

October 22, 2024

Dr. Shannon Bettridge
Chief, Marine Mammal and Sea Turtle Conservation Division
Office of Protected Resources, NMFS
1315 East-West Highway
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Dear Dr. Bettridge,

We are writing to comment on the proposed list of fisheries for 2025. In the June 3, 2024 Pacific Scientific Review Group (PSRG) recommendation letter to NOAA Fisheries and the U.S. Fish and Wildlife Service, the PSRG noted [emphasis in the original]:

“The PSRG recommends that NMFS revisit categorization of the Hawai‘i charter vessel and Hawai‘i trolling, rod and reel fisheries in relation to spotted dolphin fishery interactions. At the November 2011 PSRG meeting, it was reported that these fisheries were elevated to Category II based on a suite of qualitative information, including fishing techniques; however, in the final list of fisheries published in 2012 these fisheries remained category III fisheries, i.e., having a “remote likelihood or no known incidental mortality and serious injury of marine mammals”. At the 2015 PSRG meeting, information was presented on a study examining spotted dolphin fishery interactions relevant to these fisheries, and this information was presented at the 2019 meeting at PSRG-2019-16, and published in Fisheries Research in 2020. In 2019, the PSRG recommended that “NMFS develop and implement a research strategy that will provide the basic information needed to complete an informative stock assessment for insular spotted dolphins in Hawai‘i. The existing information is sufficient to conclude that individuals from this stock interact with fisheries around the main Hawaiian Islands.””

At the time of the proposed 2012 List of Fisheries, only a single stock of pantropical spotted dolphins was recognized in Hawaiian waters. In the 2013 and subsequent Stock Assessment Reports, NMFS recognized three separate island-associated stocks (Carretta et al. 2014), and estimated abundances for each of the island-associated stocks are small relative to that of the pelagic stock (Becker et al. 2022). As noted by Becker et al. (2022), the abundance estimates for the insular stocks from species distribution models do not account for likely differences in densities between the windward and leeward sides of the islands (Pittman et al. 2016). Thus, these estimates are likely biased high. Evidence from the Cascadia Research Collective (CRC) photo-identification catalog for pantropical spotted dolphins around the main Hawaiian Islands provides evidence for strong site fidelity (Gless et al. 2022), and also suggests that the Becker et al. (2022) estimates are biased high. For example, off Hawai‘i Island, our catalog spans over 19-

years, and contains only 474 distinctive individuals, of which 29% have been seen on more than one occasion (CRC, unpublished data). While the 474 individuals do not account for non-distinctive or slightly distinctive individuals, the long time-span of the study suggests that many of the distinctive individuals have died over the duration of the study, and that mark changes may have resulted in individuals being counted more than once. Combined, these suggest the abundance of the Hawai‘i Island stock is small, possibly less than 1,000 individuals¹. Consequently, fisheries interactions likely have a greater impact on the dynamics and viability of this and the other island-associated stocks than previously assumed.

Given the PSRG recommendation and the available published evidence (see below), NMFS should elevate these fisheries to Category II. Baird and Webster (2020) provide peer-reviewed evidence for the nature and frequency of interactions between fishing vessels and pantropical spotted dolphins around the main Hawaiian Islands. A report on interviews with small-boat fishermen in the main Hawaiian Islands, including those who largely use trolling and hand line methods, also provides evidence for interactions between these fisheries and dolphins, including spotted dolphins (Madge, 2016), as does evidence from dorsal fin injuries off Maui Nui (Stack et al. 2019; Machernis et al. 2021) and elsewhere among the islands (Gless et al. 2022; CRC unpublished). Such interactions continue to occur², and there is evidence for serious injuries associated with these interactions (see Baird (2016), Baird and Webster (2020), and footnote¹). The number of vessels/persons in the troll fishery in Hawai‘i is increasing, and interactions with spotted dolphins are also likely to increase. Given the above, NMFS should follow the recommendation from the PSRG and consider re-categorizing these fisheries as Category II.

Thanks for considering these comments.

Robin W. Baird, Erin J. Gless, Michaela A. Kratofil, Sabre D. Mahaffy

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¹ Catalog sizes of distinctive individuals from other insular stocks are even smaller, and for both Maui Nui and O‘ahu span longer periods (~28 years for Maui Nui and ~20 years for O‘ahu; CRC unpublished).

² For example, on 19 October 2024 a group of pantropical spotted dolphins off Hawai‘i Island was observed with three fishing vessels associated, two that were repositioning through the group and one that was trolling through (see Baird and Webster 2020). Note, one juvenile spotted dolphin with a line wrap injury on the peduncle was associated with the group – photo available at <https://cascadiaresearch.org/hawaii-update/oct2024/>

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