Flawed and Inadequate Science and Data

As previously mentioned, fundamental errors in the DEIS's impact analysis resulted in patently false findings of no significant impacts and improper evaluations of HEPA significance criteria. Those errors include, but are not limited to, the use of an improper baseline, the minimization of potential collection rates under the proposed alternatives, and an expanded area to which the impacts would apply. A properly conducted DEIS would focus on impacts to the area(s) where the subject activity is to take place. This DEIS is fundamentally flawed in that it fails to do so. In addition, the DEIS ignores the true evidence of impacts, including the most important one: the magnitude of depletion to targeted species in the areas from which they are taken as determined by a comparison to the baseline.

A. The use of an improper baseline.

A critical component in any DEIS is the establishment of proper baseline against which to compare the impacts of the proposed action. Any analysis stemming from an improper baseline cannot be considered accurate or relevant. A proper baseline reflects pre-project environmental conditions, and is spatially relevant. In this case, a proper baseline is found in the conservation districts and managed areas, collectively referred to as Marine Protected Areas (MPAs), within the WHRFMA where aquarium collecting has been prohibited for nearly 30 years.

Rather than using a proper baseline, free from the impacts of aquarium collecting, the DEIS incorrectly incorporates the effects of prior aquarium collecting into the baseline, and states in sections on the scope and affected environment, “the evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s,” and “permitted commercial aquarium fishing has been a part of the socioeconomic, cultural, physical, and biological resources for decades and is considered a part of the baseline condition of the affected environment.”⁹

The important role MPAs serve as a baseline for fish populations in the WHRFMA is underscored by their use as such in reports and papers that seek to document the effects of aquarium collecting on targeted fish populations. For example:

- Six MPAs were among the 25 study sites established by West Hawai‘i Aquarium Project (WHAP) to measure the effects of aquarium collecting in the WHRFMA as part of the WHAP design, because at the time (1999), they had been closed to aquarium collecting for at least 9 years (now 28 years as of 2018) and were presumed to have close to “natural” levels of aquarium fish abundances and, thus, “serve as a reference or ‘control’ to compare with the [Fish Replenishment Areas] FRAs and open areas.”¹⁰

They further noted, “changes in FRAs and *open areas* can best be estimated by comparing them to other areas which have been protected for relatively long periods of time. These areas (MPAs) serve as control areas against which the FRAs are measured both before and after the closure of the FRAs. This rationale is derived from a well-known statistical procedure known as the BACI (Before-After-Control-Impact) procedure (Tissot et al, 2004) which is an especially appropriate and statistically powerful method . . .” (emphasis added).¹¹

- Two MPAs were used in 1997-1998 to document the magnitude of the effect of aquarium collecting on natural populations:
 - “The magnitude of the effect was estimated by comparing fish abundance at collection sites where aquarium fish collecting was known to occur and control sites where collecting was prohibited. Because the study was initiated after collection had begun, we assumed there were no differences between control and collection

⁹ DEIS at 16 and 20.

¹⁰ DEIS at 72; Walsh et al. (2010).

¹¹ Walsh et al. (2010).

sites in the abundance of aquarium fishes *prior to the onset of aquarium harvesting* (i.e. their natural abundances were similar.” (emphasis added).¹²

B. Flawed Impact Analysis

In determining the level of impact to targeted (i.e. White List) species that would occur under the preferred alternative, the DEIS compares reported catch from “the 14 fishers” (presumably the 14 unidentified collectors who are seeking aquarium permits) to the estimated *island-wide* populations of those species. When used properly, the basic analysis – catch as % of population – is useful in describing impacts and has been employed since at least 2010 as one method for doing so in the WHRFMA.¹³

The analysis would be properly conducted by comparing the estimated population of a given species in the area of interest to the average reported catch of that species during the same time frame. Unfortunately, the analysis is easily manipulated, and in the DEIS, the impacts are minimized as described below:

1. Affected Environment/Directly Affected area

The use of island-wide fish populations in determining impacts of the proposed action to targeted (i.e. White List) species, which would occur in the WHRFMA, minimizes the appearance of impacts by expanding the population. Proper analyses use the WHAP data to assess aquarium collecting impacts via catch as % of population, because, as noted in the DEIS, the WHAP was designed to “gauge the effects of the aquarium fishing industry” in the WHRFMA.¹⁴ In those analyses, the impacted populations have appropriately been defined as those within the WHRFMA open areas, and more narrowly, within the 30’-60’ depth range, because those are the areas and depths from which the fish are taken (i.e. the directly affected area).¹⁵

The DEIS includes an example of a WHAP catch as % of population analysis, but discards it for the impact analysis in favor of island-wide population estimates.¹⁶ The DEIS expands the affected environment in the impact analysis to include the fish populations in the nearshore reefs of the entire island of Hawai’i which is inappropriate, irrelevant, and wrong. The proposed action is for 14 aquarium permits to be issued in the WHRFMA, as stated throughout the document and as identified in the TMK (tax map key) sections in the Applicant submittal and publication forms. The action would not occur throughout the WHRFMA, but, specifically, on reefs and other areas *only* within the open areas of the WHRFMA. These open areas are where the direct (and greatest) impacts occur. Other indirect impacts likely occur to the closed areas of the WHRFMA, and possibly to East Hawai’i (i.e. Hawai’i Island as a whole), but they would be eclipsed by the impacts in the actual areas where the activity would take place.

¹² Tissot and Hallacher (2003)

¹³ Walsh et al. (2010); Walsh et al. (2013); Walsh (2010); Walsh (2015).

¹⁴ DEIS at 72.

¹⁵ Walsh et al. (2010); Walsh et al. (2013); Walsh (2010); Walsh (2015).

¹⁶ DEIS at 74 and 80.

2. Inaccurate Projected Levels of Catch

The DEIS determines the level of impact by comparing the projected annual average catch of the White List Species by “14 aquarium fishers” to the island-wide populations of those species, per Tables 5-11 and 5-14.¹⁷ In those tables, and elsewhere throughout the DEIS “the 14 fishers” is used to describe past and potential future aquarium catch and values that would occur under the alternatives. However, per the DEIS, “the 14 commercial fishers who are part of this proposed action made up 3 to 11 of the WHRFMA fishers in any given year from 2000 – 2017.”¹⁸ DLNR data shows that, on average, the actual number of collectors represented by “the 14” fishers/collectors in the tables was 7.6 (see Appendix 2 for this data showing the actual numbers of “the 14” collectors represented in Tables 5-2, 5-11, and elsewhere). Therefore, both past and future average and maximum rates of collection and impacts are grossly underestimated.

C. Flawed Threshold for “Sustainable” Collection

The applicant bases the DEIS on the premise that fish collection is considered sustainable if it removes less than 5% to 25% of the entire island-wide population (annually), but the reasoning behind this threshold is entirely flawed. The DEIS states that “While specific research into sustainable levels of collection has not been conducted for the 40 White List Species, Ochavillo and Hodgson (2006) suggest collection between 5% and 25% is sustainable for various reef species in the Philippines that are similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish).¹⁹ However, the DEIS should not use these thresholds because:

- These thresholds for sustainable ornamental fish collection are species-specific based on estimated natural mortality rates (M) and fishing mortality at maximum sustainable yield (F_{MSY}) or year-per-recruit analysis. Natural mortality rates for reef fishes are based on growth rates and length and thus are also area-specific. Mortality is based on catch data. Yield-per-recruit analysis should be derived from several annual surveys. Thus, these parameters should be specifically calculated for Hawaiian reef fish targeted by the aquarium industry as highlighted in Ochavillo and Hodgson (2006).
- These thresholds were developed to calculate total allowable catch (TAC) in comparatively small “collection areas” that are orders of magnitude smaller than Hawai‘i Island. Specific collection areas used by Ochavillo and Hodgson (2006) to develop the methodology are adjacent to Bohol island in the Philippines, which is close in size, though smaller, than Hawai‘i Island. One collection area, Clarin, is part of a coastal town of the same name that has a coastline of approximately 6 linear km. Another, Batasan Island, lies approximately 6.4 km off the coast of Clarin. Applying the 5%-25% threshold to the entire island of Hawai‘i far exceeds the parameters it was developed for.

¹⁷ DEIS at 118 and 136.

¹⁸ DEIS at 20.

¹⁹ DEIS at 122.

- The 5%-25% threshold indicates “a good rule-of-thumb of collection limit” for coral reef fishes in the Philippines.²⁰ This does not mean it is a good rule of thumb for collecting reef fishes in Hawai‘i.
- Most ornamental fish species in Ochavillo and Hodgson (2006) are species different from those on the White list. Only a few species share the same genus or species (butterflyfish, a couple of wrasses, one angelfish, a couple of damselfish, one tang and one triggerfish). Thus, it is questionable whether this fairly wide threshold (5%-25%) is representative and applicable to Hawaiian species.
- Finally, this report is not peer-reviewed research, it is a field manual: Marine Aquarium Trade for Coral Reef Monitoring Protocol with a Data Analysis and Interpretation Manual. This field manual was designed in part to: “provide a scientific basis for recommending sustainable levels of collection.”²¹

The DEIS continues to assert that current fish abundance for target species is the baseline, and thus 1% to 5% of individuals removed from the population would be considered sustainable. But this is wrong. The DEIS fails to acknowledge that current population abundance of most of these fish species is already depleted due to in part to heavy exploitation by the aquarium trade since at least the 1980’s and habitat degradation. The total allowable catch for each species must be calculated based on information on natural mortality rates and the available and limited information on catch records, specific to the geographic areas and locations where they are taken in the WHRFMA.²² Additionally, an analysis of larval dispersal and connectivity patterns for White List species on Hawai‘i Island is key to preventing local extirpation of heavily targeted and/or rare species.

D. Unrepresentative Data Used

The Coral Reef Ecosystem Program (CREP) data used in the DEIS for the entire Island of Hawai‘i (based on 2010-2016 surveys) are not representative of regional population abundance such as in East Hawai‘i and the WHRFMA, and should not be used to estimate regional proportions of fish catch.

Population abundance estimates for fish species for the entire island of Hawai‘i²³ are not representative of regional fish abundances such as East Hawai‘i and WHRFMA. The CREP data collect fish data from 257 stationary point count locations around Hawai‘i between depths of 0-98 feet. In contrast, the West Hawai‘i Aquarium Project (WHAP) collected data from 25 transect survey sites from WHRFMA area between depths of 30-60 feet.

It is well established that population abundances of reef fish species in Hawai‘i, especially relatively small-size species that are targeted by the aquarium industry, are highly variable in space depending on reef complexity, depth and wave exposure, and in time (within and among years)

²⁰ Ochavillo & Hodgson (2006), at 12.

²¹ Ochavillo & Hodgson (2006).

²² See Ochavillo and Hodgson (2006) for step by step guidance on using natural mortality rates for this analysis.

²³ CREP (2018).

depending on the season, mortality, recruitment to the population, and environmental factors.²⁴ The relative proportion of fish species taken annually by the aquarium industry should be based on regional total abundances and regional catch records (e.g., aligned with the aquarium fish trip report zones). Allowable levels of take should be determined in conjunction with the wishes of Hawai'i residents and visitors who strongly desire that fish populations are restored to their naturally occurring (i.e. unfished) levels of abundance on the majority of Hawai'i reefs.

The allowable number of individuals that could be collected from aquarium fish populations must be substantially less than those proposed in the DEIS Preferred Alternative, because most of these species are already depleted. Fishing effort has substantially increased for aquarium fish species on the Island of Hawai'i.²⁵ Prime-targeted species have significantly declined due to overharvesting.²⁶ For example, population abundance of one of the most heavily exploited species, Yellow Tang (*Zebrasoma flavescens*), on the west coast of the island of Hawai'i (West Hawai'i) declined 45% due to exploitation in areas open to fishing/collection from 1999 to 2007.²⁷ Yellow Tang abundance is closely tied to annual levels of recruitment, and after good recruitment levels from 2008 – 2013, Yellow Tang abundance in the Open Areas improved, but was still 4.7% lower than the 1999 – 2000 Open Area baseline.²⁸ As noted earlier, an anomalous recruitment pulse in 2014 is likely behind the increase in abundance seen since then.²⁹

Even when including marine managed areas (MMAs) such as FRAs, where collection is prohibited and abundances are five times higher than in open areas, the population abundance of Yellow Tangs on West Hawai'i is substantially less than historical levels.³⁰ The established networks of MMAs have definitely worked to increase Yellow Tangs and some other fish species in the West Hawai'i FRAs,³¹ but not all species have responded positively, and some have actually decreased overall since the FRAs were established. The extent to which collection pressure—whether in the Open Areas or due to poaching—is driving the decline of heavily targeted aquarium species in the areas closed to the trade must be studied. While the DEIS attempts to minimize the impacts of collection pressure by proposing that factors other than aquarium collecting are also affecting their populations, it remains highly likely that the main cause is collection pressure. An example of the effect of collection pressure on populations in MMA's is found in the significant decline of Yellow Tangs in those areas from 2004-2009 which coincided with Yellow Tang reported catch during that period that was substantially higher (e.g. in 2004 and 2006 it was more than double that reported in 2002).

²⁴ Friedlander & Parrish (1998a, 1998b).

²⁵ DLNR Catch Reports.

²⁶ Williams et al. (2009); Walsh et al. (2004).

²⁷ Williams et al. (2009).

²⁸ Walsh (2015).

²⁹ Gove et al. (2016).

³⁰ Williams et al. (2009).

³¹ Tissot et al. (2004); Williams et al. (2009).

Given the relative long life-span of Yellow Tangs (>40 yrs.) and increasing fishing intensity, these MMAs are just becoming sources for the aquarium fishing industry. The recovery of this species to past levels is unlikely if fishing/collection intensity continues or increases in the future.

The commercial aquarium fishery in the Island of Hawai'i has grown over the last three decades, particularly after the O'ahu aquarium fishery substantially declined in the early 1990s due to hurricanes and localized overfishing.³² It is thought that the expansion of the Island of Hawai'i aquarium fishery was due to new collectors and relocation of collectors from O'ahu.³³ Scientific evidence shows that collecting activities substantially affect targeted species in Hawai'i³⁴ and fishing intensity remains high even when stocks are depleted or recruitment is weak.³⁵

Therefore, the current estimates of population abundance of fish species for the entire Island of Hawai'i (from 2010 to 2016)³⁶ should not be used as regional/local reference abundances (e.g., East Hawai'i, WHRFMA) to estimate minimum and maximum percentage of fish taken per year.³⁷ This is because these calculations underestimate the proportion of fish collected by region (East and West Hawai'i) and assumes fish populations of the entire Island of Hawai'i are distinct or discrete. A more accurate calculation of allowable catch would be based on regional population abundance, using the aquarium trip report zones, and by using the WHAP data estimates obtained from the depth ranges where the fishes are captured, rather than by regions.

Finally, sustainable fishable abundance for target species must take into consideration the fact that most target species are depleted in comparison with historical levels. The EIS fails to analyze the impact of collection/fishing on current population abundance and fails to consider that these populations are far below the historical baselines as represented in the MPAs, or otherwise.

E. Catch Is Grossly Underreported

As mentioned above, there is no requirement for recreational aquarium collectors to report catch. For commercial collectors, while reports are required, catch report compliance is substantially low. As such, the impact of the aquarium fishing industry is likely larger than is reported, which has been discussed in the scientific literature.³⁸

As a former DLNR employee succinctly wrote regarding aquarium catch reports: "The reliability of the data depends upon the sincerity of the permittees."³⁹ There is no verification system, such as that provided by independent observers, to ensure the accuracy of self-reported data. One additional major impediment to accurate data stems from the lack of a license requirement for marine dealers and/or exporters. Currently there is a requirement for dealers (i.e. those who buy directly from aquarium collectors) to report their purchases. According to DLNR, the effect is that "dealer reporting is essentially on a voluntary basis and a few dealers are not reporting in whole or

³² Walsh et al. (2004); Friedlander et al. (2008).

³³ Friedlander et al. (2008).

³⁴ Tissot & Hallacher (2003).

³⁵ Stevenson et al. (2011).

³⁶ CREP (2018).

³⁷ Hawai'i FEA, Tables 10, 11, 12, 13, 14, 15.

³⁸ Friedlander et al. (2008).

³⁹ Katekaru (1978).

in part.⁴⁰ DLNR cannot know whether a “few” or a dozen dealers are not reporting, without a requirement for these businesses to have licenses, thus, these businesses operate beneath the radar and serve as a conduit for moving unreported catch out of the state.

Establishing a marine dealer/exporter license has long been a priority for those within DLNR concerned about Hawai‘i’s marine resources, because it would enable the department to verify catch reports, identify unlicensed collectors (and all commercial fishers), identify dealers and helped with generating economic data about the fisheries. Without this information, DLNR/DAR has no accurate data on health of fish populations. According to a former DAR Commercial Fisheries manager, Karl Brookins, the process of establishing the license was abandoned due to lack of funding.⁴¹

F. Further Necessary Data Excluded is Needed for an EIS

As discussed above, there is no reliable data on how many fish and other species are actually taken pursuant to aquarium permits in any given year. The DEIS repeatedly refers to a lack of data for numerous species. For example:

- “Most of the Flame Wrasse population occurs below the 60-foot depth surveyed by the WHAP and below the 98-foot depth surveyed by the CREP, and therefore the species is not observable by the methods of either survey. As such, data are not available to produce a reliable WHRFMA or island-wide population estimate.”⁴²
- For Psychedelic (Redtail) Wrasse, Tinker’s Butterflyfish, Longfin Anthias, Flame Wrasse, Fisher’s Angelfish, and Eyestripe Surgeonfish (Palani), open area populations and catch as a percent of the open area populations are not available, because species “occur[] in habitats not adequately surveyed by transects.”⁴³

This data is necessary in order for the EIS to properly assess impacts. Furthermore, the Agency must conduct stock assessments of species before it is able to determine a sustainable rate of take. Clearly the Agency has not done so, as DLNR personnel have stated that to do so would take over a decade for just 40 fish species, out of the more than 287 fish and invertebrate species the Agency identifies as targeted by the trade (found at Appendix 5).⁴⁴ Without such data, the Agency cannot meaningfully assess the environmental impacts of commercial aquarium collection. Such assessments must be completed prior to the issuance of the EIS, and in the face of any uncertainty, the EIS’s analyses must err on the side of caution to protect these vulnerable species.

G. Examples of Proper Impact Analyses

Other comparisons of reported catch to estimated populations reveal that upwards of 80% of Achilles tangs and 60% of yellow tangs in the WHRFMA open areas have been taken by commercial

⁴⁰ DLNR (2014).

⁴¹ Clark & Gulko (1999); Brookins, K., DAR commercial fisheries manager, personal communication to author R. Umberger (October 7, 2008).

⁴² DEIS at 63.

⁴³ DEIS at 44.

⁴⁴ DLNR (2017); Eagle (2017); Aquarium Fishing Trip Report.

aquarium collectors in some years and concluded that “aquarium collecting is having a major impact on Achilles and yellow tang.”⁴⁵ Although these estimates are imperfect, because they do not factor under-reporting, they are still more accurate than presented in the DEIS because they are spatially relevant. Still, the extremely high levels of take are reflected in the difference between populations where they are taken (i.e. the open areas) and baseline areas where they have not been taken for decades (i.e. the MPAs). For yellow tangs, it has resulted in a 62% reduction in natural abundance in those areas, on average, compared to the MPA baseline since researchers began documenting the differences in 1999 in the three management areas comprising the WHRFMA.

H. Other omissions, and misleading and incorrect data sets used

The DEIS ignores the largest single year surge in fish abundance that has ever been recorded in the WHRFMA which has occurred in the open areas in 2018 after aquarium collecting was prohibited in the area (Fig. 17). Note that the increase occurred solely in the areas recently closed to aquarium collecting: a similar increase did not occur in the areas long closed to the trade. This significant increase, once collection pressure is removed, is further indisputable evidence of major aquarium collecting impact on heavily targeted species.

At the foundation of every determination made in the DEIS is the flawed conclusion that aquarium collecting takes less than 5% of the populations of targeted species on Hawai‘i Island. The DEIS fails to consider cumulative impacts, both short- and long-term. HEPA requires that “agencies shall consider the sum of effects on the quality of the environment and shall evaluate the overall and cumulative effects of an action.”⁴⁶ Furthermore, the Agency must consider “both primary and secondary” consequences, “and the cumulative as well as short-term and long-term effects of an action.”⁴⁷ Notably, “cumulative impact” is defined as the impact resulting from “the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions,” and “[c]umulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”⁴⁸

III. All Impacts Improperly/Inadequately Analyzed

A. Failure to Adequately Analyze Long-Term Impacts

The Applicant unlawfully limited its analyses to the time period of five years.⁴⁹ PIJAC’s provides no reasoning for this 5-year period, while noting that each permit lasts only one year, and therefore a new HEPA analysis would need to be completed on an annual basis.⁵⁰ However, while Commenters agree that it is critical for the Agency to continue to monitor the impacts that aquarium collection is having over time, the relatively short time period of the activity itself does not nullify HEPA’s clear

⁴⁵ Walsh et al. (2010)

⁴⁶ HAR § 11-200-12.

⁴⁷ HAR. § 11-200-12.

⁴⁸ HAR. § 11-200-2.

⁴⁹ See DEIS at 16

⁵⁰ DEIS at 16

requirement for considering the long-term effects of that activity.⁵¹ For example, a large excavation project could destroy habitat in an area of an island that takes decades to regrow—and even if the excavation itself was only for a year, HEPA would clearly require consideration of the impacts to the environment during the decades of regrowth. Similarly, the use of a pesticide could have known impacts on a species where serious or lethal effects are felt far beyond the time frame of the actual application of the pesticides—yet HEPA would clearly require consideration of those expected impacts. Thus, PIJAC’s logic simply does not hold up. Additionally, stating that the Agency can simply reevaluate the consequences of a year-long permit *after* that year is up entirely contradicts HEPA’s mandate to evaluate the potential consequences of an action *before* the Agency authorizes the action.

Additionally, a 5-year timeframe that analyzes impacts is inadequate because the impact of fish removal will accumulate over time. For example, though collection pressure has been removed from the White List species in the FRAs, populations of once heavily targeted species in those areas, such as yellow tangs, have yet to return to natural levels of abundance, as reflected in the baseline MPAs, even after 20 years of protections. For very long-lived species such as the yellow tang and other surgeonfishes heavily targeted by aquarium collection, which have lifespans measuring decades, and which may not reproduce until they are at least 5 years old, a 5-year analysis period is far too short.

In addition, studies show that catch numbers from the commercial aquarium fishery in Hawai‘i have significantly increased over the last few decades and are likely to increase even more, despite the limited request for 14 permits.

DLNR data shows a strong correlation between the number of permits issued and the level of catch (Fig. 2); however, historically commercial aquarium collectors have reported catching fish just three days per week.⁵² There is nothing preventing them from increasing that effort, via increasing the number of hours and/or days they collect, in response to perceived scarcity from, for example, impacts to habitat from storms and climate change, or from additional collectors seeking permits through the HEPA process (i.e. the “get it while you can” mentality); or, in order to meet the high demand for aquarium reef fish and their increasing market value.⁵³

⁵¹ See HAR. § 11-200-12.

⁵² Stevenson et al. (2011).

⁵³ Friedlander et al. (2008); Stevenson et al. (2011).

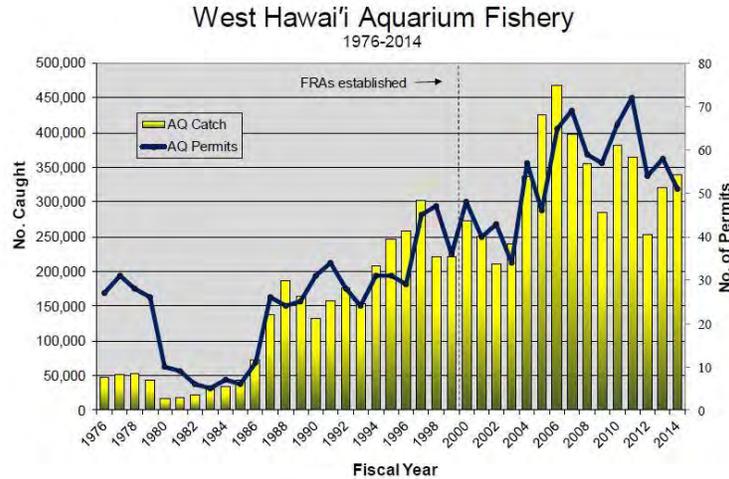


Fig. 2. Number of aquarium animals caught and number of commercial permits in West Hawai'i for Fiscal years 1976-2014.⁵⁴

Furthermore, the Hawai'i Supreme Court has made clear that the proper inquiry under HEPA is “the outer limits of what the permits allow”⁵⁵ The outer limits allowed by the permits are the take of every fish and every invertebrate from every reef in the state of Hawai'i that isn't in a protected area. Permits issued under this DEIS would allow just that without a new law, rule, or permit condition, defining geographic and take limits. Further, as there are no limits on the number of commercial marine licenses (CML) issued for aquarium collecting, in the rest of the state and East Hawai'i, the issue of aquarium trade impacts to Hawai'i's coral reefs remains unresolved.

The DEIS analyzes the effects of issuing aquarium permits to 14 people in the WHRFMA, however permits are issued statewide, with no geographic limits, other than those pertaining to managed areas, which are regulated by other statutes. The DEIS fails to identify this unresolved issue, to discuss how it will be resolved prior to commencement of the action, or describe any overriding reasons for proceeding without resolution of the issue, though legally required to do so.⁵⁶ Currently the use of fine mesh nets for aquarium purposes is prohibited everywhere, and with the issuance of any geographically limited permits, DLNR would likely be unable to enforce those geographic limits given their extremely limited resources.

Furthermore, the DEIS is for 14 fishers, however nothing prevents more fishers from seeking permits through additional HEPA reviews. In addition, pursuant to HRS § 189-2, DLNR is currently issuing an unlimited number of commercial marine licenses for aquarium collecting. The relationship between the number of participants in a fishery and impacts to fish populations is well-established in the literature. The importance of restricting access to fisheries has been acknowledged and used for thousands of years to conserve and help sustain fish populations.⁵⁷

⁵⁴ DLNR (2014).

⁵⁵ *Umberger*, 403 P.3d at 294.

⁵⁶ See HAR 11-200-17 (n)

⁵⁷ Dewees and Weber (2001).

The DEIS failed to take into account how increasing demand and increasing market value will affect already depleted targeted reef fish species in the coming years, thus resulting in significant environmental impact. For example, the market value of tropical reef fish (e.g., Yellow Tang) has increased and thus collection/fishing pressure is also likely to increase in the near future. The commercial aquarium fishery in Hawai'i reports annual landings of over 579,000 organisms (fish and invertebrates combined).⁵⁸ The number of aquarium fish caught on the island of Hawai'i since 1976 has substantially increased by 645%.⁵⁹ Similarly, the adjusted value of the Hawai'i Island aquarium fishery increased by over 280% between 1976 and 2003.⁶⁰ The DEIS fails to properly analyze this relationship, and fails to propose mitigation to reduce population declines. The DEIS claims that the high fecundity and long lifespans of reef fishes combined with the limited targeting of adult brood-stock by the trade removes the certainty that the losses will accumulate over time is false. Studies show that populations of heavily targeted species, such as Yellow Tangs, are neither annually replenished, nor restored over time to their natural levels of abundance, even 20 years after collection pressure has been removed. On the contrary, they have been severely depleted over time, especially in the areas where they are collected. While the DEIS noted that for Yellow Tang and *kole*, which represent two of the top three collected species, population trends are stable or increasing, it failed to acknowledge that the increase in fish abundance is due to an anomalous recruitment pulse that coincided with warming waters in 2014.⁶¹ Typical recruitment pulses, such as those that occurred in 2002 and 2009, have resulted in short-lived increases in fish populations that were followed by prolonged or short and steep population declines.⁶²

More importantly, the 2017 and 2018 increases in populations of White List species in the Open Areas was due to the total prohibition of aquarium collecting in the WHRFMA as of January 5, 2018. In fact, the 2018 surge in yellow tang abundance was the largest ever recorded in the WHRFMA and occurred only in the Open Areas while populations in the FRAs declined in 2018, and were slightly, but insignificantly higher in the MPAs (i.e. they cannot be attributed to anything other than the removal of collection pressure).

Thus, the DEIS not only fails to acknowledge the evidence of depletion caused by collection activities that is apparent when using the proper baseline, but also fails to acknowledge the beneficial impact that would occur in the WHRFMA under the No Action Alternative.

The failure of the DEIS to conduct a proper analysis, as described above, is not only a legal flaw but also the main reason that the DEIS does not find a significant impact of the aquarium fishing industry on targeted species and their habitat. In addition, by limiting the timeframe of their analysis to five years, the DEIS fails to accurately consider the impacts of one-year collection permits cumulatively with other "past, present, and reasonably foreseeable actions" "over a period of time."⁶³

⁵⁸ DLNR Catch Reports.

⁵⁹ Walsh et al. (2004); Friedlander et al. (2008).

⁶⁰ Walsh et al. (2004).

⁶¹ Gove et al. (2016).

⁶² Hawai'i FEA Fig. 5.

⁶³ HAR. § 11-200-2.

B. Failure to Analyze Indirect and Cumulative Impacts

Coral reefs are connected by currents which carry and disperse fish larvae to other areas, both near and far. Most fishes on Hawai'i's reefs are the result of other fishes upstream of that reef.⁶⁴ The currents and conditions that control larval connectivity and dispersal processes are complex. The larvae of some species are able to travel between islands, while others do so to a lesser extent. For example, in one study, some yellow tang larvae on Hawai'i Island travelled on ocean currents for 15 km before settling on a reef while others traveled 184 km.⁶⁵

Recent research into two species of small bodied surgeonfishes, including kole which is heavily targeted by the aquarium trade, has determined that populations of these fishes are genetically distinct on each of the main Hawaiian Islands. This means that, for at least these two species, there is little genetic mixing between islands, and once species are depleted on any given island, there is no other source for population replenishment. Further, connectivity and dispersal studies on the island scale for certain species have identified important spawning source areas that are essential for maintaining populations on other reefs across the island.

This larval connectivity between coral reefs serves to highlight areas where secondary or indirect impacts of the Applicant's actions will manifest. Regardless of whether larval connectivity exists mainly intra-island or extends inter-island, reduced populations of reef fishes in their source areas will seriously impact reef fish abundance in their downstream, sink reefs, and thus the entire island.⁶⁶ The DEIS fails to account for this critically important reproductive strategy used by Hawai'i's reef fishes. The precautionary approach requires the determination of source areas for the 40 White List species on Hawai'i Island and the establishment of protections for those populations to ensure local species survival, which was not provided in the DEIS.

Additionally, the DEIS fails to properly address the true nature of what the Applicant is requesting in its Preferred Alternative whereby:

"DLNR would issue Aquarium Permits to 14 aquarium fishers in the WHRFMA...No Aquarium Permits would be issued for areas outside of the WHRMA (in East Hawai'i aquarium collection using legal gear or methods other than fine-mesh nets could continue but use of fine mesh nets would not be allowed). Permittees would abide by all rules and regulations set forth in HRS 189-2,3 (Commercial Marine Permit), HRS-188-31 (Section 1.2.1), governing Aquarium Permit use, and would obtain a West Hawai'i Aquarium Permit as required under HAR 13-60.4 (Section 1.2.3.2). These rules and regulations include restrictions on equipment, restrictions on access to various areas, bag limits on various collected fish species, collection in the WHRFMA restricted to 40 White List Species only, and reporting requirements. In addition, under this alternative, the daily bag limit for commercial aquarium collection of Achilles Tang within the WHRFMA would be reduced from 10 per day to 5 per day."⁶⁷

⁶⁴ Noland (1978); Christie et al. (2010); Coleman (2019).

⁶⁵ Christie (2010).

⁶⁶ Coleman (2019).

⁶⁷ DEIS at 19.

In other words, the Applicant's Preferred Alternative continues to be the collection of an *unlimited* number of fish, with one exception for the Achilles Tang—the limits of what regulation allows. Yet, the DEIS considers only very *limited* collection. HEPA requires that an EIS assess the potential cumulative impacts of what State regulations allow, not just what some permittees may claim they *intend* to do, or have historically done, with their permits. As the Hawai'i Supreme Court clearly stated, "the properly defined activity for the purposes of the HEPA analysis must encompass the outer limits of what the permits allow and not only the most restrictive hypothetical manner in which the permits may be used."⁶⁸ The DEIS failed to address this.

Relatedly, the DEIS assumes that aquarium collection without the use of fine-mesh gear will continue "legally" in East Hawai'i; however, as indicated in a letter dated January 7, 2020, from Earthjustice to DLNR (attached as Appendix 8), such collection also requires HEPA review, which currently is not being conducted. If this purportedly "legal" collection were halted pending environmental review, then the 14 collectors would have even greater incentive to increase collection levels in West Hawai'i in the meantime. The DEIS fails to consider this effect.

Likewise, although the DEIS purports to analyze impacts cumulatively with those of recreational collection permits, the DEIS still does not account for the fact that the Agency issues a permit for *every* application that is submitted, and therefore the take under recreational permits is potentially unlimited as well.⁶⁹ And the DEIS admits that, as there is no required reporting for recreational permits, it is currently impossible to know how many of each species are taken under those permits, and therefore, the impact of collection under these permits on species collected under these permits cannot be quantified.⁷⁰ This lack of data is not properly addressed in the EIS.

