**From:** Will Caron
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 10:37:24 AM

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Dear BLNR,

The Division of Aquatic Resources (DAR) is betraying public trust by proposing rules to re-open Hawai‘i's reefs to large-scale commercial aquarium collection.

This proposal inverts a community-led petition to ban the practice. Despite instructions to create a compromise, DAR collaborated exclusively with the aquarium trade, dismissing community input. The result is a framework for permitting the capture of hundreds of thousands of fish annually.

Worse, DAR is attempting a power grab to stifle dissent: the rules would transfer permit approval from the public Board of Land and Natural Resources (BLNR) to DAR itself, allowing permits to be issued behind closed doors without public scrutiny. This repeats a failed 2024 attempt and breaks a promise to maintain BLNR oversight.

Why This Proposal is Unacceptable:

- Institutional Betrayal: It abandons conservation for commercial exploitation.
- Obscene Greed: Proposed catch limits are 400% higher than historical takes.
- Scientifically Bankrupt: Mass extraction of herbivores contradicts the need for resilient reefs in the face of climate change.
- Fiscally Irresponsible: Estimated to cost hundreds of thousands to manage while generating only hundreds in revenue.
- Undemocratic: 84% of residents support a permanent ban, yet DAR is pushing a plan that only a small minority support.

This rule package is a profound breach of trust that sacrifices our reefs for private profit. I urge you to reject it.

Mahalo,

Will Caron
Community Organizer
Kahalu‘u, O‘ahu
8083874920

**From:** Nicole LeClaire
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 10:42:09 AM

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Attn BLNR,

I am asking you to please send the rules back for redrafting so that they **reflect the community's call to safeguard reef life**—rather than reviving the very trade the proposed rules were meant to end—and **restore the public's trust** by keeping the permitting authority with BLNR itself for full transparency and accountability.

Sincerely,
Nicole LeClaire
Haiku, Maui

Maui Nutritional Therapy
Nicole LeClaire NTP, CGP
808-463-7783

**From:** Bill Stockton
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 10:49:23 AM

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Dear Sirs,
As a 45 year resident of West Hawaii, I have witnessed the loss of reef fish on the west side of Hawaii Island.
I have fond memories of the “Gold Coast” with so many yellow tangs the water was gold. In the 80’s, I free dove on reefs and saw menpachi by the hundreds. Now they are hard to find.
Several times a week I distance swim at the Kailua Pier and area beach parks only to look at striped out reefs.

Our wonderful coast line needs complete protection for future generations. Please ban west side reef fish collection from Upolu Point to Ka Lae and allow the fish to thrive.

William Stockton
Kailua Kona

**From:** Peter Klune
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Aquarium trade versus our reefs
**Date:** Saturday, October 18, 2025 11:03:41 AM

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What are you guys thinking?! I've lived on island for greater than 10 years and have watched our ecosystem decline and I have yet to see a politician or bureaucrat stand up and take a strong position to protect our valuable and fragile ecosystem here in Hawaii. Is it too much to ask for you guys to get your act together and not just cater to some financial interest or some pressure from a local group with a bureaucrat's ear. Wake up and do the right thing

send the rules back for redrafting so that they reflect the community’s call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public’s trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

**From:** Dan Harrang
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Ban aquarium "harvesting"
**Date:** Saturday, October 18, 2025 11:06:19 AM

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The natural world is under relentless pressures from human activity.
Allowing persons to abduct cornerstone reef species is an unnecessary violation against marine ecosystem health. The economic benefit is negligible while the damage, death and destruction is significant.
FYI: I worked nearly 2 decades inspecting air cargo shipments at OGG and I know for a fact that many of these species arrive to their destinations in poor health or already dead. What a waste!
Dan Harrang
Wailuku

**From:** John Hoover
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 11:07:22 AM

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Please vote NO. The proposed rule goes against the community's clear mandate to stop aquarium fish collecting on Hawaii's reefs. Please protect our reefs from totally unnecessary commercial exploitation and give a chance to aquaculture entrepeneurs who are learning how to breed aquarium fish for sale.  -- John Hoover, Volcano, Hawaii

**From:** Neil Frazer
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24 meeting, Agenda Item F.2
**Date:** Saturday, October 18, 2025 11:08:43 AM
**Attachments:** preview.png

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To: Hawaii Board of Land and Natural Resources

Aloha Chair Chang, and Board Members,

I write in opposition to commercial aquarium collecting on Hawaii's reefs. My personal observations over the last 40 years indicate a striking decline of juvenile finfish on the windward side.

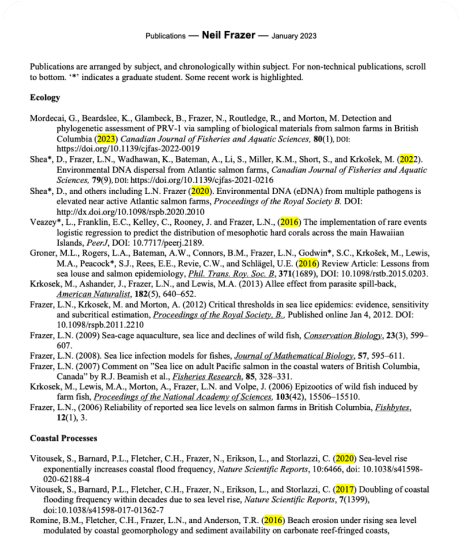
I do not have to tell you how important finfish are to the health of coral reefs, and how important Hawaii's coral reefs are to shoreline protection in a time of rising sea levels, or how important a healthy reef ecosystem is to Hawaii tourism. I am certain that if economists were to study this issue, they would find that the negative externalities of aquarium collecting (paid by all of us) far outweigh the financial benefit to the few.

I feel strongly that there should be no inshore fishing whatever other than traditional cultural fishing by native Hawaiians, and furthermore that fishing regulations should be decided by ahupua'a resource councils. Until such councils come into existence, we should err on the side of caution (the well known precautionary principle) with Hawaii's marine environment.

Mahalo for your unselfish service to the people of Hawaii.

Sincerely,
Neil Frazer, PhD

my peer-review scientific publications here:



Publications — **Neil Frazer** — January 2023

Publications are arranged by subject, and chronologically within subject. For non-technical publications, scroll to bottom. '*' indicates a graduate student. Some recent work is highlighted.

**Ecology**


Mordecai, G., Beardslee, K., Glambeck, B., Frazer, N., Routledge, R., and Morton, M. Detection and phylogenetic assessment of PRV-1 via sampling of biological materials from salmon farms in British Columbia (2023) *Canadian Journal of Fisheries and Aquatic Sciences,* **80**(1), DOI: https://doi.org/10.1139/cjfas-2022-0019

Shea*, D., Frazer, L.N., Wadhawan, K., Bateman, A., Li, S., Miller, K.M., Short, S., and Krkošek, M. (2022). Environmental DNA dispersal from Atlantic salmon farms, *Canadian Journal of Fisheries and Aquatic Sciences,* **79**(9), DOI: https://doi.org/10.1139/cjfas-2021-0216

Shea*, D., and others including L.N. Frazer (2020). Environmental DNA (eDNA) from multiple pathogens is elevated near active Atlantic salmon farms, *Proceedings of the Royal Society B.* DOI: http://dx.doi.org/10.1098/rspb.2020.2010

Veazey*, L., Franklin, E.C., Kelley, C., Rooney, J. and Frazer, L.N., (2016) The implementation of rare events logistic regression to predict the distribution of mesophotic hard corals across the main Hawaiian Islands, *PeerJ*, DOI: 10.7717/peerj.2189.

Groner, M.L., Rogers, L.A., Bateman, A.W., Connors, B.M., Frazer, L.N., Godwin*, S.C., Krkošek, M., Lewis, M.A., Peacock*, S.J., Rees, E.E., Revie, C.W., and Schlägel, U.E. (2016) Review Article: Lessons from sea louse and salmon epidemiology, *Phil. Trans. Roy. Soc. B*, **371**(1689), DOI: 10.1098/rstb.2015.0203.

Krkosek, M., Ashander, J., Frazer, L.N., and Lewis, M.A. (2013) Allee effect from parasite spill-back, *American Naturalist*, **182**(5), 640–652.

Frazer, L.N., Krkosek, M. and Morton, A. (2012) Critical thresholds in sea lice epidemics: evidence, sensitivity and subcritical estimation, *Proceedings of the Royal Society, B.*, Published online Jan 4, 2012. DOI: 10.1098/rspb.2011.2210

Frazer, L.N. (2009) Sea-cage aquaculture, sea lice and declines of wild fish, *Conservation Biology*, **23**(3), 599–607.

Frazer, L.N. (2008). Sea lice infection models for fishes, *Journal of Mathematical Biology*, **57**, 595–611.

Frazer, L.N. (2007) Comment on "Sea lice on adult Pacific salmon in the coastal waters of British Columbia, Canada" by R.J. Beamish et al., *Fisheries Research*, **85**, 328–331.

Krkosek, M., Lewis, M.A., Morton, A., Frazer, L.N. and Volpe, J. (2006) Epizootics of wild fish induced by farm fish, *Proceedings of the National Academy of Sciences*, **103**(42), 15506–15510.

Frazer, L.N., (2006) Reliability of reported sea lice levels on salmon farms in British Columbia, *Fishbytes*, **12**(1), 3.


**Coastal Processes**


Vitousek, S., Barnard, P.L., Fletcher, C.H., Frazer, N., Erikson, L., and Storlazzi, C. (2020) Sea-level rise exponentially increases coastal flood frequency, *Nature Scientific Reports*, 10:6466, doi: 10.1038/s41598-020-62188-4

Vitousek, S., Barnard, P.L., Fletcher, C.H., Frazer, N., Erikson, L., and Storlazzi, C. (2017) Doubling of coastal flooding frequency within decades due to sea level rise, *Nature Scientific Reports*, **7**(1399), doi:10.1038/s41598-017-01362-7

Romine, B.M., Fletcher, C.H., Frazer, L.N., and Anderson, T.R. (2016) Beach erosion under rising sea level modulated by coastal geomorphology and sediment availability on carbonate reef-fringed coasts,


pubs_neil
PDF Document · 217 KB

**From:** shayla@blissfulhat.com
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 11:23:34 AM

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Aloha

My name is Shayla Middleton. I have been a resident of Kihei, Maui for over 20 years.

