

November 22, 2011

Howard Braham, Chief
Marine Mammal and Sea Turtle Conservation Division
Office of Protected Resources
1315 East-West Highway
Silver Spring, MD
20910-3226

Attn: Stock Assessments Reports (SARs)

Dear Howard,

I am writing to provide comments on the Draft 2011 Pacific SARs, in particular for cetaceans in Hawaiian waters, based on research being undertaken by Cascadia Research Collective (CRC) for the last eight years.

In November 2010 I provided comments on the Draft 2010 SARs, noting that for melon-headed whales there is evidence of at least two populations in Hawaiian waters, and that there were several management concerns that warranted recognition of multiple stocks. In NMFS' response to this comment it was noted that the new information was available after the 2010 SARs were drafted, but would be evaluated and included in the next update to the Hawaii melon-headed whale SAR. However, in the Draft 2011 SARs, no updated SAR for melon-headed whales in Hawaiian waters is presented. For melon-headed whales in Hawaiian waters, there is good evidence from photo-identification of two demographically-isolated stocks in Hawaiian waters (Aschettino 2010; Aschettino et al. 2011). One of these, the Hawaii Island Resident Population, is relatively small (Aschettino 2010), has a restricted range (Baird et al. 2010), and there is evidence of fisheries interactions for this stock (Aschettino 2010). Sufficient information from sightings and satellite tagging is available to assess boundaries of both stocks. As melon-headed whales may be susceptible to impacts from naval exercises (Southall et al. 2006; Brownell et al. 2009), the presence of a small population with a restricted range in an area adjacent to where naval exercises may be undertaken should be sufficient justification for recognizing multiple stocks in Hawaiian waters.

The changes made to the false killer whale Pacific Islands Region Stock Complex SAR provide a stronger basis for management of these populations, in particular the pro-rating of bycatch of "unidentified blackfish" based on the proportion of known species in the observer bycatch data from the longline fishery. For the Hawaii Pelagic Stock, the Status of Stock section notes that "no habitat issues are known to be of concern for this stock". However, the two habitat issues identified in the draft SAR for the Hawaii Insular Stock, elevated levels of polychlorinated biphenyls (Ylitalo et al. 2009) and declines in the biomass of some false killer whale prey

species in Hawaiian waters (Oleson et al. 2010), also apply to this stock. Three biopsy samples collected during a CRC field project in 2008 from individuals from the Hawaii Pelagic Stock have been analyzed for PCB levels (Ylitalo unpublished), and one of the three (the only adult male sampled) has lipid-corrected PCB levels almost double those of the highest levels noted in the Ylitalo et al (2009) study.

Thanks for the opportunity to provide comments on the Draft SARs.

Best regards,

A handwritten signature in black ink, appearing to read 'RW Baird', enclosed within a large, loopy oval shape.

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