The analysis of cumulative impacts included the impact of the commercial aquarium fishery, regardless of the gear used to capture the marine life, combined with non-aquarium commercial and recreational fisheries and other activities that impact population abundance, but reached a conclusion that is erroneous. Commercial and recreational fishing combined with the aquarium fishery have a substantial impact on targeted species. The EIS fails to determine cumulative impact of all fishing on target species. In addition, the EIS fails to analyze indirect impacts from collection such as vessel traffic and accumulated reef damage due to vessel anchoring and collection practices.

The DEIS fails to adequately evaluate the potential of cumulative impacts of climate change (warming, coral bleaching, and ocean acidification) on targeted fish species such as decline of coral coverage which have been demonstrated to influence reef fish species diversity and abundance.⁷¹ The EIS recognizes that climate change poses serious threats to Hawai'i's coral reefs and the species targeted by the Applicant, yet ironically claims that climate change impacts coupled with the impacts of implementing the Preferred Alternative is expected to be less than significant. These statements completely dismiss the research and data that demonstrate what is stated, that climate

⁶⁸ *Umberger*, 403 P.3d at 294.

⁶⁹ Hawai'i DEA at 88; O'ahu DEA at 60.

⁷⁰ DEIS at 129.

⁷¹ Jones et al. (2004); Friedlander et al. (2018).

change impacts, specifically ocean warming, acidification and coral bleaching events will continue, thus further analysis of impacts and exacerbation of impacts due to climate change is required.⁷²

It is clear from an analysis of cumulative impacts that many of HEPA's "significance criteria" apply.⁷³ Had proper analyses been conducted, the Preferred Alternative most certainly would have shown significant effects on the environment due to at the least, the following: the loss or destruction of natural and cultural resources; curtailing the range of beneficial uses of the environment; substantial degradation of environmental quality; cumulative effects on the environment; and potentially substantially affecting rare, threatened or endangered species, or its habitat.⁷⁴

Flawed analyses prevented the DEIS from accurately assessing and addressing these effects, in part, because the DEIS uses as a baseline, current conditions, which have been impacted by decades of the aquarium collecting activity.⁷⁵ Therefore, the scope fails to factor the impacts of collection pressure over time. Proper examination of the magnitude of the effect of aquarium collecting on natural populations and the coral reef ecosystem over time requires a proper baseline such as occur in MPAs, which reflect natural populations, before they were depleted by this activity, and have been used as such in numerous studies.⁷⁶

IV. Failure to Adequately Analyze and Address Significance Criteria and Other Areas of Concern Proposed by DLNR in NOD

DLNR, in the Final Environmental Assessment, Notice of Determination, described five HEPA significance criteria and eleven additional areas requiring further analysis by the Applicant. Here too, the DEIS is totally inadequate, falls far short of providing proper analyses, and fails to reach conclusions that are supported by the evidence.⁷⁷

- A. HEPA Significance Criteria #1: To the question of "whether the annual take of cumulative numbers of fish as a percentage of estimated population results in irrevocable loss or destruction of populations of fish," the DEIS wrongly concludes "the Preferred Alternative (i.e., Limited Permit Issuance Alternative) does not involve an irrevocable commitment or loss or destruction of any natural or cultural resource."

Fish Populations: Any and all substantial reductions in natural abundance of White List species in West Hawai'i indicate lost natural and cultural resources. While it may be true that a potential *revocable* loss may be indicated by increasing populations of some White List species when aquarium collecting is halted, such as occurred for yellow tangs in the FRAs after their establishment in 2000 and in the open areas after collection was prohibited in 2018, there is no evidence that natural abundance will ever return. The reduced populations of yellow tangs in

⁷² DEIS at 329.

⁷³ Haw. Rev. Stat. § 11-200-12(b).

⁷⁴ Haw. Rev. Stat. § 11-200-12(b)(1), (2), (7), (8), (9).

⁷⁵ DEIS at 20

⁷⁶ Walsh et al. (2010); Walsh et al. (2013); Walsh (2010); Walsh (2015).

⁷⁷ DEIS at 329 - 337

the FRAs, compared to baseline, natural populations found in the MPAs, even after 20 years of no aquarium collecting, is further evidence of an irrevocable loss that has occurred.

Furthermore, severe coral bleaching caused by climate change has already reduced coral cover in West Hawai'i and is only expected to worsen, with annual bleaching that could begin as early as 2030 and which will result in the loss of 70% of Hawai'i's reefs. This loss of White List habitat virtually assures that a depleted population will not be able to rebound to the same extent, or at all, in the future, though it may have in the past.

Further evidence is found throughout this document and all combined point to significant adverse impacts to fish populations as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

Reef Habitat: The DEIS wrongly claims that “the pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on reef habitat as a result of the Preferred Alternative would occur.” Damage to reef habitat from commercial aquarium collection is well documented. See “Damage to Reef Habitat” later in this document and also Appendix 3 where photographs of these practices and their effects can be found.

The DEIS cites a 2003 study (Tissot and Hallacher) in an attempt to conclude that no significant impact on aquatic invasive algae control is anticipated as a result of the Preferred Alternative, noting that the authors “found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting.” However, the DEIS omits the author's subsequent conclusion that the study may not be a good test of that hypothesis for several reasons, including that herbivores taken by aquarium collectors primarily consume filamentous algae (i.e. turf), not macroalgae, and that further investigation is warranted.⁷⁸ Additionally, macroalgae accounts for <2% of algal cover in West Hawai'i – the majority is turf algae, further underscoring the irrelevance of the 2003 study.⁷⁹

Evidence throughout this comment document points to significant adverse impacts to reef habitat as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

Cultural Resources: The DEIS wrongly claims that “White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural resources would occur as a result of the Preferred Alternative.” This follows the conclusion in the CIA that “cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.” As described in detail in this comment document, White List species are currently in decline as a direct result of aquarium collecting and will

⁷⁸ Tissot and Hallacher (2003).

⁷⁹ Gove 2019.

continue to decline as such as long as aquarium collecting occurs on Hawai'i Island. Therefore, cultural resources are in fact impacted.

Further evidence is found in the CIA which includes descriptions of significant adverse impacts to cultural resources as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

HEPA Significance Criteria #2: To the question of whether “the take of aquarium fish curtails the uses of the environment, including aquatic invasive algae control, the tourism industry, and the overall integrity of diverse aquatic ecosystems,” the DEIS wrongly concludes “the Preferred Alternative does not curtail the range of beneficial uses of the environment.”

Aquatic invasive algae control: The DEIS wrongly claims that “the pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on aquatic invasive algae control as a result of the Preferred Alternative would occur. The DEIS cites a 2003 study (Tissot and Hallacher) to attempt to conclude that no significant impact on aquatic invasive algae control is anticipated as a result of the Preferred Alternative, noting that the authors “found no increases in the abundance of macroalgae where the abundance of herbivores was reduced by aquarium collecting.” However, the DEIS omits the authors subsequent conclusion that the study may not be a good test of that hypothesis for several reasons, including that herbivores taken by aquarium collectors primarily consume filamentous algae (i.e. turf), not macroalgae, and that further investigation is warranted.⁸⁰ Additionally, macroalgae accounts for <2% of algal cover in West Hawai'i – the majority is turf algae, further underscoring the irrelevance of the 2003 study.⁸¹

Reductions in herbivore biomass drive an increase of algae abundance. In West Hawai'i, herbivore biomass is as much as 2 times higher in the baseline MPAs than in the open areas and FRAs.⁸² Historically, 26.5% of the total biomass removed from West Hawai'i reefs in fishing and other extractive uses has been aquarium take, 98% of which are herbivores.⁸³ Logically, it follows that algae control is being significantly curtailed by aquarium take in the open areas.

Evidence throughout this comment document points to significant adverse impacts to aquatic invasive algae control as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

Tourism: The DEIS wrongly claims that “populations of the White List Species are not anticipated to significantly decline, therefore not significantly impacting viewing opportunities. Consequently, continued commercial aquarium collection under the Preferred Alternative, which would limit the number of Aquarium Permits and decrease collection, is not anticipated

⁸⁰ Tissot and Hallacher (2003).

⁸¹ Gove 2019.

⁸² Gove 2019.

⁸³ DLNR 2019; DEIS at 97.

to significantly impact tourism.” As described below, viewing opportunities and marine tourism revenue losses resulting from depleted populations of beautiful, charismatic and iconic fishes are captured in studies documenting willingness to pay and consumer surplus losses.

Therefore, there are significant adverse impacts to marine tourism as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

Integrity of Diverse Aquatic Ecosystems: The DEIS wrongly claims that “The pressures from commercial aquarium collection under the Preferred Alternative are anticipated to be lower than rates seen prior to the October 2017 ban on commercial aquarium collection; therefore, it is not anticipated that a significant impact on the integrity of diverse aquatic ecosystems as a result of the Preferred Alternative would occur.” As described throughout this document, White List species are currently in decline as a direct result of aquarium collecting and will continue as such as long as aquarium collecting occurs on Hawai‘i Island. Additionally, local extirpation has already been identified for some aquarium targeted species, which have been described by DAR and former aquarium collectors as “once common, now rare”, a condition that likely exists for other species, as well.⁸⁴

Therefore, there are significant adverse impacts to the integrity of diverse aquatic ecosystems as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

- B. HEPA Significance Criteria #3: To the question regarding the extent to which the take of aquarium fish conflicts with the state’s long-term environmental goals, the DEIS wrongly concludes that “the Preferred Alternative does not conflict with the State’s long-term environmental policies, goals, or guidelines as expressed in chapter 344 HRS.”

As described throughout this document, significant adverse impacts to natural resources would occur as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact in the WHRFMA.

- C. HEPA Significance Criteria #4: To the question of the impact of the take of aquarium fish on cultural practices in the state, the DEIS wrongly claims that “White List Species are not anticipated to significantly decline under the Preferred Alternative. Therefore, it is not anticipated that a significant impact on cultural resources would occur as a result of the Preferred Alternative.” This follows the conclusion in the CIA that “cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.” As described in detail in this comment document, White List species are currently in decline as a direct result of aquarium

⁸⁴ Williams & Walsh (2008); Former aquarium collectors personal communications to R. Umberger (Dec. 16, 2019).

collecting and will continue as such as long as aquarium collecting occurs on Hawai'i Island. Therefore, cultural resources are in fact impacted.

Further evidence is found in the CIA which includes descriptions of significant adverse impacts to cultural resources as a result of all proposed Alternatives with the exception of the No Action alternative, which would have a beneficial impact.

- D. HEPA Significance Criteria #8: to the question regarding the cumulative effect of the commercial take of aquarium fish using fine mesh nets when combined with the effects of: the commercial take of aquarium fish by other legal methods; the take of aquarium fish for recreational purposes; and, the commercial and non-commercial take of aquarium fish species for consumption as food, particularly including Achilles Tang and kole, the DEIS wrongly concludes "the Preferred Alternative does not involve a commitment for larger actions. When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species. However, the Preferred Alternative is not a significant contributor to the cumulative effect upon the environment."

As described throughout this document, fundamental errors in the DEIS's impact analysis resulted in patently false findings of no significant impacts and improper evaluations of these HEPA significance criteria. By failing to properly identify the varied and significant effects of commercial aquarium collection, the DEIS fails to accurately assess the cumulative effects when combined with other extractive activities.

The evidence is clear that all proposed Alternatives would significantly contribute to the cumulative effect upon the environment, with the exception of the No Action alternative, which would have a beneficial effect.

- E. Additional Areas Requiring Further Analysis as Described in the DLNR NOD:

- 1) *"It is also necessary to analyze the potential impacts under the no action alternative resulting from non-issuance of aquarium permits, including the increased take of larger, reproductively mature aquarium fish in East Hawai'i using legal mesh nets."*

Since aquarium collecting was prohibited in the WHRFMA, aquarium take in East Hawai'i has grown to be 5X the historic average catch for that entire coastline.⁸⁵ Most of that catch has been reported from zones 107 and 108, which share a boundary with Punalu'u, a known source area for juvenile yellow tangs in West Hawai'i (see DLNR map of aquarium fish zones at Appendix 6).⁸⁶ As previously stated, understanding and factoring larval dispersal and connectivity patterns is critically important for determining impact. It is through the identification of larval source and sink areas that

⁸⁵ DLNR Catch Reports.

⁸⁶ Christie et al. (2010).

appropriate direct, indirect and cumulative impacts, whether past, present or future, can be assessed and proper levels of take determined in order to prevent harm to populations of targeted species.

Both DLNR and the DEIS assert that under the no action alternative, aquarium take outside the WHRFMA is performed by using purportedly legal nets with larger than 2 inch mesh, and therefore, small fish will not be captured at the same rates as they would be with small (less than 2 inch) mesh, because “the smaller fish would escape the larger mesh.”⁸⁷ The DEIS concludes that the impact of this scenario cannot be quantified at this time.

We understand that because catch reports do not require information on fish sizes other than for yellow tangs, it impossible to determine size-related volumes of catch in the states commercial data. However, information gleaned from the retail market provides ample evidence that fish under 2” (i.e. small enough to escape purportedly legal mesh nets) continue to be captured in very high numbers despite the prohibition on small mesh nets (see Appendix 7 for examples). Further, and as noted in Appendix A, there was no response to our questions as to the specific methods or net sizes used for ongoing collection outside of the WHRFMA.

Therefore, the DEIS wrongly concludes that in East Hawai’i, the “no action alternative would have a less than significant direct impact on reef fish populations and the reefs in which they occur.” As with the WHRFMA, a proper and thorough analysis of the impacts has not been conducted for East Hawai’i.

- 2) *“The FEA identifies the scope of the analysis as one year and states that an EA with updated data and analysis would need to be completed on an annual basis. This improperly segments the analysis which must include the long-term and cumulative impacts over time of aquarium collection.”*

The DEIS expands the scope of the analysis to 5 years. However, this time frame is too short to adequately analyze long-term and cumulative impacts over time. For example, though collection pressure has been removed from the White List species in the FRAs, populations of once heavily targeted species in those areas, such as yellow tangs, have yet to return to natural levels of abundance, as reflected in the baseline MPAs, even after 20 years of protections. For very long-lived species such as the yellow tang and other surgeonfishes heavily targeted by aquarium collection, which have lifespans measuring decades, and which may not reproduce until they are at least 5 years old, a 5-year analysis period is far too short.

⁸⁷ DEIS at 96 and 329.

- 3) *“There is no statistical analysis of population growth compared to the life span of each fish and the number of years to and size of first reproduction against which this annual proposed take can be measured for purposes of estimating sustainable take.”*

The DEIS fails to address this issue entirely, providing zero of the statistical analyses that were requested and zero reasons for not doing so. Notably those statistical analyses form the foundation of determining estimations for sustainable in the Ochavillo and Hodgson (2006) work, which is referenced throughout the DEIS concerning what constitutes “sustainable reef fish harvest”. Instead, the DEIS relies solely upon analysis of catch as % of population, which as described here, is far too flawed to be used to legitimately justify the levels of take proposed in the DEIS.

- 4) *“With regard to proposed levels of sustainable catch, using “5% to 25% annual take of estimated populations as proposed in several research papers, we note that 5% to 25% is a wide range, and the precautionary principle calls for applying the lowest estimated percentage of sustainable take in the absence of scientific certainty.”*

Here again, using the fatally flawed analysis described earlier, the DEIS summarizes that “under the Preferred Alternative, collection of any of the 40 White List species is anticipated to be below 5% of the island-wide populations.” It is to be expected that inaccurate and under-reported catch levels applied to areas far beyond the directly impacted environment will result in a greatly reduced level of impact.

The 5% to 25% annual take of estimated populations, as proposed by Ochavillo and Hodgson (2006) pertains to small finite areas, called “collection areas” where the collection activity occurs. For example, two of the Philippine collection areas that form the basis for Ochavillo and Hodgson’s work, Batasan Island and Clarin, are part of Bohol, an island with a coastline that’s 390 km long and comparable to, though smaller than, Hawai’i Island’s 428 km long coastline.⁸⁸

One area is Batasan Island, a minor island of less than 120,000 m² that lies about 6.4 km off the Bohol coast, and is part of the municipality of Tubigon, itself just 81.87 km². The other collection area is the neighboring municipality of Clarin, which has a total municipal land area of 62.79 sq. km and a coastline of approximately 6 linear km.

The Ochavillo and Hodgson total allowable catch (TAC) as % of population is based on estimated natural mortality rates for certain reef fishes in those specific areas. Furthermore, their TAC relates to fish populations in those specific small areas, not the entire island of Bohol. The DEIS erroneously takes their 5% to 25% range, applies it to species that are not included in their work, to an area that extends far beyond the

⁸⁸ Spalding and Vosseler.

proposed collection area (i.e. the WHRFMA) to encompass the entire island of Hawai‘i, an area which is orders of magnitude larger than those used by Ochavillo and Hodgson.

- 5) *“We also note that there are no bag limits for most species, and that the fishery as currently regulated does not limit the number of permits, so that the annual take as a percentage of estimated population could rise significantly. Alternatives of overall annual take limits, a limited entry aquarium fishery program, and restrictions including full moratoria on the take of herbivores, species of special concern, and species evidencing severe population declines have not been proposed or analyzed.”*

The DEIS does not address this issue. The Preferred Alternative includes limited issuance of permits in this instance, but nothing prevents others from pursuing additional permits for themselves. Other than a reduced bag limit for Achilles tang, nothing more is proposed or analyzed.

- 6) *“The FEA asserts that certain types of fish such as Psychedelic Wrasse, Tinker’s Butterflyfish, and Fisher’s Angelfish inhabit waters deeper than the CREP monitoring studied, resulting in populations being underestimated and thus the annual take as a percentage of estimated population being overestimated.”*

The inclusion of these species on the state’s species of concern list indicates a heightened need for an accurate and thorough assessment of their populations.⁸⁹ As noted earlier, the annual take as a percentage of estimated population should factor under and non-reporting and should apply to the areas where direct impacts occur. Reporting sub-zones would represent the largest area that might be considered appropriate, however more specific areas would be the most appropriate (e.g. bays, reefs, and depth ranges). Allowing limitless take under the Preferred Alternative is contrary to DLNRs conservation actions identified for these species which includes protecting current populations and establishing further populations to reduce the risk of extinction.⁹⁰

- 7) *“In addition, we note the proposed alternatives for reduction in bag limits for Achilles Tang, but do not see a scientific basis for concluding that the proposed reduction would be sufficient to sustain the population.”*

The DEIS fails to address this issue entirely. Reducing the Achilles tang daily bag limit from 10 to 5 would do nothing to prevent further depletion, and extirpation of these important species. In 2014 a bag limit of 10 Achilles Tang per day was imposed on the aquarium trade in an attempt to address declining populations in West Hawai‘i. Since 2014, the Achilles tang market price has increased, while populations have decreased.

⁸⁹ DLNR, SWAP (2018).

⁹⁰ DLNR, SWAP (2018).

The outer possibilities of what the permits would allow must be considered. A cursory analysis of the Preferred Alternative and the data presented in the DEIS shows that 14 permittees taking 5 Achilles tang per day equates to 25,550 fish. This amount exceeds to total population estimate in the WHAP surveys in the 30'-60' range and is 11% of the island-wide population under the CREP estimates. Combined with the limitless take allowed by aquarium collectors in East Hawai'i, and the pressure from food fishers, the cumulative impact on this important species is extreme.

- 8) *“Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action’s potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis.”*

As extensively noted herein, the DEIS’ Cultural Impact Assessment (CIA) is extremely flawed and inadequate, with its inherent purpose-- to identify cultural impacts and propose mitigations measures to limit such impacts, not being met.

- 9) *“Enforcement and compliance needs and challenges are key factors in the effectiveness of fisheries management, and should be analyzed as part of the environmental impact statement.”*

The DEIS fails to address this issue, citing only an unreliable claim regarding so-called “catch report validation” that did not indicate substantial underreporting of catch by aquarium collectors. DLNR is well aware of the major gaps and flaws in their reporting system that facilitates any amount of under and non-reporting. Additionally, an important avenue for validation, tallies of the species and their numbers leaving the state via air cargo, which are required by federal law, are not being provided, exposing both aquarium trade members and air cargo carriers to violations of the federal Lacey Act.⁹¹

Furthermore, the DEIS fails to analyze other significant gaps in enforcement and compliance, as we, too, spelled out in our comments to the Applicant/Stantec, responding with a single sentence, “enforcement is within the purview of the State of Hawai’i.”⁹²

⁹¹ U.S. Fish and Wildlife Service (2019).

⁹² DEIS at 474 and 483.

10) *“We appreciate that as an applicant action, the applicant can propose but not ensure regulations aimed at protecting and restoring populations of aquarium fish. We are interested in proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions even in the absence of or prior to establishing other regulations to accomplish the same purposes.”*

The DEIS fails to address this issue, providing no proposals for self-regulation that could be incorporated into permit conditions.

11) *“Overall, we appreciate that certain alternatives have been proposed, but believe they are more appropriately proposed as mitigation measures in an environmental impact statement to mitigate potential environmental impacts, rather than as alternatives in an environmental assessment, which, if implemented, might result in a finding of no significant impact. The Department of Land and Natural Resources is obligated to ensure full analysis under HRS Chapter 343 of potential environmental impacts of its actions in issuing aquarium permits. We believe this is most appropriate in an environmental impact statement.”*

The DEIS fails to address this issue and proposes no mitigation measures because their flawed analysis concludes there are no significant impacts to mitigate.

IV. Further Impacts Inadequately Analyzed

Environmental impacts from aquarium trade activities have been documented for over forty years. Under the Preferred Alternatives, every fish and marine creature, other than corals and those associated with live rock, could be removed from one, or all, of the State of Hawai‘i’s reefs—with catastrophic effects. This is not speculation: there is currently no law, regulation or enforcement capability that would prevent this from occurring. The potential for unlimited collection is a fact that encompasses the outer limits of what the aquarium permits allow, as was explained earlier.

Collecting individual species in high numbers poses a significant threat to coral reef health. As explained herein, herbivorous species, such as Yellow Tangs and Goldring Surgeonfishes, are the most heavily targeted.⁹³ Herbivorous fish are essential to avoid algal overgrowth of corals and concomitant degradation of the reef. Other important functional groups include: planktivores (e.g. Hawaiian Dascyllus), corallivores (e.g. Fourspot Butterflyfish, Multiband Butterflyfish), fish predators (e.g. Hawkfishes, Hawaiian Lionfish) and cleaner fishes (e.g. Hawaiian Cleaner Wrasse).

The reduction of natural populations of species taken by the aquarium trade in any area (e.g. specific site, zone, coastline, island or statewide), and by any amount, whether one or one hundred percent, indicates an irrevocable commitment and loss of a natural and cultural resource.⁹⁴ This

⁹³ DLNR Catch Reports.

⁹⁴ Haw. Rev. Stat. § 11-200-12(b)(1).

very loss curtails the range of beneficial uses that would otherwise be provided by the natural abundance of these populations.⁹⁵

We disagree with the DEIS response to our comment above that “this is not an irrevocable action, as commercial aquarium permits may be suspended pursuant to HAR 13-74-3(1) if the department determines that it is necessary for the protection and conservation of aquatic life. In addition, fish will continue to reproduce.” As previously stated, any and all substantial reductions in natural abundance of White List species in West Hawai‘i indicate lost natural and cultural resources. While it may be true that a potential *revocable* loss may be indicated by increasing populations of some White List species when aquarium collecting is halted, such as occurred for yellow tangs in the FRAs after their establishment in 2000 and in the open areas after collection was prohibited in 2018, there is no evidence that natural abundance will ever return. The reduced populations of yellow tangs in the FRAs, compared to baseline, natural populations found in the MPAs, even after 20 years of no aquarium collecting, is further evidence of an irrevocable loss that has occurred.

As has been long recognized,

The impact of commercial aquarium fish collecting is a complicated issue. The fish community members are highly dependent on one another. There is a constant interaction between predators and competitors, as well as other members of the food web. There is a lot of variability in the system, even when it is not disturbed by man. Reefs seem to undergo natural cycles. At times they may be very abundant. There is also natural variation in the fish community at different locations.⁹⁶

The DEIS fails to assess the high aesthetic value of this beautiful marine life as well as impacts to the complex relationships inherent in coral reef ecosystems and impacts to overall coral reef health. “Animal communities” are included in the rule definition for “environment,” however the EIS excludes any mention of the impact to fish and invertebrate communities, or the impact to the animals themselves.

The Hawai‘i State Wildlife Action Plan (SWAP) states that “Excessive extractive use constitutes a threat to wildlife. Certain reef fishes are harvested for sale in the aquarium trade . . . These activities are not sustainable on a large scale and impact native wildlife.”⁹⁷

A. General Impacts on Targeted Species

The list of species of greatest conservation need includes at least 18 native fish species that are threatened by the aquarium trade and in need of conservation actions to reduce the risk of extinction (depicted in Fig. 3).

⁹⁵ Haw. Rev. Stat. § 11-200-12(b)(2).

⁹⁶ Noland (1978).

⁹⁷ DLNR, SWAP (2018).



Fig. 3. Native fish species threatened by the aquarium trade.⁹⁸

Butterflyfishes are among the most beautiful of coral reef fishes (see Fig. 4). Their bright yellow, white and black markings are especially striking against pale corals and deep blue waters. When encountered by snorkelers/divers the beauty of these species is often breath-taking. They are heavily targeted by the aquarium trade in Hawai'i. In 1976 five of the top ten most collected species were butterflyfish (see Fig. 5).⁹⁹



Fig. 4. Most heavily targeted butterflyfishes on Hawai'i reefs, statewide: Fourspot Butterflyfish, Longnose Butterflyfish, Teardrop Butterflyfish, Forcepsfish, Multiband/Copperband Butterflyfish.¹⁰⁰

⁹⁸ DLNR, SWAP (2018).

⁹⁹ Katekaru (1978).

¹⁰⁰ Katekaru (1978).

TOP TEN MARINE AQUARIUM FISHES COLLECTED IN HAWAII (Fiscal Year 1976)						
Species	Number	% of Total Catch	Estimated Value	% of Total Value	Estimated Value Per Fish	
1. <i>Sailma flavesceus</i> (Yellow marlin)	35,006	22	\$ 43,235	18	\$1.24	
2. <i>Forcipiger longirostris</i> (Long-nosed butterfly)	10,022	6	18,718	8	1.87	
3. <i>Centropyge potteri</i> (Potter's angel)	9,299	6	17,919	7	1.93	
4. <i>Acanthurus achilles</i> (Naemae)	9,233	6	18,920	8	2.05	
5. <i>Rasa bicinctus</i> (Kala)	6,478	4	14,536	6	2.24	
6. <i>Chaetodon quadrimaculatus</i> (Fourspot butterfly)	4,925	3	6,997	3	1.42	
7. <i>Zanclus cornutus</i> (Kihikihii)	4,520	3	8,763	4	1.94	
8. <i>Chaetodon unimaculatus</i> (Teardrop butterfly)	4,496	3	6,502	3	1.45	
9. <i>Forcipiger flavescens</i> (Long-nosed butterfly)	4,259	3	6,914	3	1.62	
10. <i>Chaetodon multilineatus</i> (Copperband butterfly)	3,623	2	3,343	1	.95	
TOTAL: top ten	91,861	58%	\$145,938	51%	\$1.67 (avg.)	

Fig. 5. Five butterflyfish species were among the top ten marine aquarium fishes collected in 1976, statewide.¹⁰¹

Reported aquarium harvest of those same five species has since plummeted (see Fig. 6). The same is true for other heavily targeted butterflyfish species that have been among the top twenty aquarium fishes collected by the trade since 1976.¹⁰²

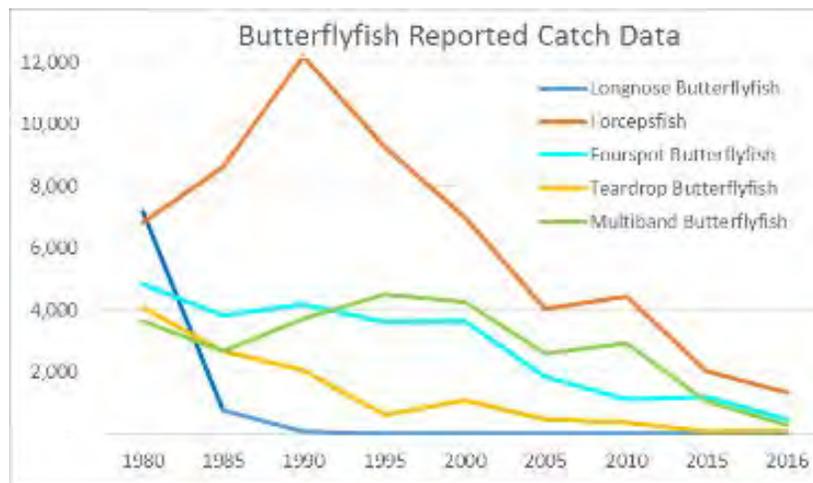


Fig. 6. DLNR reported harvests of the five most heavily targeted butterflyfish species since 1976. Data represents statewide annual average catch over five-year periods.¹⁰³

¹⁰¹ Katekaru (1978).

¹⁰² DLNR Aquarium Catch Reports.

¹⁰³ DLNR Aquarium Catch Reports.

This sharp decline in reported catch is not an indicator that these species are no longer in demand. Continuing demand is confirmed by several examples:

- These species' inclusion in the West Hawai'i White List.
- Their exclusion from the O'ahu rules.
 - The O'ahu aquarium rule prohibits take of three butterflyfishes, citing their "coral diets" as the need for the restriction.¹⁰⁴ Since 1999 total reported take of those three species was 50 fish.¹⁰⁵
 - Zero restrictions were provided for three additional coral eating butterflyfishes, with total reported take of over 51,000 individuals since 1999.¹⁰⁶
- The Fourspot Butterflyfish catch increase that followed the 2014/2015 warming event and unprecedented fish bloom.¹⁰⁷ Subsequently, catch of the Fourspot Butterflyfish declined to an all-time low.¹⁰⁸

The EIS fails to use a temporal baseline that captures the impacts of the heavy collection pressure on these species over time, before their natural populations were depleted by this activity.

B. Damage to Reef Habitat

In nearly every encounter with commercial aquarium collectors on West Hawai'i reefs, snorkelers and divers have witnessed and documented destructive practices that harm corals, with the most damage coming from vessel anchors and chains. Sticks, buckets, nets, underwater propulsion devices (scooters) are laid in the corals and the fins, knees and legs of collectors often come in contact with the reef—in fact, they are typically described as "crawling across" or "standing" on the corals. The results of these actions include abrasion and coral breakage. Both FEAs refer to a study that determined there was no evidence to indicate the presence of destructive fishing practices (e.g. breaking apart corals to capture hiding fishes).¹⁰⁹ However, the abundance of photographic evidence documenting coral breakage from vessel anchoring and fish capture activities, these impacts cannot be dismissed and must be evaluated in the EISs. Photographs of these practices and their effects can be found at Appendix 3.

Abundant coral reefs—put at risk by the Preferred Alternative—have a range of beneficial uses. The DEIS fails to adequately assess the curtailment of "the range of beneficial uses of the environment."¹¹⁰

¹⁰⁴ DLNR (2012).

¹⁰⁵ DLNR Aquarium Catch Reports.

¹⁰⁶ DLNR Aquarium Catch Reports.

¹⁰⁷ Talbot (2014).

¹⁰⁸ DLNR Aquarium Catch Reports.

¹⁰⁹ Hawai'i FEA at 89; O'ahu FEA at 68.

¹¹⁰ Haw. Rev. Stat. § 11-200-12(b)(2).

C. Examples of Impacts in Various Hawai'i Island Regions

Baseline fish population data from the 1970's at Honaunau in West Hawai'i were compared to data gathered in surveys conducted 1998 – 2001. The results indicated that nearly all small bodied surgeonfish, butterflyfish and angelfish (i.e. species targeted by the aquarium trade) declined in abundance. Commercial aquarium collecting was implicated in the decline (see Fig. 9).¹¹¹ Similar results were found at Ke'ei where the site had been intermittently surveyed since 1979.¹¹²

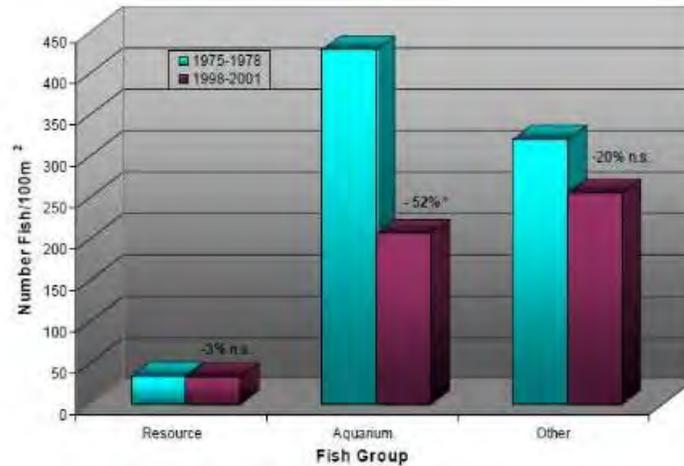


Fig. 9. Comparison of various fish functional groups at Honaunau over two survey periods.