I have seen the significant decline in fish populations before the hard won ban on reef collection was implemented on Maui a few years ago and the noticeable increase when the ban was in effect.

Prior to the ban, we ran into a man at the boat ramp soliciting us to buy his boat because he was going to buy a bigger boat since he was doing so much reef collecting he was getting so wealthy. On the boat that he was trying to sell us were over a dozen 5 gallon buckets filled to the brim with reef fish.

It was honestly appalling to see so many fish taken in one haul out of the sea. He was boasting that he did this several times a week and was becoming a rich man.

We were so relieved when the ban was implemented on Maui, as that kind of greed has no place in Hawaii. Without controls on reef collection, one man's greed can decimate the entire shores of Maui!

I urge you to reconsider what's going on with the rule changes being suggested to allow reef collection to resume in Hawaiian Waters.

I am in opposition to the draft rule package being done by the Division of Aquatic Resources (DAR) to **re-open Hawai'i's reefs to commercial aquarium collecting.**

Thank you for your consideration,
Shayla Middleton

Sent from my iPhone

**From:** Marge Bonar
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Opposition to any commercial permitting for aquarium fish taking
**Date:** Saturday, October 18, 2025 11:39:32 AM

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We have been fighting to ensure reef sustainability for years.
Banning the indiscriminate collection of fish for decorative purposes was a big step in the efforts to protect the reefs. What possible up side is there to reinstating this disgraced practice ?
Prior enforcement was a dismal failure and the rapacious techniques commonly used for harvest are damaging in the short term and have long term ramifications for inhibiting reef recovery.
When DLNR can produce funding for enforcement officers and a method to valid the catch, it will be time to allow small operations that can guarantee the viability of the harvested fish.
Marjorie Bonar
Pukalani, Maui

**From:** Keith Christie
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] BLNR Permitted Authority for Aquarium Collection Permits
**Date:** Saturday, October 18, 2025 11:40:31 AM

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To whom it may concern,

My name is Keith Christie from Maui Island, Hawaii. I am an avid dive & snorkel water sports enthusiast who loves Hawaii's reefs ecosystem. I have a deep commitment to keeping Hawaii's reefs free from the commercial extraction of tropical marine species or any other living organisms from Hawaii's reefs for the aquarium trade. The collection of marine life for the aquarium trade should be banned statewide.

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability."

Thanks,
Keith Christie
Maui, Hawaii

**From:** But4puako
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Commercial aquarium fishing
**Date:** Saturday, October 18, 2025 11:47:30 AM

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Aloha,
I don't understand why people is against only CAF . It's not fair to ban only 1 type of fishing.
It's a honest living.

**From:** Anita Kelleher
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] BLNR Testimony
**Date:** Saturday, October 18, 2025 11:48:11 AM

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“Please send the rules back for redrafting so that they reflect the community’s call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public’s trust by keeping the permitting authority with BLNR itself for full transparency and accountability.”

This is a complete betrayal. What about future generations?

Anita Kelleher
Kailua Kona Hawaii

**From:** bonnie siemer
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Puako Reef
**Date:** Saturday, October 18, 2025 12:11:11 PM

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I live at Puako, Hawaii. I swim, dive and snorkel at the reef. I am asking you to not open the reef for collection of any fish, coral or plant. There are so few of them living on the reef now! Give them time to come back and give us time to cherish our reef and those that live on or around it.
Do not open the reef!
Bonnie Siemer

Sent from my iPad

**From:** Gregg Blue
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] fish
**Date:** Saturday, October 18, 2025 12:20:31 PM

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You gotta be kidding me what a breach of the public trust. Please stop the ref fishing. Gregg Blue, 265 W. Kuaha Rd., Haiku, HI 96708 808-575-9477.
Sent from my iPhone

**From:** Rebecca Monk
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Save the Reefs
**Date:** Saturday, October 18, 2025 12:31:34 PM

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Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life it would be unconscionable to revive the very trade the proposed rules were meant to end. Restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

Regards,
Rebecca Monk
Kihei, Maui

**From:** Shannon Wong
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24 Agenda Item F.2
**Date:** Saturday, October 18, 2025 12:36:17 PM

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Subject: Oppose DAR's Draft Rules on Aquarium Fish Collection

Dear Chair Chang and Members of the Board,

I strongly oppose DAR's draft rules on commercial aquarium collecting. These rules ignore the community's petition—unanimously approved by BLNR—to ban the practice and instead allow large-scale capture of reef fish.

DAR's proposal also removes BLNR oversight of permits, cutting out public transparency and accountability. This directly undermines the intent to protect Hawai‘i's reefs and the public trust.

Please reject these rules and uphold the original goal: protecting our reefs, not exploiting them.

Respectfully,

Shannon Wong

Homeowner, Kailua Kona, Island of Hawai'i

**From:** RJ Eckardt
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] I protest this horrible action.
**Date:** Saturday, October 18, 2025 12:46:12 PM

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Thank you for the work you're doing to protect our beautiful fish~

**From:** Mary L Keller
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 12:46:21 PM

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URGENT! How many times to we have to tell you? We do not want any entities taking Hawaii's fish out of local waters for sale and use in aquariums. PERIOD. The people have spoken many times on this already. PLEASE DO not permit this to get any further.
Your job is to safeguard our waters and the creatures in them! Enough already! Let Hawaii keep its beautiful fish!

Mary Keller
41 Meha Place
Paia, HI 96779
508 280 4099

**From:** Marie Addario
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Puako says no to commercial aquarium collecting.
**Date:** Saturday, October 18, 2025 2:01:29 PM

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Marie Addario
Puako, KAmuela
Big Island

For over 10 years, the community of Puako has been actively involved with local government, nonprofit groups , state and federal agencies to protect the Puako reef, which serves the citizens and visitors of Waikoloa, Kamuela and upcountry communities in West Hawai'i.

The Division of Aquatic Resources (DAR) has drafted a rule package to **re-open Hawai‘i’s reefs to commercial aquarium collecting** and, on **October 24**, will ask the **Board of Land and Natural Resources (BLNR)** to approve it for public hearings.

We ask that you please send the rules back for redrafting so that they reflect the community’s call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public’s trust by keeping the permitting authority with BLNR itself for full transparency and accountability.”

*Marie Addario*

**From:** Mary Metcalf
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 2:53:36 PM

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Aloha e Board of Land and Natural Resources,

Please send this agenda item back to the DAR staff to rework this proposal in keeping with the community's overwhelming support for conservation of Hawaii's reef fish to protect our coral reefs.

Coral reefs around the world are under near term extinction threat from climate change as ocean acidity and heat levels continue to climb unabatedly. Your purpose is to protect Hawaii's natural resources, not to let corporate greed profit off our natural resources by allowing reef fish removal from where they are needed and treasured the most.

Please do what is pono and listen to the people who live here, and not those affiliated with the pet trade industry.

Mary Metcalf
Full time resident of Kailua Kona,
Hawaii Island

**From:** christy vail
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] SHAME ON YOU!
**Date:** Saturday, October 18, 2025 3:25:12 PM

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What a travesty. I have been scuba diving here in Hawaii and watch the depletion of fish, the deformation of coral and the complete failure of our aquatic resources management. That you would reverse everything that so many of us have fought for makes me ill! If you have ever been at the beach, watching hundreds of fish, native fish, not found anywhere else in the world, fish that have speciated here and are only found here in Hawaii laid out to die on the hot sand because they can't get packed fast enough. If you ever saw something like that, you would be sick. If I wanted to go up to Waikamoi Reservoir area and trap/Native birds and ship them off to die in cages around the world I would go to jail! Yet our government here has decided that it is OK to capture these rare fish and let them die. I guarantee they will die because what they eat is only found here on our local reefs. They evolved to eat certain things and those things will not be available to them in an aquarium. The chemically created "saltwater" in these aquariums is artificially created fish cannot live in it. You are shipping these fish off to certain deaths. People want these fish in their aquarium so they can say To their friends "look! I have this rare fish from Hawaii! I paid $500 for it! No one else has it!"
Do any of you have any conscience? Does this fish's life have no value to our reefs have no value? Shame on you all you make me sick. This is just greed and power politics. Shame on you all. What I would truly love would be to see your children, kidnapped, and put in cages on other planets so that alien children would have the pleasure of getting to see an earthly child. Every alien family on another planet could say look we have one too shipped all the way from earth! "Look at the earthling baby! Sure he might die within a year because we can't feed him what he needs we can't produce enough oxygen for him to breathe, he will not grow up and be able to meet anyone to marry and have a family because there are no other earthlings here, but gosh, look at us. We're so cool. We built this special oxygenated tank in our home here on Mars to keep this little creature a prisoner that we can show off to our friends and family. If he dies, we can get another one. They have a regular trade going with Mars. They're capturing them and sending them off to anybody who wants one."
Do none of you see how horrible that is. Shame on you. I don't seem to be able to say that enough! Shame on you.
Christy Vail
1865 Olinda Rd
Makawao Hi 96768

**From:** Kathryne Kent
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Stop Hurting our Marine Resources
**Date:** Saturday, October 18, 2025 3:31:31 PM

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We do not need aquarium fish collecting in Hawaiis waters..so stupid and shortsighted and somewhat typical of greed at the expense of nature.

Please do not allow this to happen.

