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October 12, 2010

Management Plan Review Coordinator Hawaiian Islands Humpback Whale National Marine Sanctuary 6600 Kalaniana ole Highway, Suite 301 Honolulu, Hawai 96825

I am writing to provide comments on the Management Plan Review being undertaken by the Hawaiian Islands Humpback Whale National Marine Sanctuary (HIHWNMS), in relation to including additional species of marine mammals under the scope of the Sanctuary.

Of all species of cetaceans in Hawaiian waters, the resident population of false killer whales around the main Hawaiian Islands (the "Hawaiian insular stock") should be the highest priority for addition to the Sanctuary for a variety of reasons. The population size for the Hawaiian insular stock of false killer whales is the smallest of any species of toothed whale in Hawaiian waters, estimated at less than 150 individuals. This population is genetically distinct (Chivers et al. 2010) and is the only-known resident island-associated population of false killer whales in the world. Our research has shown that this population regularly uses the waters of the HIHWNMS (Baird et al. 2010). There is evidence the population has undergone a large scale decline in size since the late 1980s and they are currently being considered for listing under the Endangered Species Act (Baird 2009; Oleson et al. 2010). Because false killer whales are top predators they have high levels of persistent organic pollutants (e.g., PCBs, flame retardants) that may be impacting their immune system (Ylitalo et al. 2009). Their diet (large pelagic game fish) overlaps almost entirely with recreational, commercial and sports fisheries in Hawaiian waters and thus they are impacted by declines in fish stocks caused by overfishing. Conservation measures are needed to reduce the impacts of anthropogenic activities on this population, but such measures are unlikely to be implemented unless there is broad public support. Inclusion of false killer whales under the purview of the HIHWNMS would help raise awareness of this species in Hawai'i and the factors that are influencing the population, and help build a constituency to support conservation efforts. As well, Sanctuary involvement in efforts to document individuals as they move through Sanctuary waters would greatly contribute to assessing population size and trends for this population, which will be critical for conservation and management efforts.

Sincerely,

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