***= $p < 0.05$, t-test. ¹¹³**

“Of the 20 most collected aquarium species, 18 declined in abundance with the species facing the heaviest fishing pressure typically showing the greatest declines.”¹¹⁴

In addition to documenting the impact of aquarium collecting in these areas, these studies also document baselines for abundance levels of aquarium targeted and other impacted species. Examinations of reported catch, as documented by DLNR, serve to further highlight the impacts of the trade.¹¹⁵ The documentation shows that the initial surveys were conducted during a time when the aquarium trade reported taking fewer than 50,000 fish annually from West Hawai'i reefs. In subsequent years, from 1987 to the final surveys in 2001, reported aquarium fish catch in West Hawai'i ranged between 150,000 and 300,000 individuals taken. Since then the annual West Hawai'i aquarium fish catch has ranged between 250,00 and >450,000 fish. Additionally, with the closure of approximately 32% of the reefs in West Hawai'i with the implementation of the FRAs in 2000, this increased fishing pressure was focused in smaller areas with likely intensified results.

¹¹¹ Williams & Walsh (2007).

¹¹² Williams & Walsh (2007).

¹¹³ Williams & Walsh (2007).

¹¹⁴ Williams & Walsh (2007).

¹¹⁵ DLNR (2014).

Another long-term study looked at reefs in South Kohala and determined that reef fish abundance was in “drastic decline” and reefs were in “dire straits”.¹¹⁶ Populations of all of the top five most abundant fish families had declined since the original surveys conducted in 1979-1981 (see Fig. 10). Thirty-one of the thirty-five most abundant fish species had declined, including 19 species targeted by the aquarium trade. Most of the aquarium targeted species had declined by more than 50% and many were down by more than 80%.¹¹⁷ The extent to which the massive increase in reported take has contributed to this decline was not studied in the DEIS.

As the Applicant noted in the FEAs’ responses to this comment, the “Dire Straits” report concluded that “the widespread declines in families of fish not typically targeted either for food use or for the aquarium fishery suggest that other, more widespread factors are *additionally* contributing to the overall long-term declines in fish abundance.”¹¹⁸[emphasis added] Rather than rebutting the argument that further analysis is needed, this statement only served to highlight why the DEIS needed to *also* evaluate the potential of cumulative impacts of other factors (e.g. pollution, and sedimentation) on targeted fish species, such as decline of coral coverage, which have been demonstrated to influence reef fish species diversity and abundance.¹¹⁹ Here, too, the flawed analyses failed to accurately identify impacts.

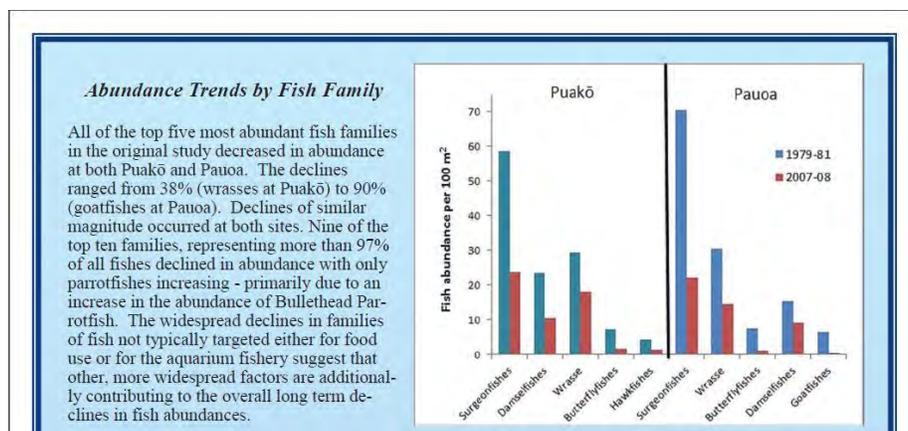


Fig. 10. Drastic declines of the most abundant fish families at two South Kohala Reefs.¹²⁰

The areas south of these reefs are subject to some of the most intense aquarium collecting pressure in the state. Aquarium take between Keahole Point and these reefs in South Kohala, in one year alone, exceeds the aquarium take from the entire Great Barrier Reef in Australia, which has a reef area that is 300 times larger than Hawai‘i’s. For example, in 2014 aquarium collectors reported

¹¹⁶ Walsh (2013).

¹¹⁷ Walsh, unpublished data used as background in South Kohala Reefs in Walsh (2013).

¹¹⁸ Hawai‘i FEA at Comment No. 833-24

¹¹⁹ Jones et al. (2004); Friedlander et al. (2018).

¹²⁰ Walsh (2013).

taking 191,083 fish from this Hawai'i zone.¹²¹ By comparison, 2014 reported aquarium take from the Great Barrier Reef was 112,000.¹²²

Abundant populations of herbivorous fishes are critically important to coral reefs. They keep algae from overgrowing corals or preventing new corals from starting. Important families of herbivorous fishes in Hawai'i include surgeonfishes, damselfishes and parrotfishes. The vast majority of fishes taken by the aquarium trade are surgeonfishes. Yellow Tangs are the dominant herbivore in West Hawai'i.¹²³ They are also the most heavily collected species. The Dire Straits study documented a 90% decline in herbivorous surgeonfish and damselfish populations, while parrotfish populations had actually increased over time.¹²⁴

This aforementioned 90% decline in herbivores contributed to a 35% reduction in coral cover, a 64% reduction in coral building coralline algae, a 38% increase in algae at one site and a staggering 322% increase in algae at another. DLNR claims that parrotfishes are more important herbivores than surgeonfishes when it comes to keeping algae in check on coral reefs.¹²⁵ On these South Kohala reefs, the increased parrotfish populations were not enough to offset the loss of surgeonfishes and damselfishes, and the algae still outcompeted the corals. The notion that surgeonfishes taken by the aquarium trade are not an important component to coral reef health is challenged by this study.

The DEIS attempts to downplay the importance of surgeonfishes and other herbivorous fishes taken by the trade by citing a 2003 study by Tissot and Hallacher (described more in the next section) that found no evidence of increased macroalgal growth in areas of collection versus areas without collection, despite reduced fish abundance in the collected areas.¹²⁶ However, the authors concluded that the study may not be a good test of that hypothesis for several reasons, including that most surgeonfishes taken by aquarium collectors consume filamentous algae, not macroalgae, and that further investigation is warranted.¹²⁷

Further, a more recent assessment of ecosystem trends in West Hawai'i includes, among other data, the differences in herbivore biomass and coral cover between reefs on the northern portion of the West Hawai'i coast (which encompasses the South Kohala area described above and extends from Keahole Point, northward) and reefs on the southern portion (from Keahole Point, southward).¹²⁸ The data shows that herbivore biomass in the north is significantly lower than that found on the south.¹²⁹ Additionally, while the northern reefs are now dominated by algae, and coral cover has declined by ~30%, the same not true for the southern reefs.¹³⁰ Notably, though the northern area is

¹²¹ DLNR Aquarium Catch Reports.

¹²² Queensland Summary Fishery Reports.

¹²³ Eble et al. (2011).

¹²⁴ Walsh (2013).

¹²⁵ DLNR (2015); KHON TV (2015).

¹²⁶ Hawai'i FEA at 89; O'ahu FEA at 68

¹²⁷ Tissot and Hallacher (2003).

¹²⁸ Gove et al. (2016).

¹²⁹ Gove et al. (2016).

¹³⁰ Gove et al. (2016).

~33% smaller than the area to the south, catch reports do not indicate a corresponding reduction in take. In fact, in 2014 take was higher in the north than in the south.¹³¹ The extent to which heavy collection pressure in the north has contributed to this shift was not addressed in the DEIS.

The DEIS also attempts to downplay the importance of herbivores taken by the trade by claiming that they target the smaller fish which are “the least effective sizes for cropping algae.”¹³² However, research shows that these fish play key roles:

- “The degree of change that a herbivore or group of herbivores can impose on a system is determined by several factors, including the intensity of the bite size, the number of bites and the number and type of each grazer in the system.”¹³³
- Research on Maui shows that more herbivorous fishes on the reef, even those that are smaller bodied, equates to “more mouths on the algae.”¹³⁴
- In addition, a comparison of adult Yellow Tang densities in the West Hawai‘i long-term protected areas (i.e. MPAs) vs. the Open Areas, shows that collection pressure on small, juvenile, Yellow Tangs has reduced the natural abundance of sub-adult and adult yellow tangs, which are 2 – 4 times larger than juveniles, by an average of 60%.¹³⁵

The fact remains that algae now dominates many West Hawai‘i reefs, but the DEIS failed to accurately evaluate Applicant impacts that occur as a result of reduced herbivory.

D. Examples of Impacts to Species

Two peer reviewed studies documented the magnitude of the effect of aquarium collecting on natural populations of heavily targeted species by the aquarium trade. One, published in 2003 by Tissot and Hallacher, was conducted the two years prior to the establishment of the West Hawai‘i Fish Replenishment Areas (i.e. aquarium no-take zones).¹³⁶ The next study, by Tissot, et al., was conducted in 2000-2002, three years after those area closures.¹³⁷ The results of each study showed that aquarium collectors have a significant effect on the abundance of targeted aquarium fishes (see Fig. 11).

¹³¹ DLNR Catch Reports

¹³² Hawai‘i FEA at 89; O‘ahu FEA at 68

¹³³ Smith et al. (2001)

¹³⁴ Kelly et al. (2017)

¹³⁵ Hawai‘i FEA at 77 (Table 9).

¹³⁶ Tissot & Hallacher (2003).

¹³⁷ Tissot et al. (2004).

Taxa	This Study	Tissot and Hallacher (2003)
<i>Acanthurus achilles</i>	-56*	-58*
<i>Centropyge potteri</i>	-42*	-46*
<i>Chaetodon multicolor</i>	-4	-38*
<i>Chaetodon ornatissimus</i>	-7	-39*
<i>Chaetodon quadrimaculatus</i>	-97*	-42*
<i>Ctenochaetus strigosus</i>	-14*	-15
<i>Forcipiger</i> spp.	-55*	-54*
<i>Zanclus cornutus</i>	-49*	-46*
<i>Zebrasoma flavescens</i>	-43*	-47*
Overall	-26*	

Note: Statistical differences in density between reference and FRA sites were tested using a two-sample *t*-test (* = significant at $P < 0.05$). Mean estimates are compared with the study of Tissot and Hallacher (2003), which estimated the effects of aquarium collectors on these species in a previous study in West Hawai'i.

Fig. 11. Effects of aquarium collecting on nine heavily collected aquarium species. Significant declines, ranging from 14% - 97%, were seen in 7 of 9 species.¹³⁸

The U.S. Coral Reef Task Force described these results as follows: “Severe overfishing for aquarium trade occurs even in the United States: Aquarium fishes outside of reserves [in West Hawai'i] experience significant declines – from 14% to 97%.”¹³⁹

In a 2010 grant report to NOAA, DLNR documented that “a number of aquarium-targeted species have not responded to the increase in protected areas and have actually decreased in West Hawai'i since 1999” (see Fig. 12).¹⁴⁰ Per DLNR aquarium catch reports, these species are also among the top 20 most harvested fishes. Nonetheless, all but two species, the Moorish Idol and the Hawaiian Cleaner Wrasse, were included in the West Hawai'i 40 Species White List adopted in 2014. DLNR therefore calls for the continued harvesting of these species, despite knowing that their populations are in decline.

¹³⁸ Tissot et al. (2004).

¹³⁹ U.S. Coral Reef Task Force, Trade Subgroup Report (2005).

¹⁴⁰ Walsh et al. (2013).

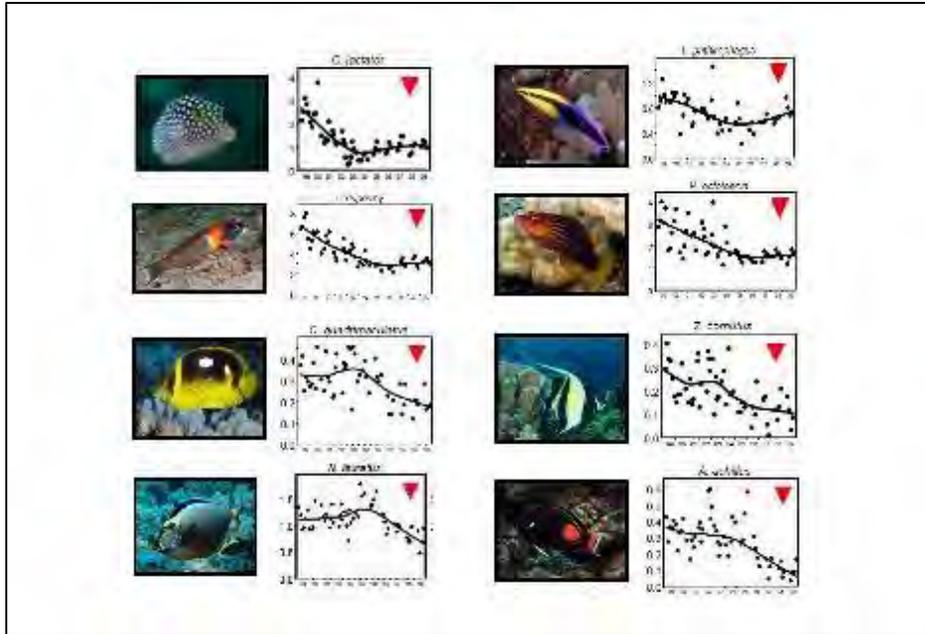


Fig. 12. Example of some targeted aquarium species that failed to respond to FRA's and had decreased along the West Hawai'i coastline from 1999 - 2010 (x-axis = year; y-axis = # 100 sq. meters).¹⁴¹

Three species identified in the SWAP, the Bandit Angelfish, Bluestripe Butterflyfish, and Hawaiian Turkeyfish Figure 4 (in gold outline) were included in a DLNR presentation on West Hawai'i Species of Special Concern (Fig. 3) where two were described as routinely seen in the 1970's and now very rare, and one was described as down by 99% in two different areas.¹⁴²

In West Hawai'i the decline of butterflyfishes has been well-documented in both population surveys and aquarium catch data. A 2008 presentation on West Hawai'i aquarium species of special concern reported declines in butterflyfish abundance and diversity.¹⁴³ Two species were particularly hard hit: the Bluestripe Butterflyfish and the Teardrop Butterflyfish, experienced population declines ranging from 89% - 100% in two West Hawai'i areas (see Fig. 13).

¹⁴¹ Walsh et al. (2013).

¹⁴² Williams & Walsh (2008).

¹⁴³ Williams & Walsh (2008).

Are There Grounds For Concern?

- Recent Attempts to Introduce AQ Bill to Hawaii Legislature
- Evidence of significant change on West Hawaii reefs..
 - Honaunau surveyed 1975-78; resurveyed by DAR 98-01
 - Puako surveyed 1979-81; resurveyed by DAR 06-07
 - Ke'ei surveyed since 1978 and ongoing
- Butterfly Abundance ▼ 80% at Puako & ▼ 69% at Honaunau
Diversity declined from 9.0 → 6.5 per habitat at Puako)
- Bluestripe Butterfly ▼ 98% at Puako ▼ 100% at Honaunau
Teardrop Butterfly ▼ 89% at Puako ▼ 91% at Honaunau
- Some species routinely seen in 1970s, now very rare:
Bandit Angel, HI Turkeyfish, Thornback Cowfish




Photos: J.E. Randall, J. Conay, H. Tanaka

Fig. 13. Aquarium trade impacts to heavily targeted butterflyfishes and other species in West Hawai'i.

The Bluestripe Butterflyfish is a highly unique, endemic Hawaiian species that, having no sister species elsewhere in the Indo-Pacific, is also known as a relic (see Fig. 14).¹⁴⁴ Until 1980, this species was among the top twenty fishes collected in West Hawai'i, with an annual average harvest of 347.¹⁴⁵ By 2012, the last year this species appeared on West Hawai'i catch reports, reported harvest had dropped to a total of nine.¹⁴⁶ This species was excluded from the West Hawai'i forty species White List which went into effect in 2014.¹⁴⁷



Fig. 14. Relic species, Bluestripe Butterflyfish (Photo courtesy of Lynn Allen).

¹⁴⁴ Randall (1996).

¹⁴⁵ DLNR Aquarium Catch Reports 1976 – 2005.

¹⁴⁶ DLNR Aquarium Catch Report for 2012.

¹⁴⁷ See HAR. § 13-60.4-7.

The 2015 Hawai'i SWAP lists the Bluestripe Butterflyfish among the species of greatest conservation need. Threatened by the aquarium trade, conservation actions include to “protect current populations, but also to establish further populations to reduce the risk of extinction.”¹⁴⁸

According to DLNR reef surveys and catch data, the Teardrop Butterflyfish has also experienced drastic declines on West Hawai'i reefs (see Fig. 13). This beautiful species is named for the striking upside-down black teardrop located mid-body (see Fig. 4).

Until 1980, the Teardrop Butterflyfish was among the top ten fishes collected in West Hawai'i with an average annual harvest of 1,454 individuals (see Fig. 15).¹⁴⁹ During the following five years, the harvest rate dropped, but it was still among the top twenty species collected (see Fig. 15).¹⁵⁰ Though collection continued until at least 2013, by the late 1990's DLNR considered Teardrop Butterflyfish as no longer targeted by the aquarium trade and excluded them a list of aquarium targeted species provided to researchers, Brian Tissot and Leon Hallacher, who were embarking on a project to document the magnitude of the effect of aquarium collecting on natural populations.¹⁵¹ They were, however, included in the surveys to test assumptions since they were similar to targeted species.¹⁵² The researchers encountered just one individual Teardrop Butterflyfish during the entire study and so they were excluded from further analysis.¹⁵³

Taxa	1980	1985	1990	1995	2000	2005
Bluestripe Butterflyfish	347	85	269	77	58	12
Teardrop Butterflyfish	1,454	185	508	158	204	185

Fig. 15. Adapted from DLNR Hawai'i Island reported catch data for top 20 aquarium species. Data represents statewide annual average catch over five-year periods.

In 2011 a group of divers encountered an aquarium collector at a popular North Kohala dive site. They watched in horror as the collector scooped up the first Teardrop Butterflyfish they had seen in that area in years along with a number of Yellow Tangs and other fishes (Fig. 16).¹⁵⁴ In 2013, the last year Teardrop Butterflyfish appeared on aquarium catch reports, reported take had dropped to a total of ninety, reflecting a 99% drop in annual catch since 1980.¹⁵⁵ This species was excluded from the West Hawai'i forty species White List which went into effect in 2014.

¹⁴⁸ DLNR, Species of Greatest Conservation Need (2018).

¹⁴⁹ DLNR Aquarium Catch Reports 1976 – 2005.

¹⁵⁰ DLNR Aquarium Catch Reports 1976 – 2005.

¹⁵¹ Brian Tissot 2010. Email communication with Rene Umberger

¹⁵² Tissot & Hallacher (2003).

¹⁵³ Tissot & Hallacher (2003).

¹⁵⁴ Brooke Everett 2011. Pers. Communication with Rene Umberger

¹⁵⁵ DLNR Aquarium Catch Report for 2013.



Fig. 16. Teardrop Butterflyfish captured by an aquarium collector on a North Kohala Reef (photo courtesy of Brooke Everett).

The exclusion of any formerly collected species from the White List, such as the Bandit Angelfish, Bluestripe Butterflyfish, Hawaiian Turkeyfish, Teardrop Butterflyfish, or Thornback Cowfish, is not an exemption for a thorough analysis of their current status within the West Hawai'i Regional Fishery Management Area (WHRFMA) and elsewhere on Hawai'i Island, compared to the baseline (i.e. historic natural abundance)..

The aquarium fishery in West Hawai'i takes 1.8X more reef fish than recreational and other commercial fishing combined. Most of these fish are Yellow Tangs.¹⁵⁶

“Overall Yellow Tang abundance in 30'-60' hardbottom habitat in West Hawai'i increased by 355,758 individuals from 1999/2000 to 2010-2012 even though Yellow Tang abundance in the Open areas decreased by 21%. This decrease is attributable largely to an increase in the number of aquarium collectors and collected animals relative to the period when the FRAs were established.”¹⁵⁷

Over sixty percent of West Hawai'i reefs are open to the aquarium trade. On the reefs in those areas, the impact of the aquarium trade on natural populations of Yellow Tangs has been a significant reduction in the abundance.¹⁵⁸ For example, natural populations were reduced by over 75% in 2007-2009 and in recent years, by 60% (see Fig. 17). The increase in FRA Yellow Tang abundance that began in 2002, three years after establishment of these protected areas, is a clear example of the impact of the trade on natural populations: when collection pressure is removed, given enough time, populations may be able to rebound. As noted earlier, the overall increase in Yellow Tang abundance that has occurred since 2014 is due to an anomalous recruitment pulse that coincided

¹⁵⁶ DLNR (2014).

¹⁵⁷ Walsh et al. (2013).

¹⁵⁸ Tissot & Hallacher (2003); Tissot et al. (2004); DLNR (2014).

with warming waters in 2014.¹⁵⁹ Typical recruitment pulses, such as those that occurred in 2002 and 2009, have resulted in short-lived increases in fish populations that were followed by prolonged or short and steep population declines (see Fig. 17).

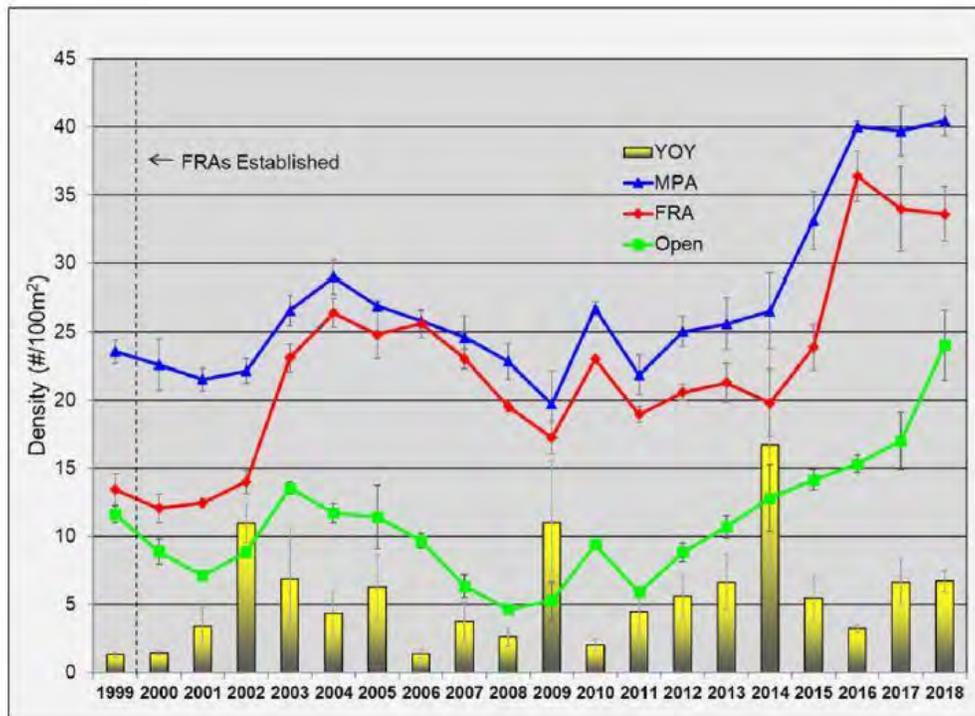


Fig. 17. Overall changes in Yellow Tang abundance 1999-2018. As shown by the large gap between the green line (areas open to the aquarium trade) and blue line (long term protected areas which serve as a proxy for natural abundance), millions of Yellow Tangs are missing from West Hawai'i reefs.¹⁶⁰

E. Failure to Assess Impacts to Aesthetic Value

In addition to the impacts to biodiversity, ecosystem function, and other fisheries, aesthetic and other social values are also heavily impacted.¹⁶¹ Species experiencing the heaviest collection pressure, with a corresponding reduction in natural abundance, are Hawai'i's most beautiful, charismatic and iconic fishes. The diminished aesthetic value from the cumulative and substantial reductions in species such as Yellow Tangs, butterflyfishes and Moorish Idols, which are dominated by vibrant yellows and oranges and striking white and black patterns, cannot be overestimated (see Fig. 7).

¹⁵⁹ Gove et al. (2016).

¹⁶⁰ DEIS at 101.

¹⁶¹ Walsh, Background on Proposed Hawai'i Administrative Rule 13-60.4 (2013).



Fig. 7. Reefs lacking yellow and orange fishes are greatly diminished in beauty.

These colors are more than aesthetically pleasing, as our eyes are physiologically attuned to them. The frequencies and wavelengths of yellows, oranges and reds allow them to strike our eyes much faster than the other colors.¹⁶²

By removing the species with prominent yellow, orange, red or white coloration and markings, the palette and very essence of what makes a coral reef beautiful to the human eye is diminished and degraded. It is impossible to decrease populations of a coral reef's beautiful wildlife without greatly decreasing the natural beauty of the place. Divers who have frequented these coral reefs, such as some of the Commenters, have noticed decreased abundance of colorful fish in recent years. The DEIS fails to address these cumulative losses and propose proper mitigation measures.

E. Failure to Assess Impacts to Property/Amenity Value

The DEIS fails to acknowledge and address the effects of the trade on the amenity/property values and propose proper mitigation measures. Houses that are within a block or 100 meters of beautiful, clean and healthy coastlines, beaches and coral reefs are more valuable and sell for significantly higher prices than comparable properties elsewhere. The same is true for condos and hotels/hotel rooms which generally command higher room and occupancy rates. Healthy coral reefs are also more likely to prevent beach erosion and, therefore, add value as a form of coastal protection. One and a half percent of the sale price of these properties is attributable to the marine ecosystem. Hawai'i's reef-related property value in 2001 was calculated at \$40 million.¹⁶³

G. Failure to Assess Impacts to Recreational Value

The DEIS fails to acknowledge and address the effects of the trade on the recreational value of this marine life and their coral reef homes and propose proper mitigation measures. The annual estimated expenditures related to marine life viewing (i.e. snorkeling and scuba) in Hawai'i is \$551 million. Reef-adjacent marine tourism expenditures (including hotel rooms) within 30 km of the coastline are an annual \$680 million.¹⁶⁴

¹⁶² Slembrouck (2011).

¹⁶³ Cesar et al. (2002).

¹⁶⁴ Spalding (2017).

These amounts exclude the lost value from declining fish abundance which is captured in willingness to pay surveys and summarized below:

- Healthier reefs lead to substantial economic gains.
 - Recreational users are willing to pay higher rates for a healthier marine environment.¹⁶⁵
 - Snorkel/dive businesses benefit when there are more fish for their clients to see.¹⁶⁶ One recent study showed divers were willing to pay \$93 to \$110 more to dive with abundant fish life.¹⁶⁷
- Without new regulations the potential for increasing losses is real.
 - Inability to stem declining reef fish numbers could cause significant losses to dive tourism industry (i.e. reductions in willingness to pay).¹⁶⁸
 - These consumer surplus losses could range from \$1.2 million to \$12.2 million annually.¹⁶⁹
 - Areas with degraded reefs and low fish populations could also see significant losses from a decrease in their share of the global dive market.¹⁷⁰
 - Anecdotal reports from long-time residents and visitors point to revenue loss already occurring from reduced abundance of beautiful fishes on Hawai'i reefs.

H. Failure to Assess Impacts to Passive Use Value

The DEIS fails to acknowledge and address the effects of the trade on the substantial non-use values of this marine life and their coral reef homes and propose proper mitigation measures. Intrinsic and social values associated with coral reefs are diminished by reduced fish populations. Concern for the marine environment has increased in recent years and people now place tremendous value on coral reef ecosystems. Many people value beautiful and healthy coral reef ecosystems as part of their legacy and responsibility to ensure future generations are able to experience them. A 2011 report for the National Oceanic and Atmospheric Administration (NOAA) estimated the passive use annual value of Hawai'i's coral reef ecosystems through a willingness to pay survey of U.S. households. The survey included a visual representation of an overfished and an abundant coral reef (see Fig. 8).

¹⁶⁵ Davidson et al. (eds.) (2003); FORCE Management Brief #4 for Caribbean Reef Management (P7/2007-2013).

¹⁶⁶ Davidson et al. (eds.) (2003).

¹⁶⁷ FORCE Management Brief #4 for Caribbean Reef Management (P7/2007-2013).

¹⁶⁸ FORCE Management Brief #4 for Caribbean Reef Management (P7/2007-2013).

¹⁶⁹ FORCE Management Brief #4 for Caribbean Reef Management (P7/2007-2013).

¹⁷⁰ FORCE Management Brief #4 for Caribbean Reef Management (P7/2007-2013).



Fig. 8. Survey excerpt: NOAA Economic Value for Protecting and Restoring Hawaiian Coral Reef Ecosystems.¹⁷¹

The project determined that increased protections and restoration of degraded coral reefs in Hawai'i is worth about \$288 to the average U.S. household which aggregated over all U.S. households amounts to a \$34 billion annual passive use value for Hawai'i's coral reefs.¹⁷² This and other socio-economic values described here provide meaningful insights into the public's concerns and should be addressed in a comprehensive DEIS.

I. Failure to Assess Impacts to Aquatic Life Post Capture

A major factor that drives the rates of collection is premature mortality rates in captivity. According to a long-time industry insider, most Yellow Tangs die with the first month in a hobbyist tank and fewer than 1% of those captured survive one year in captivity.¹⁷³ A 2012 study determined that mistreatment in capture, handling, transport, and holding plays a larger factor in these premature deaths than hobbyist inexperience.¹⁷⁴ Hawai'i's Yellow Tang ranks among the top ten fish sold in the marine aquarium trade.¹⁷⁵ As such, it was prominently featured in the study, in both the consumer survey, as one of the nine fish species featured, and in the supply chain analysis, as one of the eighty-five species analyzed which included eleven other species that are captured both in Hawai'i and elsewhere in the Indo-Pacific.¹⁷⁶ The researchers also determined that each step in the supply chain significantly profits from customer purchases to replace fish that die prematurely, and

¹⁷¹ Bishop et al. (2011).

¹⁷² Bishop et al. (2011).

¹⁷³ Fenner, FAQs About Yellow Tangs 4; Fenner. Marine Life Use in the Aquarium Hobby.

¹⁷⁴ Cartwright et al. (2012).

¹⁷⁵ DLNR Aquarium Catch Reports; Rhyne et al. (2015).

¹⁷⁶ Cartwright et al. (2012).

that profits from replacement fish sales are so high, stores have no incentive to take action to reduce deaths.¹⁷⁷

A number of practices frequently utilized as cost saving measures by the aquarium trade in Hawai'i are inhumane and significantly contribute to the stressors that accumulate and ultimately lead to premature deaths of captive marine life. They include rapid surfacing and subsequent use of a technique known as "fizzing" to mitigate the resulting barotrauma injury to swim bladders; starving fish for 2 - 10 days prior to transport and spine cutting. Alternatives to these practices include slow surfacing, transport in larger volumes of water to dilute any waste produced by fishes during transport, and transport in hard plastic containers that cannot be punctured by fish spines.

Every fish that dies early puts extra pressure on natural resources because of the take of replacements. There is a general consensus in many countries that it is not ethical to trade in live animals, unless their health and welfare are ensured. These unnecessary and early deaths have given the trade a poor image. A \$20 million, multi-stakeholder reform effort failed, in part, because of trade reluctance to address, and take steps to reduce, mortality rates.

Fifty percent of species among Hawai'i's historical top 20 fish list are either not guaranteed to arrive alive or stay alive longer than 7 - 14 days when purchased from online or "brick and mortar" retailers. Examples are found in Appendix 4.

The DEIS erroneously excludes an analysis of impacts to fish and other aquatic life once they are taken, stating "because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population." One of the core requirements of the aquarium collection statute, HRS § 188-31 is that aquatic life taken under the permit is maintained alive and in reasonable health. Aquarium catch reports capture presumed mortalities between capture and sale to marine dealers and indicate that an average of 3% of captured fishes die at this stage of the chain of custody. Self-reporting by a handful of wholesalers report that up to 2% more die while in their custody and an additional 1% - 2% die in air cargo transport. Wholesalers receiving fish from Hawaii report a similar "dead on arrival" rate, and note that the industry standard is to allow up to 5% to arrive dead with no charge-back to the shipper for losses.

Per Appendix A, the Applicants failed to respond to any questions regarding mortality rates. In order to fulfill its statutory duties to exercise discretion in granting permits, DLNR needs the average and maximum annual mortality rates for fish taken by the 14 fishers. Without this information the state has no way of assessing whether these permittees are responsible aquarium collectors that deserve these exclusive privileges. Furthermore, the public needs this information, as well, which is one of many reasons why withholding the identity of the 14 fishers is unacceptable.

V. Flawed Analysis of Cultural Impacts and Lack of Proposed Mitigation Measures

As set forth in HAR §§ 11-200-10 and -16 through -18, a complete analysis and discussion of impacts to cultural resources is required. The EIS must acknowledge and address the direct,

¹⁷⁷ Cartwright et al. (2012).

indirect, and cumulative impacts on cultural resources. The loss and harm caused by the irrevocable commitment of natural resources equally applies to impacts to cultural resources, as well. The EIS must also acknowledge and address the effects of the trade on Native Hawaiians traditional reliance on species targeted by the trade for subsistence, and most importantly, propose proper mitigation measures.

Decades of Applicant actions have directly impacted more than 200 species and indirectly impacted an unknown number of additional vertebrate and invertebrate species found in Hawai'i's coral reefs, one of the most complex ecosystems on Earth, where the fate of each species is determined by the existence, abundance and diverse actions of a multitude of other species that inhabit or otherwise rely upon these unique places.