Thank you

Kathryne

K Kent 808-938-9655
kksolar@lava.net or
anouzhka@gmail.com

**From:** Jon Hall
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Hawaii"s Reefs
**Date:** Saturday, October 18, 2025 3:43:11 PM

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Please do not allow Hawai‘i’s reefs to be reopened for commercial aquarium collecting.  Don’t be foolish. Here we are working so hard to install sewer systems to protect our reefs and fish, and you are talking about allowing this??.

**Jon Hall**
**33 Puako Beach Road**
**Kamuela, Hawaii 96743**
jonhall@earthlink.net

**From:** Irena Baker
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Reef fish harvesting
**Date:** Saturday, October 18, 2025 4:21:56 PM

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A recent scientific poll found **84%** of O‘ahu and Hawai‘i Island residents support **permanently ending** the commercial capture of reef fish.
It is your job to protect the fish and act in accordance with Hawaii residents wishes.
Stop harvesting of reef fish!!!

Irena Baker
69-1754
Puako Beach drive
Kamuela Hi 96743

**From:** Janet Goodmanson
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 4:35:27 PM

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Why are we asking yet again for our reefs to be protected?

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

Janet Goodmanson

***PO Box 747***
***Kealakekua, HI 96750***

***(C) (302) 540 3492***

**From:** Katy Grainger
**To:** DLNR.BLNR.Testimony
**Cc:** Scott Grainger; Dani Ainslie; Jordan Grainger and Kai Haugland c/o Grainger
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 4:40:05 PM

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From Katherine Grainger, Puako, Island of Hawaii

As a 17 year resident of Hawaii, I ask that you **continue the BAN ON AQUARIUM COLLECTION from our endangered reefs**. If the ban is reversed, every reef would be **vulnerable to degradation and collapse, as occurred decades ago in leeward O‘ahu.**

Please send the rules back for redrafting so that they reflect the community’s call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public’s trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

Thank You,

Katherine Grainger
Puako 136
Hawaii Island

**From:** Robert Raimo
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Reef collecting
**Date:** Saturday, October 18, 2025 5:11:21 PM

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Robert and ellen Raimo
220 kamakoi loop
Kihei. Maui

I want you to know i strongly oppose collecting of reef fish. It makes no sense, the economy of Maui, and other islands runs on tourism. Tourists come to see those fish. Why would anyone think opening up collecting to say a hundred people is a good idea when it destroys a valuable resource people pay to come see? It will have s huge negative impact on the economy.

Don't permit thie travesty. Zero permits would be the correct number.

Robert raimo

**From:** Judith Cucco"s gmail
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 5:19:56 PM

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Aloha,

The proposed annual catch limits are 400 percent higher than what seven collectors reported taking annually for 20 years.

The proposed rule no longer reflects the community's conservation intent. Instead, it now functions as a permitting framework for the large-scale commercial take of reef fish.

DAR refuses to set local limits to prevent depletion. With no guardrails, every reef would be vulnerable to degradation and collapse, as occurred decades ago in leeward Oʻahu.

A recent scientific poll found **84%** of Oʻahu and Hawaiʻi Island residents support **permanently ending** the commercial capture of reef fish. Only **10%** support the large-scale capture proposed in DAR's draft rule.

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

Judith Cucco

Honolulu

| | |
|---|---|
| **From:** | Susan RobertsEmery |
| **To:** | DLNR.BLNR.Testimony |
| **Cc:** | Susan RobertsEmery |
| **Subject:** | [EXTERNAL] October 24th ; Agenda Item F.2 |
| **Date:** | Saturday, October 18, 2025 7:53:50 PM |

Aloha Members of the Board of Land and Natural Resources ,

My name is Susan RobertsEmery, as co-chair of the Green Party of Hawai'i , we are writing to you today to share our very strong opinions on the harvesting of valuable reef fish from the waters off of Hawai'i Island and all our Islands reefs. We believe that no fish, Zero harvesting , of reef fish , for greed and profit, is the Green Party's stance on the limits of how many reef fish are allowable to be bought and sold. A big fat zero!
Research has shown that we need reef fish ,now more than ever, as climate change is having huge effects on our Oceans waters. 84% of O'ahu and Hawaii Island residents believe that zero reef fish should be harvested for aquarium sales, they want to permanently end the commercial capture of reef fish ! Please help to restore the public's trust and transparency in this process . The DAR has lost the trust of the people and we are asking the BLNR to step up and redraft the rules so that they reflect the community's call to safeguard reef life and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability. The DAR looks to be trying to run off with the local reef fish, the same fish we snorkel with and say hello to each and every day. They are misinformed if they think the people are not watching. We see the DAR, and the Green Party stands in solidarity with the people of Hawai'i to ask the BLNR to safe guard our reefs for all future generations.

Mahalo for your good work,

Susan RobertsEmery
Co chair GPH
Paauilo, Hi
Hamakua coast of Big Island

Sent from my iPad

**From:** Scott Grainger
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Continue the ban on Aquarium Collection
**Date:** Saturday, October 18, 2025 8:56:57 PM

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As a 17 year resident of Hawaii, I ask that DAR/BLNR **continue the BAN ON AQUARIUM COLLECTION from our endangered reefs**. If the ban is reversed, every reef would be **vulnerable to degradation and collapse, as occurred decades ago in leeward Oʻahu.** Listen to the local communities, native practices and science; ban Aquarium take.

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

Best, Scott Grainger
Puako
Kamuela, HI

**From:** michael gilbert
**To:** DLNR.BLNR.Testimony
**Cc:** Michael Bailey
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Saturday, October 18, 2025 9:01:45 PM

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Aloha
Michael Gilbert MPA.Cr.
Curator of Corporate Collections Waldorf Astoria
This is insane who in their right mind would want to see our reefs stripped. As a snorkel person in Maui I have seen our reefs first hand stripped. These people are also thugs as well and will hurt you. It's happened to me when I tried to document it
What's up with these people
Please use some common sense or are you paid off
Michael Gilbert MPA.Cr
Sent from my iPad

**From:** Lois Anderson
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] THIS IS CRITICAL TO THE HEALTH AND WELLBEING OF HAWAII
**Date:** Saturday, October 18, 2025 9:19:36 PM

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Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

My husband and I are homeowners at both Hualalai and Kukio on the Big Island.

Thank you.

Lois Anderson
@loisathome
https://freshperspectives.org/

**From:** Vivian Toellner
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Don"t redraft HAR chapter 13-60.4
**Date:** Saturday, October 18, 2025 11:56:46 PM

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To BLNR:

Why do we have some people who just keep trying to remove the Natural Resources of Hawai'i?
Why do they continue to get the attention of the government agency that is supposed to protect Hawai'i Natural Resources?
For an industry that has the mortality rate nearly equal to the rate of regular fishing.

Hawai'i makes far more money from tourism...why because it is unique !!

Did you know that Kailua-Kona is nicknamed the “Golden Coast”? Because at one time there was an abundance of yellow tang fish in the waters surrounding the area.

In my 21 years here on the Big Island I have only witnessed one large school of Yellow Tang, that made me actually understand where the name 'Gold Coast' originated from. Standing on an old abandon dock in North Kohala, looking down into the water, the ocean floor appeared to be covered in gold...you could not distinguish that it was actually a massive school of Yellow Tang !!! Oh, a sight to behold !!! It was glorious to snorkel there and leave it for others to enjoy. Allowing someone to come and remove is surely criminal!

**Please set the 'rules back for redrafting' so that they reflect the community’s call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public’s trust by keeping the permitting authority with BLNR itself for full transparency and accountability.**

Most Sincerely,
Vivian S. Toellner

PO Box 6894, Hilo HI  96720
(808) 345-2753
viviansuet@hotmail.com

| | |
|---|---|
| **From:** | Jeep Dunning |
| **To:** | DLNR.BLNR.Testimony |
| **Subject:** | [EXTERNAL] Commercial aquarium collection |
| **Date:** | Sunday, October 19, 2025 2:49:20 AM |

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

I strongly oppose reef fish aquarium collection as it undermines the health of our coral reefs and is proven to be anti-science.

Sincerely,
Jeanne Dunning
Kihei, Maui, Hawai'i

| | |
|---|---|
| **From:** | Mark Schacht |
| **To:** | DLNR.BLNR.Testimony |
| **Subject:** | [EXTERNAL] Opposition to DAR rule proposal re-opening Hawai'i's reefs to commercial aquarium collecting |
| **Date:** | Sunday, October 19, 2025 4:45:28 AM |

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I write as a 40-year veteran scuba diver, videographer and Divemaster, in the strongest possible opposition to continuation of any 'for profit' commercial reef harvesting in Hawaii.

There is no conceivable scientific justification for allowing the commercial trade to once again profit from the removal of hundreds of thousands of living reef fish from Hawaii's waters each year.

Putting aside the shocking mortality of these fish in captivity, and putting aside the obvious continuing harm to the reefs, DAR's persistent efforts to favor a few profiteers at the expense of the fish, the reefs, and the public interest is precisely the wrong direction.

What Hawaii ***should*** be doing is attempting to curb onshore pollution that contributes to reef distress, expanding marine protected areas, interdicting shipments of illegally-captured reef fish, and vigorously prosecuting poachers.

Instead, what DAR proposes is to repudiate its statutory mandate to protect aquatic resources in favor of a greedy few.

As a longtime Hawaii diver, I urge that this proposal be rejected and that the reefs be spared from a renewal of this destructive, short-sighted commercial activity.

Sincerely,

**Mark Schacht**
PADI Divemaster (1994)
Marina Bay, California
Cell/Text: **510.812.5399**
*markschachtl@gmail.com*

***CONFIDENTIAL. If you are not the intended recipient(s), please immediately delete/destroy this email and any attachments, and contact Mark Schacht at 510-812-5399.***

**From:** Susan L Rhymes
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Sunday, October 19, 2025 6:09:26 AM

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Those of us living on the Big Island know that protecting our reefs and fish is something on which we all agree. So why is the Division of Aquatic Resources proposing to change the rules for commercial aquarium collection? There's not enough money to be collected from permits, so who's making the money, other than the collectors?

