



FORMERLY FORESTETHICS

December 22, 2016

Attn: Lynne Barre, Seattle Branch Chief

Protected Resources Division
National Marine Fisheries Service
7600 Sand Point Way NE
Seattle, WA 98115
Email: Lynne.Barre@noaa.gov

RE: WHALE PROTECTION ZONE (WPZ) FOR SOUTHERN RESIDENT KILLER WHALES (SRKW)

Dear Ms. Barre,

We are all in agreement that the Southern Resident Killer Whales (SRKWs) are facing the serious threat of extinction. The National Marine Fisheries Service's own science concludes that there are three primary threats to the recovery of the SRKW: shortage of food and contaminants in their environment, as well as noise and disturbance from vessels. As a weak population, the SRKWs also are very vulnerable to potential oil spills or a disease outbreak (possibly more likely as the result of climate change). All of these are clearly forms of habitat degradation.

As an organization, we support efforts by other groups and agencies to increase the number of salmon, remove dams from the Snake River, and reduce the toxins in the Salish Sea. However, our advocacy work is focused on the third threat to the SRKWs – noise and disturbance, particularly from increased vessel traffic through the Salish Sea. A WPZ should not prevent vessels from engaging in other activities such as fishing (especially tribal rights fishing), sailing and kayaking; our primary concern is with boats actively following whales for whale watching, boats moving at high speed, and an increase in large tanker traffic – the noise and disturbance from these activities disrupts SRKW behavior and blocks their sonar for hunting.

Orca Relief Citizens' Alliance, the Center for Biological Diversity, and Project SeaWolf recently submitted a regulatory petition to NOAA NMFS, which provides a framework for establishing a Whale Protection Zone for part of the SRKWs critical core habitat in Haro Strait off of San Juan Island, Washington state. The WPZ could quickly and inexpensively reduce the noise and disturbance the SRKWs experience in, and ensure unimpeded access to the core of their critical habitat on which they rely for hunting, communications, and rest.

After careful review of Orca Relief's regulatory petition, we at Stand.earth (Formerly ForestEthics) support their request to establish a Whale Protection Zone and other regulatory efforts to help SRKW recover from the brink of extinction. Taking action now to establish a Whale Protection Zone should be conducted in concert with efforts to increase salmon populations and reduce contaminants.

We write to request that you begin the process to create a Whale Protection Zone with all due haste. This process conducted by the NMFS should be a public process, where all who have an interest in the SRKWs are enabled to weigh in with their ideas and information, and that this input is properly incorporated into the regulation framework.

The southern residents are counting on your help to ensure their future.

Sincerely,



Karen Mahon
Canadian National Director
Stand.earth, Formerly ForestEthics



Matt Krogh
Extreme Oil Campaign Director
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CC:

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