While the CIA provided an extensive history of native Hawaiians and their symbiotic relationship with the ocean and its animal inhabitants, it completely dismissed the overwhelming oral testimonies in opposition to ¹⁷⁸both past and current trade practices and impacts.

More than 90 percent of those interviewed noted how the trade both directly and indirectly impacts their cultural resources, beliefs, practices and values, yet none of these concerns were included in the conclusion or proposed mitigation measures.

The CIA also failed to propose any substantive mitigation measures to address the biological and various socio-economic impacts to cultural resources and the ethical concerns and harm done to the animals, themselves.

The CIA initially acknowledges *“As stated in the OEQC Guidelines for Assessing Cultural Impacts, the goal of the oral interview process is to identify information ‘relating to the practices and beliefs of a particular cultural or ethnic group or groups’ (State of Hawai‘i, Office of Environmental Quality Control 2012:11). It is our contention that, in addition to assessing the significance of any identified traditional cultural properties, oral interviews should also be used to augment the process of identifying traditional cultural properties.”*

Thus, it is the researcher's responsibility to utilize the gathered cultural-historical background information, as well as the information collected through the consultation process, to identify and describe potential cultural impacts to resources, practices, and beliefs, **and to propose appropriate mitigative measures for those impacts as necessary.**

The DEIS further states: *“As discussed in Section 4.2 and detailed in the CIA, many of the 40 White List Species **have a cultural significance** in Hawai‘i, and **there are distinct differences between the traditional Native Hawaiian approach to fish harvest and management and the western model approach**”* (emphasis added).¹⁷⁹

¹⁷⁸ CIA at 104.

¹⁷⁹ DEIS at 91.

However, the above statements and subsequent lack of proposed mitigation measures, do not reflect these findings. Fifty-five individuals were consulted for the CIA, 50 of whom voiced strong concern with the trade.

The CIA further concludes that “***...if the issuance of commercial aquarium permits leads to a significant depletion of the populations of the above-mentioned species (either directly or indirectly through habitat disruption), then the result would be a cultural impact. Conversely, if the biological assessments (conducted by others) indicate that the issuance of the fourteen commercial aquarium permits will have no significant effect on either the fishes or their habitat, then the issuance of the permits would not result in a cultural impact***” (emphasis added).¹⁸⁰

As discussed earlier, the biological assessments used to analyze the impacts of the trade is extremely flawed, thus, the above conclusion, that the issuance of 14 permits will have no significant impact, is equally, inherently flawed.

We continue to agree with a number of concerns earlier raised by DLNR, and respectively, the Office of Hawaiian Affairs (OHA):¹⁸¹

*“Cultural impacts of aquarium fishing need significantly more analysis than provided in the FEA. The OEQC guidelines should be followed for assessing cultural impacts, including consulting with traditional cultural practitioners and other knowledgeable informants and sources about cultural resources, cultural practices, and the proposed action's potential impacts. Traditional Hawaiian practices and subsistence uses, local place-based and life-cycle knowledge, and traditional Hawaiian cultural significance of each type of aquarium fish taken should be reviewed. **The indirect impact of modern technologies for highly efficient catch methods on traditional harvest capabilities should be included in the analysis**”* (emphasis added).

The DEIS failed to respond to our questions regarding what type of gear/nets are currently being used to collect animals (outside of fine mesh nets). The CIA failed to include a discussion on gear types or recommend any regulations or prohibitions on the use of aquarium collection gear, that allows for the take of hundreds more animals per day, than if using traditional subsistence fishing methods. Further, there is no discussion about additional species take-prohibitions, bag limits (less reducing the daily bag limit of Achilles Tang from 10 to 5), “pono” fishing practices, the foundation of which is taking only what is needed, or a discussion on “resting” (closing) certain areas from commercial extraction.

OHA also states it “*anticipates that the DEIS will include a broader scope of analysis and **include a consideration of all consequences on the environment, including both direct and indirect effects**, in accordance with Hawai‘i Administrative Rules § 13-200-17(i)...*” yet the scope of the discussion of impacts is limited to 14 collectors who made up nearly 80 percent of the total catch even in years when not all 14 collectors were reporting take. The CIA also fails to include any legally

¹⁸⁰ CIA at 135.

¹⁸¹ CIA at 4; DEIS at 359.

required proposed mitigation measures, to address cumulative (past, present and reasonably foreseeable future) impacts to cultural resources.¹⁸²

In yet another gross contradiction, the CIA states that: “According to those guidelines: In scoping the cultural portion of an environmental assessment, the geographical extent of the inquiry should, in most instances, be greater than the area over which the proposed action will take place. This is to ensure that cultural practices which may not occur within the boundaries of the project area, but which may nonetheless be affected, are included in the assessment. (State of Hawai‘i, Office of Environmental Quality Control 2012:11) For this reason, for assessing the potential cultural impacts of the issuance of fourteen commercial aquarium permits within the WHRFMA, the entire fishery management area along the **western coast of Hawai‘i Island** is considered, not just those areas within which commercial aquarium fishing will be permitted. To Hawai‘i’s host culture, the ocean is viewed as an integrated whole, flowing unrestrained by politically imposed boundaries...” but fails to consider the impacts to the entire island of Hawaii, including the East side of the island which is seeing increased take rates from those seen in the past, with no disclosure or discussion of current gear-take methods, or the impacts of reducing species in one area impacting their health and abundance in other areas.¹⁸³

The CIA concludes with the following inadequate and/or unmeasurable recommendations, that in no way could be considered substantive mitigation measures, especially based on the numerous oral interviews and testimonies proposing a full closure of the trade or significant remedies to past and continuing conflict:

*“It is clear that the nearshore waters of West Hawai‘i Island, along with all of its contributing tangible and intangible elements and associations, could be considered a traditional cultural property significant under Criteria a, b, and e. Having a comprehension of the traditional cultural significance of nearshore waters of West Hawai‘i Island by all of its user constituencies, is a first step in ensuring that the activities of any one user group does not in any significant way conflict with the activities of another user group. As part of any future permitting processes associated with the WHRFMA, **it is recommended that DLNR-DAR provide to potential permit issues a document that provides a synopsis of the traditional cultural significance of the fishery**”* (emphasis added).¹⁸⁴

It is woefully inadequate to attempt to simplify this complex issue by only providing collectors with “a” document. There is no way to ensure that collectors even read the document let alone take any actions not to impact cultural resources, beliefs and practices.

The CIA then states: “... the authors recommend that PIJAC, and any commercial aquarium fishers who intend to conduct their operations within the WHRFMA, **consider developing or partnering with governmental and/or local organizations to help improve the management and**

¹⁸² DEIS at 359

¹⁸³ CIA at 4.

¹⁸⁴ CIA at 135.

sustainability of the nearshore fishery as a means to not only sustain, but actually improve reef-fish populations in the take areas... (emphasis added).¹⁸⁵

The CIA notes that aquarium collectors should “*consider developing or partnering with governmental and/or local organizations to help improve management and sustainability of the nearshore fishery...*” yet fails to provide even the most basic information, timeline or explanation as to how any partnership would proceed. The CIA further states the hope of improving reef-fish populations in the take areas, yet goes on to support the status quo, “*it is recommended that the existing bag limits and no-take areas within the WHRFMA remain in-place...*”.¹⁸⁶

The CIA adds “*Furthermore, it is recommended that the applicant (PIJAC) continue to work with the approving agency (DLNR), and the various other user groups within the WHRFMA, to **help improve the transparency of the accounting methods for fish takes, and the enforcement of the existing rules and regulations that govern those takes.** With respect to limiting the potential for cultural impacts, DLNR-DAR plays a significant role in managing and enforcing the rules and regulations that are intended to support the sustainability, viability, and fecundity of the WHRFMA . . .*” yet provides no information or guidance on actually improving the transparency of catch/accounting records and enforcement. This approach removes any all responsibility and accountability from the collectors and offers no solutions to the issues of enforcement, compliance and oversight.¹⁸⁷

The CIA continues, “*As voiced by many of the consulted parties, the lack of support and funding have hampered DNLR DAR’s ability to fulfill its fiduciary responsibility, namely to enhance, protect, conserve, and manage Hawai’i’s unique and limited resources, which are supposed to be held in public trust for the current and future generations of the people of Hawai’i nei, and visitors alike. While achieving this goal is not an easy task, and it certainly cannot be achieved by any single means, **DLNR-DAR should be proactive in seeking additional funding sources, and work with the various user groups who are most familiar with the WHRFMA, including the commercial aquarium fishers, to improve its enforcement capacity***” (emphasis added).¹⁸⁸

Again, this empty statement provides no information on mitigation measures, including proposed regulations, or funding sources, that could encourage better compliance or enforcement.

Finally, the CIA notes “*As expressed by multiple community members, the lack of enforcement by DLNR-DAR has resulted in community members feeling the need to police their respective areas themselves, which ultimately diverts time and energy from their desire to educate the next generation of Hawai’i and to perpetuate their own cultural practices. As part of improving enforcement, as expressed by some of the consulted parties, the **DLNR-DAR should consider incorporating more traditional Hawaiian fishery resource management practices (as detailed above) into the management of the WHRFMA, and representatives from the aquarium fishing industry should continue to work with the other user constituencies (i.e., Native Hawaiian organizations) that maintain an interest in the WHRFMA***” yet fails to include any discussion on what, if any, traditional

¹⁸⁵ CIA at 135

¹⁸⁶ CIA at 135

¹⁸⁷ CIA at 135

¹⁸⁸ CIA at 135

Hawaiian fishery resource management practices should be considered, when they might be considered or how.¹⁸⁹

In summary, the CIA remains extremely flawed and inadequate, with its inherent purpose-- to identify cultural impacts and propose mitigations measures to limit such impacts, not being met.

VI. Additional Deficiencies

A. Lack of Meaningful Alternatives Analyses

The DEIS does not propose or consider adequate alternatives. The Limited Permit Issuance Preferred Alternative is not reasonable, as is required by HEPA.¹⁹⁰ The Preferred Alternative ignores the vast majority of comments submitted on the DEA, FEA and by the consulted parties. Instead, it focuses on just one species, the Achilles Tangs and ignores the many comments naming locations where the impacts of collecting pressure are of concern. The conclusion that no significant adverse effects would occur as a result of the Preferred Alternative is erroneous and unsupportable,

The Agency's letter of determination stated that "because the applicant can propose but not ensure regulations aimed at protecting and restoring populations of aquarium fish, [the Agency] is interested in proposals for self-regulation by aquarium permit holders which could be incorporated into permit conditions even in the absence of or prior to establishing other regulations to accomplish the same purposes."¹⁹¹ We dispute the value of any self-regulation measure. Meaningful change must be binding on the industry, and a meaningful alternatives analysis requires the Applicant to propose binding measures. Here, the Applicant proposed neither self-regulation nor binding measures.

A reasonable alternative would require the Agency to first determine:

- 1) the life history, spawning grounds and offspring/recruitment patterns for each species to be collected for aquarium purposes (see DLNR list of aquarium species at Appendix 5);¹⁹²
- 2) natural abundance (i.e. unfished) levels and complete stock assessments, for each collection zone, for those same species (see DLNR map of aquarium fish zones at Appendix 6);¹⁹³
- 3) a definition for "sustainable" as it relates to the natural abundance of coral reef species taken in Hawai'i for aquarium purposes; and
- 4) annual total allowable catch, by species, designed to restore and then sustain natural abundance levels, with negligible impacts as defined in the Queensland Ecological Risk Assessment of the Marine Aquarium Fish Fishery, for each species to be taken for aquarium purposes, in each zone.¹⁹⁴

¹⁸⁹ CIA at 136

¹⁹⁰ See HAR. § 11-200-10(7).

¹⁹¹ DLNR HRS Chapter 343, Final Environmental Assessment, Notice of Determination for Hawai'i at 3 and for O'ahu at 3.

¹⁹² See DLNR Aquarium Fish Trip Report

¹⁹³ See DLNR Aquarium Fish Trip Report

¹⁹⁴ See Roelofs (2008) for a useful guide for describing the range of impacts to populations of target species in marine aquarium fisheries.

After making these necessary threshold determinations, the Agency should issue limited numbers of Aquarium Permits, by zone and by species with corresponding total allowable catch limits, per the above parameters. Additionally, the Agency should require Aquarium Collection Permits, for all take for aquarium purposes, regardless of the method of collection.

B. Lack of Mitigation Measures

HEPA also requires an EIS to consider mitigation measures.¹⁹⁵ With minor exceptions, such a discussion is plainly absent from the DEIS. Decades of Applicant actions have directly impacted more than 200 species and indirectly impacted an unknown number of additional vertebrate and invertebrate species found in Hawai'i's coral reefs, one of the most complex ecosystems on Earth, where the fate of each species is determined by the existence, abundance and diverse actions of a multitude of other species that inhabit or otherwise rely upon these unique places. Yet, the DEIS claims there are no significant impacts whatsoever, and therefore, proposes no mitigation measures outside of the bag limit for Achilles tang found in the Preferred Alternative.¹⁹⁶ The DEIS also fails to propose mitigation measures to address biological and related impacts to the various socio-economic values described herein, and also fails to propose mitigation for impacts to cultural resources, and for the ethical concerns and harm done to the animals, themselves, also described herein.

VII. Conclusion

For the reasons explained above, the DEIS is patently insufficient in its analysis of the impacts of commercial aquarium collection permits.

A serious overhaul of aquarium fish permitting in Hawai'i is needed.

Because currently there are not restrictions on the number of collection permits or the amount of take per species under a fine mesh net (i.e. aquarium) permit or commercial marine license, the impact that collection may have on target species must be evaluated before issuing permits. As such, each aquarium collection permit or commercial marine license issued for aquarium collecting must show the total allowable catch, per species and ideally per zone that permit holders must follow to prevent unsustainable fishing. Catch limits per species and per zone should be calculated in conjunction with input from all stakeholders and based on the stock assessment for each target species in the specific areas where they will be allowed to be taken under a permit.

The legislature has decreed it the "policy of the State" that DNL and other agencies must "[c]onserve natural resources . . . by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics . . ." ¹⁹⁷ The Agency must also "[e]ncourage management practices which conserve . . . all natural resources," and encourage all individuals "to fulfill the responsibility as trustees of the environment for the present and succeeding generations."¹⁹⁸ In enacting HEPA, the State legislature found "that the quality of

¹⁹⁵ HAR. § 11-200-10(7).

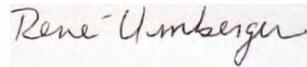
¹⁹⁶ DEIS at 19.

¹⁹⁷ Haw. Rev. Stat. § 344-3(1).

¹⁹⁸ Haw. Rev. Stat. § 344-4(2)(A), (10)(A).

humanity's environment is critical to humanity's well-being, [and] that humanity's activities have broad and profound effects upon the interrelations of all components of the environment . . .”¹⁹⁹
The Agency simply cannot meet these mandates by continuing to allow unlimited aquarium collection, in light of the serious environmental consequences of those permits.

Respectfully submitted,



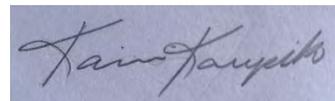
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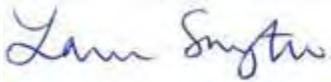
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¹⁹⁹ Haw. Rev. Stat. § 343-1.

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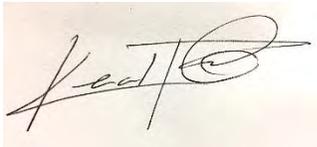
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Appendix 1

Outstanding Questions from Consultation

APPENDIX A

Outstanding Questions

The below questions were prompted after we were made aware of the limited geographic scope of the forthcoming DEIS, to include only West Hawaii, as well as the DEIS's intent to provide exclusive aquarium collection privileges to 14 individuals, which was contrary to the earlier Draft Environmental Assessments (DEAs). Stantec's failure to provide this crucial information to all Consulted Parties limited some of the Consulted Parties' ability to meaningfully comment, and undermined HEPA's notice requirements.

Despite our objections to this flawed process, we submitted the below comments and questions to Stantec in an effort to inform and improve the DEIS and ensure that they were thoroughly evaluating the environmental impacts of this proposed action pursuant to HEPA. Stantec's response to our concerns with compliance with the HEPA process simply stated "*Comment noted. The commenters were included in the consultation process for the DEIS.*"

Therefore, below are our **outstanding questions** and in red, those questions that were inadequate in their response, or were not answered, and thus await DLNR's response. Stantec's responses are italicized:

1. What are the **environmental benefits** of removing tens to hundreds of thousands of animals annually for the West Hawaii aquarium trade?

Response: Comment noted.

No environmental benefits were provided by Stantec.

2. Why is the proposed DEIS limited to West Hawaii? Collection continues in East Hawaii and at even greater rates since the Supreme Court of Hawaii's September 2017 opinion. Why would other areas of collection be excluded? Do the 14 collectors propose to collect only in West Hawaii, or is this due to the need for an additional West Hawaii permit to take in this area?

Response: Comment noted. The DEIS evaluates the impact of commercial aquarium collection on the entire island of Hawai'i. However, the Applicant is not requesting any permits to be issued for East Hawai'i...

Aquarium Collection permits issued under HRS 188-31 are issued statewide and necessary in order to have a West Hawaii aquarium fishing permit thus, it is not accurate/incorrect to state that the applicants are not requesting any permit to be issued for East Hawaii. Further, Stantec fails to state if the applicants have or will be fishing in East Hawaii or other areas, as we explicitly asked.

Under the Preferred Alternative, 14 individuals would be provided exclusive access to take aquarium fish in the WHRFMA and use fine mesh nets, privileges that no other person would otherwise have. Given these 14 applicants are requesting special permission to access and remove constitutionally protected public trust resources, the below information is needed to explain how

and why these 14 applicants should be granted this exclusive access, that would otherwise be denied to others.

Inadequate response. Awaiting response from DLNR.

3. Please identify the 14 applicants by name and business name (DBA).

Response: Comment noted. The applicant information is provided in the DEIS.

Stantec claims the information on the 14 applicants is provided in the DEIS however, they only list PIJAC as the applicant. We repeatedly requested this information from Stantec and they never responded. We await this critical information. PIJAC is not an individual/collector nor are they a/the person who would potentially apply for, possess the necessary permits and engage in the activity (aquarium collecting) that is subject to HEPA. Again, given these 14 individuals/collectors are requesting exclusive access to natural resources, otherwise denied to all others, we need the name and business name of the collectors.

This information is not privileged and is routinely disclosed any time an individual is requesting permission to potentially alter or degrade the environment, or access a resource held in the public trust.

Further, as defined under HEPA, an Applicant is “Any person who, pursuant to statute, ordinance, or rule, officially requests approval for a proposed action. Under HEPA, an applicant cannot be an agency, nor can an agency be an applicant. This mutual exclusivity establishes an important boundary in HEPA and serves to divide the universe of actions in one of two different areas: applicant actions (see Section 343-5(c), HRS) or agency.

Inadequate/no response. Awaiting response from DLNR.

4. How many reef animals have been taken by the 14 applicants in the past decade (list per year, per species and method of collection) and in what area, and how many are the applicants proposing to take each year for the next decade (list per species and method)?

Response: Comment noted. The average and maximum collection by species of the 14 fishers has been added to Table 5-11. It should be noted that these fishers waived their right to confidentiality, and as such, this includes all their collected numbers from 2000 through 2017 (no data are excluded due to Hawai'i confidentiality laws). The collection numbers are limited to the WHRFMA for the analysis. It is assumed for the environmental consequences that the collection rates seen over the past 18 years will remain relatively the same over the 5-year analysis period, though the maximum collection is also included in the analysis. Collection would occur via fine mesh nets or other legal methods.

This is not correct nor accurate. As discussed in more detail in our comments, all 14 fishers either did not fish or did not disclose their catch in the data provided. In some years as few as 3 collectors reported taking in the WHRFMA. This grossly underestimates the impacts of 14 collectors in the WHRFMA. Moreover, the DEIS assumes that aquarium collection without the use of fine-mesh gear will continue “legally” in East Hawai‘i; however, as indicated in a letter dated January 7, 2020, from Earthjustice to DLNR (attached as Appendix 8), such collection also requires HEPA review, which currently is not being conducted. If this purportedly “legal” collection were halted pending

environmental review, then the 14 collectors would have even greater incentive to increase collection levels in West Hawai'i in the meantime. The DEIS fails to consider this effect.

5. Have any of the applicants been charged with any offense related to the aquarium trade or occurring during the course of aquarium trade activities, or county or state natural resource related offenses? If so, include date, offense and outcome of each offense.

Response: Comment noted. We do not possess this information. Enforcement and information occurring during the course of aquarium trade activities, or county or state natural resource concerning it is within the purview of the State of Hawaii.

Stantec could have asked the 14 applicants for this information. Given they chose not to provide this information we are requesting this information from DLNR. Again, given the 14 collectors are requesting exclusive privileges and access that no other person would have, it is in the interest of the public and the state, if these 14 collectors have been charged with any criminal or natural resource violation (i.e. at least 1 collector was criminally charged with attacking a diver in the WHRFMA in the past).

Inadequate response. Awaiting response from DLNR.

6. What steps will be taken by the 14 applicants to reduce the impacts of climate change, specifically, coral bleaching and ocean temperature rise, which is predicted to occur more frequently and more severely over the next decade, given they will be removing thousands of herbivorous species?

The environmental review must fully disclose the changing baseline from climate change and the effects of the proposed activities on the reef in light of climate change. The [Fourth National Climate Assessment](#), released in late 2018, projects that by 2040 Hawaii's coral reefs will bleach annually which will result in the loss of 71% of the state's current coral reef cover by mid-century, and 99% by 2100. Unprecedented coral bleaching across Hawaii and especially in West Hawaii has already occurred: back-to-back years of increased sea temperatures in 2014 and 2015 caused 50% of bleached corals to die in West Hawaii.

Further, on August 23, 2019, the Hawaii Dept. of Land and Natural Resources (DLNR) warned of possible severe and widespread coral bleaching across the state within the next two months as the result of sea temperatures that are currently 3 degrees above normal. Because temperatures are expected to rise even further, this bleaching event will likely be even worse than the one that damaged so many of Hawaii's reefs 4 – 5 years ago. Reefs in West Hawaii are already showing signs of stress such as bleaching and both DLNR and the National Oceanic and Atmospheric Administration (NOAA) have asked the public to take actions to minimize any additional stress to Hawaii's reefs. Notably, among the actions to be avoided are many that are widespread and/or inherent to the aquarium trade, referenced below.

Response: Comment noted. There is no evidence that suggests that commercial aquarium collection is a major contributor to climate change, including coral bleaching or ocean temperature rise...

Our question did not suggest that aquarium collection *causes* climate change but that collection exacerbates the impacts of climate change, which include coral bleaching and ocean temperature rise and the removal of herbivores, which is discussed further in our comments.

7. How will the 14 applicants 1) specifically comply with the following recommended actions, and, given the extremely limited enforcement resources and capabilities of DLNR, 2) how do they propose to show compliance with these recommended actions?
 - Reduce or stop taking herbivorous fishes such as surgeonfish which are needed to keep algae growth under control so as not to smother and kill corals stressed from bleaching
 - Avoid touching, standing in corals
 - Keep vessel anchors and chains off corals

Inadequate response. Stantec failed to provide any information on how the 14 collectors would comply or show compliance with DLNR's recommended actions.

Inadequate response. Awaiting response from DLNR.

8. How do the 14 applicants propose to prevent population reductions of reef species when, outside of the current court order, there are **no limits on**:
 - the issuance of West Hawaii aquarium collection permits
 - the issuance of State aquarium collection permits
 - the issuance of Commercial Marine Licenses
 - caps on the issuance of the above permits or a limited entry program
 - the use of certain types of gear that may be detrimental to the environment
 - overall take (Total Allowable Catch)
 - area/geographical limitations outside of "no take" areas
 - collection of species outside of the "white list"
 - number of "white list" species that may be taken

Aside from reducing the bag limit of Achilles Tang, Stantec failed to respond to any of the above questions. Further, they premise their Preferred Alternative on rules, regulations or legislative changes that the Applicants are not in a legal or policy position to change. Only DLNR, with public input, could make the changes necessary to amend or create a new permitting process to limit statewide issued aquarium collection permits (issued under HRS 188-31) to a specific geographic area and change the West Hawaii aquarium permit process to limit issuance to only 14 individuals. No other case is known where a proposed alternative subject to HEPA is contingent upon a state action(s) that has yet to be undertaken. A proposed action or alternative must be described in its entirety and cannot be broken up into component parts, as suggested in the preferred alternative that has yet to be initiated if at all. Per HEPA this could be considered a phased project (involving a later phase that cannot be fully described) or "segmenting", which is generally forbidden under HEPA.

This proposal further exemplifies the flawed process as the Applicants are proposing policy and legal changes that have yet to be implemented and are subject to the public input process and other approvals (BLNR, DLNR, state legislature). On pages 17-18 of the DEIS Stantec states *"The Applicant has no legislative or regulatory authority and cannot create, eliminate, or alter conservation areas*

(e.g., MPAs, FRAs, MLCs); create, eliminate, or alter current regulations (e.g., bag and size limits, season length, permit term); or change reporting requirements. Despite this, during the public comment period on the Draft EA Draft Environmental Impact Statement Alternatives 18 that was published on April 8, 2018, in response to DLNR concerns and in coordination with the DLNR, the Applicant developed an alternative that required regulation creation by DLNR (i.e., implementation of bag limits)."

Please clarify if DLNR-DAR coordinated with and made any commitments to the Applicants about undertaking such regulatory/statutory changes, without notifying the public about such proposed actions, that must be disclosed immediately.

Inadequate/no response. Awaiting response from DLNR.

9. The Hawaii Department of Land and Natural Resources (DLNR), specifically the Division of Aquatic Resources (DAR) and their enforcement arm, the Division of Conservation and Resource Enforcement (DOCARE) has severely restricted resources, such as inadequate staff and funding for enforcement, and there are current statutory restrictions on searches of certain containers carrying marine life and certain vessels.

How do the 14 applicants propose that enforcement will be achieved on any proposed limits to their activities, including verifiable compliance with current administrative rules, and state and federal laws, including those listed below. How are the 14 applicants currently complying?

- Federal Lacey Act requirements USC Title 16
- Hawaii Misdemeanor Cruelty to Animals statute HRS 711-1109

Response: Comment noted. Enforcement is within the purview of the State of Hawaii.

Stantec fails to respond to our questions or provide any information as to their required compliance with the federal Lacey Act, specifically how they are complying with labeling and documentation laws when shipping live animals, or HRS 711-1109 which prohibits the starvation or abuse of animals. Animals are defined in HRS 711-1100 as "any non-human animal."

They also failed to provide any information on what they will do to assist with enforcement given DOCARE's limited resources, staff and restrictions on inspections. The applicants/collectors fail to show any earnest interest in proposing any actions to assist with their complying and cooperating with law enforcement.

Inadequate/no response. Awaiting response from DLNR.

10. The commercial aquarium trade has long operated with fewer regulations, oversight and compliance-verification mechanisms than those that commercial food fisheries must adhere to. Further, while the issuance of aquarium collection permits is discretionary, and subjects the permit holder to certain legal obligations, including inspection of facilities holding marine life, many of these regulations have not been actively enforced. For clarification, do the 14 applicants cooperate and comply with the following:

- provide open and immediate access to coolers, containers, vessels and other aquarium related gear, equipment and holding facilities upon request of a DLNR-DOCARE Officer, as per the conditions of their permits?
- allow observers on their vessels with/without notice?

Response: Comment noted. Permit holders must comply with law. Enforcement is within the purview of applicants cooperate and comply with the following: the State of Hawaii.

Again, Stantec fails to respond to the questions or propose any applicant actions to mitigate potential violations, or to encourage or assist law enforcement. This same issue was raised in DLNR's rejection of the EA and was not addressed by the applicants.

Inadequate response. Awaiting response from DLNR.

11. The earlier DEAs for the aquarium trade failed to include data and records which are not readily accessible to the public and other interested parties. Please provide the necessary data and response to the following to address our outstanding concerns with enforceability of the above-referenced laws specifically as it relates to animal health, welfare and mortality rates:

- a) Thousands of fish have been taken since the Supreme Court opinion and subsequent District Court orders were issued in September and October of 2017 which prohibited the use of fine mesh nets (nets with a mesh less than 2 inch). Ninety plus percent of catch prior to the court ruling involved the use of fine mesh nets.

Please explain in detail the gear and method(s) of collection **currently** (October 2017 to present) used by each of the 14 applicants and for what species. If the 14 collectors did NOT collect during this period please provide that information as well.

Response: Comment noted. Within the WHRFMA, collection of aquarium fish is not occurring under any method. In East Hawai'i, collection can occur without fine mesh nets...

Stantec again fails to answer the questions, including providing info as to if and who is collecting in East Hawaii, and what methods of catch are currently being used by the applicants if collecting in East Hawaii, given the use of fine mesh nets are prohibited and 90+ percent of collection prior to the court ruling was performed with fine mesh nets.

Inadequate/no response. Awaiting response from DLNR.

- b) Per HDOA intrastate shipment records, thousands of fish have been shipped since the above-referenced court order took effect. For the 14 applicants please provide:
 - how many fish/animals were shipped by each applicant per month since October 2017 to the present and;
 - specifically where these fish/animals were shipped to (e.g., intrastate to Honolulu, interstate or international) and;
 - the mortality rates for each shipment (a) upon arrival and (b) at 14 days post-shipment;
 - what percentage of animals remain in Hawaii (for resale) versus those who are shipped 1) to the US mainland and 2) international;

Inadequate/no response. Awaiting response from DLNR.

- c) For each of the 14 applicants please note whether the collector is also a dealer. If the collector is not a dealer, provide who the collector sells their catch to;

Inadequate/no response. Awaiting response from DLNR.

- d) For each of the 14 applicants, please note which collectors engage in the following practices in contradiction to HRS 711-1109:

- withholding of food (starvation) and for what period of time;
- flogging or puncturing of the swim bladder;
- cutting of spines or dorsal fins;
- body compression (squeezing animal to force out ejection of fecal matter).

Inadequate/no response. Awaiting response from DLNR.

Appendix 2

This is in response to the UIPA request dated 12/19/2019 that asks DLNR to provide actual numbers of the 14 collectors represented in DEIS Tables 5-2 and 5-11.

DEIS Table 5-2

Information on the actual count of the 14 collectors who fished annually in East Hawaii cannot be disclosed due to data confidentiality, as only a few of the collectors harvested in this area. The count of the 14 collectors who fished in West Hawaii and the combined areas are posted in the table below.

<u>Year</u>	<u>WHRFMA</u>	<u>Combined</u>
2000	4	4
2001	3	3
2002	5	5
2003	7	7
2004	7	7
2005	8	8
2006	8	8
2007	7	8
2008	8	9
2009	7	9
2010	9	9
2011	9	9
2012	9	9
2013	8	8
2014	8	8
2015	9	9
2016	10	10
2017	11	11
2018	Closed	n.a.

DEIS Table 5-11

Information on the actual count of the 14 collectors who fished annually in East Hawaii, West Hawaii and combined areas by the 40 white species cannot be disclosed because of data confidentiality, because for some species, fewer than three collectors harvested it annually.

Appendix 3

All photos courtesy of Paul Cox.

Aquarium Collecting Vessel Anchored off Black Rock Caves, North Kohala 2011



Aquarium Collecting Vessel Anchored off Papa Bay, Milolii, February 2014: prior coral damage apparent in trench adjacent to current anchor location; newly broken coral indicated by bright white pieces.



Aquarium Collecting Vessel Anchored off Papa Bay, Milolii, March 2014 (same vessel as in images for Feb. 2014).



Aquarium Collecting Vessel Anchored off Papa Bay, Milolii, September 2014: (different vessel from Feb/March photos).





Aquarium collectors crawling through coral wearing knee pads. Note: none of these divers are wearing buoyancy control devices—used to maintain neutral buoyancy above the coral—which are standard equipment for recreational scuba divers. Instead they use a backpack designed to contribute to negative buoyancy, along with weight belts.





Fins, sticks, nets, buckets in the coral



Appendix 4

Live Arrive/Stay Alive Restrictions on Guarantees

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Bandit Angelfish

QUICK FACTS

Scientific Name	Apolectichthys aruatus
Reef Compatible	With Caution
Care Level	Expert-only
Disposition	Semi-aggressive
Minimum Tank Size	100 gallons
Mature Size	7 inches
Diet	Omnivore
Range	Hawaii
Size Class	9

Curator's Note
The Bandit Angelfish is best kept in marine aquariums using live rock for filtration or decoration. They are natural sponge eaters and will graze on the rock work until they can weaned onto prepared foods.

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Zoanthids	Shroom Grab Bag	BZA Mixed Polyp Rock
Lawnmower Blenny	Polyp Grab Bag	Blue Tang
Yellow Tang		

Item #	Description	Price	Quantity	Stock Status
000075	Bandit Angelfish, Small: over 1.5-2", Hawaii * Restriction On Guarantee	\$2,499.95		email me
000076	Bandit Angelfish, Medium: over 2-3", Hawaii * Restriction On Guarantee	\$1,899.95		email me
000078	Bandit Angelfish, Large: over 3-4.5", Hawaii * Restriction On Guarantee	\$1,999.95		email me
000080	Bandit Angelfish, X-Large: over 4-5", Hawaii * Restriction On Guarantee	\$1,999.95		email me

*Due to availability and individuality of each species, colors and sizes may vary.