**From:** Colleen Wallis
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] save out reef fishes
**Date:** Sunday, October 19, 2025 6:48:33 AM

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Aloha BLNR,
It is difficult enough with climate change affecting our land and oceans but to allow those who rape our shores of reef fishes, it just adds to the destruction of our natural environment,
Please do not allow those who take reef fishes from destroying our ecosystem of reef fishes, I recall a while back when WHT had published a photo dead Yellow tangs discarded on wharf at Honokahao harbor and I cannot foreget how those people just desregard these precious creatures,
Sincerely,
Colleen Miyose-Wallis\
Former reef teach volunteer at Kahalu'u beach

## Testimony Support F2 Rules Package Introduction

## By Ron Tubbs B.S.N.D.

## blnr.testimony@hawaii.gov

## BLNR Meeting 10-24-25 9 am

## Please provide the Zoom link to testify in person.

**By William Walsh Ph.D., Ivor Williams Ph.D., Brian Tissot Ph.D.; Leon Hallacher Ph.D.; Bruce Carlson Ph.D.; Charles Birkeland Ph.D.; Jeremy Claisse Ph.D.; Mark Christie Ph.D.; Richard Pyle Ph.D.; Leighton Taylor Ph.D.; Randy Kosaki Ph.D.; Cynthia Hunter Ph.D.; Brian Bowen Ph.D.; Brian Zgliczynski Ph.D.; Jeff Ebel Ph.D.; Alan Friedlander Ph.D.; Kosta Stamoulis Ph.D.; Delisse Ortiz Ph.D.; Jan Dierking Ph.D.; Rob Toonen Ph.D.; and Jim Beets Ph.D. My Turn | Thursday, June 25, 2020, 12:05 a.m.**

**"We are concerned with the level of false information and lack of data these individuals have used to support their assertions, and the havoc they have created over a well-managed aquarium fishery that has benefited from the aforementioned goodwill partnerships".**

Meetings with DAR scientists and 20 years of management, 2014 and 2015 Rules package passage, and new laws, ensure the fishery was and will be sustainable.

**The highest management possible for a fishery, decades of fish counts, considered by many scientists as a "Model Fishery". No other fishery in the world had this kind of management!**

## THE BIG LIE, and how activists and lawyers (not marine biologist researchers) got the ruling to require an EIS for the aquarium fishery.

*"There are no fish left, aquarium fishermen have taken them."*

**From the 2020 DLNR West Hawaii Report To the Legislature:**

Page 28 "Overall **Yellow Tang** abundance in the 30'-60' depth range over the entire West Hawai'i coast is
estimated to have increased by over 3.4 million fish from 1999/2000 to 2017/2018 **(150% increase)**

to a **current population of about 5.7 million fish within this depth range alone**." ( 5.7 million yellow tangs,
30-60ft depth alone, times 1.14 million fry per spawn per pair results in 6 trillion 260 billion fry per year
result in a potential 62 billion new fish on reefs every year at a 1% survival rate.)

Page 37 "Overall **Kole** abundance in the 30'-60' depth range over the entire West Hawai'i coast is estimated
to have **increased 118%** (>5.1 million fish) during this time period with a **current estimated
population of almost 9.6 million fish**. As with Yellow Tang, summer 2014 recruitment for Kole
in many areas was very strong. Recruitment at the Manuka survey site for example was 254%
higher than on any other previous survey at the site over the last 20 years."
(Kole produces more fry per spawn than yellow tangs.)

Pager 17 "the marine aquarium fishery has been the most economically valuable commercial
inshore fishery in the State of Hawai'i with FY 2017" (the **206-billion-dollar a year U.S. pet industry** economic benefits could be a great sustainable boom for exports from Hawaii)
https://files.hawaii.gov/dlnr/reports-to-the-legislature/2020/AR20-WHRFMA-Rpt-FY19.pdf

"Aquarium fishers are worse than child molesters"

This statement has no merits, it has been published in books by Snorkel Bob "Some Fishes I have Known", no one catching aquarium fish has ever been prosecuted or proven to do such terrible acts and is pure slander going to show the true nature of the zealots opposing the aquarium fishery.

"Aquarium fishers break corals"

**Corals and The Aquarium Fishery;**

Dr. Bill Walsh Recognized as an Outstanding Natural resource manager by the United States Coral Reef Task force and head of the 20-year West Hawaii Reginal Fishery Management Area Report to the Legislature 2020 showed **no differences between coral damage in open versus closed areas related to the Aquarium Fisheries coral impacts**.
Dr. Brian Tissot a member of the CRAMP (Coral Reef Assessment and Monitoring Program) in a multi-year West Hawaii study on impact and damage on the coral reef found **"there was no difference between areas closed to aquarium collecting and areas opened. In**

**fact, the highest impact area studied with the most damage was in a MPA"**, Marine Protected Areas, where aquarium fishermen do not fish. The closed MPA areas are mainly used by tourist groups.

**Clearly, long-term science studies prove the aquarium fishery does not cause coral damage.**

Dr. Bill Walsh DAR study Link: https://files.hawaii.gov/dlnr/reports-to-the-legislature/2020/AR20-WHRFMA-Rpt-FY19.pdf

Dr. Brian Tissot study link p.68: https://www.malamamaunalua.org/wp-content/uploads/DLNR-DAR-2010.pdf

*"Aquarium fishers are Human traffickers"*

This statement has no merits, no one catching aquarium fish has ever been prosecuted or proven to do such terrible acts and is pure slander going to show the true nature of the zealots opposing the aquarium fishery.

*"Aquarium fishers are wildlife traffickers"*

This statement has no merits, all fish taken by aquarium fishers are not endangered species, in fact the IUCN, International Union for Conservation of Nature has deemed all species targeted by aquarium fishers in Hawaii as species of **"least concern."** See each species can be reviewed in "Fish Base" search results and all species taken have been fully reviewed in the West Hawaii Aquarium Fishery full 1585 page HEPA. This is not a true statement!

*"Aquarium fishers use crow bars"*

**No aquarium fisherman has ever used a crowbar**; it is pure slander. See proof of no coral damage from 20 years of research, corals and the aquarium fishery, with more links above.

"The netting of aquarium fish are like the slaughter of dolphins near the Japanese town of Taiji,"

What? we do not kill Marine mammals or any fish, there is no bycatch, larger breeders are not taken, fish replenish fully in just a few months, and no lasting environmental damage is done.

*"Aquarium fishers take money from tourist groups"*

Act 306 gave West Hawaii tourists in 1999 a MPA (Marine Protected Area) system where 33% of West Hawaii for tourist use only. Science, in two recent studies, has shown that tourist activities have caused fish decline. It was clearly not the aquarium fishers responsible for the lack of fish in tourist areas.

*"The ocean is worth billions, and aquarium fishers cost tourist groups money."*

This is an unproven statement. Tourist groups have their own areas where aquarium fishers do not go. Tourists who have aquariums at home are more likely to visit ocean activities, supporting local tourist ocean users. Aquairum fishers have historically helped support and left tourist areas alone. No user conflict even occurred on Oahu until activists spread their propaganda!

*"Aquarium fishers are inhumane"*

Aquarium fishers do not even kill fish but care for and love fish as pets. How is that inhumane? **Emily S. Munday, Veterinarian also with M.S. Washington State University:** In conclusion, we determined that the methods commonly used by aquarium fishers in Hawaii do not cause mortality in Yellow Tang. *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).*

"Aquarium fishermen take fish from Hawaiians and reduce food for eating fish"

West Hawaii 2020 report to the legislature and **"My Turn: We expect better"** show no decline in any adult fish in open or closed areas throughout West Hawaii, only small, abundant fish are taken, not affecting adult breeders or larger fish used for cultural Hawaiian uses. Fish taken replenish within a few months! Because they have no science indoctrination, and buying off the West Hawaii Hawaiian community has been their goal to keep the aquarium fishery shut down. The problem is that many Hawaiians in the fishery were making good money sustainably. Now that has ended, and even more, Hawaiians are out of jobs and leaving Hawaii due to biased activist minority lies and misinformation. Eating fisheries are now at risk, and lawsuits and testimony from the same people are now trying to shut down or severely restrict cultural eating fisheries. Obviously, closing fisheries hurts Hawaiians, and tourism does not provide enough income or well-paid jobs to support Hawaiians living in Hawaii.

**Recent News:**

https://mauinow.com/2024/12/15/maui-ocean-center-touts-marine-conservation-but-nonprofit-says-it-repeatedly-violates-fish-taking-permits-with-high-mortality-rates/

What makes it even worse is the news publishing it without fact-checking! Uneducated activists continue the lies:

Public aquariums have the lowest mortality rates; aquarium collectors have a mortality rate of less than 1% or less. Studies and DAR have tried correcting these people with emails to no avail; the misinformation continues. So, who will you believe, an uneducated activist with profit in mind or a Marine Biologist with a PhD? I've attached an email. Activists ignore science, constantly change the science, and extensively pervert the truth! Even misquoting the Researcher here over and over!

**By doing so, they harm the environment.** Ture ecological concerns go by the wayside, and much-needed, valuable, sustainable fisheries are shut down. Seafoods where you kill fish are OK to them! But keeping one alive is Immoral and should be shut down. Does that make sense? In 47 of the 50 states, fishing permits do not even distinguish between dead and live fish! Only three states require an aquarium fish permit.

The lies they create have now come back to haunt them. Tourist groups now have to do environmental reviews and have been shut down costing many jobs and much need income for Lahaina businesses.

“Below is Dan Polhemus' response about Rene Umberger's (Maui activist ) statement regarding aquarium collectors under reporting and she likes to quote him directly. Umberger is Claiming 99% mortality!

