

Marine  
**EDUCATION AND RESEARCH**  
Society

Chief, Permits, Conservation and Education Division  
Office of Protected Resources  
National Marine Fisheries Service, Silver Spring, MD 20910

Dear Mr. Payne:

Please accept this as our comment on the proposed satellite tagging permit modification application by NMFS (File # 781-1824-01). The Marine Education and Research Society is an association whose members include marine biologists and educators that are actively involved in cetacean, avian, and marine invertebrate research and education in numerous parts of the world.

We have taken into account the existing literature and our combined knowledge and views on the matter as well as those of colleagues. We have found that while satellite tagging may be largely beneficial to the conservation and management of some cetacean populations, this method is not ideal for use on southern resident, northern resident and transient killer whales. This is for 5 reasons.

The first reason is that Canadian and American scientists have over 30 years of both published and unpublished dedicated photo-identification and acoustic monitoring data that provide information on where these animals range. Given the amount that is already known about these populations based on over 30 years of less invasive continuing studies, we feel that satellite tagging is not necessary due to the limited data it provides in comparison.

Secondly, we do not support the satellite tagging of any orcas in these 3 populations because of the risks associated with the method. Disturbance from the research vessel, potential for infection at the tag site, potential to miss the desired target and stress to the animal(s) are all risks that are difficult to measure. Clearly, satellite tagging is at an unknown expense to the animals.

Our third concern is that the technology itself is not advanced enough. Erroneous satellite data points, less than ideal structural integrity of the tag itself (see attached photo), vastly limited data transmission duration, and a barbaric attachment design are all negative attributes of this method.

The fourth reason we do not support satellite tagging of southern resident, northern resident and transient orcas is because while we understand the importance of knowing their range, habitat and distribution, these are likely to continually evolve and change over time. Such changes in distribution have been described at the pod, matriline and individual levels in both resident and transient killer whales. Tag deployment on every animal in these 3 populations would still not provide a complete understanding of their overall distribution. We realize that critical habitat can

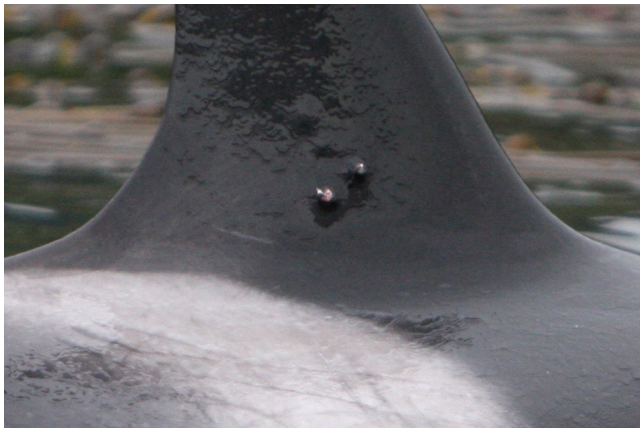
only be identified based on what we know today; however, this designation is not useful unless it applies to the future. Where these animals are in the future will depend on various factors. Using satellite tag data in real time to find out what these factors include, such as answering questions about their prey preferences in less well known parts of their range, does not seem to be plausible and has not been proposed as an integral part of the tagging study by Dr. Hanson.

Lastly, these 3 populations of killer whales are all well known and have high public profiles. Resistance to this method from the Canadian and American public, non-government organizations, as well as individual biologists and scientists will be consistent until the technology and scope of questions that can be answered with it improves.

For these 5 reasons the Marine Education and Research Society has concluded that satellite tagging is not appropriate for southern resident, northern resident and transient killer whale populations. We respectfully request that any existing permits to tag transients and northern residents be revoked and that the application for amendment to tag southern residents be denied.

Sincerely, Christie McMillan

President  
Marine Education and Research Society



T090 weeks before giving birth with tag missing and tag bolts secure and protruding 2 to 3 inches.