Guarantee Restriction:

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Some species do not handle stress from environmental conditions well. These stresses can include poor water quality, harassment from tank mates or confined aquarium conditions. When stressed, these species can lose the ability to ward off infection and disease. Other species have such specialized feeding requirements that is difficult to recreate in a aquarium and may succumb to mal nutrition.

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Blue Stripe Butterflyfish

QUICK FACTS

Scientific Name	Chaetodon frembli
Reef Compatible	No
Care Level	Intermediate
Disposition	Peaceful
Min. Tank Size	75 gallons
Mature Size	5 inches
Diet	Omnivore
Range	Hawaii
Size Class	9

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Item #	Description	Price	Quantity	Stock Status
001583	Blue Stripe Butterflyfish, Small: over 1.5-2", Hawaii * Restriction On Guarantee	\$94.95		email me
001589	Blue Stripe Butterflyfish, Medium: over 2-3", Hawaii * Restriction On Guarantee	\$99.95		email me
001591	Blue Stripe Butterflyfish, Large: over 3-4.5", Hawaii * Restriction On Guarantee	\$119.95		email me

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Fourspot Butterflyfish

QUICK FACTS

Scientific Name	Chaetodon quadrimaculatus
Reef Compatible	No
Care Level	Intermediate
Disposition	Peaceful
Min. Tank Size	50 gallons
Mature Size	6 inches
Diet	Carnivore, Pocillopora polyps
Range	Western Pacific, Hawaii
Size Class	9



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Lawmower Blenny	Polyp Grab Bag	Blue Tang

Item #	Description	Price	Quantity	Stock Status
003735	Fourspot Butterflyfish, Small: over 1.5-2", Hawaii * Restriction On Guarantee	\$54.95	<input type="text"/>	email me
005913	Fourspot Butterflyfish, Medium: over 2-3", Hawaii * Restriction On Guarantee	\$64.95 ON SALE \$51.96	<input type="text"/>	in stock
003737	Fourspot Butterflyfish, Large: over 3-4.5", Hawaii * Restriction On Guarantee	\$89.95	<input type="text"/>	email me

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Appendix 5: DLNR Commercial Aquarium Species List (available in DLNR Aquarium Fish Trip Report Booklet)

rev. 9/30/2011

Commercial Aquarium Species List

Angelfishes	(Pomacanthidae)	Butterflyfishes (cont)	(Chaetodontidae)
219 Bandit	<i>(Desmoholocanthus arcuatus)</i>	206 Reticulated	<i>(Chaetodon reticulatus)</i>
223 Fisher's	<i>(Centropyge fisheri)</i>	208 Saddleback	<i>(Chaetodon ephippium)</i>
221 Flame	<i>(Centropyge loricula)</i>	210 Teardrop	<i>(Chaetodon unimaculatus)</i>
225 Masked	<i>(Genicanthus personatus)</i>	203 Thompson's	<i>(Hemitaurichthys thompsoni)</i>
220 Potter's	<i>(Centropyge potteri)</i>	209 Threadfin (Cross-stripe)	<i>(Chaetodon auriga)</i>
Anthias & Groupers	(Serranidae)	224 Tinker's	<i>(Chaetodon tinkeri)</i>
663 Bicolor Anthias	<i>(Pseudanthias bicolor)</i>	390 Cardinalfishes	(Apogonidae)
675 Grammistidae		394 Bandfin	<i>(Apogon menesemus)</i>
650 Groupers, Basslets and Anthias		395 Bay	<i>(Foa brachygramma)</i>
661 Hapu'u Grouper	<i>(Epinephelus quernus)</i>	393 Iridescent	<i>(Apogon kallopterus)</i>
664 Hawaiian Longfin Anthias	<i>(Pseudanthias hawaiiensis)</i>	392 Red	<i>(Apogon erythrinus)</i>
667 Redblotch perchlet	<i>(Plectranthias winniensis)</i>	391 Spotted	<i>(Apogon maculiferus)</i>
660 Roi - Bluespot Grouper	<i>(Cephalopholus argus)</i>	195 Damselfishes	(Pomacentridae)
600 Soapfishes		192 Agile Chromis	<i>(Chromis agilis)</i>
662 Thompson's Anthias	<i>(Pseudanthias thompsoni)</i>	187 Backfin Chromis	<i>(Chromis vanderbilti)</i>
665 Yellow Anthias	<i>(Holanthias fuscipinnis)</i>	181 Blackspot Sergeant	<i>(Abudefduf sordidus)</i>
Blennies	(Blenniidae)	185 Blue-eye Damsel	<i>(Plectroglyphidodon johnstonianus)</i>
440 Blenny	<i>(Blenniidae)</i>	183 Brighteye Damsel	<i>(Plectroglyphidodon imparipennis)</i>
449 Biting	<i>(Plagiotremus goslinei)</i>	191 Chocolate-Dip Chromis	<i>(Chromis hanui)</i>
448 Blue-striped	<i>(Plagiotremus rhinorhynchus)</i>	180 Hawaiian Domino	<i>(Dascyllus albisella)</i>
447 Hump-Head	<i>(Blenniella gibbifrons)</i>	182 Hawaiian Sergeant Major	<i>(Abudefduf abdominalis)</i>
445 Istiblennius spp.	<i>(Istiblennius spp.)</i>	193 Indo-Pacific Sergeant Major	<i>(Abudefduf vaigiensis)</i>
444 Marbled	<i>(Entomacrodus marmoratus)</i>	188 Oval Chromis	<i>(Chromis ovalis)</i>
441 Red Sailfin	<i>(Exallias brevis)</i>	184 Rock Damsel	<i>(Plectroglyphidodon sindonis)</i>
443 Red Speckled	<i>(Cirripectes variolosus)</i>	190 Threespot Chromis	<i>(Chromis verator)</i>
442 White speckled	<i>(Cirripectes obscurus)</i>	189 Whitetail Chromis	<i>(Chromis leucurus)</i>
446 Zebra Rockskipper	<i>(Istiblennius zebra)</i>	186 Yellow-eye Damsel	<i>(Stegastes fasciolatus)</i>
Boxfishes - Trunkfishes	(Ostraciidae)	Eels	Moray & Others
323 Spiny Cowfish	<i>(Lactoria diaphana)</i>	423 Brown Moray	<i>(Gymnothorax steindachneri)</i>
320 Spotted Boxfish	<i>(Ostracion meleagris)</i>	422 Common Moray	<i>(Gymnothorax eurostus)</i>
322 Thornback Cowfish	<i>(Lactoria fornasini)</i>	414 Dark-banded Moray	<i>(Echidna polyzona)</i>
319 Trunkfishes	<i>(Ostraciidae)</i>	417 Dragon Moray	<i>(Enchelycore pardalis)</i>
321 Whitley's Trunkfish	<i>(Ostracion whitleyi)</i>	411 Dwarf Moray Eel	<i>(Gymnothorax melatremus)</i>
199 Butterflyfishes	(Chaetodontidae)	410 Moray	<i>(Muraenidae)</i>
207 Blacklip (Kleini, Coral)	<i>(Chaetodon kleinii)</i>	426 Mustache Conger	<i>(Conger cinereus)</i>
205 Bluestripe	<i>(Chaetodon fremblii)</i>	413 Snowflake Moray	<i>(Echidna nebulosa)</i>
218 Chevron	<i>(Chaetodon trifascialis)</i>	429 Tiger Moray	<i>(Scuticaria tigrina)</i>
214 Fourspot	<i>(Chaetodon quadrimaculatus)</i>	425 Undulated Moray	<i>(Gymnothorax undulatus)</i>
228 Golden Banded	<i>(Prognathodes roa excelsa)</i>	416 Uropterygius knighti	<i>(Uropterygius knightii)</i>
216 Lemon (Citron)	<i>(Chaetodon citrinellus)</i>	415 Uropterygius spp.	<i>(Uropterygius spp.)</i>
222 Lined	<i>(Chaetodon lineolatus)</i>	421 Whitemouth Moray	<i>(Gymnothorax meleagris)</i>
200 Longnose	<i>(Forcipiger flavissimus)</i>	424 Yellowhead	<i>(Gymnothorax rueppelliae)</i>
217 Milletseed	<i>(Chaetodon miliaris)</i>	420 Yellowmargin Moray	<i>(Gymnothorax flavimarginatus)</i>
227 Orange Margin	<i>(Prognathodes basabe)</i>	419 Yellowmouth Moray	<i>(Gymnothorax nudivomer)</i>
213 Ornate (Clown)	<i>(Chaetodon ornatissimus)</i>	412 Zebra Moray	<i>(Gymnothorax zebra)</i>
212 Oval	<i>(Chaetodon lunulatus)</i>	428 Magnificent Snake Eel	<i>(Myrichthys magnificus)</i>
215 Pebbled	<i>(Chaetodon multicinctus)</i>	427 Snake Eels and Worm Eels	<i>(Ophichthidae)</i>
202 Pennantfish	<i>(Heniochus diphreutes)</i>	310 Filefishes	(Monacanthidae)
204 Pyramid (Zoster)	<i>(Hemitaurichthys polylepis)</i>	313 Orange-fin	<i>(Cantherhines dumerilii)</i>
211 Raccoon	<i>(Chaetodon lunula)</i>	312 Redtail	<i>(Pervagor spilosoma)</i>
201 Rare Longnose	<i>(Forcipiger longirostris)</i>	311 Scribbled	<i>(Aluterus scriptus)</i>

Commercial Aquarium Species List

Filefishes (cont)	(Monacanthidae)	Surgeonfishes	(Acanthuridae)
314 Squaretail	(<i>Cantherhines sandwichiensis</i>)	103 Achilles Tang	(<i>Acanthurus achilles</i>)
315 Yellowtail	(<i>Pervagor aspricaudus</i>)	107 Bluelined Surgeon	(<i>Acanthurus nigroris</i>)
169 Goatfishes	(Mullidae)	114 Chevron Tang	(<i>Ctenochaetus hawaiiensis</i>)
170 Bandtail	(<i>Upeneus taeniopterus</i>)	104 Goldrim Surgeon	(<i>Acanthurus nigricans</i>)
176 Kumu - Whitesaddle*	(<i>Parupeneus porphyreus</i>)	113 Kole - Goldring	(<i>Ctenochaetus strigosus</i>)
175 Moana kali - Blue	(<i>Parupeneus cyclostomus</i>)	106 Lavender Tang (Forktail)	(<i>Acanthurus nigrofuscus</i>)
177 Moano - Manybar*	(<i>Parupeneus multifasciatus</i>)	120 Long bodied Surgeon	(<i>Naso brevirostris</i>)
178 Munu - Doublebar	(<i>Parupeneus bifasciatus</i>)	101 Manini - Convict Tang*	(<i>Acanthurus triostegus</i>)
172 Red Weke - Yellowfin*	(<i>Mulloidichthys vanicolensis</i>)	118 Naso Tang	(<i>Naso lituratus</i>)
174 Sidespot	(<i>Parupeneus pleurostigma</i>)	109 Orange-shoulder Surgeon	(<i>Acanthurus olivaceus</i>)
171 White Weke - Yellowstripe*	(<i>Mulloidichthys flavolineatus</i>)	110 Palani - Eyestripe	(<i>Acanthurus dussumieri</i>)
330 Hawkfishes	(Cirrhitidae)	111 Pualu - Yellowfin	(<i>Acanthurus xanthopterus</i>)
331 Arc-eye	(<i>Paracirrhites arcatus</i>)	112 Ringtail Surgeonfish	(<i>Acanthurus blochii</i>)
332 Blackside (Freckled, Forster's)	(<i>Paracirrhites forsteri</i>)	116 Sailfin Tang	(<i>Acanthurus veliferum</i>)
336 Longnose	(<i>Oxycirrhites typus</i>)	119 Sleek Unicorn*	(<i>Naso hexacanthus</i>)
335 Redbar	(<i>Cirrhitops fasciatus</i>)	102 Spotted Tang	(<i>Acanthurus guttatus</i>)
333 Stocky	(<i>Cirrhites pinnulatus</i>)	100 Surgeonfishes	(Acanthuridae)
334 Twospot	(<i>Amblycirrhites bimaculata</i>)	108 Thompson's Surgeon	(<i>Acanthurus thompsoni</i>)
Pipefishes	(Syngnathidae)	121 Unicorn*	(<i>Naso unicornis</i>)
504 Fantail	(<i>Doryhamphus exisus</i>)	117 Unicornfishes	
565 Pipefishes		105 Whitebar Surgeon	(<i>Acanthurus leucopareius</i>)
505 Redstripe	(<i>Doryhamphus baldwini</i>)	115 Yellow Tang	(<i>Zebrasoma flavescens</i>)
566 Seahorses		122 Moorish Idol	(<i>Zanclus cornutus</i>)
567 Spotted Seahorse	(<i>Hippocampus kuda</i>)	307 Triggerfishes	(Balistidae)
349 Porcupinefishes	(Diodontidae)	303 Black	(<i>Melichthys niger</i>)
350 Porcupinefish	(<i>Diodon hystrix</i>)	300 Blue-throat	(<i>Xanthichthys auromarginatus</i>)
351 Spiny Balloonfish	(<i>Diodon holocanthus</i>)	299 Crosshatch	(<i>Xanthichthys mento</i>)
290 Pufferfishes	(Tetraodontidae)	302 Lagoon	(<i>Rhinecanthus aculeatus</i>)
293 Amboy Toby	(<i>Canthigaster amboiensis</i>)	301 Picasso	(<i>Rhinecanthus rectangulus</i>)
291 Crown Toby	(<i>Canthigaster coronata</i>)	304 Pinktail	(<i>Melichthys vidua</i>)
294 Maze Toby	(<i>Canthigaster rivulata</i>)	305 Whiteline, Lei	(<i>Sufflamen bursa</i>)
341 Spotted Puffer	(<i>Arothron meleagris</i>)	130 Wrasses	(Labridae)
342 Stripebelly Puffer	(<i>Arothron hispidus</i>)	157 Belted (Orange-bar)	(<i>Stethojulis balteata</i>)
292 White-spot Toby	(<i>Canthigaster jactator</i>)	151 Bird	(<i>Gomphosus varius</i>)
295 Yellowtail Toby	(<i>Canthigaster epilamera</i>)	150 Blacktail	(<i>Thalassoma ballieui</i>)
400 Scorpionfishes	(Scorpaenidae)	146 Christmas	(<i>Thalassoma trilobatum</i>)
405 Devil Scorpionfish	(<i>Scorpaenopsis diabolus</i>)	131 Cigar (Alligator)	(<i>Cheilio inermis</i>)
403 Green Lionfish	(<i>Dendrochirus barberi</i>)	134 Cleaner	(<i>Labroides phthiropagus</i>)
402 Hawaiian Turkeyfish	(<i>Pterois sphex</i>)	144 Dragon	(<i>Novaculichthys taeniourus</i>)
401 Leaf Scorpion	(<i>Taenianotus triacanthus</i>)	139 Eightline	(<i>Pseudocheilinus octotaenia</i>)
407 Speckled Scorpionfish	(<i>Sebastapistes conioarta</i>)	153 Elegant Coris	(<i>Coris venusta</i>)
406 Titan Scorpionfish	(<i>Scorpaenopsis cacopsis</i>)	160 Flag	(<i>Anampses cuvier</i>)
Squirrelfishes & Soldierfishes	(Holocentridae)	162 Flame	(<i>Cirrhilabrus jordani</i>)
376 Bigscale Soldier	(<i>Myripristis berndti</i>)	140 Fourline	(<i>Pseudocheilinus tetrataenia</i>)
377 Brick Soldier	(<i>Myripristis amaena</i>)	133 Hogfish	(<i>Bodianus bilunulatus</i>)
374 Crown Squirrel	(<i>Sargocentron diadema</i>)	155 Lined Coris	(<i>Coris ballieui</i>)
375 Hawaiian Squirrel	(<i>Sargocentron xantherythrum</i>)	165 Moon (Lyretail)	(<i>Thalassoma lunare</i>)
378 Shoulder-bar Soldier	(<i>Myripristis kuntee</i>)	161 Ornate (Pinkface)	(<i>Halichoeres ornatissimus</i>)
370 Squirrelfish	(Holocentridae)	143 Peacock Razorfish	(<i>Xyrichtys pavo</i>)
373 Whitespot Squirrel	(<i>Sargocentron punctatissimum</i>)	156 Pencil	(<i>Pseudojuloides cerasinus</i>)
		158 Potter's	(<i>Macropharyngodon geoffroy</i>)

Commercial Aquarium Species List

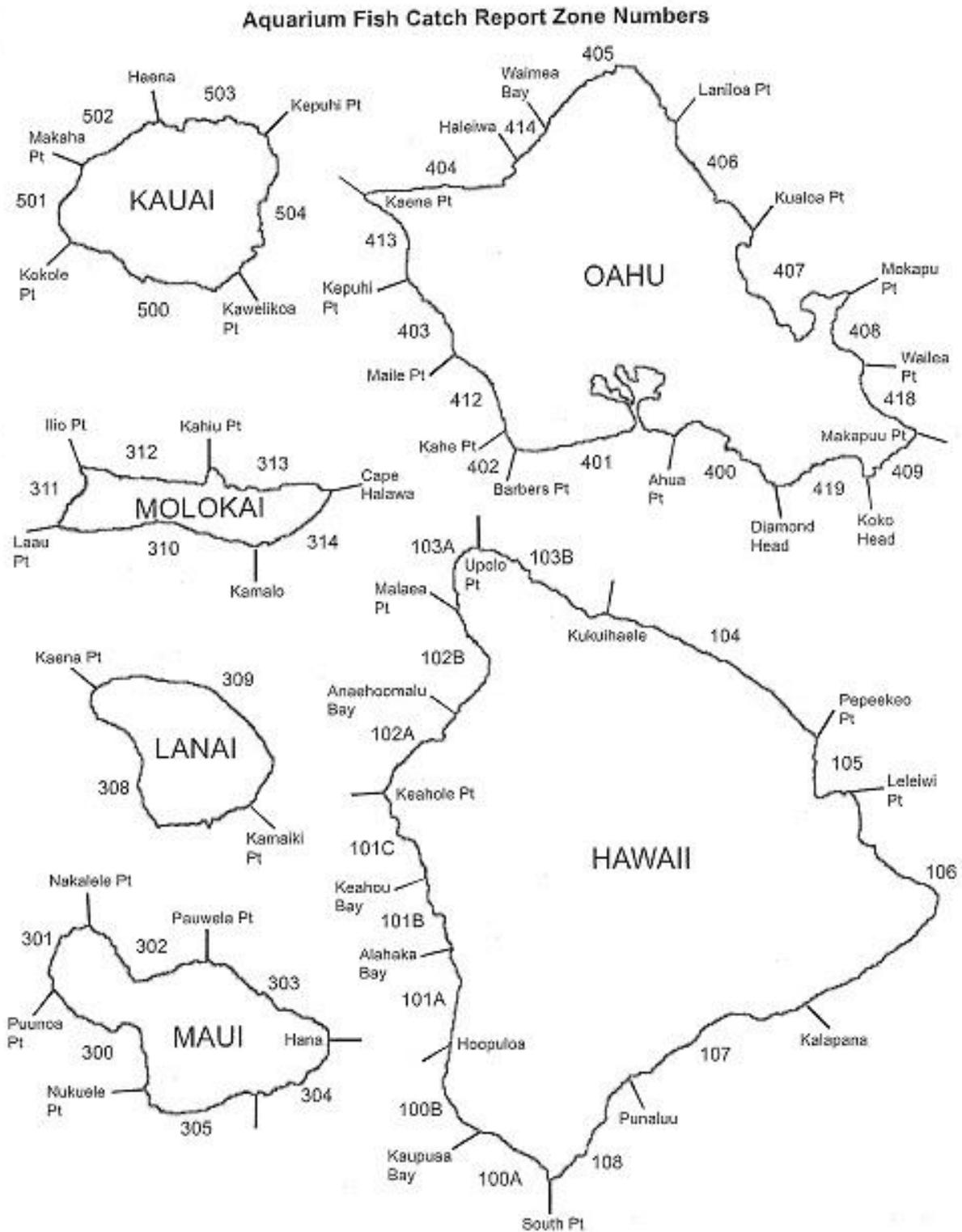
Wrasses (cont)	(Labridae)	Algae (Limu - Seaweed) (cont)	
145 Razorfish	(<i>Xyrichtys umbrilatus</i>)	803 Red Kelp	(<i>Halymenia</i> spp.)
159 Red-tail (Psychedelic)	(<i>Anampses chrysocephalus</i>)	805 Sea Lettuce	(<i>Ulva</i> spp.)
136 Ringtail	(<i>Oxycheilinus unifasciatus</i>)	Invertebrates	
148 Saddle	(<i>Thalassoma dupperey</i>)	926 Anemones	
138 Scarlett	(<i>Pseudocheilinus evanidus</i>)	811 Mann's Anemone	(<i>Cladactella manni</i>)
142 Sharp-headed	(<i>Cymalutes lecluse</i>)	812 Seabae Anemone	(<i>Heteractis malu</i>)
132 Sunrise Wrasse	(<i>Bodianus sanguines</i>)	931 Crustaceans: Crabs	
147 Sunset	(<i>Thalassoma lutescens</i>)	863 Aama	(<i>Grapsus tenuicrustatus</i>)
149 Surge	(<i>Thalassoma purpureum</i>)	933 Anemone Hermit (Orange-leg)	(<i>Dardanus gemmatus</i>)
137 Twospot	(<i>Oxycheilinus bimaculatus</i>)	860 Black Zanthid	
152 Yellowstriped Coris	(<i>Coris flavovittata</i>)	861 Flat Rock (Sally Lightfoot)	(<i>Percnon planissimum</i>)
154 Yellowtail Coris	(<i>Coris gaimard</i>)	862 Pom-Pom	(<i>Lybia</i>)
Other Fish		932 Yellow Hairy Hermit	(<i>Aniculus maximus</i>)
280 Aholehole - Hawaiian Flagtail*	(<i>Kuhlia sandvicensis</i>)	937 Halloween Hermit Crab	(<i>Calcinus elegans</i>)
360 Aweoweo - Bigeyes	(Priacanthidae)	934 Hermits (small & misc.)	(Diogenidae)
780 Baitfish		938 Zebra Hermit Crab	(<i>Chibanarius zebra</i>)
630 Bat fish	(Onocephalidae)	854 Arrow	(Majidae)
570 Boarfish	(Histiopteridae)	865 Strawberry	(Xanthidae)
500 Cornetfish	(<i>Fistularia commersonii</i>)	800 Crustaceans: Crayfish	
465 Dartfish	(Microdesmidae)	909 Crustaceans: Lobsters	
680 Dwarf rockfish	(<i>Canthidermis maculatus</i>)	936 Hawaiian Red Lobster	(Enoplometiidae)
610 Frogfish	(Antennariidae)	910 Spiny Lobster*	(Palinuridae)
460 Gobies	(Gobiidae)	912 Slipper Lobster*	(Scyllaridae)
560 Hawaiian Morwong	(<i>Cheilodactylus vittatus</i>)	949 Crustaceans: Shrimp	
670 Helmet Gurnard	(<i>Dactyloptena orientalis</i>)	945 Cleaner	(<i>Lysmata amboinensis</i>)
470 Lefteye Flounders	(Bothidae)	948 Coral-banded	(<i>Stenopus hispidus</i>)
480 Lizardfishes	(Synodontidae)	943 Ghost	(<i>Stenopus pyronotus</i>)
790 Mollies	(Poeciliidae)	944 Green	(Hippolytidae)
530 Moi - Threadfin*	(<i>Polydactylus sexfilis</i>)	946 Harlequin	(<i>Hymenocera picta</i>)
700 Mu - Bigeye Emperor	(<i>Monotaxis grandoculis</i>)	866 Opa'e ula - Red Pond	(<i>Halocaridina rubra</i>)
270 Nenu	(<i>Kyphosus bigibbus</i>)	947 Red-Stripe	(<i>Saron marmoratus</i>)
250 Papio - Jacks*	(Carangidae)	880 Echinoderms: Brittlestars (Ophiuroidea)	
715 Redspotted Sandperch	(<i>Parapercis schauinslandii</i>)	952 Echinoderms	
475 Righteye Flounders	(Pleuronectidae)	953 Echinoderms: Sea Cucumbers (Holothuroidea)	
620 Saltwater cats	(Brotulidae)	876 Black	(<i>Holothuria atra</i>)
690 Sand Tilefish	(<i>Malacanthus brevirostris</i>)	877 Strawberry or Pink	(<i>Holothuria edulis</i>)
240 Scaridae	(Scaridae)	878 Stubborn	(<i>Holothuria pervicax</i>)
795 Sharks		955 Echinoderms: Seastars (Asteroidea)	
522 Sharp-jaw Mullet	(<i>Neomyxus leuciscus</i>)	881 Blue Linckia	(<i>Linckia guildingi</i>)
520 Striped Mullet*	(<i>Mugil cephalus</i>)	882 Common Linckia	(<i>Linckia multifora</i>)
510 Stripey	(<i>Microcanthus strigatus</i>)	954 Crown-of-Thorns	(<i>Acanthaster planci</i>)
267 Ta'ape - Blueline Snapper	(<i>Lutjanus kasmira</i>)	883 Cushion Star	(<i>Culcita novaeguinae</i>)
642 Toau - Blacktail Snapper	(<i>Lutjanus fulvus</i>)	884 Orange Knob	(<i>Pentacaster cumingi</i>)
490 Trumpetfish	(<i>Aulostomus chinensis</i>)	957 Echinoderms: Urchins (Echinoidea)	
230 Uhu - Parrotfishes*	(Scaridae)	891 Longspine	(<i>Echinothrix</i> or <i>Diadema</i> spp.)
398 Velvetfish	(Caracanthidae)	892 Pincushion	(<i>Tripneustes gratilla</i>)
Algae (Limu - Seaweed)		893 Shortspine	(<i>Echinometra</i> spp.)
801 Grape Calerpa	(<i>Caulerpa racemosa</i>)	956 Slate urchin	(<i>Heterocentrotus mammilatus</i>)
804 Halimeda	(<i>Halimeda</i> spp.)	928 Jellyfishes	
802 Letuce Cauerpa	(<i>Caulerpa</i> spp.)		
970 Other Algae			

Commercial Aquarium Species List

958 Molluses	
858 Bobtail Squid	(<i>Euprymna scolopes</i>)
963 Bubble Shells	(order Cephalaspidea)
961 Nudibranchs	(order Nudibranchia)
900 Octopus*	(Octopus spp.)
859 Oval Squid	(<i>Sepioteuthis lessoniana</i>)
962 Sea Hares	(order Anaspidea)
964 Spanish Dancer	(<i>Hexabranchus sanguineus</i>)
959 Cones	(Conidae)
960 Cowries	(Cypraeidae)
852 Reticulated Cowries	(<i>Cypraea reticulata</i>)
851 Tiger Cowries	(<i>Cypraea tigris</i>)
929 Soft Corals	
818 Snowflake Coral	(<i>Carijoa riisei</i>)
965 Sponges	
922 Worms	
921 Featherduster	(<i>Sabellastarte sanctijosephi</i>)
923 Medusa Worms	(<i>Loimia medusa</i>)
825 Zoanthids	
999 Misc. (For any Invert or Fish: please describe specimen)	

Appendix 6

DLNR Aquarium Fish Catch Report Zones (available in DLNR Aquarium Fish Trip Report Booklet)



Appendix 7

Examples of retail offerings of fish <2” captured in Hawai’i .

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Home > Marine Fish > Customer Favorites, Marine Fish > Yellow Tang, Hawaii



ON SALE! SAVE up to 31%!

Yellow Tang, Hawaii
(*Zebrasoma flavescens*) Item: CN-74760

~~\$ 64.99~~ **\$ 44.99**

Select Product

Small Was: \$ 64.99 Now: \$ 44.99	Small/Medium \$ 69.99	Medium \$ 74.99
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Quantity: Subtotal: \$44.99

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Overview

The Yellow Hawaiian Tang is for many aquarists, the definitive fish of home saltwater aquariums. With its oval-shaped, vibrant yellow body, *Zebrasoma flavescens* brightens any marine system. The Yellow Hawaiian Tang is an active swimmer that will glide throughout your aquarium in near constant motion, acting as an aquarium tour guide of sorts to any onlooker who follows its meandering swim path.

Though iconic to the reefs of Hawaii, the Yellow Hawaiian Tang's natural habitat is actually widespread throughout the Pacific Ocean as far as Indonesia and the Great Barrier Reef. The Yellow Hawaiian Tang is also known as the Yellow Sailfin Tang or Yellow Surgeonfish. For best care, it should be housed in an aquarium of at least 100 gallons with ample room to swim. Like other Tangs, this member of the Acanthuridae family demonstrates territorial aggression towards its own species, or Tangs in general. Therefore, it is best to keep just one Yellow Hawaiian Tang per aquarium, unless multiple Yellow Hawaiian Tangs are introduced into the system simultaneously.

Although the Yellow Hawaiian Tang will eat meaty foods along with the other fish in the aquarium, it is important the Yellow Hawaiian Tang is offered plenty of marine based seaweed and algae. This will strengthen its immune system, reduce aggression and improve overall health. Offer dried seaweed tied to a rock or use a veggie clip, and feed at least three times per week. Sea Veggies, Seaweed Salad and Ocean Nutrition are all ideal products and are very easy to use.

The Yellow Hawaiian Tang is a very common, extremely popular, and hardy addition to any fish-only or reef aquarium system.

Approximate Purchase Size: Small: 1-1/2" to 2-1/4"; Small/Medium: 2-1/4" to 3-1/4"; Medium: 3-1/4" to 4-1/4"; Medium/Large: 4-1/4" - 5-1/4" Large: 5-1/4" to 6"

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Due to variations within species, your item may not look identical to the image provided.

Yellow Tang - Hawaii

(*Zebrasoma flavescens*) Item: CN-74760

\$ 54.99

Select Product

Yellow Tang (Hawaii) - Small \$ 54.99	Yellow Tang (Hawaii) - Small/Medium \$ 59.99	Yellow Tang (Hawaii) - Medium \$ 64.99
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Quantity

− 1 +

Subtotal: \$54.99

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Home > Marine Fish > Everyday LOW PRICE Favorites! > Yellow Tang - Hawaii



ON SALE! SAVE up to 20%!

Yellow Tang - Hawaii

(*Zebrasoma flavescens*) Item: CN-74760

~~\$ 49.99~~ **\$ 39.99**

Select Product

<p>Yellow Tang (Hawaii) - Small Was: \$ 49.99 Now: \$ 39.99</p>	<p>Yellow Tang (Hawaii) - Small/Medium \$ 54.99</p>	<p>Yellow Tang (Hawaii) - Medium \$ 59.99</p>
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Quantity

 1 

Subtotal: \$39.99

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Overview

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January 7, 2020

Via First-Class Mail and Email

Suzanne Case, Chairperson, suzanne.case@hawaii.gov

State of Hawai'i Department of Land and Natural Resources

Brian Neilson, Administrator, brian.j.neilson@hawaii.gov

David Sakoda, Commercial Fisheries Program Manager, david.sakoda@hawaii.gov

Division of Aquatic Resources

Kalanimoku Building

1151 Punchbowl Street

Room 330

Honolulu, Hawai'i 96813

Re: Ongoing Illegal Aquarium Collection Under Commercial Marine Licenses and Request for Meeting

Dear Chair Case, Administrator Neilson, and Mr. Sakoda:

By this letter, Earthjustice, For the Fishes, Willie and Ka'imi Kaupiko, Mike Nakachi, and Center for Biological Diversity wish to raise for your immediate attention and corrective action the Hawai'i State Department of Land and Natural Resources' (DLNR's) ongoing unlawful practice of allowing commercial aquarium collection to continue without compliance with the environmental review requirements under the Hawai'i Environmental Policy Act (HEPA), Haw. Rev. Stat. (HRS) ch. 343. This practice flouts the Hawai'i Supreme Court's ruling in *Umberger v. Department of Land & Natural Resources*, 140 Hawai'i 500, 403 P.3d 277 (2017), that commercial aquarium collection requires HEPA review to address the impacts of the industrial-scale extraction of marine organisms for the aquarium trade on the marine environment.¹ DLNR, nonetheless, has chosen to disregard and circumvent the supreme court's ruling and the circuit court's subsequent injunction, allowing commercial aquarium collection to continue illegally under Commercial Marine Licenses (CMLs) issued pursuant to HRS § 189-2, without HEPA review or aquarium collection permits under HRS § 188-31.

Before the *Umberger* ruling, commercial aquarium collectors routinely obtained from DLNR both an aquarium permit under § 188-31, and a CML under § 189-2, regardless of the types of gear used. Despite the court injunction halting issuance of new commercial aquarium permits until the HEPA review process is complete, DLNR has since logged a statewide industry-reported commercial take of at least 372,769 fish and 203,972 aquatic invertebrates for

¹ *Umberger v. Dep't of Land & Natural Res.*, 140 Hawai'i 500, 506-10, 403 P.3d 277, 283-87 (2017).

aquarium purposes—totaling at minimum 576,741 individual animals.² DLNR has sought to justify this outcome by asserting that the court rulings only applied to the use of fine-meshed gear, and that any and all aquarium collection without the use of fine-meshed gear may continue without any aquarium permits or HEPA review.³

This ongoing end-run around the courts' rulings in *Umberger* violates state law and must immediately cease, for the following reasons:

- Aquarium collection under § 189-2 meets the exact same criteria triggering HEPA review as aquarium collection under § 188-31 and is equally subject to HEPA's legal requirements regardless of DLNR's chosen permitting methods;
- HRS § 188-31 regulates all aquarium collection regardless of the types of gear used, as confirmed by the statutory scheme and legislative history; therefore, all aquarium collection requires an aquarium permit and is subject to HEPA; and
- DLNR is failing to satisfy its public trust duties to reasonably monitor aquarium collection to ensure compliance with state laws and protection of public rights and resources.⁴

We also request a meeting with you as soon as possible to address this issue, and hopefully, reach a cooperative and productive resolution in the public interest and consistent with DLNR's public trust duties.