## More Proof of the lies:

Begin forwarded message:

From: Dan.A.Polhemus@hawaii.gov
Date: December 23, 2009 8:25:16 AM HST
To:Rene Umberger
Subject: Re: Your quote is being used is it accurate?

Hi Rene,

Thanks for the dialog. Let me see if I can address your questions.

I haven’t seen any work to support the figure of 99% mortality rate within one year for captive marinelife.

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 wholesalers' 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)."

The difference in yellow tangs reported caught and sold was 2,233, which if it does represent mortality, suggests a collector to dealer mortality of 0.8% - quite similar to what Cesar found.

So, in the grand scheme of things, the aquarium take on Maui (2009) 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. "

- Dan Polhemus

Dr. DAN A. POLHEMUS
Division of Aquatic Resources
State of Hawaii DLNR
1151 Punchbowl St.
Honolulu, HI 96813

Phone: (808) 587-0100
e-mail: Dan.A.Polhemus@hawaii.gov

**Updated Meta-Analysis Hawaii, & Pacific Fisheries, Environmental Review, and Global Warming 2025 Report**

**Sustainability** is Key to Hawaii's future. As the most isolated island in the world, Hawaii is too dependent on tourism, the military, and other non-sustainable, unreliable economic sources.

**Marine fish are Hawaii's most renewable resource.** Opah Moon Fish produces 300 million eggs a year per pair. Tuna produce 5 million to 15 million fry per female

per spawn. Reef fish produce tens of thousands to millions of fry per spawn per female. Fish can renew and sustain current fishing practices if appropriately managed. We must support a managed, sustainable fishery to create a more sustainable society, especially in isolated Hawaii.

**Since the introduction of the first men to Hawaii in 400 A.D., land-based species** have resulted in over 100 endemic plant species, 30 bird species, 74 insect species, and 41 tree snails becoming endangered or extinct. Insects, Birds, snails, and many others are listed as Hawaii IUCN red species of concern. In 2023 8 more birds were removed from the Federal Lists of Endangered and Threatened Wildlife and Plants due to their confirmed extinction.

**Marine Fish are more immune to global warming impacts,** and **no Pacific marine fish species have become extinct over the past historical period. No Hawaiian marine fish are on the IUCN Red List of Endangered Species. Moreover, almost all of Hawaii's marine fishes used for the aquarium trade are listed as species of IUCN "Least Concern." The lowest conservation level is there.**

**Ninety percent of United States fisheries are deemed sustainable by NOAA US fisheries are the most regulated in the world. Closing the aquarium trade in Hawaii just forces aquarium trade buyers to buy from less-regulated, sustainable sources. (**Lin, B., Zeng, Y., To, B., Holmberg, R. J, )

Examining the marine species extinctions of the past five global extinction-level events, marine fish have been more resilient to global impacts and are likely to out-survive land-based species.

It should be noted, however, that some marine mammals, with their low and long reproductive cycles, are more vulnerable than broadcast-spawning, highly reproductive marine fish species.

**Marine fish's vast geographical distribution,** due to broadcast breeding and larval distribution over as much as five thousand miles and even other oceans like the Atlantic and Indian Ocean from and to Hawaii, makes them much *less vulnerable* to fishing and environmental impacts. Marine fish studied in aquariums show that they are more resistant to global warming temperature changes, pH changes, salinity changes, and other ecological changes than land-based species. For example, Tuna and many other species are found in all oceans of the world. Ocean Depth habitat range, the latitude of the Hawaiian Islands chain from 19 degrees to 28 degrees latitude, and 1500 miles of 132 atolls, reefs, and shoals create a vast, unique habitat range protecting Hawaii's ocean biodiversity. Seventy percent of the earth is ocean, making marine fish in

Hawaii less vulnerable to point-source pollution and global warming.

**Hawaii could greatly benefit from the 2.15 billion per year ornamental marine fish trade** and the **207- billion-dollar** United States pet trade, which has grown from 100 billion in just a few years.

**The value of Hawaii's nearshore oceans is worth 15.3 billion dollars** in highly renewable resources in 2024, with a current 50% estimated increase every 20 years, which means one of the state of Hawaii's most valuable resources is our Ocean. *Unlike fisheries, Tourism impacts are Hawaii's biggest ocean ecological offender and the largest source of Carbon Footprint and is not sustainable*.

**The aquarium fishery**, with its higher biomass value and sustainable, highly renewable resources, should be utilized to its fullest to aid the state's plan for a sustainable future.

**University of Hawai'i Economic Research Organization** report in 2024 by UHERO. "Hawai'i's economy depends heavily on tourism and is therefore vulnerable to sudden drops in visitor numbers and inconsistent and slow growth in tourism revenue for the past 30 years". The University of Hawai'i Economic Research Organization (UHERO) analyzes the variety of industries across counties in the U.S. and Hawai'i to identify potential opportunities to diversify the state's economy.

What UHERO found based on industries already in Hawai'i, the study shows Hawai'i has great potential for ocean- based industries—such as *fishing, fish farming* and hatcheries, boat building, port and harbor operations, and seafood packaging. Diversifying into these industries can create long-term stability and support growth beyond tourism."

With science supporting the sustainability of the aquarium fishery, an approval of fishery permits could aid the state in its greatly needed shift to sustainable, renewable resource uses.

Out of the national 277-billion-dollar pet industry, Hawaii pet owners spent 355 million dollars on pets in 2021. Providing 21.8 million state tax revenues and 27.3 million local tax revenues. Hawaii residents have 1.7 pets per household on average. Nearly 57% of Hawaii households have one pet. That is 11% of U.S. households' fish. Tapping into the sustainable, renewable income that aquarium fishing can provide sustainable economic benefits. **Marine fish used as pets are worth per fish as much as % 400 more than those similar fish used for**

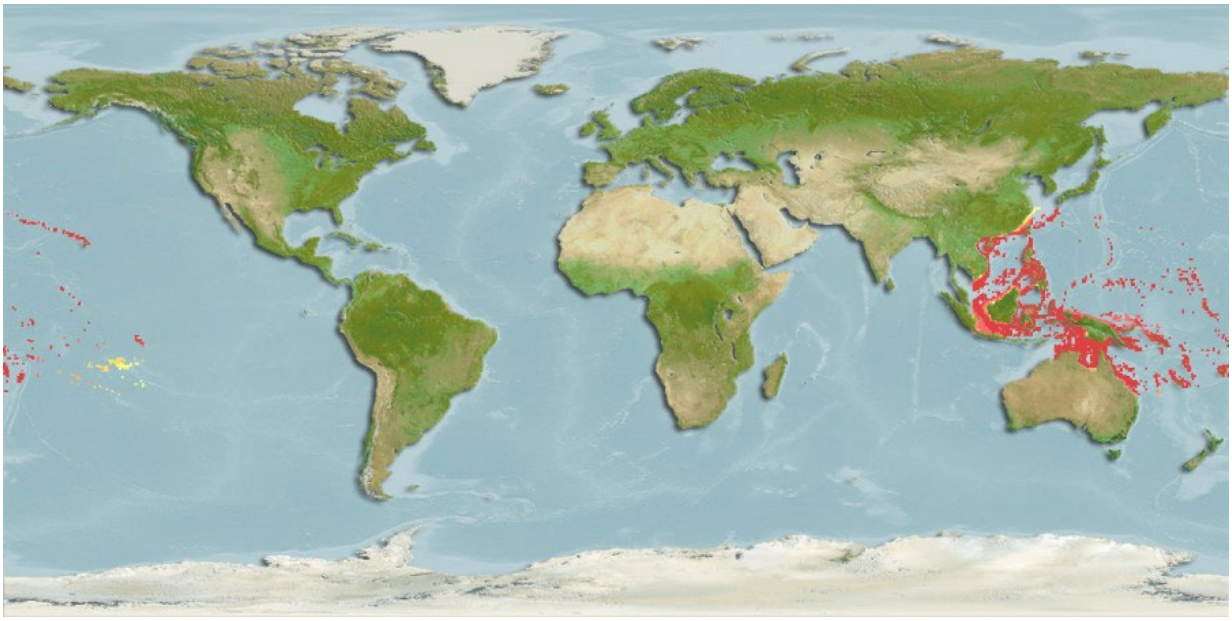
**food purposes.** Pet fish leave breeders' sizes to make it a "**Model Fishery**." Declines in food fish near shore near human-populated areas have not been seen in reef fish used for aquarium purposes.

**When in fact, If tourists see the amazing fish in aquariums, they will be more likely to join in on a snorkel or dive tour!**

## Yellow Tang (*Zebrasoma flavescens*) E*cology*

The Yellow Tang is one of the most popular aquarium species, growing to 8 inches in length, oval in shape, and laterally compressed. It has a small mouth and eyes set high on its 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 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 Tang 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 protecting prime feeding territories (University of Hawai'i 2016). Yellow Tang are found from shallow surge zones to a depth of 130 feet. They occur in the Pacific Ocean: Ryukyu, Mariana, Marshall, Marcus, Wake, and the Hawaiian Islands. (Froese and Pauly 2020). Fish Base



AquaMaps

**Computer Generated Native Distribution Map for *Zebrasoma flavescens* (Yellow tang), with modelled year 2050 native range map based on IPCC RCP8.5 emissions scenario**

**Currently known distribution: Pacific Ocean: Ryukyu, Mariana, Marshall, Marcus, Wake and Hawaiian islands. Has been reported off the coast of Florida in the Western Central Atlantic (Ref. 51238).**

Froese, R. and D. Pauly. Editors.
2024.FishBase. World Wide Web electronic
publication. www.fishbase.org, ( 02/2024 )

Yellow tangs are not endemic to Hawaii with distribution Pacific Ocean: Ryukyu, Mariana, Marshall, Marcus, Wake and Hawaiian Islands. Has been reported off the coast of Florida in the Western Central Atlantic. They are normally 0 to 150 feet deep but have been reported in depths as deep as 265 feet. (Fish Base) The depth of yellow tangs can also protect populations from environmental effects. Deep Refuge Theory

The International Union for Conservation of Nature (IUCN) **(https://www.iucnredlist.org/).** The cumulative review concluded that Yellow tangs are a species of "**least concern**" for management, environmental factors, and vulnerability to fishing.

