

Wednesday, January 06, 2010

Ms. Donna Darm  
7600 Sand Point Way, NE  
Seattle, WA 98115

Ms. Darm:

I have been an ardent sport fisherman since relocating to this state in 1971. I also fish the west side of San Juan Island quite frequently in the summer months. Please accept these comments on NOAA's proposed regulations to protect Southern Resident Killer Whales from marine vessel effects. I am writing you as a member of Coastal Conservation Association (CCA) Washington, as well as a strong supporter of marine conservation efforts and the important contribution recreational anglers make to the local economy and the stewardship of Puget Sound's marine resources. I have several fundamental concerns with the proposed vessel restrictions announced by NOAA on July 28, 2009.

The proposed "No Go" zone along the west side of San Juan Island is flawed in several key areas. First, the proposed closure area arbitrarily includes several types of vessels, including recreational anglers, while exempting other types of vessels from the regulations. This determination is contrary to the findings of the Draft Environmental Assessment and observation groups that have specifically found that "fishing vessels make up a very small percentage of vessels within ½ mile of the whales" and there is "a low likelihood of fishing vessels affecting whales". No specific scientific research has been presented indicating that recreational fishing vessels are impacting killer whale populations or that vessels exempted from the proposed restrictions are not impacting killer whale populations.

Furthermore, of the three pods that comprise the Southern Resident Killer Whale population, the J-pod spends the most time in the proposed No Go zone. The data and the Draft Environmental Assessment suggests that the J-pod population numbers have actually seen marked increases since extensive surveys began in 1974. The J-pod's growth percentage since 1974 is well above that experienced by the other two pods, which spend less time in the proposed No Go zone. This raises additional questions about the basis in science for the proposed No Go zone.

The proposed regulations would have a significant impact on recreational fishing along the west side of San Juan Island, which is a popular destination for anglers throughout Puget Sound. The socioeconomic analysis contained in the Draft Environmental Assessment greatly underestimates the economic value of recreational fishing to communities in the Puget Sound region. NOAA should engage knowledgeable economists and local recreational angling representatives in developing an accurate assessment of the economic benefits derived from recreational angling.

In lieu of the proposed No Go zone NOAA should instead consider the adoption of a "Go Slow" zone where vessels would be limited to a 7 knot seasonal speed to limit possible vessel interactions. Additionally, increased emphasis should be placed on enforcement, education and monitoring efforts surrounding the current 100-yard approach regulation (RCW 77.15.140) and the proposed restriction prohibiting vessels parking within 400 yards in a

whale's path.

It is clear that local and state officials have insufficient funds to enforce vessel restrictions or monitor vessel interactions. Since NOAA does not have the infrastructure required to conduct these activities, it should provide adequate funding to state and local agencies to conduct needed enforcement, monitoring and educational activities.

I support the need to restore local killer whale populations and appreciate this opportunity to comment on NOAA's proposed regulations.

Sincerely,

A handwritten signature in cursive script that reads "Bill Thomson". The signature is written in black ink and has a long, sweeping horizontal line extending to the right.

Bill Thomson  
14215 Cedar Way  
Anacortes, WA 98221

Thursday, January 07, 2010

Ms. Donna Darm  
7600 Sand Point Way, NE  
Seattle, WA 98115

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Sincerely,



Frank Betrozoff  
452 Kinwood St SE  
Olympia, WA 98503

I think NOAA should look into more science before a determination is made.

Frank Betrozoff  
President, Capital City CCA