² Commercial aquarium catch data is self-reported by the collectors themselves, and thus may not accurately reflect the full amount of marine life taken. These numbers represent commercial aquarium catch data for October 2017 through October 2019. Extraction has presumably continued apace since then.

³ DLNR, Frequently Asked Questions – Aquarium Permit (HRS §188-31), https://dlnr.hawaii.gov/dar/files/2018/12/aquarium_permit_faq_rev6.pdf (last visited Jan. 5, 2020). DLNR recognizes West Hawai'i as a single exception to this loophole, since DLNR regulations require § 188-31 aquarium permits for all aquarium collection, regardless of the types of gear used.

⁴ In this context, DLNR has failed to monitor or enforce against poaching in express violation of the court's rulings. DLNR has also failed to take affirmative steps to ensure that collectors are, in fact, not using fine-meshed equipment, since extraction at the large scales being reported is likely infeasible or extraordinarily difficult with non-fine-meshed equipment.

Aquarium Collection Under Commercial Marine Licenses Requires HEPA Review.

In *Umberger*, the Hawai'i Supreme Court described commercial aquarium collection under HRS § 188-31 as the “systematic and deliberate extraction of aquatic life using procedures, equipment, facilities, and techniques authorized or required by [statute] and related administrative rules for the specific purpose of holding captive such aquatic life for aquarium purposes in order to earn profit” and determined that environmental review was required for such activity.⁵ Aquarium collection under a CML and HRS § 189-2 is indistinguishable in principle and result: aquarium collection gear⁶ is being used to systematically extract hundreds of thousands of fishes and marine organisms for profit, and there would be little point in collecting aquarium fish without facilities and equipment to keep specimens alive pending sale on the aquarium market.⁷ Further, the court described in detail why aquarium collection constitutes a “use” of “state land,” the analysis of which applies regardless of which statute purportedly authorizes it.⁸ Finally, the court’s analysis of “discretionary consent” under § 188-31 equally applies to collection under § 189-2 CMLs because DLNR likewise has discretion to issue them.⁹

Simply put, if commercial aquarium collection under HRS § 188-31 is subject to HEPA, that *same conduct* occurring under CMLs cannot evade environmental review. Indeed, it was the proposition of unlimited and unexamined commercial aquarium species extraction that

⁵ See *Umberger*, 140 Hawai'i at 514, 403 P.3d at 291.

⁶ Pursuant to its authority to administer CMLs under HRS § 189-2, DLNR authorizes non-fine-meshed gear for commercial aquarium purposes by offering “Aquarium” as an option on the “Gear Preferences” drop-down menu found on DLNR’s CML application/renewal webpage.

⁷ In addition to conforming with the *Umberger* court’s analysis of HEPA “action,” commercial aquarium collection under a CML would also constitute a HEPA “project” and “program” under the new HEPA definitions that went into effect in August 2019. See Haw. Admin. R. (HAR) § 11-200.1-2 (defining a HEPA “project” as a “discrete, planned undertaking that is site and time specific, has a specific goal or purpose, and has potential impact to the environment” and defining “program” generally as multiple projects with similar impacts).

⁸ See *Umberger*, 140 Hawai'i at 520-23, 403 P.3d at 297.

⁹ *Id.* at 525-27, 403 P.3d at 302-04; HRS § 189-2; HAR §§ 13-74-2(4), 13-74-3, 13-74-20.

spurred the court to require HEPA review—not the specific methods by which such collection was accomplished.¹⁰

HRS § 188-31 Applies Broadly to All Aquarium Collection, Regardless of the Types of Gear Used.

In response to *Umberger* and the circuit court's subsequent injunction against commercial aquarium permits until HEPA review is complete, DLNR has construed HRS § 188-31 to apply only to collection using fine-meshed equipment, and, based on this reasoning, has allowed commercial collection to continue under CMLs, purportedly using non-fine-meshed equipment. This cramped reading of the aquarium collection law is fundamentally flawed because it contradicts the statutory framework and legislative history and produces absurd results.

The underlying purpose for the enactment of the aquarium collection statute (which dates back to the 1950s) was threefold: (1) allowing inroads into the national aquarium fish trade for local fishers, by (2) carving out an exemption for the use of otherwise prohibited fine-meshed equipment, while (3) providing safeguards for the health and vitality of collected organisms.¹¹ This last requirement is unique to HRS § 188-31: while other statutes or administrative rules exempt uses like 'ōpae fishing from the fine-mesh prohibition, § 188-31

¹⁰ See *Umberger*, 140 Hawai'i at 506-09, 140 P.3d at 283-87 (reciting the factual bases for Petitioners' claim that aquarium collection should be reviewed under HEPA, including "disrupt[ion] of ecosystems," "marked difference[s] in the condition between those reefs that are open to collection and those that are not," "noticeable difference[s] in aquarium fish species' populations and coral damage" in areas open to collection, and impairment of overall reef ecosystem health due to removal of fish species "that serve a larger role in reef ecosystems"); *id.* at 516, 430 P.3d at 293 ("Given the nature, magnitude, and scale of aquarium collection . . . any environmental effects that aquarium collection may have falls squarely within the ambit of what HEPA's environmental review framework intends to integrate into governmental decision making"); *id.* at 523, 403 P.3d at 300 (holding that aquarium collection is a HEPA "use" of state lands and conservation districts because it entails the "*unlimited collection* of fishes and other aquatic life") (emphasis added); *id.* at 524-25, 140 P.3d at 301-02 (holding that commercial aquarium collection cannot be exempted from HEPA, in part because "*extraction of an unlimited number* of fish and other aquatic life annually" is not a "minor alteration" of public resources) (emphasis added).

¹¹ See H. Stand. Comm. Rep. No. 586, in 1953 House Journal, at 675.

alone includes the express requirement that collected animals be kept “alive and in reasonable health.” The statute was clearly intended to permit and regulate commercial aquarium collection, providing both a means to accomplish it efficiently and a caveat to control and prevent waste of aquatic resources.

Since its original enactment, § 188-31 has been amended to encompass aquarium collection comprehensively, and not just fine-meshed equipment. Most notably, legislative amendments in 1992 confirmed the broad scope of permitting authority, by adding the broad catch-all term “other aquatic life” to the operative permitting provision, which had previously referred to “marine or fresh water nongame fish.”¹² Along the same lines, the 1992 amendment clarified the title of the statute from “[n]ets and traps for aquarium purposes” to the more broadly expressed “[p]ermits to take aquatic life for aquarium purposes.”¹³ The inclusion of “other aquatic life” in the permitting section acknowledged the breadth of aquarium collection to include, for example, invertebrates like sea cucumbers, while the title amendment evinced legislative acknowledgement of the purpose and practice of regulating the take of aquatic life generally, and not the equipment in particular.¹⁴

Notwithstanding that the aquarium collection permitting statute has been in effect since the mid-1950s, DLNR now claims that an aquarium permit is unnecessary for any and all collection that does not use fine-meshed gear. This turns the statute on its head: instead of recognizing § 188-31’s original, fundamental purpose to permit and regulate aquarium collection activity and commercial industry, DLNR distorts the statute to allow widespread aquarium collection free from any regulation, including the requirement to keep collected fish alive and in reasonable health.

DLNR’s current reading of § 188-31, moreover, contradicts DLNR’s established interpretations via formal rulemaking, as well as its practice over decades, to regulate aquarium collection more broadly. For example, Haw. Admin. R. (HAR) ch. 13-86.1 regulates take of sea cucumbers, and requires a § 188-31 permit to collect sea cucumbers for aquarium purposes, even though such collection does not require traps or nets of any kind. HAR ch. 13-60.4 regulates take in the West Hawai‘i Regional Fishery Management Area (WHRFMA) and defines “aquarium gear” as “*any* equipment or gear adapted, designed, or commonly used to collect, capture, or maintain aquatic life alive in a state of captivity”; thus, collection in the WHRFMA

¹² 1992 Haw. Sess. Laws Act 96, § 2 at 146. Previously, the term “other aquatic life” had been included only in the statute’s definitional sections. RLH § 21-64 (1955).

¹³ 1992 Haw. Sess. Laws Act 96, § 2 at 146.

¹⁴ *See id.*

requires both an aquarium permit and a WHRFMA permit.¹⁵ In sum, DLNR has consistently issued aquarium permits for collection with gear other than fine-meshed traps and nets. To now claim that aquarium collection permitting applies only to fine-meshed gear is disingenuous at best.

Finally, DLNR's restrictive interpretation of § 188-31 has led to the absurd and unjust result of large-scale extraction persisting without any environmental review under HEPA, despite the court's rulings and the agency's duties to conserve and protect public trust resources. This contravenes the fundamental rule that a statute should not be construed "to create an absurdity, or worse yet, to circumvent [an agency's] constitutional and statutory obligations."¹⁶

DLNR Must Proactively Monitor and Regulate Commercial Aquarium Collection to Fulfill Its Public Trust Duties.

As DLNR is well aware, conservation lands, which include all state marine areas, are public resources held in trust for the people of Hawai'i pursuant to article XI, § 1 of the Hawai'i Constitution.¹⁷ Conservation districts exist in part to conserve "indigenous or endemic plants, fish, and wildlife."¹⁸ Submerged lands and associated resources also are part of the public trust *res*.¹⁹ DLNR must ensure that these public natural resources are responsibly managed and conserved. DLNR's public trust duty to manage public resources extends beyond simply issuing licenses and permits, and includes a responsibility to reasonably monitor uses of public trust assets to ensure that measures prescribed by law to conserve and protect such resources

¹⁵ HAR § 13-60.4-3 (emphasis added).

¹⁶ *Morgan v. Planning Dep't, Cnty. of Kaua'i*, 104 Hawai'i 173, 185-86, 86 P.3d 982, 994-95 (2004).

¹⁷ *See In re Thirty Meter Telescope*, 143 Hawai'i 379, 400, 431 P.3d 752, 773 (2018); *see also* Haw. Const. art. XI § 6 (specifically granting the state power to manage "marine, seabed, and other resources within the boundaries of the State").

¹⁸ HRS § 205-2(e).

¹⁹ *See Umberger*, 140 Hawai'i at 521, 403 P.3d at 298.

are “actually being implemented.”²⁰ DLNR cannot “turn a blind eye to imminent damage, leaving beneficiaries powerless to prevent damage before it occurs.”²¹

The courts have already determined that the large-scale removal of marine life by commercial aquarium collectors threatens impacts to public trust marine resources.²² Yet, DLNR has allowed commercial extraction to continue at an alarming rate, without any oversight beyond administration of CML applications and renewals, and logging of catch reports. Commercial collection should only be allowed to resume if and when the long-term impacts have been fully vetted and a final determination is made that some level of continued take will not adversely affect public resources. Absent such an informed determination, DLNR should take the precautionary measure of declaring an immediate moratorium on all commercial aquarium collection, regardless of the types of gear used, rather than evade HEPA by allowing continued industrial-scale extraction.

In any event, the law requires DLNR, at minimum, to proactively monitor ongoing commercial collection to ensure that such extraction is, in fact, being conducted via the claimed methods. Fish extraction at the levels seen since *Umberger* would be likely infeasible or extraordinarily difficult without fine-meshed gear. In this context, particularly given the public resources at stake, DLNR cannot simply sit on its hands and assume compliance, but must instead take diligent action to monitor and enforce the fine-mesh ban.

Similarly, since the *Umberger* ruling, there have been multiple reports of poaching and illegal activity in the WHRFMA, where all aquarium collection is undisputedly prohibited until environmental review under HEPA is complete. Yet, DLNR has failed to meaningfully monitor, investigate, and take enforcement action against illegal collection in the WHRFMA.

We hope that DLNR will embrace its role as the public's trustee and responsibly manage our precious marine resources in compliance with the law and court rulings, rather than choose an oppositional course that may lead to needless legal action. We would welcome the opportunity to discuss and resolve this cooperatively with DLNR, and we request a meeting for this purpose as soon as possible, particularly before DLNR proceeds with issuing any further CMLs for aquarium collection purposes. Mahalo nui for your attention to and consideration of our request.

²⁰ *Ching v. Case*, 145 Hawai'i 148, 170, 449 P.3d 1146, 1168 (2019) (citing *Kelly v. 1250 Oceanside Partners*, 111 Hawai'i 205, 231, 140 P.3d 985, 1011 (2006)).

²¹ *Id.*

²² See *supra* note 10.

Suzanne Case, Brian Neilson & David Sakoda
State of Hawai'i Department of Land and Natural Resources
January 7, 2020
Page 8

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kylie W. Wager Cruz', with a long horizontal flourish extending to the right.

Kylie W. Wager Cruz
Mahesh Cleveland
EARTHJUSTICE

cc (via email):

Office of the Governor, State of Hawai'i

Linda Chu Takayama, Chief of Staff, linda.c.takayama@hawaii.gov

William J. Wynhoff, Deputy Attorney General, State of Hawai'i, bill.j.wynhoff@hawaii.gov

From: [Gary Harrold](#)
To: david.sakoda@hawaii.gov; brian.j.neilson@hawaii.gov; [VanDeWalle, Terry](#)
Subject: Ban Aquarium Collection
Date: Wednesday, December 11, 2019 10:57:56 AM

As an proactive, lifetime member of The Sierra Club, I am advocating for Hawaii's Coral Reef health. Years upon years of cyanide poisoning our inshore waters, decades of juvenile reef fish extraction, globally broken swim fin damaged coral colonies due to careless divers/snorkelers, overfishing due to rising human population and demand and, now, ocean warming and acidification has most definitely had major negative impacts of reef vibrancy and species numbers and diversity. All marine creatures are victims of human impact. Lifetimes are cut short by disease and death due to aquatic plastic contamination. { As a certified diver, I have seen drastic **deleterious** changes in Hawaii, Fiji, Indonesia, Cook Islands, Mexico, Jamaica and California. } Any collection that may be allowed should be licensed educational aquariums such as the Monterey Bay Aquarium and the Waikiki Aquarium. And captive breed programs should be encouraged. That will take pressure off taking directly from our ocean environment. Extremely strict EIS should be drafted. I appreciate you three, David, Terry and Brian taking my testimony to heart.

--

G a r y H A R R O L D 11 Ala Muku St. Hilo 96720
Biking to Reverse Climate chaos

From: [Dan L](#)
To: david.sakoda@hawaii.gov
Cc: jim.lynch@kigates.com; [VanDeWalle, Terry](#)
Subject: Comment - Fish collecting Hawaii island. EA
Date: Monday, December 2, 2019 8:39:57 PM

Aloha.

Please note my strong disapproval of any commercial reef fish collection in Hawaii. There is no justification in satisfying a very small minority (collectors) at the expense of the remaining residents of Hawaii, not to mention the ecological damage the collectors have done.

Thank you.
Dan Lanterman
Kona Hawaii
[808-756-0608](tel:808-756-0608)

From: [David Sakoda](mailto:DavidSakoda@hawaii.gov)
To: [David Sakoda](mailto:DavidSakoda@hawaii.gov), [Terry VanDeWalle](mailto:TerryVanDeWalle@hawaii.gov), [Brian Neilson](mailto:BrianNeilson@hawaii.gov)
Subject: Comment regarding Hawaii Island Commercial Aquarium Permits DEIS, 11/23/2019
Date: Tuesday, January 7, 2020 5:07:23 PM
Attachments: [Screenshot20200107](#)

January 7, 2020

Dear David Sakoda, Terry VanDeWalle, Brian Neilson:

Thank you for the opportunity to comment on the Pet Industry Joint Advisory Council Draft Environmental Impact Statement (DEIS) for the issuance of commercial aquarium permits for the West Hawaii Regional Fishery Management Area.

I am a West Hawaii, South Kona, Papa Bay resident and after review of the DEIS I would like to comment on the environmental, the cultural, and financial impact of the aquarium collecting industry with photo documentation as I have been a primary witness to aquarium collecting in West Hawaii and AQ collectors are personally known to me including individuals of the 14 permit applications to which this DEIS pertains, some represented in the following photos.

Moving to South Kona as a retiree with no prejudices or knowledge that aquarium collecting took place in the wild, while swimming recreationally near my home in Papa Bay I observed collecting of ornamental fish. I thought it odd and wrong that an apparent variance on coral damage was inherent with an aquarium collecting permit. After being advised by a Honokohau DOCARE officer via phone that coral damage certainly was an offense but that they would have to witness the coral damage and response time would prohibit that, I took up underwater photography.

Logistics ruled DANE's Conservation and Resources Enforcement out of the equation as Papa Bay is over an hour away from the Honokohau DOCARE office. Being aware that the breaking and damaging, with dive fins, leaded nets, and stick implements, of stony coral was occurring (HAR 13-95-70) I felt ethically obligated to assist, especially considering that I was one of very few non-collectors who have ever witnessed AQ collecting.

Although not familiar with Hawaii's standards and training, as a retired California Peace Officer I intended to contribute professionally and positively. My first actions were to swim to collectors that came into Papa Bay, introduce myself and tell them I intended to photo document when I observed the reef being busted up. Four out of six sets of collectors never came back to Papa.

Photos attached are small for the sake of a manageable email file. Full-size photos are available at this dropbox link: <https://www.dropbox.com/sh/1j1vq8773hw/AAAATpHfEjpsCv6mDpW1458-g>

DEIS 2.0 Purpose and need

2.1 "The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats."

2.2 "The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods in compliance with all applicable laws, rules, and regulations pertaining to the industry."

Photos #1 & 2, anchor damage, Papa Bay, February 25, 2014



I filed anchor damage to coral report with DOCARE and it was referred to the Hawaii county prosecutors office. I was never interviewed. Months later I was told by an office assistant at the Hawaii County Prosecutors office that my case number was not in the system. The reporting DOCARE officer that took my report said that although it is clear that the AQ collectors are anchored in a healthy coral area it is not clear that any damage occurred therefore the case was dropped.

In photo #1, the collector is aware that they have anchored into a rich coral area but made no effort to move and set the anchor into a sandy or rubble area. When this collector returned to Papa Bay a few weeks later, he was angry and stated that I should have understood that the wind came up after he was in the water causing the coral damage.

In photo #2, I would like to point out that the majority of AQ collectors do not use buoyancy control device (BCD) vests, also note that knee pads are worn over the wetsuit. As with this photo, my observations of collectors confirm that contact with the reef is an inevitable part of the collecting process.

Photos #3 & 4, Poaching, incomplete vessel hull number and no AQ permit number on equipment, Papa Bay, March 18, 2014.



I filed a poaching report with photos to DOCARE and this was also passed to the Hawaii County Prosecutors office. I was never interviewed and my subsequent phone inquiry produced the same result from the prosecutors' office, my case number was not in the system. The reporting DOCARE officer never returned my calls.

Photo #3, This photo illustrates contact with the reef. In the DEIS executive summary, page ii, the statement "the aquarium industry has no significant impact on the reef ecosystem" and "the targeted collection of smaller, less fecund individuals, commercial aquarium collection likely has minimal impacts on populations in general".

Hawaii's endemic finger coral makes the perfect sanctuary for the targeted juvenile herbivores, a maze to foil predators. For collectors to herd the fish into the apex of the collection net the collector must use an aggressive technique, the use of sticks to penetrate the finger coral depths and the collectors themselves crawling along the reef floor. In this photo, a rough count reveals 75 Yellow Tang and 80 Kole, this was one of four stings on the first of two dives by these collectors. One thousand fish may have been taken that day. This day most certainly had a significant impact on the reef ecosystem.

Photo #4, the white broken tips of finger coral visible mostly to the right of the nets, this is a photo taken while the collectors were packing up gear upon completion of the dive.

Photo #5 & 6, poaching, Collecting inside the boundaries of the Miloli'i Fish replenishment area (FRA), June 4, 2015



DEIS 1.2.3.2 HAR 13-60.4

"Aquarium collection is prohibited within FRAs, FMAs, and MLCs."

I sent photo documentation and a report to DOCARE on the responding DOCARE officer was unable to respond before these three AQ collectors on this Miloli'i, South Kona based collectors' boat left the area. A follow-up call to Honokohau DOCARE revealed that the collectors in the photos had reported to the DOCARE office and apologized for unintentionally collecting AQ fish inside the FRA and no charges were filed. Would the collectors have reported to the DOCARE office if they hadn't known I photographed the violation? and should that matter as this Miloli'i based collector has been cited twice before for collecting inside the Miloli'i FRA?

Again, the DEIS pledge in the Purpose and need section 2.0, mainly that "The purpose of the Applicant's action is to ensure that commercial aquarium fish collection allows for the lawful, responsible, and sustainable commercial collection of various fish species from nearshore habitats." On February 17, 2015, a Miloli'i fish collector was told by the Hawaii county planning department to stop packaging and shipping fish in a noncompliant ag zoned residential area, Miloli'i Beach Club Association II, South Kona.

This collector appealed the decision, one of his points was that he was not an aquarium collector but a fish breeder.

Quote: "The Petitioners' use of the property consists of gathering aquarium fish, holding such fish in tanks, breeding and propagating fish using wild stock, and packaging of some of the fish gathered and bred on the Property for shipment to customers."

The Planning Department Administrator agreed and closed the case before any neighbors could respond or submit evidence at the hearing.

**SUBJECT: Closure Letter
Complaint – Operating an Unpermitted Non-Agricultural Business
in an Agricultural Zone
Reference: Notice of Violation & Order dated February 17, 2015
File No. 2014-078W
TMK: 8-8-010:093 Papa 2nd, South Kona, HI, Milolii Beach Lots Sub'n**

Thank you for your letter dated April 16, 2015 which you say you are operating an aquaculture production facility consisting of gathering aquarium/ornamental fish, holding of such fish in tanks, breeding and propagating the fish using wild stock, packaging of some of the stocked and propagated fish for commercial shipment to customers from the subject property.

After consultation with County of Hawaii Corporation Counsel, the Planning Department has decided to close the complaint file without prejudice as to future determinations in this matter.

If you have any questions come in and see us or call us at 323-4770. We are here to assist you.

Sincerely,



(copy)
DUANE KANUHA
Planning Director

RJL

[\coh22\Planning Randy-Hilo_Server TMK 8-8-010-093 Basabe Closure Ltr.doc](#)

www.cohplanningdept.com

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planning@co.hawaii.hi.us

Photo #7. A fish breeding and propagating facility at Milolii Beach Club Association, Ag zoned residential lots on the day that the planning department interviewed for possible zoning violation, January 5, 2015. The packaging of 19 subs full of "breed and propagated" fish. This individual is one of the 14 commercial aquarium fishers of which the DEIS pertains, therefore, is the DEIS incomplete? Should the breeding and propagating of aquarium fish be included in the DEIS?



Last one! Photo #8, Anchor Chain in Coral



On the Memorial Day holiday, May 29, 2017, an AQ vessel with three collectors was working in Papa Bay. I photographed the AQ vessels anchor, Photo #8, then continued on swimming with four other neighbors. Moments later the AQ vessel buzzed us at full 200hp throttle missing my wife by 15 feet, they knew we were there as one of the collectors was waving at us with her middle finger. A conflict between recreational use of a neighborhoods swimming and snorkeling area and AQ collectors on a holiday weekend, I am thankful no injuries occurred.

Whats important to note in this photo is the 20 plus feet of the 9mm chain and the small claw anchor. Most AQ collectors, as most west side boaters in general use the chain to anchor not the actual anchor itself, enabling easy pull-up but damaging more square meters of coral as a result. A system of day-use mooring buoys has not been established in AQ collecting areas.

DEIS 2.5 Scope of Analysis. "The proposed action and resulting commercial collection does not include any activities different from or in addition to those that have occurred in the past."

The preceding sentence with my observations, that the collection of the targeted juvenile fish, in profitable amounts, can not be accomplished without aggravating actions to stoney coral, is disquieting. And the inability to monitor and enforce rules will result in continued reef damage by the careless time and cost saving actions of the AQ collectors such as improper anchoring.

Peoples observation skills are honed by their experiences. I worked for some years in the logging industry and so an analogy between timber harvesting and aquarium collecting and the management system contrasts between these two natural resources are in my thoughts as I observe AQ collectors at work. The Forest Service offers timber to logging contractors in a bid process were the opening bid is set to insure that infrastructure for the sale is not a cost liability to the public trust, the taxpayers. Road construction, environmental study and the resulting protections to plant and wildlife, and monitoring personnel, these costs are covered before a tree drops. If an endangered or threatened species or a historical/cultural site is discovered the timber sale does not happen. During and after the timber harvest forest service monitoring persons are on site to document that environmental safeguards such as erosion control are satisfactory.

For the most part the people in the logging industry love the woods and understand the importance of sustainability of our forests. But I can affirm that when profit is a factor shortcuts will be taken if the monitoring is not in place. More than one big Sugar Pine has made it to the mill with no evidence that it ever existed. Humans can justify actions and when something is gone it is often forgot.

DNR Mission

"Enhance, protect, conserve and manage Hawaii's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawaii nei, and its visitors, in partnership with others from the public and private sectors."

Public trust does not owe fourteen or four hundred individuals our natural resources. Until the removal of reef life can happen with assurances that such removal will enhance, protect and conserve the reef for future generations and the cost of those assurances, such as effective law enforcement, be paid for by the individuals removing that reef life, the moratorium needs to remain in place.

Mahalo Nui Loa for your service,

Paul Cox
Papa Bay, South Kona
808-987-6892
info@akamaihiki.com

Comments of William Graham of Hawi, January 2, 2020

Regarding the Draft EIS for the Issuance of Aquarium Permits

Introduction

This draft EIS is clearly intended to assess the environmental impacts of resuming the aquarium fishery business in West Hawaii using fine mesh nets. The applicant is not a fisherman but a mainland based trade industry group. The DEIS describes its scope in this manner: "Regarding biological resources, this DEIS focuses primarily on the effects of aquarium fishing on wild populations of White List species." That is understandable but the DEIS is extremely deficient when it comes to looking at anything beyond those particular populations. The bulk of my comments will speak specifically to this deficiency.

We also need to better understand the aquarium fishing permitting rules in order to evaluate the reasonableness of future oriented assumptions employed in the DEIS. In particular, the permitting rules appear silent on issues of scale that seem very important. Must the permittee be an individual or could it be a corporation? May the permittee employ multiple boats for collecting the fish? Is there any limit on the number of divers that may deploy from a single collection boat? Above all, there is no present limit on the number of fish that can be taken with a single permit. I attach a copy of the aquarium fishing permit form used by the DLNR.

Finally, the underlying structure behind this HRS 343 related program undertaken by the applicant is very confusing. This makes it difficult for myself and for the community to participate in a properly focused manner. The Pet Industry Joint Advisory Council was not initially applying for any permit. Rather, according to its environmental assessment, it was engaging in a "program" which is intended to facilitate the permitting process (for the apparent benefit of itself and others.) The activity of the Pet Industry group within this program was ostensibly to prepare this EIS. Was there a discretionary approval being sought? However the draft EIS now takes a different stance, and the discretionary approval sought is for "Commercial Aquarium Fishing Permits." That is a very consequential change. It would seem that the Pet Industry group now plans further actions beyond this

EIS? Any forthcoming EIS or revised DEIS must prominently explain these matters in a thorough manner.

My best guess is that the PIJAC recruited these 14 individuals to add on the ground substance to its decision to fund an EIS so that the aquarium trade worldwide could benefit. The 14 agreed provided that they remain anonymous. Of course I cannot substantiate this guess. But it surely fits the process we now see, which is a mess.

1. Impacts on our coral reefs

Today the primary ocean related concern in Hawaii should be the survival of our coral reefs. It is well-known that the ongoing and increasing threat is the warming and rising acidity of the oceans. Therefore coral survival is a worldwide problem but it's especially acute here in Hawaii where we depend so much on our ocean environment. When we discuss the populations of the inshore fishes our focus must turn to their role in maintaining the health of our coral reefs. The DEIS tells us that the overwhelming majority of aquarium fish collection in Hawaii has been of fishes in the surgeon fish family, about 90% of the total take. We know that these fish are herbivores which graze on algae. And without sufficient grazing, algae will overtake coral colonies that have been killed or weakened by adverse ocean conditions. This unwelcome algae growth then eliminates the chance for coral polyps to recover or repopulate when ocean conditions improve. Plus, once getting a foothold in one location, algae and seaweeds tend to spread. The bottom line is that we must do whatever we can to maintain strong populations of all the herbivores on our reefs. How can removing large numbers of surgeonfish align with that goal? The DEIS must address this squarely.

It is certainly not my conjecture that without aquarium fish collection the reefs would be able to maintain good health in the future. But the additional negative impact stemming from aquarium fish collecting will accelerate the loss of healthy reef. This is common sense reasoning. The Draft EIS presents no forward looking analysis of future reef health or herbivore populations. The herbivore populations will in turn be impacted by the prevailing condition of the reefs. Here is part of the DEIS response when the Humane Society asks for a more lengthy look into

future effects: "While it is correct that individuals are removed from the population annually, it is also true that new individuals are added during that period, and therefore it is not certain that losses will accumulate over time." That is hardly reassuring. The DLNR needs to be certain that losses will NOT accumulate. The DEIS keeps its focus on population levels, whereas EIS law requires reporting on indirect and cumulative impacts, such as the coral reefs where the fish reside.

Prior to the massive 2015 bleaching event our most notable coral reef bleaching had occurred back in 1998. That was the time when the world truly became aware of the fragility of the coral reef ecosystem. More recently during the latter half of 2015, and again during September and October of 2019 we have sustained major damage to our reefs here in Hawaii. The draft EIS only briefly mentions this situation and does not address it in any depth. Addressed on pages 116-117 it simply states that overall mean coral cover in West Hawaii declined 19.6% in closed areas and 17.6% in the open areas between 2014 and 2016. On page 133 the draft EIS indicates that after the bleaching event of 2015 there was an average coral cover loss of 49.7% in the leeward reefs of Hawaii Island. I won't try to reconcile the divergent numbers offered, but the magnitude of the problem is most apparent. Since the 2019 bleaching is too recent to be reflected in the DEIS I refer readers to the website hawaiicoral.org to visualize the magnitude of this most recent setback.

It is commonly acknowledged within the research community and the general public that coral bleaching events will occur more frequently in the future, and with increasingly stressful water conditions. The impact of aquarium fishing on future reef health must be examined in full. A look at other reefs in other countries should also be included for developing a better understanding of forward looking prospects in Hawaii. On page 133 the DEIS does say that Great Barrier Reef studies conclude that fishing pressure had minimal effect on bleaching. First off there is very little fishing pressure on that reef which has lots of protections. Furthermore, any pressure specifically due to aquarium fishing would be next to nothing compared to the intensity of aquarium fishing that we have had in West Hawaii. For reading on impacts to the Great Barrier Reef I

suggest Reef Life, chapter 13 by researcher Callum Roberts, published in 2019.

I think it also should be acknowledged that numerous individuals have been involved for many years since 1998 in establishing and protecting the sizeable Fish Replenishment Areas in West Hawaii where aquarium fishing with fine mesh nets has been prohibited. This effort has been extremely valuable in my opinion. But we are now in a new era when the survivability of our coral reefs is clearly in dire jeopardy.

2. From the ocean to the pet shop

With its narrow focus on population levels the DEIS shows minimal attention to the fishing activity itself or the handling of the fish which follows. Others have brought attention to the direct effects of the collection process on the reef, coming from both the anchoring and the actions of the divers. I'd like to look at the effects on the fish while in the ocean and thereafter.

To begin with, the most common fish collected is the yellow tang, and they run in tight schools of perhaps 20 to 40 fish as a rule. I dive and photograph in leeward North Kohala where yellow tang are still common. Once I closely watched an aquarium collector doing his job on a school of yellow tang off Mahukona. I don't have any particular criticism of how he comported himself, he seemed careful to me. The boat anchored further offshore where it could find a sandy bottom. But I want to put attention on the fish and how things went for them. The DEIS on page 32 describes succinctly and accurately the usual process for collection in just three paragraphs. Much more information must be provided, including the collection methods used with species that do not readily school and also with any invertebrates that are collected. To that last point, is the collection of invertebrates so negligible as not to be included in the DEIS? Otherwise we expect to find data on the quantity and types of invertebrates collected along with the environmental consequences. I have no sense that there is a problem here, but it should be addressed in the DEIS.

Regarding the yellow tang collection which I witnessed, not all the fish in the school got trapped in the net. Some broke away and were free, and scattered. But

not enough to form a new school, apparently. What happens to all those fish, who by nature want to be in a school? There were no other schools nearby to join and I have no idea if they would be accepted in a new school anyway. Are they out of luck, will they become easy prey? Or will little groups form and eventually join to make a new school? And how about those fish that were captured. The rules say that no more than 5 individuals longer than 4.5 inches can be taken in a single day. From my experience, only looking, I'd say adult yellow tang are generally maybe 6 inches long. And the schools do appear to contain fish that are of similar size. Does the collector make off-the-cuff judgments as to which to keep and which to release right away, due to size? Probably one develops a rather accurate eye with experience. Still I wonder about those that are perhaps too large. Do they get released after netted? Or do they arrive back at the boat and perhaps get released on the surface at that point? How do they fare thereafter? These are all issues that I think do not get addressed in the EIS. Specifically, is there loss of life of fish while in the collection activity that does not show up in any reporting?