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (**https://cites.org/eng/disc/species.php)**, CITES, does not list Yellow tangs in the red

endangered species list.

The Hawaii State Wildlife Action Plan (SWAP) does not list yellow tangs as a species of concern for further monitoring. Key factors considered for inclusion are individual species information, distribution, abundance, location, and key habitat, threats like fishing pressure and pollution, to produce conservation actions, monitoring, and identifying research priorities. In most cases IUCN Red List status is not considered

(Hawaii Department of Land and Natural Resources. 2015. Hawaii's State Wildlife Action Plan. Prepared by H. T. Harvey and Associates, Honolulu, Hawaii. http://www.state.hi.us/dlnr/dofaw/swap/)

Fish counts from 1999 to 2017 show an increase in fish counts according to the 2020 West Hawaii report to the Legislature, Overall Yellow Tang abundance in the 30'-60' depth range over the entire West Hawai'i coast is estimated to have increased by over 3.4 million fish from 1999/2000 to 2017/2018 (150% increase) to a current population of about 5.7 million fish within this depth range alone.

Oahu saw a similar increase, but accurate data is not available. Indeed, at a number of locations around the state, 2014 recruitment has been termed 'biblical' (Talbot 2014). At the most southerly WHAP survey site (Manukā, Ka'u District), the number of Yellow Tang recruits in July 2014 was 390% higher than on any other previous survey at the site over the last 20 years.

Catchability of yellow tangs I considered medium, with most fish in an area available to avoid capture. There is no bycatch, and under- or oversized illegal-sized fish are released unharmed if captured. Small mesh nets do not entangle fish but block their paths long enough to be caught with hand nets. Entanglement of fish or gill nets is highly avoided because any damage to the fish results in unsellable fish. Fish become net-wise quickly, and fishermen must move to new locations after two net sets. Fish regularly avoid nets passing on either side or going under them in coral or rocky areas. Fish can easily outswim divers who travel at most 1.726 mph while fish can swim up to 67 mph. With the aid of underwater scooters, a diver may be able to reach speeds of 3 mph. But most divers do not use underwater scooters. Divers also employ fishery management techniques to enhance their catch by avoiding certain areas for 6 months or more. Fish return to their fishing grounds quickly and also repopulate quickly.

In 2015, laws enacted utilizing Oahu Fisher's and DAR scientist reviews placed further restrictions on Yellow Tangs with a lengthy rules package. These were done to address any

future environmental effects and increased fishing pressure even though the fishery was considered stable at the time.

Net lengths were reduced to 30 feet in length and 6 feet in height. That reduces potential catch greatly. In addition, size limits for catch were imposed. No yellow tang less than 1.5 inches in length can be taken, and no yellow tang more than 5 inches in length can be taken. The total daily catch was also limited to 100 yellow tangs per day by law, which are still in effect. (BLNR rules package Oahu 2015)

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). ). Over time, the larvae develop the ability to adjust their depth and eventually become strong swimmers (reviewed in Christe et al. 2010).

Successful larvae dispersal data shows the main deeper depth habitat of larvae to be 100m, below PIFSC-ESD (2020) data depth count range of 30 m, and the larvae can travel from one end of the Main Hawaiian Islands to the other in 45 days. (Wren, Johanna LK. *Reef fish connectivity in the Hawaiian archipelago: A biophysical modeling approach*. University of Hawai'i at Manoa, 2016.)

Christe et al. (2010) conducted a novel parentage analysis that matched post-settlement juveniles with their parents. This study demonstrated that larval yellow tangs disperse from 15 to 184 km from the place they were spawned (Christe et al. 2010). Over longer (evolutionary) time scales, yellow tang populations show signs of genetic connectivity across thousands of kilometers of ocean (Eble et al. 2009).

However, survival of recruits increases in areas with suitable habitat and few adult fish (i.e., reduced competition) (Claisse et al. 2009b), suggesting that high fecundity and robust source populations (such as in marine protected areas [MPAs]) could restock areas that had been depleted due to overfishing

Tissot and Hallacher (2003) did not find widespread coral or habitat damage associated with this fishery. Fishing with poison and other destructive fishing methods is illegal in Hawaii and these practices are not commonly employed (Walsh et al. 2004).

Because they are key to the aquafarm fishery , Yellow Tangs DNA Dispersal, and Biodiversity Journal Genetic population connectivity has been studied extensively in the Hawaiian Archipelago.

Despite decades of research, factors that drive population patterns and connectivity in the ocean are Still hotly debated and largely unknown. With a changing climate and an ever-increasing anthropogenic strain, protecting our oceans for future generations is vital. Coral reefs are some of the most productive ecosystems on earth, and in order to protect them we need to gain a deeper understanding of the biological and physical dynamics that govern species distributions and survival.

Connectivity patterns in the Main Hawaiian Islands are not explained by the physical oceanographic environment, rather, biological and anthropogenic factors are likely important for dispersal. The biophysical model identified distinct breaks in the archipelago where larval exchange is limited, and I was able to describe the directionality and relative size of dispersal between the MHI and the NWHI. Understanding larval exchange between the MHI and NWHI is important because the MHI are heavily fished while the NWHI are protected as part of one of the largest marine protected areas in the world, Papahānaumokuākea Marine National Monument.

These periodic long distance dispersal events may contribute to the exchange of genes between distant populations, and allowing greater genetic diversity and potentially building resilience towards changing environments.

https://www.proquest.com/openview/3b37a5eabdbcd58f342db462d01c61f4/1?pq-origsite=gscholar&cbl=18750

Wren, Johanna LK. *Reef fish connectivity in the Hawaiian archipelago: A biophysical modeling approach*. University of Hawai'i at Manoa, 2016.

Yellow tangs have a lower reproductive fecundity at 1.14 million larvae per pair per year, estimated to be lower than other tangs. Still, that is an impressive number despite a less than one percent larvae survival rate to the adult breeding stage. (E.S.Munday, BN Tissot)

Yellow tangs produce 44 to 24,00 eggs per spawn two days in a row, mainly around the full moon. An estimate of annual fecundity (mean ±s.e. 1, 055 628 ± 120 596 eggs) was also generated using a simple model of the lunar variability in egg production. Females greater than 20mm in length are estimated to produce one million 55 thousand eggs per year, similar to the reported 1.14 million reported in a different study. Yellow tangs as small as 2.6 inches 65mm have reproductive organs and oocytes in their ovaries.

Schemmel, Eva. "Size at maturity for yellow tang (Zebrasoma flavescens) from the Oahu, HI, aquarium fishery." *Environmental Biology of Fishes* 104.9 (2021): 1139-1147.

So with 12 full moons two days of spawning per full moon = 24 spawn days x 24,000 = 576,000 and 44,000 x 24 =1,066,000 larvae per female per year. Females are the rate-limiting sex as males produce more sperm than females produce oocytes.

So per pair per year, depending on reproductive size, yellow tangs produce 576,000 to 1 million 66 thousand eggs per spawn per pair per year.

Multiply the total range by times the number of estimated yellow tangs, 728,777 each on Oahu for the 0- 98 foot survey range alone. To get potential renewal populations, we can now estimate renewal based on a low average of 1 % survival to the adult breeding stage.

So on Oahu alone, 414 billion 550 million new yellow tang fry <98ft times 1% survival adult stage per year, divided by two for one male and one female pair results in an estimated 4 billion 145 million potential new adult stage yellow tangs on Oahu reefs every year. The estimate does not include a reduced amount for size fecundity or increased populations for depths greater than 98 feet. However, it also does not account for the much greater populations that we know exist and extend deeper than 98 feet, so these figures are very conservative.

With a conservative maximum sustainable yield of 25%, catch equals 1 billion 36 million sustainable catches, with a current 2024 value of $ 169.00 per tank-raised yellow tang.

That would mean a potential income of $175 billion in highly renewable, sustainably caught fish for yellow tangs alone.

Bushnell, M. E., J. T. Claisse, and C. W. Laidley. "Lunar and seasonal patterns in fecundity of an indeterminate, multiple-spawning surgeonfish, the yellow tang Zebrasoma flavescens." *Journal of Fish Biology* 76.6 (2010): 1343-1361.

Yellow tangs reach sexual maturity at 4–6 years old and can live for at least 41 years (J.T. Claisse, unpublished data). Individuals that reach adulthood have the potential to be reproductively active for decades.

Male yellow tangs grow quicker than females, which ensures female egg fertilization. The aquarium fishery is a juvenile fishery that does not remove the highly reproductive breeders, instead leaving them on the reefs to quickly repopulate.

Earlier studies (2004 Tissot) regarding fishery impacts and population decreases, and it was disproved over time. The 2003, 2004 **(Tissot and Hallacher 2003)** West Hawaii studies were just a snapshot in time; impact of fishery less than 2004 study implied. Populations vary depending on various ecosystem variations and fish count dates. West

Hawaii Alone reported from 1999/2000 to 2017/2018 (150% increase) to a current population of about 5.7 million fish within the 30-98 foot depth range alone. After recruitment, counts will be higher than before recruitment. 2014 and 2015 warming events in the Pacific saw a biblical increase in fish population when, more than likely, a greater than 1% occurred to the adult breeding stage. Oahu reported these same fish population increases, as also reported in the West Hawaii 2020 report to the Legislature.

Thornhill, Daniel J. "Ecological impacts and practices of the coral reef wildlife trade." *Defenders of Wildlife*
187 (2012): 137-141.

Froese and Pauly (2023) indicate that Yellow Tang populations have high resilience, with a population doubling time of less than 15 months.

(Table Error! No text of specified style in document.**-10**).

