

October 15, 2010

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

**Re: HIHWNMS Management Plan Review – Inclusion of the resident population of Hawaiian False Killer Whale**

Dear Management Plan Review Coordinator:

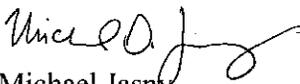
On behalf of the Natural Resources Defense Council (“NRDC”) and its more than 600,000 members, thousands of whom reside in Hawaii, I submit these comments on the Hawaiian Islands Humpback Whale National Marine Sanctuary (“HIHWNMS”) Management Plan Review. In short, we urge you to add the insular Hawaii population of false killer whales as a Sanctuary resource.

We strongly endorse the comments submitted by Dr. Robin Baird of Cascadia Research, a leading expert on cetaceans in the Hawaiian Islands, and particularly his conclusion that the insular population should be the highest priority among cetaceans for inclusion in the Sanctuary plan. As you may know, NMFS has just completed a one-year status review of the population, in response to a petition filed under the Endangered Species Act. The whales comprise little more than 120 individuals, the remnant of what appears to have been a dramatic decline over the past twenty-five years. According to NMFS’ status review, the whales’ core range includes the HIHWNMS.<sup>1</sup>

Addition of the insular false killer whales to the HIHWNMS Management Plan would help protect this population against toxic chemicals, reduced food sources and interactions with fishing vessels, all of which have contributed to its rapid decline, and would aid NMFS in implementing a recovery plan for the population. It would also reflect the uniqueness of the Hawaiian marine environment, as the insular population is alone among its far-ranging species in making a coastal area into a permanent home.

Thank you for considering these comments. Please feel free to contact us at (310) 434-2300 if you would like to discuss these comments further.

Sincerely,

  
Michael Jasny  
Senior Policy Analyst  
Natural Resources Defense Council