And then, how about the treatment of the fish once they arrive at the boat, come to the dock, go into storage, get prepared for shipping, get shipped. On page 16 in the scoping analysis the DEIS informs us: "Therefore, because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population." I would disagree, and I strongly believe the DEIS should not be so constrained. As evidence, consider state law in the matter of granting permits, HRS 188-31. Paragraph b reads: "Except as prohibited by law, the permits shall be issued only to persons who can satisfy the department that they possess facilities to and can maintain fish and other aquatic life alive and in reasonable health." Although the DLNR may not even be able to properly enforce this provision, clearly the welfare of the fish is important to the department. Furthermore, the Pet Industry Joint Advisory Council (which is the applicant) has expressed their Mission Statement on their website, pijac.org/who-we-are. The first mission is to "PROMOTE animal well-being and responsible pet ownership." In this DEIS, by choosing to neglect any consideration of the well-being of the

animals caught, PIJAC doesn't conform to their professed mission.

3. Absence of meaningful alternatives

My understanding is that the role of alternatives within the EIS process is one which pertains to possible courses of action by the applicant. Alternatives are not proposals for possible changes in agency rules, although they can be useful towards that end. I believe this is an accurate understanding.

In the DEIS I found there to be no alternatives of any consequence under consideration. It is also notable that the DLNR chairperson explicitly called out this failure in her letter of July 26, 2018 to the OEQC. That letter was referring to the alternatives considered in the Environmental Assessment, and it specifically suggested three consequential alternatives that might be analyzed. None of those three alternatives are examined in this DEIS. A look at the subject matter of the 5 alternatives that are considered in the DEIS should reinforce my conclusion.

First, reducing the Achilles Tang daily take limit down from 10 to 5 is a very modest change to just one of the forty species open to aquarium fishers. A second minimal alteration would limit collection by permit to just the West Hawaii area, designated as WHRFMA. It is already understood that the WHRFMA is where most aquarium fishing now occurs and is the primary area of environmental concern. Probably this is where the 14 proposed permittees have fished in the past. So that potential offering is of minor importance. Finally, limiting requested permits to just 14 individuals is not representing an alternative, it's just the scope of action related to the current application. That plus the alternative of no action essentially completes the alternatives considered.

The applicant could easily present and evaluate meaningful alternatives that might lessen the environmental impact of the proposed issuance of permits to the 14 seeking to use fine mesh netting for fish collection. The applicants might agree to conditions like the following: A sizeable subset of the 40 species could be considered off limits to their collection activity. They could abide by a closed season of some duration. They could offer further cooperation to ensure accurate reporting of fishes collected as well as survival statistics. They could constrain

themselves to annual limits on the total take of any one licensee. The presentation of such alternatives is not detrimental to the interests of the potential licensees, it merely looks more broadly before recommending the preferred alternative. This also gives the DLNR valuable information towards determining how it might handle its licensing task in the future.

Hawaii's EIS rules suggest the range of alternatives which are sought in a Draft EIS. Referring to 11-200-17, after citing the no action alternative the rule goes on to suggest: "Alternatives requiring actions of a significantly different nature which would provide similar benefits with different environmental impacts." I find the DEIS unacceptable since no significantly different alternatives for the proposed activities of the 14 are presented or evaluated.

4. Underlying structure of this application

It is important to keep in mind the process by which this DEIS has arisen. First Hawaii's court system ruled in early 2018 that current aquarium permits are invalid and new permit issuance must await a full study of the environmental impacts of collecting for aquariums. Obviously it is too expensive for a single fisherman to bankroll the preparation of an environmental impact statement. However, worldwide the aquarium industry is sizeable, with retailers and wholesalers and shippers all involved. So a trade group, the Pet Industry Joint Advisory Council located in Alexandria, Virginia has chosen to proceed with the environmental impact statement. Keeping things in perspective, it would be a net positive for Hawaii residents to get a comprehensive, fair minded environmental impact study of aquarium fishing and our reef life without spending taxpayer dollars. Let us hope that is forthcoming.

However there are striking oddities involved in the current process. The draft EIS (DEIS) lists the Pet Industry Council as the applicant who has initiated the EIS process. But the "applicant" hasn't applied for any aquarium permits yet, although I believe that the DLNR is not currently accepting applications. It's not clear that the Council has officially applied for anything. But within this DEIS the Project Summary section reads: "Proposed Action: issuance of 14 Commercial Aquarium Permits" Note that HRS343-2 defines applicant thus: "Applicant

means any person who, pursuant to statute, ordinance, or rule, officially requests approval for a proposed action." Clearly there is a mismatch here, the proposed action cited by the applicant is not being officially requested by the applicant. Furthermore, this DEIS action is a big change from the original "program" as described in the EA of March 13, 2018 under the section entitled "Project Summary". These are not mere housekeeping issues. Perhaps the HRS 343 process should be restarted with a clearly defined action maintained throughout.

There are 14 specific individuals who form the basis for significant parts of the data cited in the DEIS. Yet those 14 individuals have not been identified publicly nor have they applied for new permits. The Humane Society asked the DEIS authors for identification of the 14 applicants by name and business name after the issuance of the Environmental Assessment. Here is the response they received: "Comment noted. The applicant information is provided in the DEIS." This is a clear example of how the irregular situation here has brought about unnecessary confusion. We should hear in a forthright manner why the 14 are not identified. I can imagine reasons why those individuals might not want to be publicly singled out and I can respect their decision. But the DEIS itself suffers without full disclosure. In fact the permit application form used by the DLNR specifically asks for the name of the applicant and much more. See attached AquariumPermit.pdf. Furthermore one finds that some of the data within the EIS is purportedly based upon the historical records of those 14 specific individuals. Examples would include tables 5.2 and 5.11 in the DEIS. Absent specific disclosure of the 14, why should the public have confidence in the accuracy of that data when commenting on the DEIS? No verification is possible.

Also, the DEIS attempts to make use of the ambiguity that revolves around the 14 individuals and their role in the current application for which the DEIS has been prepared. On one hand, page 19 in section 3.5 Limited Permit Issuance (Preferred) Alternative, one reads: "Under the Limited Permit Issuance Alternative, the DLNR would issue Aquarium Permits to 14 aquarium fishers in the WHRFMA,"). Note that it does not say anything about any constraint on the DLNR from also issuing permits to other applicants. Then on page 135 in section 5.44, Mitigation, the second paragraph reads as follows: "Nevertheless, the

Preferred Alternative includes mitigative measures (see section 5.0) such as a reduction in the number of Aquarium Permits that would be issued, ..." So here the ambiguity is clearly exposed. Nowhere is the DLNR asked to limit its overall issuance of permits to only 14, since that is clearly not the proper role for the applicant. (Why would these 14 qualify as preferred over others, anyway?) The EIS must either explain how their proposal constrains the DLNR from further issuance of permits or else discontinue using the 14 number as a valid alternative to unlimited issuance.

With this EIS, if the PIJAC plans to get an approval of some nature which allows it to act as an agent of the DLNR insofar as issuing permits, that would be unusual. There is no indication that these 14 individuals are current applicants for permits. If this so-called application for 14 permits constrains the DLNR in any manner from deciding to whom it will choose to issue permits (such as to these 14) if and when the DLNR resumes issuance of permits, the public should be made aware of that right now, in this document.

Sierra Club, Hawai'i Island Group

PO Box 1137, Hilo, Hawai'i 96721 333cory@gmail.com

Comments on Draft Environmental Impact Statement

Issuance of Commercial Aquarium Permits

for the West Hawai'i Regional Fishery Management Area

[http://oeqc2.doh.hawaii.gov/EA EIS Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf](http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2019-11-23-HA-DEIS-Hawaii-Island-Commercial-Aquarium-Permits.pdf)

Published November 23, 2019

Comments due January 7, 2020

To david.sakoda@hawaii.gov, jim.lynch@klgates.com, terry.vandewalle@stantec.com

Mailing Addresses:

Pet Industry Joint Advisory Council 925 Fourth Ave
Suite 2900 SEATTLE, WA 98104 United States

David Sakoda
Hawai'i Department of Land and Natural Resources
Division of Aquatic Resources
1151 Punchbowl Street, Room 330
Honolulu, HI 96813-30813

GENERAL COMMENTS

Sierra Club comments in this document are indicated in italics. We concur and uphold DLNR's mission to 'Enhance, protect, conserve and manage Hawai'i's unique and limited natural, cultural, and historic resources held in public trust for current and future generations of the people of Hawai'i nei, and its visitors, in partnership with others from the public and private sectors.'

The legislature has decreed it the "policy of the State" that DNLN and other agencies must "[c]onserve natural resources . . . by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics . . ."1 The Agency must also "[e]ncourage management practices which conserve . . . all natural resources," and encourage all individuals "to fulfill the responsibility as trustees of the environment for the present and succeeding generations."2 In enacting HEPA, the State legislature found "that the quality of humanity's environment is critical to humanity's well-being, [and] that humanity's activities have broad and profound effects upon the interrelations of all components of the environment . .

¹ Haw. Rev. Stat. § 344-3(1).

² Haw. Rev. Stat. § 344-4(2)(A), (10)(A).

Sierra Club concurs with the DEIS analysis submitted collectively by For the Fishes, The Humane Society of the United States, Moana Ohana, and the Center for Biological Diversity. We ask that their response be incorporated into our comments and responded to in the succeeding draft of the EIS.

We find that this DEIS fails to provide adequate baseline data from which to analyze the risks posed by cumulative factors, such as unregulated collecting, under-reporting of catch, failure to monitor and take enforcement actions when violations occur, changes to habitat from natural and human perturbations historically, and the effect proposed alternative(s) would have on traditional fishing practice and diminishment of our clean and healthful environment. The DEIS fails to offer appropriate mitigation for anticipated impacts, regulation and reporting of all collection, sales records and export data, and it fails to address the cruelty to which the collected animals are exposed. The compiler of this DEIS failed to consult with citizen groups and communities who are affected, and dismissed the significant input provided by those with whom it did consult. The DEIS did not address our specific issues and concerns raised in the earlier environmental assessments, nor did it appropriately disclose adverse effects to the biological and cultural resources that are part of the public trust the State of Hawaii has the responsibility to protect. Future serious impacts to the coastal near-shore habitat due to climate change are ignored in this document, and the proposed action alternatives do not address mitigation for the anticipated loss of coastal habitat. The DEIS preferred alternative proposes to exploit a public resource for the economic benefit of a few, (who have been non-compliant with past rules and regulations), at the expense of the subsistence communities, the resident public, the visitors, and the health of the state as a whole. Absent the documentation needed for a complete and accurate analysis, we ask that at the very least, a No Action Alternative be implemented.

SPECIFIC COMMENTS

Executive Summary

p. ii

Even if the collection rates of the 40 White List Species were closer to the maximum collection by the 14 fishers from 2000-2017, the annual collection of all species would be less than 3.5% of the island-wide population. Research suggests collection of between 5%-25% is sustainable for various reef species similar to those on the White List (e.g., tang, wrasse, butterflyfish, angelfish, triggerfish). Based on the low percentage of the overall populations collected annually by commercial aquarium fishers, which is spread throughout the year and across multiple areas, as well as the targeted collection of smaller, less fecund individuals, commercial aquarium collection likely has minimal impacts on populations in general.

Explain why the research is reliable if it is only based on similar species, not actual species.

Calculations and evaluation of impacts should include catch of food fish which are also caught for aquarium collecting.

p.iii

Loss of the fishery would result in the loss of income, tax revenue, and jobs.

Recommendation by cultural practitioner Pelika Andrade was that the aquarium industry should invest in aquaculture, which would teach them how to grow and spawn their own supply and make contributions to replenishing the fish removed from our waters.

Income tax revenue, and jobs from sustainable aquaculture could replace that of aquarium fish collecting from the ocean.

2.0 PURPOSE AND NEED

p. 15 The need for the Applicant's action is to continue commercial aquarium fishers' livelihoods...

The resources of the ocean and the nearshore waters are a component of the Public Trust held for the benefit of Native Hawaiians and the general public. When the public trust resources are "mined" for the benefit of a few commercial collectors to enhance the pleasure of a few aquarists keeping open ocean animals in a closed and artificial environment, the sustainability of the habitat on which traditional practitioners depend is altered. The livelihoods of local fishers (and their families) for subsistence is a need that outweighs the needs of the applicant.

2.2 NEED FOR APPLICANT'S ACTION

Using fish for food meets a basic human need. Using fish for aquariums only provides pleasure, but there are many other options which do not involve animal cruelty and are more environmentally friendly.

p. 16

2.5 SCOPE OF ANALYSIS

p. 16

Regarding biological resources, this DEIS focuses primarily on the effects of aquarium fishing on wild populations of White List Species, as it is at the population level that DAR measures changes in White List Species and makes management decisions (e.g., issuance of harvest permits, implementation of bag limits). Therefore, because population effects have already occurred once an individual fish has been removed from the ocean, it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population.

The focus should be on impacts on specific West Hawai'i locations, not on the entire population around the island of Hawai'i.

2.5.1 Resources Evaluated and Dismissed from Further Consideration

pp. 16 - 17

This DEIS evaluates the impacts of five commercial aquarium fish collection alternatives on the nearshore habitat (0-600 feet; 0-100 fathoms) in which commercial aquarium fishing (or lack thereof) would take place over a 5-year period. During the evaluation process, it was determined that some resources typically evaluated in an EIS would not be impacted by any of the alternatives under consideration. The evaluation includes past use and potential impacts by the commercial aquarium fishery because it has been a part of the baseline condition of these resources since the late 1940s. Because a significant increase in commercial aquarium fishing is not anticipated during the 5-year assessment period evaluated in this DEIS, and in fact a decrease when compared to historic conditions is anticipated due to the issuance of only Aquarium Permits, this DEIS does not anticipate a significant change in the current baseline condition of these resources.

It is not clear that the DEIS examines the condition set forth by DLNR to examine "The adequacy of the analysis presented in the DEA, including but not limited to removal and replenishment rates for vulnerable species; specifically, how is the estimated sustainable range of 5% to 25% annual take of the estimated total population arrived at, and should the threshold be 5% or 25%."

The DLNR's issuance of 14 Aquarium Permits is not anticipated to result in significant beneficial or adverse impacts to water and air quality, geology and soil resources, aesthetics, noise, vegetation, terrestrial wildlife and avian species, threatened and endangered species, land use, public health and safety, communications, transportation, utilities, or population and demographics from the current baseline condition, therefore, these resources will not be evaluated further.

In light of Judge Wilson's dissenting opinion on the Thirty Meter Telescope, which is incorporated by the reference below, identify any Federal and State laws which state that if resources are degraded, it's acceptable to degrade them further.

<https://www.courts.state.hi.us/wp-content/uploads/2018/11/SCOT-17-0000777disam.pdf>

The DEIS states...it is beyond the scope of this analysis to evaluate effects on individual fish once they are removed from the population.

The trade as proposed in DEIS violates Hawaii's Cruelty to Animals statute. The disclaimer on the scope to exclude what happens to these creatures after caught is inappropriate and omits critical information needed to evaluate alternatives. If all of the captured individuals died, under this analysis, it would not be considered, because it would be outside the scope.

Fish may be brought up from reefs so quickly they suffer immediately. If their swim bladders are not punctured they can die. In several instances, fish have been found dead in trash cans (note the 500 dead at the harbor). Several Hawaiians interviewed complain that they see bags of dead reef fish and this is not pono. What measures are taken to ensure fish are treated humanely? We understand they are deprived of food at warehouses before shipping. Their fins are trimmed. What agency is charged with DOH and DLNR regulating care of fish?

The effects on individual fish removed from the population matter. The manner of capture and care should be included in the analysis! These fish are not used for subsistence, they are used for ornamentation and fleeting pleasure. The impacts of trapping, finning, starving, enclosure in confined packaging, transporting and eventual placement of remaining live "specimens" in artificial conditions must be considered in the DEIS analysis.

Hawaii Cruelty to Animals Statute

§711-1109 Cruelty to animals in the second degree. (1) A person commits the offense of cruelty to animals in the second degree if the person intentionally, knowingly, or recklessly:

(a) Overdrives, overloads, tortures, torments, beats, causes substantial bodily injury to, or starves any animal, or causes the overdriving, overloading, torture, torment, beating, or starving of any animal;

(b) Deprives a pet animal of necessary sustenance or causes such deprivation;

(c) Mutilates, poisons, or kills without need any animal other than insects, vermin, or other pests; provided that the handling or extermination of any insect, vermin, or other pest is conducted in accordance with standard and acceptable pest control practices and all applicable laws and regulations.

3.0 ALTERNATIVES

3.1 NO ACTION ALTERNATIVE

No Action Alternative does not meet the Applicant's purpose and need to continue fishers' livelihoods participating in lawful, responsible, and sustainable commercial collection of approved fish species from nearshore habitats

*Include the fact that collectors can pursue **alternate** livelihoods raising aquarium fish in captivity, working in commercial aquariums, fishing for food fish, and running boat and dive tours.*

In order to protect and ensure the sustained health of the reef and subsistence fishing practices of native communities, the Sierra Club requests that the DLNR accept the No Action Alternative.

3.5 LIMITED PERMIT ISSUANCE (PREFERRED) ALTERNATIVE

This Alternative is based on the best available science, supports the DLNR's purpose to ensure Applicant's Actions do not lead to degradation of fish populations and the habitats in which they occur in the context of commercial aquarium collection.

The problem continues to be that DLNR/DOCARE do not demonstrate the capacity, funding or commitment to enforce the regulations as proposed. This statement is corroborated by the numerous interviews conducted in the cultural impact statement appended as Appendix A.

Quotes from the Cultural Impact Assessment include the following:

(WILFRED KAUPIKO, KA'IMI KAUPIKO, AND GREG ASNER) When asked about their thoughts on the proposed action, they explained some of the reasons why they were not in support of the proposed action. The four individuals explained that while aquarium collection is not permitted within Miloli'i Bay, they noted that aquarium collectors often launch their boats and utilize water at the Miloli'i dock to fill their tanks. Ka'imi and Uncle Willy described several instances when they have caught aquarium collectors illegally harvesting fish within the FRA which they reported to DLNR. Uncle Willy (Kaupiko) stated that for the past ten years and because the State cannot fulfill its duties, the Miloli'i community has been implementing Makai Watch, a community- based watch and outreach program promoted by DLNR. Despite numerous complaints and reports to DLNR about the illegal taking of fish by collectors, Ka'imi and Uncle Willy opined that DLNR has failed in their responsibility as they do not follow up or issue citations to violators. For these reasons and many others, Uncle Willy feels that the "State cannot take care of our resources." (CIA P 127)

Shane Palacat-Nelson, In referencing Kealakekua Bay, Shane stated that the current state of the bay is unknown because there is not enough fish count, water quality, or reef health data to provide feedback on the potential impacts to the area. He further related that schools of fish can be depleted in one season, but if there is no data to detect these depletions then communities witnessing the depletion of their own resources are left with no support or evidence to resolve these on-going problems. He believes that restricted areas "are not working properly" and therefore declined to comment until there is a thorough study done within these areas. With the lack of data, he is unable to accept the commercialization of aquatic fisheries until these issues are addressed. (CIA P 128)

Joe (Balismo) also spoke about the lack of DOCARE enforcement officers because of their limited resources and stated that ensuring compliance with all laws pertaining to the aquarium industry is a difficult thing to enforce. He added that the lack of enforcement means that the state relies on the "trust system," which for him is unacceptable. (CIA p 132)

(Summary) As voiced by many of the consulted parties, the lack of support and funding have hampered DNLN-DAR's ability to fulfill its fiduciary responsibility, namely to enhance, protect, conserve, and manage Hawai'i's unique and limited resources, which are supposed to be held in public trust for the current and future generations of the people of Hawai'i nei, and visitors alike. (CIA P 135-6)

1.2.3.2 HAR 13-60.4 (p 13) In addition to applying any other penalties provided by law, the DLNR may revoke any West Hawai'i Aquarium Permit for any infraction of these rules or the terms and conditions of the permit, and any person whose permit has been revoked shall not be eligible to apply for another West Hawai'i Aquarium Permit (commercial or recreational) until one year from the date of revocation.

How has DLNR implemented enforcement to date? Have permits been revoked?

If, under the preferred alternative, each of 14 permittees were assessed at least \$50,000 annual fee to cover the cost of a dozen enforcement officers, the boats and equipment to monitor the commercial collection activities, and staff to conduct population assessments in the collection areas, such a system might be within reason, but the institutional will and funding are not evident. For this and many other reasons, this is not a practical or sustainable alternative.

4.1.1 Socioeconomic Aspects of the Commercial Aquarium Fishery

- In 2017, the commercial aquarium fishery on the island of Hawai'i reported landings near \$1.4 million, with more than \$1.29 million coming from the WHRFMA (DAR 2018a). **For the 14 fishers requesting commercial Aquarium Permits under the Proposed Action, 3 to 11 fishers reported catch in any given year between 2000 and 2017**, contributing from 22.3% to 69.1% to the total overall WHRFMA fishery value (Table 4-1). (Emphasis added)
-
- In addition to incorporating Act 306 into the Hawai'i Administrative Rules, HAR 13-60.4 identified West Hawai'i Aquarium Permit Terms and Conditions by implementing the following provisions:
- **Aquarium collectors must submit each month's daily aquarium fishing trip reports before every 10th day of the following month.** (Emphasis added)

According to table 4.1, barely 47 percent of permittees provided required reports, and of the 14 proposed permittees in the Preferred Alternative, only 3 to 11 provided reports during 2000-2017, so how does the DLNR expect to collect meaningful data, if those with permits are historically non-compliant?

4.2 CULTURAL RESOURCES

P 29 Commercial aquarium fish collection is not a part of Native Hawaiian culture; however, Native Hawaiians do participate in and support the fishery and Hawaiian culture has been a significant aspect of the fishery's management since the 1970's. Although the process has been contentious at times, the WHFC has been successful.

This section fails to acknowledge the significant impact of aquarium collecting on lawei`a (fishing and gathering) and its effect on Hawaiian traditional culture, contemporary practice and way of life.

Quoting a few passages from the Cultural Impact Statement:

P of 111-112 CIA quoting Pelika Andrade

When asked if the proposed project would lend to any potential cultural impacts, Pelika (Andrade) compared the practice of lawai'a to aquarium fish collection as it is practiced in Hawai'i today. She evaluated that lawai'a—the reciprocal relationship between man and the environment—and aquarium collection, which focuses on the act of lawei'a, removing fish from the ocean does not align with the Hawaiian worldview of caring for the ocean and its resources. She stated that aquarium fishing is not about feeding those at your table, but a business that impacts that

larger community. She feels that there is no accountability to the communities that are impacted by this industry, which was a fundamental aspect of traditional fishing practices. Based on this, Pelika believes that the proposed project would lend to adverse impacts to the community and is not aligned with traditional fishing practices. She went on to explain that with aquarium collection, "there's no tending process, only lawe i'a." She argued that modern aquarium collection practices negatively impact fisheries and disrupts traditional knowledge systems, because there is no input or contribution to maintaining the very resource that the industry is dependent upon. She emphasized that the practice of kupuna (Hawaiian elders) was not based exclusively on lawe i'a (taking fish), rather the act of lawe i'a was carried out after a fisher understood all of the other components that allowed for healthy marine resources. She argued that identifying oneself to the act of lawe i'a (taking fish) with no forms self-management, severely limits the individual from fully embracing the traditional practice of lawai'a, which emphasized caring for the resources. Pelika opined that the act and the sense of entitlement associated with lawe i'a (taking fish) can be applied to other fishing industries, from commercial to subsistence fishing. She explained that this mindset shift from caring for our resources, to entitlement to our resources, is a result of a lifestyle change. For these reasons, Pelika does not support aquarium fishing and other fishing practices or industries that make no effort towards contributing to maintaining the resources or encourages self-management.

P115 of CIA

The Kailapa Community members and those from the Kohala Estates spoke openly against the collection of reef fish to supply the aquarium industry. Many stated that the practice of catching fish without intending to consume it goes against traditional belief and that this act is not pono (proper, morally fitting, beneficial). They expressed that all fish are part of the public trust and that removing fish to supply a "lucrative" industry undermines traditional practices and beliefs associated with the ocean.

P 131 of CIA

Damien (Kenison) shared that for him, he feels that the take of fish for aquarium purposes is a "wasteful practice" and expressed that it is a cultural value not to waste fish. He opined that this practice from a Hawaiian perspective is maha'oi (rude and impudent). He feels that "tropical fish collectors have no respect for the resource and the communities" and described instances when coolers of dead tropical fish were found. He stated that the aquarium industry does not have a stake in the local communities. He expressed that dealing with this growing conflict has been stressful for the community.

4.4 BIOLOGICAL RESOURCES

The cultural significance of White list species are under-reported throughout the DEIS; for example, the DEIS section on Cultural Significance of the Achilles Tang states (p 36)

The yellow tang, called *lāī pala* or *lauī pala* in Hawai'i, although small was considered a delicacy and also involved in healing rituals.

It fails to provide this significant information:

P117 of CIA, Kehau Springer stated that "Through her interactions with various communities in West Hawai'i, and in speaking with kama'āina of the areas, certain harvesting and fishing practices have changed due to a decrease in fish population and environmental changes as exemplified by the pākuikui (Achilles tang). Kehau shared that this is a favorite delicacy in South Kona. Elders of the area shared that this fish was highly favored for parties and gatherings. However, according to oral interviews with various community members, in the last decade, there has been a major population decline. As a researcher, she confirmed that she has observed a very small population of pākuikui in these areas and in comparing scientific monitoring data, statistics, and literature reviews, their numbers have decreased significantly over the years. She does contend that there are other factors that may affect the population, such as their monogamous behavior, urbanization, pollution, and overharvesting."

While a decline in the abundance of Achilles Tang is described in the DEIS on p 76, the loss of the cultural resource is not addressed:

- Commercial aquarium landings of Achilles Tang have declined in West Hawai'i over the past two decades in association with a recent dramatic increase in its value (192% since 2008). This is strongly suggestive of declining availability (i.e., abundance). (Addressed in Section 5.4.1.2 – Achilles Tang).
- Achilles Tang have declined significantly in FRAs and Open Areas over the last 20 years. Open Area populations have usually been higher than FRA populations in the past decade. Achilles Tang has had low levels of recruitment over the past two decades, and because of its popularity as a food fish as well as an aquarium fish, this species is harvested both as juveniles and adults.

4.4.2.1 Red Pond Shrimp

Opae`ula, referred to in the DEIS as Red Pond Shrimp, are in a group known to be endemic to the Hawaiian Islands. The Center for Biological Diversity(CBD) has sued the US Fish and Wildlife Service(USFWS) for not designating critical habitat for all endangered species recently designated for Hawai'i and this Red pond shrimp is one. The suit claims that by not designating critical habitat, USFWS is violating the Endangered Species Act because 14 of 15 of species recently designated are not protected. Max Phillips of CBD says "These special species are found nowhere else...so if they disappear from here they'll be lost forever. Anchialine pool shrimp and the rest of the group needed habitat protection years ago but there not getting it from the anti-wildlife Trump administration. Species with habitat protections are twice as likely to be in recovery as those without".

4.4.3 Hawai'i Species of Greatest Conservation Need

pp. 67-68

...three White List Species occur on Hawai'i's SGCN list:

1. Psychedelic Wrasse
2. Tinker's Butterflyfish
3. Fisher's Angelfish

Since there is cause for concern about these species, they should not be collected.

p. 69 Ecosystem indicators related to benthic reef community integrity indicate a shift in West Hawai'i towards lowered reef accretion and reduced structural complexity.

Given the observations of cultural practitioners, over-fishing, pollution, damaged habitat, coral bleaching and climate change have all led to significant changes in the habitat for reef fish. There is no discussion in this section to address the significant degradation of the habitat both historically and contemporaneously.

P123 of CIA

Megan (Lamson) pointed to the 2015 coral bleaching event that resulted in the loss of close to fifty percent of live coral covers in West Hawai'i. She added that the drastic reduction in coral has severely altered the very foundation upon which reef fish and other marine life need to survive. She emphasized that although some fish listed on the "white-list" are highly valued in Hawaiian culture, she explained that all fish have a role in maintaining the necessary balance of the ecosystem. She stressed that we don't fully understand the ecological relationships that exist between the different species.

4.4.5 Reef Habitat

Due to Hawai'i's extreme isolation, an estimated 25% of the coral reef species are found nowhere else...The ratio between the cover of calcifying to non-calcifying organisms – an indicator of coral reef community dynamics and the extent to which a given system is dominated by organisms that contribute to coral reef development and persistence – declined across West Hawai'i since 2003...

Removing herbivorous aquarium fish will not help in mitigating the decline of coral reef health. Reef fish from larval through juvenile stages have an extremely high natural mortality rate, this natural order is important to the life on the reef as well as the mid water feeders and even the pelagic predators. An abundance of invasive algae will occur in a un-healthy ecosystem.

*A recent DAR announcement appealed to subsistence and recreational reef fishers to **refrain from taking herbivorous fish off the reefs**. This tacit recognition of the vital symbiotic service they perform in this delicate ecosystem is overdue and yet completely absent in the DEIS.*

The 'preferred alternative' in the document would allow (with one exception) for unlimited takes of many of these same important organisms.

4.4.7.1 West Hawai'i Aquarium Project (WHAP) Surveys

The 2010 and 2014 Hawai'i Island aquarium catch report validation did not indicate substantial underreporting of catch by aquarium collectors.

This statement is not consistent with tables 4-1 and 4-2 that detail significant underreporting by permittees and proposed permittees over a multi-year period.

Table 4-5. West Hawai'i Open Area population estimates...

Some catches as a percent of population seem high (30' -60' open area) This may indicate past mismanagement by DLNR. So perhaps DEIS assumptions that DLNR will enforce regulations are unfounded.

Achilles Tang

32.70% in 2013 – 2014

39.67% in 2017 – 2018

Yellow Tang

17.26% in 2013 – 2014

Black Surgeonfish

11.66% in 2013 – 2014

Shortnose wrasse

18.07% in 2017 – 2018

Psychedelic wrasse

55.78% in 2017-2018

p. 76

Achilles Tang have declined significantly in FRAs and Open Areas over the last 20 years. Open Area populations have usually been higher than FRA populations in the past decade. Achilles Tang has had low levels of recruitment over the past two decades, and because of its popularity as a food fish as well as an aquarium fish, this species is harvested both as juveniles and adults.

Pressure on food fish that are declining in numbers should not be increased by aquarium collecting.

p. 77

The Psychedelic Wrasse, Tinker's Butterflyfish, and Fisher's Angelfish are all listed as SGCN in Hawai'i...Adequate population estimates based on WHAP data (30-60 feet depth) are not available to assess the impact of continued aquarium collection on these three species due to their deeper water habitats. However, based on deep diver observations, Tinker's Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs). Commercial aquarium fishers generally do not fish in the deeper waters in which these species occur. In 2017, there were 599 Psychedelic Wrasse, approximately 290 Tinker's Butterflyfish (n.d. in East Hawai'i), and 288 Fisher's Angelfish collected by aquarium fishers on the island of Hawai'i

See comments re. 4.4.3. Since two of the species seem to thrive when protected, they should not be collected.

In particular, the wide range (5% -25%) of claimed 'sustainable' takes for a range of 'white list' species is never fully backed up with studies of the subject areas. Nor does this gross margin of 'sustainability' cohere with statements elsewhere such as,

"The DAR (2019a) has noted significantly declining populations in one or more management area for 12 of the White List Species. However, as noted above and in Section 5.4.3, these declines are occurring in both areas open and closed to commercial aquarium fishing for all but one species, indicating that aquarium collection is not driving the decline (DAR 2019a). Because these declines are occurring in FRAs and/or MPAs as well (i.e., areas not open to commercial aquarium collection) it is reasonable to assume that banning commercial aquarium collection would not halt the declines.."

We observe that any declines whether driven by or contributed to by the trade are simply not justified by the logic and necessity of sustainability. It is the larger abiding responsibility of DLNR, as specified in the State constitution, to preserve in abundance this resource.

4.4.7.3 WHAP and CREP Survey Comparison

p. 81

...due to the larger spatial coverage and greater range of depths surveyed by the CREP, CREP data were considered to be a better estimator of island-wide fish populations, and therefore serve as the primary basis for the impact analysis found in Section 5.0.

See comments re. 2.5. WHAP should be used because it is specific to West Hawai'i.

5.2 SOCIOECONOMIC RESOURCES

5.2.1 Direct Impacts

p. 84

Total ex-vessel value (i.e., price received by a fisher for the catch) for the 14 fishers in the WHRFMA ranged from a low of \$164,040 in 2001 to a high of \$1,162,964 in 2016, with an average of \$793,352 (inflation- adjusted 2019 dollars...)...The 2017 ex-vessel inflation-adjusted value for the 14 fishers within the WHRFMA was \$932,735...It should be noted that the dollar value of these fisheries represents only the ex-vessel value, what the fishers are paid for their catch, and does not include the value which would be generated by additional dealer and retail sales.

p. 21

In 2001, Cesar et al. documented the annual recreational value of the coral reefs of the Hawaiian reefs for snorkelers and divers was estimated to be \$281 million and \$44 million, respectively. Although the direct expenditure per diver is much larger than the direct expenditures of snorkelers, the overall value related to the latter group is much larger due to their large numbers.