PIFSC-ESD (2020) data indicate that the 2019 island of O'ahu population of Yellow Tang at the 0–98-foot depth in hardbottom habitats was approximately 728,777 individuals. Furthermore, they are found to inhabit depths of 2 to 46 meters, 6 ft-150 ft (Froese and Pauly 2023), and therefore the actual population may be higher since PIFSC-ESD surveys are limited to 30 meters in depth. The species is listed as 'Least Concern' by the IUCN (Mcllwein et al. 2012a; Table Error! No text of specified style in document.**-10**).

Mismatch analyses indicate the oldest contemporary populations are in the Hawaiian Archipelago (ca. 318000 yr) with younger populations in the West Pacific (91000 to 175000 yr). Estimates of yellow tang historical demography contradict expectations of Hawaii as a population sink and instead indicate asymmetrical gene flow, with Hawaii exporting rather than importing yellow tang larvae.

Yellow tangs originated in the Western Pacific and migrated to Hawaii. Many considered endemic species have their origins elsewhere than Hawaii and rode in on currents from areas like those from Okinawa, which is 4820 miles away from Hawaii. Once reaching Hawaii, they continued to spread long distances using broadcast breeding. Early DNA studies linked Maui as an original destination hotspot for these larval Hawaii Imports, which has greatly expanded from the young 1.3 million-year-old Maui to the 3 to 4 million-year-old Oahu and the 500,000-year-old Big Island. A recent article by Reef Builders discusses the fact that Yellow tangs are also found in the Calayan Islands, 5,325 miles away from Hawaii. This validates other information showing distribution to and from very distant distances.

https://reefbuilders.com/2024/09/30/rvs-finds-yellow-tangs-noble-anthias-and-more-at-calayan-island-philippines/#:~:text=But%20with%20the%20Hawaii%20fishery,in%20the%20far%20North%20Philippines.

Eble, J. A., Toonen, R. J., Sorenson, L., Basch, L. V., Papastamatiou, Y. P., & Bowen, B. W. (2011). Escaping paradise: larval export from Hawaii in an Indo-Pacific reef fish, the yellow tang Zebrasoma flavescens. *Marine Ecology Progress Series*, *428*, 245-258.

Williams, I. D., et al. "Impacts of a Hawaiian marine protected area network on the abundance and fishery sustainability of the yellow tang, Zebrasoma flavescens." *Biological Conservation* 142.5 (2009): 1066- 1073.

Claisse, Jeremy T., et al. "Habitat-and sex-specific life history patterns of yellow tang Zebrasoma flavescens in Hawaii, USA." *Marine Ecology Progress Series* 389 (2009): 245-255.
Claisse, Jeremy T., et al. "Habitat-and sex-specific life history patterns of yellow tang Zebrasoma flavescens in Hawaii, USA." *Marine Ecology Progress Series* 389 (2009): 245-255.

*Cultural Significance*

The Yellow Tang, called *lāʻī pala* or *lauʻī pala* in Hawai'i, although small, was considered a delicacy and also involved in healing rituals.

A much higher value is obtained by using the fish for aquarium purposes. Each yellow tang is currently valued at $169.00 in retail.

**Amazing Videos Must Watch: Educational**

**West Hawaii Commercial Aquarium Fishery Presentations Department Of Land and Natural Resources** DAR State of Hawaii presentation confirming the low impact of the fishery on April 12th, 2024, presentation. DAR Researchers recommend giving out aquarium fish permits. BLNR does not give out permits!

Non-embedded hyperlink: https://www.youtube.com/watch?v=djjtIsvg7qs&t=11s

**Aquarium Fishery; Scientists Hawaii Speak Out** Researchers explain how Earth justice lies in closing the fishery and expose Rene Umber and Snorkel Bob's misinformation campaign against it. The DAR head explained decades of research on the fishery.

Non-embedded hyperlink: https://www.youtube.com/watch?v=AU_WZOyJzqk&t=9s

**Fishery Sustainable Dr. Bill Walsh, Richard Pyle and NOAA Video**

Non-embedded hyperlink: https://www.youtube.com/watch?v=50L6JcMOVLQ&t=219s

**More videos and related links:**

**Most of Hawaii's coral recover from mass bleaching**

Aquarium Fish Hawaii Video

Aquarium Fish Populations Hawaii

Yellow Tangs Oahu

Flame Wrasse Schools Oahu

Flame Wrasse Oahu Schools

CORAL Excerpt: "Biblical" Spawning Event on Hawaiian Reefs

An extensive detailed environmental review is available upon request.

Source in-text links and now below:


Jablonski D (1986) Mass and background extinctions: the alternation of macroevolutionary regimes. *Science* 231:129–133

Raup DM (1991) A kill curve for Phanerozoic marine species. *Paleobiology*. 17:37–48.

https://www.nationalgeographic.com/animals/article/animals-with-most-offspring-fish-eggs-reproduction

Forsgren, Kristy, et al. "Reproductive biology of the ocean sunfishes." *The Ocean Sunfishes* (2020): 87- 104.

**(**Lin, B., Zeng, Y., To, B., Holmberg, R. J, Rhyne, A. L., Tlusty, M., & Wilcove, D. S. (2025). Extent of threats to marine fish from the online aquarium trade in the United States. *Conservation Biology*, e70155. https://doi.org/10.1111/cobi.70155 )

Rønsted, Nina, et al. "Extinction risk of the endemic vascular flora of Kauai, Hawaii, based on IUCN assessments." *Conservation Biology* 36.4 (2022): e13896.)

https://www.imf.org/en/Publications/fandd/issues/2020/12/impact-of-the-pandemic-on-tourism-behsudi)

https://www.westhawaiitoday.com/2020/06/25/opinion/my-turn-we-expect- better/hjawaiitropicalaquairumfish

https://files.hawaii.gov/dlnr/reports-to-the-legislature/2020/AR20-WHRFMA-Rpt-FY19.pdf

ME Bushnell, JT Claisse, CW Laidley - Journal of Fish Biology, 2010

Eble JA, Toonen RJ, Sorenson L, Basch LV, Papastamatiou YP, Bowen BW (2011) Escaping paradise: larval export from Hawaii in an Indo-Pacific reef fish, the yellow tang *Zebrasoma flavescens*. Mar Ecol Prog Ser 428:245-258. https://doi.org/10.3354/meps09083

(Lough et al., 1999) (Bagnato et al., 2004; Damassa et al., 2006; Cantin et al., 2010)

Muir, Paul R., et al. "Species identity and depth predict bleaching severity in reef-building corals: shall the deep inherit the reef?." *Proceedings of the Royal Society B: Biological Sciences* 284.1864 (2017): 20171551

Two major West Hawaii studies show that the aquarium fishery has no major impact on corals or detrimental effects on algae growth compared to closed habitats without aquarium fishing. (B.Tissot, B. Walsh) Isoun, E., et al. "Multi-spectral mapping of reef bathymetry and coral cover; Kailua Bay, Hawaii." *Coral Reefs* 22 (2003): 68-82.

(Adey, Walter H. "Coral reefs: algal structured and mediated ecosystems in shallow, turbulent, alkaline waters." *Journal of Phycology* 34.3 (1998): 393-406).

Capps, Krista A., and Alexander S. Flecker. "Invasive aquarium fish transform ecosystem nutrient dynamics." *Proceedings of the Royal Society B: Biological Sciences* 280.1769 (2013): 20131520.

*The Effects of Venting and Decompression on Mortality and Sublethal Effects in Yellow Tangs (Zebrasoma Flavescens) Caught for the West Hawaii Aquarium Trade*. Diss. Washington State University, 2012.

Mathew, K. J. "Net avoidance behaviour among larval, juvenile and adult euphausiids." *Journal of the Marine Biological Association of India* 30.1&2 (1988): 93-98.

De Robertis, Alex, and Nils Olav Handegard. "Fish avoidance of research vessels and the efficacy of noise-reduced vessels: a review." *ICES Journal of Marine Science* 70.1 (2013): 34-45.

**https://www.fishbase.se/search.php**

**(https://www.iucnredlist.org/**

Effectiveness of the West Hawai'i Regional Fishery Management Area (WHRFMA) that overall fish populations of targeted aquarium fish species increased significantly in West Hawaii over 20 years. “Overall Yellow Tang abundance in the 30’-60’ depth range over the entire West Hawai'i coast is estimated to have increased by over 3.4 million fish from 1999/2000 to 2017/2018 (150% increase) to a current population of about 5.7 million fish within this depth range alone. Over time, management and habitat increases due to coral growth contribute to increased fish populations. Overall Kole abundance in the 30’-60’ depth range over the entire West Hawai'i coast is estimated to have increased 118% (>5.1 million fish) during this time period with a current estimated population of almost 9.6 million fish. As with Yellow Tang, summer 2014 recruitment for Kole in many areas was very strong.

Recruitment at the Manuka survey site for example was 254% higher than on any other

previous survey at the site over the last 20 years." (WHRFMA)

Shomura, Richard. "A historical perspective of Hawai'i's marine resources, fisheries, and management issues over the past 100 years." *Status of Hawaii's coastal fisheries in the new millennium, revised 2004 edition. Proceedings of the 2001 fisheries symposium sponsored by the American Fisheries Society, Hawai'i Chapter*. 2004.

Williams, I. D., et al. "Assessing the importance of fishing impacts on Hawaiian coral reef fish assemblages along regional-scale human population gradients." *Environmental Conservation* 35.3 (2008): 261-272.

Ogawa, Thomas, and Christopher L. Brown. "Ornamental reef fish aquaculture and collection in Hawaii." *Aquarium Sciences and Conservation* 3 (2001): 151-169.

Tissot, Brian N., William J. Walsh, and L. E. Hallacher. "The effectiveness of marine protected areas and the impacts of aquarium fish collecting in Hawai'i." *Hawaii Coral Reef Initiative, University of Hawaii* 1 (2002).

https://files.hawaii.gov/dlnr/reports-to-the-legislature/2020/AR20-WHRFMA-Rpt-FY19.pdf

Wood, Elizabeth. "Global advances in conservation and management of marine ornamental resources." *Aquarium Sciences and Conservation* 3.1 (2001): 65-77.

