

December 19, 2011

P. Michael Payne
Office of Protected Resources
1315 East-West Highway
Silver Spring, MD 20910-3226

Dear Mike,

I am writing to provide comments on the proposed modification to the Letter of Authorization (LOA) for the U.S. Navy training in the Hawaii Range Complex (HRC). At the time of the original issuance of the HRC LOA only a single stock of each species of marine mammal was recognized within the HRC, and calculations of take estimates and analysis and negligible impact determinations were undertaken using the EEZ-wide abundance/density estimates. However, since issuance multiple stocks within the HRC have been designated for three species. For common bottlenose and spinner dolphins separate island-associated populations within the main Hawaiian Islands and a pelagic stock for each species have been designated. For false killer whales, two stocks have been recognized, an insular stock around the main Hawaiian Islands and a pelagic stock, with the boundaries of these stocks overlapping. For common bottlenose dolphins within the HRC there are now five stocks instead of one, and the abundance estimates for each stock are considerably smaller than the single stock for which the initial analysis and negligible impact determinations were undertaken. For spinner dolphins there are now four stocks within the HRC instead of one, and the abundance estimates for each stock are also considerably smaller than the single stock for which the initial analysis and negligible impact determinations were undertaken. Given NMFS' authorization of takes is on a stock basis, and Navy activities within the HRC are spatially biased, there is a potential for takes to be disproportionately from one or a subset of the recognized stocks of these species, and thus have a greater impact than apparent from analyses undertaken for single stocks of these species. As such, analyses of potential impacts of takes should be re-undertaken on a stock-by-stock basis, and such analyses should take account any spatial biases in Navy activities within the HRC.

Thanks for the opportunity to provide comments on the proposed modification to the Letter of Authorization.

Best regards,



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