

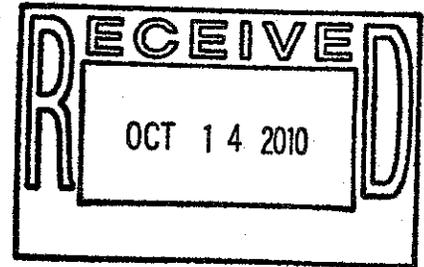


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Lance Morgan, Ph.D., Vice President for Science

October 25, 2010

Dr. Malia Chow, Project and Policy Advisor and
Management Plan Review Coordinator
Hawaiian Islands Humpback Whale National Marine Sanctuary
6600 Kalaniana'ole Highway, Suite 301
Honolulu, Hawai'i 96825
hihwmanagementplan@noaa.gov



Dear Dr. Chow and the Hawaiian Islands Humpback Whale National Marine Sanctuary Management Plan Review Coordinator:

This letter constitutes the comments of Marine Conservation Biology Institute (MCBI) on the Hawaiian Islands Humpback Whale National Marine Sanctuary Management Plan Review. We believe the Hawaiian Humpback Whale National Marine Sanctuary ("the Sanctuary") should become a sanctuary for all of the species that live there, and a place where people can learn about all of Hawaii's marine mammals. We therefore support the inclusion of other protected marine species in the sanctuary. Specifically, when making changes to your management plan, we ask that you:

- 1) Expand the mission of the Hawaiian Islands Humpback Whale National Marine Sanctuary to include conservation and management of all of the species living there. At minimum, we ask that you broaden the Sanctuary's mission to include management of all marine mammals and sea turtles that live in Sanctuary waters including the Hawaiian green sea turtle (honu, *Chelonia mydas*) the Hawaiian monk seal (ilio-holo-i-ka-uaua, *Monachus schauinslandi*), the Hawaiian spinner dolphin (nai'a, *Stenella longirostris*), and the Hawaiian false killer whale (*Pseudorca crassidens*).
- 2) Expand the stated goals of the Hawaiian Islands Humpback Whale National Marine Sanctuary Management Plan to officially include conservation and outreach efforts for Hawaii's other marine mammals and sea turtles, specifically the critically endangered Hawaiian monk seal and threatened Hawaiian green sea turtle.

We support the recommendations of the 2007 report by the National Oceanic and Atmospheric Administration (NOAA) and the State of Hawai'i entitled *Assessment of*



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Additional Resources for Possible Inclusion in the Hawaiian Islands Humpback Whale National Marine Sanctuary (“the assessment report”) to include Hawaii’s marine mammals and sea turtles in the Hawaiian Islands Humpback Whale National Marine Sanctuary Plan. As the assessment report notes, both nearshore and pelagic waters surrounding the Hawaiian Islands are home to numerous protected marine mammal species, ranging from Hawaiian spinner dolphins to blue whales (*Balaenoptera musculus*). An estimated 1,488 spinner dolphins live in Hawaiian waters, and rely on bays and inshore shallow water habitats to rest during the day before engaging in highly complex and coordinated group foraging behavior at night. Increased human presence and activities (for example, wildlife tourism that promotes observing wild dolphins) could have a negative effect on the dolphins’ ability to rest¹.

Hawaiian waters and coastline are also home to the endangered Hawaiian monk seal, whose dwindling numbers in the Northwest Hawaiian Islands are partially being offset by sustained population growth in the main Hawaiian Islands. Only one in five juvenile seals in the remote Northwest Hawaiian Islands currently survive to adulthood; these young seals are often under-nourished and become easy prey for roving sharks². In contrast, the rich coastal waters of the main Hawaiian Islands offer better sources of food and less risk of predation, thus the habitat found within and around the Sanctuary may present the best hope for the long-term viability of this imperiled marine mammal species. Hawaiian green sea turtles and the more rarely observed hawksbill turtle (*Eretmochelys imbricate*) also utilize surrounding waters to forage and rely on stretches of beach on several of the main Hawaiian Islands for important nesting habitat. Monk seals and sea turtles rely on Hawaii’s sandy beaches and coastal waters for nourishment, rest, and reproduction, yet face numerous threats including increased human presence in the islands, incidental take through fisheries, and habitat alteration³.

There is a need for heightened public awareness of these threats and to take preemptive measures to mitigate any negative impact on protected Hawaiian marine species. The Sanctuary has been, and continues to be, well-positioned to make positive contributions to these goals. The 2007 assessment report identified a number of threats to marine mammals and sea turtles in Hawaiian waters, which may act both independently and

¹ Marc O. Lammers, “Occurrence and Behavior of Hawaiian Spinner Dolphins (*Stenella longirostris*) Along Oahu’s Leeward and South Shores,” *Aquatic Mammals* 30 (2004): 237-250

² http://www.fpir.noaa.gov/PRD/prd_hawaiian_monk_seal.html

³ <http://hawaiihumpbackwhale.noaa.gov/management/pdfs/2007assessmentreport.pdf>



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synergistically, complicating protection and recovery efforts for these species. The Sanctuary can and should continue to play a substantive role in addressing these threats. We encourage NOAA to take this opportunity to address the eleven conservation needs of marine mammals and sea turtles as identified in the 2007 assessment report, namely:

1. Research on abundance and distribution, population dynamics, life history, foraging behavior, and threats
2. Minimize and monitor fishery-related interactions or impact
3. Conduct regulatory reviews/permitting to reduce and mitigate adverse impacts to protected species
4. Support rescue response to injuries, entanglements, strandings, etc.
5. Protect habitat, foraging sites, and prey base
6. Manage haul-out sites and pupping events
7. Decrease marine debris
8. Control introduced species in nesting habitat
9. Enforcement
10. Conduct education and outreach to enhance public stewardship, wildlife viewing, support conservation efforts, etc.
11. Develop and manage volunteer networks to help achieve the above⁴

As noted in the assessment report, the Sanctuary currently provides support for a number of conservation needs, including its role in enhancing marine mammal response activities through partnerships between state, local, and nongovernmental participants, and providing public education and outreach services. The Sanctuary has the opportunity to leverage its education, outreach, and coordination resources and expand these support activities to better protect Hawaii's marine wildlife. The Hawaiian Islands National Marine Sanctuary Act mandated the sanctuary to identify and evaluate other marine life and ecosystems of national significance for possible inclusion in the Sanctuary. We are happy to hear the Sanctuary is using this opportunity to examine how it can better serve and protect marine life for the people of Hawai'i and our nation.

We thank you for the opportunity to comment and hope that the Hawaiian Humpback Whale National Marine Sanctuary will seriously consider expanding its scope and mission to include protection for the critically endangered Hawaiian monk seals and other marine

⁴ <http://hawaiihumpbackwhale.noaa.gov/management/pdfs/2007assessmentreport.pdf>



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mammals and sea turtles that live in the Sanctuary. We hope that these changes, when properly implemented and funded, will have a profound positive impact on the Hawaiian monk seal population in the main Hawaiian Islands, and help this iconic species recover from the brink of extinction within our lifetime.

Sincerely,

Lance Morgan, Ph.D., Vice President for Science