Gove, Jamison M., et al. "West Hawai'i integrated ecosystem assessment ecosystem status report." (2019).

Friedlander, Alan M. (Alan Marc) ; Donovan, Mary K. ; Stamoulis, Kostantinos ; ... https://repository.library.noaa.gov/view/noaa/907/noaa_907_DS1.pdf

Hoggarth, Daniel D. *Stock assessment for fishery management: A framework guide to the stock assessment tools of the fisheries management and science programme*. No. 487. Food & Agriculture Org., 2006.

Hoggarth, Daniel D. *Stock assessment for fishery management: A framework guide to the stock assessment tools of the fisheries management and science programme*. No. 487. Food & Agriculture Org., 2006.

DAR BLNR Presentation 2024 https://youtu.be/djjtIsvg7qs?feature=shared

Oahu there is a much greater refuge area than West Hawaii. Sources; 2013 By Friedlander, Alan M. (Alan Marc) ; Donovan, Mary K. ; Stamoulis, Kostantinos ; ... https://repository.library.noaa.gov/view/noaa/907/noaa_907_DS1.pdf

Asher, Jacob. *A deeper look at Hawaiian coral reef fish assemblages: a comparison of survey approaches and assessments of shallow to mesophotic communities*. Diss. Curtin University, 2017.

. Oahu fared much better during these coral bleaching events. Jokiel, Paul L., and Eric K. Brown. "Global warming, regional trends and inshore environmental conditions influence coral bleaching in Hawaii." *Global Change Biology* 10.10 (2004): 1627-1641.

(https://myfwc.com/research/saltwater/fishstats/commercial-fisheries/marine-life-tropical-ornamentals)

**Regulated Fishing Areas on O'ahu**

**https://dlnr.hawaii.gov/dar/fishing/fishing-regulations/regulated-areas/regulated-fishing-areas-on- oahu/**

**From:** Leslie McMorrow
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Aquarium Re-Collecting
**Date:** Sunday, October 19, 2025 7:23:56 AM

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“Please send the rules back for redrafting so that they reflect the community’s call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public’s trust by keeping the permitting authority with BLNR itself for full transparency and accountability.”

**From:** Anna Harriet Myers
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Please don"t allow commercial capture of our reef fish!
**Date:** Sunday, October 19, 2025 7:31:12 AM

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I am a resident of Kauai island and an avid snorkeler.  I love the ocean, our reefs and our living critters in the water.  I see no reason to allow commercial fishing for aquariums!  Aquarium businesses can raise their own fish.  They must use the fish and invertebrates that they now possess to benefit themselves without taking from our natural resources!

Please keep commercial fishing away from our islands!  Mahalo nui.
Anna Myers of Princeville, Kauai.

**From:** Kris Brodie
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24, Agenda Item F.2
**Date:** Sunday, October 19, 2025 8:17:36 AM

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I live and swim on Kauai Island and volunteer to help the reef with Reef Guardians and educate tourists on how to be careful with our corals.
How can you even consider allowing commercial fishing for aquariums??

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability."

Kristine Brodie
resident Kaua'i Island
Hawaii.

**From:** Phyllis Connors
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Aquarium Fish Collection
**Date:** Sunday, October 19, 2025 8:20:54 AM

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I live in Kona & I am shocked to learn that despite the majority of people who live on the Big Island being against Commercial Fish Collection it may be reopened!
Reef Fish protect the health of our ocean corals. Corals protect the shore line coasts from high surf. To deplete this wonderful ecosystem is insane so people can look at wild fish in aquariums! Don't do this!
Phyllis Connors
Kailua Kona
Phylleap@aol.com

**From:** Cheryl Ramsey
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24, agenda item F.2
**Date:** Sunday, October 19, 2025 9:00:10 AM

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Hello,

The proposed opening of the reef to collection is in direct opposition to the concerns of 90% of Hawaiian Islands population. This greed cannot be allowed to destroy the precious marine reef life and those marine creatures who depend on it for life.

DAR cannot be trusted. BLNR must be the sole permitting authority. No thinking human can believe this is any kind of sustainable proposal for our reefs. Please don't let money be the drive of humankind.

Cheryl Ramsey
Kaneohe, Oahu Hawaii

Sent from my iPhone

**From:** Sandra Shimmon
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] No take Fish
**Date:** Sunday, October 19, 2025 9:10:54 AM

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I Sandra Shimmon oppose you changing the policy.  Do not allow anyone to take our reef Fish!

From Oahu
Sent from my iPhone

**From:** Larry O'Brien
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Oct 24, item f.2
**Date:** Sunday, October 19, 2025 9:19:03 AM

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This is infuriating! The public has made its overwhelming opposition to aquarium collecting clear time and time again. The economic benefit of this trade accrues to a tiny number of individuals who have already had years of time to adjust their business models. Meanwhile, the economic costs of allowing the trade have only become larger and more evident.

There is *no* public good from re-opening this debate *again*. To the extent that further rule-making is called for, the people have the right to expect the BLNR to maintain its authority.

The people have spoken. And spoken. And spoken.

Listen.

Larry O'Brien
Holualoa, Hawai'i

**From:** Liquid Cosmos Divers
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24, 2025; Agenda item F.2
**Date:** Sunday, October 19, 2025 9:27:19 AM

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Aloha, my name is Mike Rudenko, I am a resident of Hawi, Hawaii island.

I STRONGLY OPPOSE the proposed changes and a potential re-opening of the aquarium collection of reef fishes! The local and worldwide community DEMANDS for the aquarium collection to be STOPPED PERMANENTLY!! Enough with this nonsense! All of the scientific data shows that removing herbivores from the reefs puts an additional stress on already stressed ecosystems!

Your job is to protect the reef and its inhabitants, to manage it wisely and to do whatever it takes to keep the fragile balance of a healthy ecosystem.

You are are being paid by OUR TAX DOLLARS, so do your job and reflect the public's will - which is, according to the latest poll of the residents of Oahu and Hawaii island, unequivocally shows that the vast majority (84%) of the public is OPPOSED to the reopening of aquarium collection.

Please stop looking for loopholes and ways around, close aquarium collection for good and spend your time that's being paid for by OUR TAXES on something productive, constructive and sensible.

Regards,
Mike Rudenko
Owner of Liquid Cosmos Divers
Kohala coast, Hawaii island.

**From:** Robert Wilson
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24th; Agenda Item F.2
**Date:** Sunday, October 19, 2025 9:48:12 AM

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Aloha! My name is Dray Wilson of Waimanalo, HI and I just wanted to give the a little input and thought on the commercial collection of aquarium fish from our Hawai'i reefs.

I think this would be a lose/lose situation for nearly everyone involved besides the collectors themselves. The reason SO many people visit Hawai'i and choose to spend their money here is BECAUSE of those reef fish, reefs, and the natural beauty that Hawai'i provides.

The fight to save our reefs and stop over fishing is already an uphill battle, and I believe commercial collection of our reef fish is a short sighted decision that only takes short term profit into account and not much else.

Time and time again countless tropical island destinations have proven that conservation brings in more long term profit. Mexico and the Philippines with their whale shark tourism. Thailand actively working to create National marine sanctuaries. Bahamas with their efforts to save sharks. The list is infinitely long.

Finally, it doesn't represent what the people of Hawai'i want. It benefits no one except a select few of aquarium collectors.

Please make the right decision and represent long term health of our reefs, and long term interest of tourism to Hawai'i.

Mahalo for your time reading this.

**From:** Carol Momsen
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] October 24; Agenda Item F.2
**Date:** Sunday, October 19, 2025 9:53:40 AM

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How can you think of selling the reef fish? The tourist industry supports a lot of people in Hawaii. Tourist come here to see the reefs and the fish. It is very shortsighted to sell off our tourist attractions.
Please send the rules back for re-drafting so they reflect the communities call to safe guard reef life rather than reviving the very trade the proposed rules were meant to end. Restore the public trust by keeping the permitting authority with BLNR itself for full transparency and accountability.
Carol Momsen
Puako resident
Hawaii Island

**From:** Gail
**To:** DLNR.BLNR.Testimony
**Cc:** Gail Morris
**Subject:** [EXTERNAL] Permanently end aquarium taking of reef fish
**Date:** Sunday, October 19, 2025 10:02:31 AM

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This is from Gail Morris, Puako, Big Island of Hawaii.

Since 1972, I have watched the reef at Puako go from beautiful and abundant, to sparse. A few years ago when the aquarium trade was halted, the yellow tang and other reef fish populations increased somewhat. It is a slow process, but it was getting better. Do not revive the trade that is taking away the reef fish population!

Please send the rules back for redrafting so that they reflect the community's call to safeguard reef life—rather than reviving the very trade the proposed rules were meant to end—and restore the public's trust by keeping the permitting authority with BLNR itself for full transparency and accountability.

People live in Hawaii to have access to our beautiful ocean. Tourists don't come to Hawaii to see wild goats running around, they come to enjoy the ocean. They come here to view the reef fish by snorkeling and diving, just like we do. Keep our reefs in Hawaii populated. Take control within the BLNR.

Aloha-

Gail Morris
Puako, Hawaii 96743

**From:** Baine Kerr
**To:** DLNR.BLNR.Testimony
**Subject:** [EXTERNAL] Outrageous cave to aquarium trade
**Date:** Sunday, October 19, 2025 10:24:50 AM

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I'm writing to protest the appalling and possibly illegal bonanza for commercial collectors by DAR and to urge BLNR to take every possible measure to reverse it in accord with overwhelming public opinion and scientific reef management.

Baine Kerr
22 Puako Beach Drive
3038889429

Sent from my iPhone