The value of the coral reef ecosystem for tourism (snorkeling) appears to be is several orders of magnitude greater than the value of the reef-sustaining fish for "esthetically pleasing" aquaria on the continent. In addition, the process of collecting and transporting reef fish for sale on the continent constitutes animal cruelty and a waste of resources (fish die in transport or within a year many die in tanks. This) is detrimental to society in the long term.

p. 85

Analysis by the DAR (2019a) has shown that actual underreporting of catch is small, with a 3.5% difference between the number of animals reported caught and sold in 2010 and a 0.4% difference in 2014, which likely represent live releases and mortality.

How reliable are reports of numbers caught and reports of numbers sold? The reporting process should be more fully described to back up the statement that "underreporting of catch is small".

p. 85

The number of non-reporting permit holders is actually an indicator of industry growth and direct socioeconomic benefits.

The DEIS should explain this incongruous assertion. More information should be provided to explain and back up this statement.

5.2.1.1 No Action Alternative

p. 85

An increase in the East Hawai'i commercial aquarium fishery value may offset some of the loss from the WHRFMA fishery under the No Action Alternative, but the fishery as a whole would still add approximately \$6.3 million less to the economy over the 5-year analysis period than under the Pre-Aquarium Collection Ban Alternative, or \$1,250,611 less per year (on average).

The EIS should evaluate how much of this would be offset by an increase in populations of aquarium fish that are also caught for food, and by collectors changing to jobs catching food fish, doing boat and dive tours, working at public aquariums, and other employment.

5.2.1.5 Limited Permit Issuance (Preferred) Alternative

p. 87

The analysis should factor in costs to collectors for boats, equipment, gas, insurance, maintenance, etc.

p. 88

The Limited Permit Issuance (Preferred) Alternative would have a minimal, but **beneficial direct impact** on Hawai'i's overall and ocean socioeconomic resources...

Explain how removing fish from the ocean has beneficial direct impact on ocean socioeconomic resources.

5.2.2 Indirect Impacts

p. 88

Indirect socioeconomic impacts of the commercial aquarium fishery would primarily involve the additional profits from the aquarium fish market (including freight and packaging), as well as other tourist businesses such as snorkel and dive operations that rely on seeing and interacting with a healthy reef ecosystem. The presence of a healthy reef ecosystem may also impact overall land/home values on the island of Hawai'i.

Explain how removing beautiful fish helps snorkel and dive operations.

Explain how taking herbivores off the reef makes the reef healthy.

See comment re. "scientific data" in 5.2.2.1

5.2.2.1 No Action Alternative

p. 88

...approximately \$31 million in indirect economic benefits of this fishery would not occur over the 5-year analysis period...

See comment re. p. 87.

p. 88

No scientific data exist to suggest that in the absence of aquarium fishers an increase in other tourist operations would occur.

The EIS does not rely on scientific data to make assumptions about tourist businesses in 5.2.2 (see above)

p. 88

The loss of funding for reef fish conservation likely would impact the ability of the DAR to monitor and protect reef fish.

The DEIS does not explain how the No Action Alternative would lead to a loss of funding. What mechanisms are in place to currently to provide funding for monitoring and enforcement? How are reef fish protected currently? How much of this would be offset by the reduced need for monitoring with no collecting allowed in West Hawai'i?

5.2.2.5 Limited Permit Issuance (Preferred) Alternative

p. 91

The Limited Permit Issuance (Preferred) Alternative would have a **less than significant impact** on Hawai'i's tourist industry, and a minimal, but **beneficial indirect impact** on Hawai'i's overall economy through re-investment efforts in terms of equipment, maintenance, supplies, and personnel.

The DEIS does not explain how the Preferred Alternative would impact funding for equipment, maintenance, supplies, and personnel. What mechanisms are in place to currently to provide funding for monitoring and enforcement? How are reef fish protected currently?

P 125 of CIA

Both Greg (Asner) and Gail confirmed fish population crashes at Pāpā Bay and have recorded collectors walking on and damaging coral, which they expressed is key to maintaining a healthy marine ecosystem. The group stated that they have seen aquarium collectors day after day collecting fish from the same areas and feels that this intensive harvesting does not give the fish and the ecosystem a chance to recuperate from previous biological removals. Greg believes that the destructive methods used by certain aquarium collectors are dismantling this integrated system.

Describe the economic impacts from reef degradation from loss of herbivores and collectors damaging coral.

5.3 CULTURAL RESOURCES

5.3.1 Direct and Indirect Impacts

p. 92

As concluded in the CIA, cultural impacts would occur if issuance of Aquarium Permits under an alternative would cause a significant decline in the population of a White List Species considered to be a cultural resource, either directly through the collection of fish or indirectly through habitat impacts.

P115 of CIA

The Kailapa Community members and those from the Kohala Estates spoke openly against the collection of reef fish to supply the aquarium industry. Many stated that the practice of catching fish without intending to consume it goes against traditional belief and that this act is not pono (proper, morally fitting, beneficial). They expressed that all fish are part of the public trust and that removing fish to supply a "lucrative" industry undermines traditional practices and beliefs associated with the ocean. They urged people to view fish in their natural environment where their colors are bright and brilliant. Several community members expressed concern for the high mortality rates of aquarium fish. They believe that removing any part of the ecosystem alters the natural balance and that removing small fish disrupts the natural food chain.

Even if collecting does not cause a decline, cultural impacts occur because of aquarium industry practices and attitudes towards natural resources. Removing beautiful fish that consume algae threatens coral reefs that support many forms of aquatic life and protect the islands from storms...inflicting suffering for the animals and the people that love them for the convenience of the industry (fizzing, finning, starving, confining in tiny bags).

Missing from the DEIS is an analysis of species are considered 'Aumakua (family guardians) the Native Hawaiian religious significance of each and every species collected must also be included in the EIS analysis and impact statement.

Missing from the DEIS is graphical and other analysis of the socio-economic impact on native Hawaiian communities with high incidence of commercial aquarium trade and trafficking in their area, nor is there an Ahupua'a or place-based analysis. For example, and analysis of the impact this industry has on traditional Hawaiian communities such as Miloli'i.

5.3.3 Mitigation

Significant cumulative [cultural resource] impacts are anticipated; however, commercial aquarium collection is a less than significant factor in the cumulative impact. Therefore, no mitigation is required or proposed.

This statement is not substantiated, and every incremental impact is additive to cumulative impact. See comments re. pp. 16 – 17.

p 134

Several White List and non-White List Species are endemic to the Hawaiian Archipelago (including Johnston Atoll) and therefore may be impacted when faced with changes in climate over time (e.g., warming temperatures, habitat loss due coral bleaching, etc.). The extent and severity of impacts to White List Species from climate change have been ongoing for decades and are expected to increase in the foreseeable future. If environmental fluctuations resulting from climate change (e.g., tropical storms, coral bleaching episodes, acidification, etc.), or other natural or human factors, change habitat conditions, fishing mortality may present a higher risk to some White List and non-White List Species and SGCN."

Cumulative impact is, by definition, caused by numerous factors; if the impact of climate change affects reef and fish mortality, then mitigation of fish mortality through collection and removal from the reef must be proposed and required.

5.4 BIOLOGICAL RESOURCES

5.4.1 Direct Impacts

p. 94

According to data presented in DAR (2019a), the number of collected fish in the WHRFMA has increased by 29% between 2000 and 2017, growing from a collection of 252,290 in 2000 to a collection of 324,565 in 2017 (DAR 2019a)⁸, representing an annual growth rate of 1.49%⁹.

Informants to the Cultural Impact Assessment (CIA) reported significant reductions in fish traditionally used for subsistence.

P102 of CIA Throughout the early part of the 20th century, the participation of Japanese in Hawai'i's commercial fishing continued to increase, while Kānaka Maoli participation gradually waned (Glazier 2007). As the commercial fishing industry continually expanded to meet the demands of the growing consumer population in the islands, the fish and other marine resources became more scarce. With the shift to a market economy and a commercial fishery these marine resources were valued mostly for their economic potential, and little to no regard was paid to the myriad of traditional values and more that emphasized the spiritual, cultural, familial, and ecological importance of the fish and other marine species. Maly and Maly (2003:ix) contend that "this trend has continued through the present-day and fostered the decline in health and well-being of the broad range and diversity of Hawaiian fisheries."

5.4.1.1 No Action Alternative

p. 95

*Explain why it is not harmful to remove herbivorous aquarium fish, even though DLNR recently urged fishers to refrain from taking herbivorous food fish.
"Avoid fishing for parrotfish, surgeonfish, and other herbivores."
coral_card.pdf dated November 2019*

Consider impacts on larger predator fish, commonly of high-value, when prey fish numbers are reduced by collecting.

5.4.1.5 Limited Permit Issuance (Preferred) Alternative

p. 124

The 14 fishers requesting Aquarium Permits collected up to a maximum of 293,845 fish in the WHRFMA in a single year during the period from 2000-2017 (see Table 5-2). Conservatively assuming collection in the first year of the 5-year analysis period started at this maximum, and then grew at 1.49% per year, a total of 1,513,665 fish would be collected over the 5-year analysis period, or an average of 302,733 per year.

Impacts to individual species in the WHRFMA are shown in Table 5-11, using both the average and maximum number of each of the White List Species collected in the WHRFMA by the 14 fishers annually between 2000 and 2017, and what percent of the CREP population estimates those values represent. The impacts on individual species' populations is less than 2% for all species when looking at average collection rates, and less than 3% when looking at maximum rates.

As noted in Tables 4-1 and 4-2, permittees failed to report catches 47% of the time.

Instead of only using averages, state what would happen for each species in the 5th year--how many fish would be collected at maximum rates, what percentage of the population would be collected, and whether this appears sustainable. How would the 5 year analysis be conducted?

p. 124

...the bag limit for Achilles Tang would be implemented...

See comments re. Table 4-5, p. 74. The statement regarding impacts to individual species populations does not seem to correlate with the data presented.

5.4.2 Indirect Effects

5.4.2.1 No Action Alternative

p. 125

...data do not exist that would allow for a thorough analysis of such effects ...

Interviews should be done with people who frequent specific areas to help research changes in abundance of fish in these areas.

5.4.2.5 Limited Permit Issuance (Preferred) Alternative

p. 127

It is anticipated that collection of approximately 1.5 million fish would occur in the WHRFMA...

For all numbers in this section—do they cover one year, or the 5-year analysis period?

5.4.3 Cumulative Impacts

5.4.3.1 Recreational Aquarium Fish Collection

p. 128

The DAR collected recreational aquarium fish catch information from 1975 until 1985, after which, data collection was discontinued, and currently no reporting of catch is required for recreational aquarium permit holders. Historic recreational catch data were not digitized or processed into a database, and therefore, are not available for analysis (DAR 2018a).

Can DLNR do adequate enforcement without the ability to collect and store data?

p. 129

...studies conducted by Tissot and Hallacher (2003) found that aquarium collecting had no significant impact (beneficial nor detrimental) on reef habitat. In addition, 15 years of coral reef data collected and analyzed by the DAR (2018b) found no significant difference in coral cover in areas open to commercial aquarium fish collection.

Photo documentation and careful observation by community members indicate that coral damage is occurring regularly on the reef. More collecting photos at: <https://www.atdarock.photography/Big-Island-Aquarium-collecting>

5.4.3.2 Non-Aquarium Commercial and Non-Commercial Fishing (Non-Aquarium Fish)

p. 130

...unlike the aquarium fishery which targets mostly immature fish, the commercial and recreational fisheries selectively target the larger breeding portion of the population which has profound implications for the sustainable usage of the resource (DAR 2019a).

Little fish taken by collectors cannot grow up to become the big fish sought by fishers. The ideal time to take fish sustainably may vary among species. With this in mind, review studies analyzing the impacts of taking each of the species collected in West Hawai'i at various points in their life cycle.

p. 130

...on the island of Hawai'i, commercial aquarium fish collection constitutes 25% of the total catch and 11% of the biomass (when excluding Yellow Tang...)

For West Hawai'i, how many fish, and how many pounds of fish, are taken on average per year, based on the last five years, by

- *One commercial aquarium collector*
- *One commercial non-aquarium fisher*
- *One recreational non-aquarium fisher*

5.4.3.5 Climate Change

p. 134

The extent and severity of impacts to White List Species from climate change have been ongoing for decades and are expected to increase in the foreseeable future. If environmental fluctuations resulting from climate change (e.g., tropical storms, coral bleaching episodes, acidification, etc.), or other natural or human factors, change habitat conditions, fishing mortality may present a higher risk to some White List and non-White List Species and SGCN.

Cite evidence that climate change will NOT put White List species at risk by changing habitat conditions.

This DEIS is significantly deficient regarding impacts of climate change in coral systems and reef wildlife, as well as climate change impacts on run off, water diversion for development or and impacts when added to pollution and contamination for all run off sources; including golf courses, hotels, housing development and other projects that contribute to the destruction and or contamination of the reef and near shore ecosystems. All of these perturbations will have a cumulative impact on coral reef habitat and fish populations.

5.4.3.6 Cumulative Impact Conclusion

pp. 134 - 135

The DAR (2019a) has noted significantly declining populations in one or more of the management areas for 12 of the White List Species, and cumulatively, all of the factors discussed above likely contribute to

the declines...while commercial aquarium collection does contribute to the cumulative impact, it is a **less than significant** factor in the observed declines.

Since aquarium fish are only used for pleasure, relaxation and entertainment, not for food, and the economic benefits of aquarium collecting amount to less than 0.01% of the economic benefits of commercial marine activities, why add to the impacts?

The DEIS fails to adequately address the interviews/testimony of Hawaiians and therefore dismisses the wisdom and observations of the culture. The DEIS claims there will be no significant loss of fish numbers with unlimited catch. Baseline should be before trade began, not 2018. Why should Hawaiians be denied the abundance their grandparents experienced? This is continued discrimination against indigenous people in order to profit from marine resources, and is evidence of a Western colonial mindset, and does not address social justice.

5.5 SUMMARY OF IMPACTS

Table 5-13. Summary of direct and indirect impacts by alternative over the 5-year analysis period.

p. 136

Limited Permit Issuance (Preferred)...Collection of 1.5 million White List Species fish from the WHRFMA

How would the removal of 1.5 million juvenile eherbivorous fish from the ecosystem result in no loss of abundance?

5.6 EVALUATION OF HEPA SIGNIFICANCE CRITERIA

Significance Criteria #1: The Preferred Alternative (i.e., Limited Permit Issuance Alternative) does not involve an irrevocable commitment or loss or destruction of any natural or cultural resource.

Reef Habitat

p. 139

...the DAR (2019a) reported that herbivore biomass has not changed since 2003 in the open areas or FRAs and has increased by 30.8% in the MPAs. While there has been no significant change in Open Areas or FRAs, there has still been an increasing trend, with a 14.4% increase in herbivore biomass in FRAs and a 26.0% increase in herbivore biomass in Open Areas between 2003 and 2017 (DAR 2019a, Gove et al. 2019). This occurred even with the pressures from commercial aquarium collection, which was occurring during this time .

The use of an improper baseline, the minimization of potential collection rates under the proposed alternatives, and an expanded area to which the impacts would apply provide inaccurate and unverifiable data from which to make proposed actions and mitigations.



*Paul Cox took this photo of two aquarium fish collectors right out front of the Miloli'i subdivision in Papa Bay, South Kona March 18, 2014. The primary targeted fish are the juvenile fish that use the finger coral as protection from predation. By the way, finger coral (*Porites Compressa*) is endemic to Hawaii, found nowhere else in the world. The collectors set a fine mesh net in the shape of a V onto the coral. He has seen anywhere from 15' to 200' of net for this process. As you can see in this photo the net is acting as a wall due to the floats on its upper ridge, what you don't see is the net it is anchored to the reef with an equal amount of lead sinkers. Some collectors do not use lead instead they tie or pin the net to the reef. The next step is to herd the fish from out of their sanctuary that is in the depths of the finger corals towards the apex of the V in the net. This is accomplished by the use of the white sticks that you can see lying under the collector's feet. The sticks are poked into the corals aggressively as the collectors push and crawl on the coral themselves. The idea is to make this fish sanctuary a place for the fright-or-flight response. Why don't the fish just swim over the top of the net? these little guys have a hard time ascending rapidly due to their internal air bladders (the fish do use buoyancy control). The collectors do not use a buoyancy control vest, to keep themselves negatively buoyant which helps to stabilize themselves onto the reef itself while they work.*

P 141

Significance Criteria #4

The Preferred Alternative does not substantially affect the economic welfare, social welfare, and cultural practices of the community or State...

MLG Sierra Club members have supported the Hawaii County Council resolution passed in 2008 to asking for a ban on the aquarium trade. We have been active since leading West coast hikes, snorkeling and kayak outings, and talking to residents about fish numbers. We had successful program "Where have all the Fishes Gone?" with attendance over 70. Speakers included Mike Nakachi, legislator Rep. Nicole Lowen, and Paul Cox. Members and leaders report seeing more reef fish on the West side decades ago.

Members met with several Pebble Beach residents who reported more fish since Ka'ohe bay protected after prolonged fight. Some are divers and photographers. A small kayaking group going south from pebble beach about 2003 remarked how few fish could be seen under water. A friend, local to the area, said angrily that they were being taken by AQ collectors. This was during the time Pebble Beach community was fighting to stop collection in their area. They did get some protection but only about 1,000' right in front of their bay. They asked for 1 mile or so.

We met with Kaimi Kaupiko in Miloli'i who is from subsistence fishing family. They oppose the trade and succeeded in getting the area designated FRA. They are teaching keiki cultural practices. A few were in the trade but they are trying to work that out. The culture is corrupted by money system but they want to preserve culture. I see mention of community involvement in DEIS but not since 1999. We also have met with Paul Cox, underwater photographer who presented at the program with photographs of many instances of violations of collectors damaging reef, unmarked buckets and equipment and using illegal nets as they walk on coral and rocks. We snorkeled with him at Papa Bay. He has made complaints that were ignored by DLNR or summarily dismissed.

Democratic Party resolution drafted on 4/5/2018 states "The taking of reef wildlife purely for commercial purposes cannot be reconciled with the 'precautionary principle' nor the 'hierarchy of priorities' policy guidelines of Hawai'i State Department of Land and Natural Resources". They also affirm the resolution based on Public Trust doctrine as stated in Article XI, Section I of constitution. Furthermore "the Democratic Party calls for State legislation to end commercial harvesting of coral reef wildlife".

The DEIS fails to address the concerns of the communities that are impacted by the actions of the aquarium collectors.

p. 142

Significance Criteria #8:

The Preferred Alternative does not involve a commitment for larger actions. When the full range of impacts to White List Species are considered (e.g., recreational aquarium collection, non-aquarium commercial fishing, recreational fishing, tourism, climate change), there is a significant cumulative impact to some White List Species...commercial aquarium collection does contribute to the cumulative impact...

See comment re. pp. 134 – 135.

p. 143

Significance Criteria #9

The Preferred Alternative does not affect threatened or endangered species or their habitats nor does it have a significant impact on rare species.

p. 77

The Psychedelic Wrasse, Tinker's Butterflyfish, and Fisher's Angelfish are all listed as SGCN in Hawai'i...Adequate population estimates based on WHAP data (30-60 feet depth) are not available to assess the impact of continued aquarium collection on these three species due to their deeper water habitats. However, based on deep diver observations, Tinker's Butterflyfish and Psychedelic Wrasse are substantially more common in the long term protected areas (MPAs). Commercial aquarium fishers generally do not fish in the deeper waters in which these species occur. In 2017, there were 599 Psychedelic Wrasse, approximately 290 Tinker's Butterflyfish (n.d. in East Hawai'i), and 288 Fisher's Angelfish collected by aquarium fishers on the island of Hawai'i

See comments re. 4.4.3. Since two of the species seem to thrive when protected, they should not be collected.

P 143

No significant adverse effects would occur as a result of the Preferred Alternative. Therefore, mitigation for impacts is not warranted and no mitigation measures would be implemented.

The document states, "The Preferred Alternative does not substantially affect the economy but plays an important role as a nearshore fishery in the state." What role? We maintain the role is largely negative as evidenced by the history of conflicts, dissension and general retreat of the trade throughout the state.

*Elsewhere it states, "No scientific data exist to suggest that in the absence of aquarium fishers an increase in other tourist operations would occur." We say, although you can't prove a negative, the outspoken claims and concerns of recreational competitors such as **Snorkel Bob** would certainly beg to differ! And the disappointment registered by recreational users we regularly interact with on our Sierra Club snorkel outings is something we have noted as well.*

Sierra Club Conclusion: *Under the **No Action Alternative** issuance of Aquarium Permits would not occur and commercial aquarium fishing would not be permitted in the WHRFMA. Therefore, collection of all White List Species in the WHRFMA would be zero and reef habitat would not be affected.*

In the WHRFMA, where no fish would be collected, a minor, although unquantifiable, increase in number of White List Species, non-White List Species, and SGCN may occur over the 5-year analysis period, which may provide additional viewing opportunities for tourists, an increase in the prey base, additional individual herbivores to maintain the reef, and increased competition between species for available resources."

Our constituency finds the 'No Action Alternative' to be logically and integrally the most compelling. This is clearly the superior plan!

We urge decision making authorities to adopt this alternative.

Thank you for the opportunity to comment.

Sincerely,

*Deborah Ward, Chair
Cory Harden, Conservation Chair
Diane Ware and Rob Culbertson, Co-chairs, Aquarium Collection Issues committee
Hawaii Island Group, Sierra Club*

From: [Darby](#)
To: david.sakoda@hawaii.gov; jim.lynch@kigates.com; [VanDeWalle, Terry](#)
Subject: No aquarium collection
Date: Sunday, November 24, 2019 11:12:52 PM

I strongly urge you NOT to allow the collecting and selling of West Hawaii's reef fish.

The reef is in dire need of protection.

A healthy reef is a huge money-maker in Hawaii as many tourists come to snorkel and view the coral and fish.

However the reef is very unhealthy presently due to the recent high temperatures of the sea (climate change), pollution, sunscreens and other damaging aspects of human disrespect and lack of education and knowledge. Taking the reef fish will hurt the reef even more.

A healthy reef is extremely important. The fish are an important part of the eco-system.

The reef fish must be protected.

Please malama

our beautiful reefs!

Blessings,

Darby L. Partner, CPM

Certified Professional Midwife

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~all love surround you~

www.unfoldinglotus.com

808.313.2428

From: [Kumu Kuahiwi Hawaiian Studies](#)
To: [VanDeWalle, Terry](#); david.sakoda@hawaii.gov
Subject: No more commercial aquarium fishing in Hawai`i
Date: Wednesday, November 27, 2019 10:54:13 AM

I am a Native Hawaiian Cultural Practitioner. I also come from a line of fishermen on both sides of my family. I have noticed the fish population depleting. I have notice a surge in invasive fish such as the Toao and Roy. Take more efforts into eradicating those first.

Put more efforts into restoring our reefs, rather than depleting our marine life.

No more. Stop and Deny this request to resume commercial aquarium fishing not only in West Hawai`i, but in Hawai`i shores... from Lo`ihi to Papahanaumokuakea.

--

Jon. Kuahiwi Moniz, MEdT
Kupa o ka 'aina Consultant
'Ae 'Ike Wedding Officiant

From: [Dawn Wallis](#)
To: [VanDeWalle, Terry](#)
Subject: DEIS support
Date: Monday, January 6, 2020 12:40:28 PM

Dawn Wallis
1710 9th st SE
puyallup, WA 98372

January 6, 2020

Dear Terry Vandewalle,

Please re-open this sustainable fishery.

I also request that any additional applicants, should there be any, conduct another EIS and CIA to measure additional impact beyond the 14 permits in the Proposed Action, further ensuring the sustainability while complying with the Supreme Court ruling.

Sincerely,
Dawn Wallis

From: [Alan Luken](#)
To: [VanDeWalle, Terry](#)
Subject: Hawaiian Fishery
Date: Monday, January 6, 2020 3:20:43 PM

Alan Luken
6180 Big Bend Road
Gibsonton, FL 33534

January 6, 2020

Dear Terry Vandewalle,

To Whom It May Concern,

On behalf of Segrest Inc, I am emailing you to express our support for DLNR's adoption of the draft Environmental Impact Statement which analyzes the issuing of Commercial Aquarium Permits for the West Hawaii Regional Fishery Management Area. We believe that the draft EIS has fully and completely analyzed all of the potential impacts of the Hawaii aquarium fishery. In the draft EIS, measures are proposed that would further help avoid and minimize what are already insignificant impacts on fish species and the environment in the West Hawaii Regional Fishery Management Area. Researchers and scientists have consistently determined that the Hawaii aquarium fishery is one the best managed near shore fisheries in the world. This conclusion has been backed by data from the DLNR. In order to develop a management strategy for the West Hawaii Regional Fishery Management Area, input from native Hawaiians and the environmental community has been used. We fully support the DLNR resuming the issuance of permits for aquarium fishing in the West Hawaii Regional Fishery Management Area.

Sincerely,
Alan Luken

From: [Paul Juszczak](#)
To: [VanDeWalle, Terry](#)
Subject: PLEASE SUPPORT THIS ESIS DRAFT
Date: Tuesday, December 17, 2019 7:34:18 AM

Paul Juszczak
5740 Limekiln Rd
Ontario, NY 14590

December 17, 2019

Dear Terry Vandewalle,

Please support this draft. Do the right thing!
Thank you

Sincerely,
Paul Juszczak

From: [Cynthia White](#)
To: [VanDeWalle, Terry](#)
Subject: SUPPORT ENVIRONMENTAL IMPACT STATEMENT IN HAWAII
Date: Wednesday, December 18, 2019 12:05:50 PM

Cynthia White
36954 Sugar Ridge Road
North Ridgeville, OH 44039

December 18, 2019

Dear Terry Vandewalle,

.

Sincerely,
Cynthia White

From: [Grant Rakowski](#)
To: [VanDeWalle, Terry](#)
Subject: Support of Aquariums Through Conservation
Date: Tuesday, December 17, 2019 8:34:21 AM

Grant Rakowski
4530 glenberry Dr.
Holt, MI 48842

December 17, 2019

Dear Terry Vandewalle,

I feel that Aquarium hobby both professionally and at the hobby level is important way to learn about our earth. Through the use of conservation I think that Hawaiian fish can be enjoyed my many around the world without effecting the natural state of things on a reef. Often times aquariums are the only way for some to truly understand how beautiful the ocean world can be because of the cost it takes to visit Hawaii.

Sincerely,
Grant Rakowski

From: [Arthur Parola](#)
To: [VanDeWalle, Terry](#)
Subject: West Hawaii Aquarium Fishery
Date: Monday, January 6, 2020 2:40:34 PM

Arthur Parola
15321 Champion Lakes Place
Louisville, KY 40245

January 6, 2020

Dear Terry Vandewalle,

I support DLNR's adoption of the Draft Environmental Impact Statement analyzing Issuance of Commercial Aquarium Permits for the West Hawai'i Regional Fishery Management Area (WHRFMA). This draft EIS fully analyzes all of the potential impacts the Hawaii aquarium fishery may have on the environment under each of the alternatives. The DEIS proposes measures to avoid and minimize already insignificant impacts on fish species and the environment in the WHRFMA. Scientists have consistently characterized the Hawaiian aquarium fishery as one of the best managed near-shore fisheries in the world. This is back by DLNR data. Native Hawaiians and the environmental community input has been used to develop the management strategy for the WHRFMA. I support DLNR resuming the issuance of permits for aquarium fishing in the WHRFMA.

Sincerely,
Arthur Parola

APPENDIX D—DISTRIBUTION LIST FOR THE FEIS

Distribution List for the FEIS

GOVERNMENT OF THE STATE OF HAWAII(S)

Agency	Mailing Address	Electronic Mail or Internet Address	Telephone
State of Hawai'i, Department of Education, Hawaii State Library, Hawai'i Documents Center	478 S. King Street Honolulu, HI 96813	https://www.librarieshawaii.org/locations/index.htm	(808) 586-3555
State of Hawai'i Department of Hawaiian Home Lands	P.O. Box 1879 Honolulu, HI 96805	dhhl.icro@hawaii.gov	(808) 620-9501
State of Hawai'i, Department of Health, Environmental Health Administration	P.O. Box 3378 Honolulu, HI 96801	webmail@doh.hawaii.gov	(808) 586-4424
University of Hawai'i Environmental Center Patricia Hirakawa	2500 Dole Street Krauss Annex 19 Honolulu, HI 96822	hirakawa@hawaii.edu	(808) 956-7362
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Legislative Reference Bureau Library	State Capitol 415 S. Beretania St., Rm. 005 Honolulu, HI 96813	lrb@capitol.hawaii.gov	(808) 587-0690

GOVERNMENT OF THE COUNTY OF HAWAII(H)

Agency	Mailing Address	Electronic Mail or Internet Address	Telephone
County of Hawai'i Planning Department	101 Pauahi Street, Suite 3 Hilo, HI 96720	planning@hawaiicounty.gov	(808) 961-8288

LIBRARIES AND DEPOSITORIES (LD)

Library or Depository	Mailing Address	Electronic Mail or Internet Address	Telephone
North Kohala Public Library	54-3645 Akoni Pule Hwy Kapaau, HI 96755	http://www.librarieshawaii.org/locations/index.htm	(808) 889-6655
Hilo Public Library Attn: Justin Rajkowski	300 Waianuenu Ave. Hilo, HI 96720	justin.rajkowski@librarieshawaii.org	(808) 933-8890
Kailua-Kona Public Library	75-138 Haulalai Rd. Kailua-Kona, HI 96740	http://www.librarieshawaii.org/locations/index.htm	(808) 327-4327
Honokaa Public Library	45-3380 Mamane St., Bldg #3 Honokaa, HI 96727	http://www.librarieshawaii.org/locations/index.htm	(808) 775-8881
Kealakekua Public Library	81-6619 Mamalahoa Hwy Kealakekua, HI 96750	http://www.librarieshawaii.org/locations/index.htm	(808) 323-7585
Pahoa Public and School Library	15-3070 Pahoa-Kalapana Rd. Pahoa, HI 96778	http://www.librarieshawaii.org/locations/index.htm	(808) 965-2171
Thelma Parker Memorial Public and School Library	67-1209 Mamalahoa Hwy Waimea, HI 96743	http://www.librarieshawaii.org/locations/index.htm	(808) 887-6067

Distribution List for the FEIS

Naalehu Public Library	95-5669 Mamalahoa Hwy Naalehu, HI 96772	http://www.librarieshawaii.org/locations/index.htm	(808) 939-2442
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Organization	Mailing Address	Electronic Mail or Internet Address	Telephone
Honolulu Star Advertiser	Restaurant Row 7, Waterfront Plaza, Suite 210, 500 Ala Moana Boulevard, Honolulu, HI 96813	citydesk@staradvertiser.com	(808) 529-4747
Hawai'i Tribune Herald David Bock, Publisher and Editor	P.O. Box 767 Hilo, HI 96721	dbock@hawaiiitribune-herald.com	(808) 930-7323
West Hawai'i Today Tom Hasslinger, Editor	P.O. Box 789, Kailua-Kona, HI 96745-0789	thasslinger@westhawaii.com	(808) 329-9311
The Garden Island	P.O. Box 231, Lihu'e, HI 96766	neagle@thegardenisland.com	(808) 245-3681
Maui News	100 Mahalani Street, Wailuku, HI 96793	citydesk@mauinews.com	(808) 244-3981
Moloka'i Dispatch	P.O. Box 482219, Kaunakakai, HI 96748	editor@themolokaidispatch.com	(808) 552-2781

ELECTED AND OTHER OFFICIALS (EO)

Official	Mailing Address	Electronic Mail or Internet Address	Telephone
U.S. Senator - Mazie K. Hirono	300 Ala Moana Blvd., Rm 3-106 Honolulu, HI 96850	hawaiioffice@hirono.senate.gov	(808) 522-8970
U.S. Senator - Brian Schatz	300 Ala Moana Blvd., Rm 7-212 Honolulu, HI 96850	brian_schatz@schatz.senate.gov	(808) 523-2061
U.S. Representative - Ed Case	2443 Rayburn House Office Building Washington, DC 20515	ed.case@mail.house.gov	(202) 225-2726
U.S. Representative - Tulsi Gabbard	1433 Longworth House Office Building Washington, DC 20515	tulsiOffice@mail.house.gov	(202)225-4906
State Senator - Dru Mamo Kanuha Senate District 3	Hawaii State Capitol, Rm. 206	senkanuha@Capitol.hawaii.gov	(808) 586-9385
State Senator - Lorraine Inouye Senate District 4	Hawaii State Capitol, Rm. 210	seninouye@capitol.hawaii.gov	
State Senator - Kai Kahele Senate District 1	Hawaii State Capitol, Rm 213	senkkahele@capitol.hawaii.gov	
State Representative - Ryan Yamane House District 37	Hawaii State Capitol, Rm. 420	repyamane@capitol.hawaii.gov	
State Representative - Richard P. Creagan House District 5	Hawaii State Capitol, Rm. 427	repcreagan@capitol.hawaii.gov	
State Representative - Nicole E. Lowen House District 6	Hawaii State Capitol, Rm. 425	replowen@Capitol.hawaii.gov	
State Representative- David A. Tarnas House District 7	Hawaii State Capitol, Rm. 328	reptarnas@Capitol.hawaii.gov	(808) 586-8510
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