



Connecting
whales and people
in the Pacific Northwest

23 December 2010

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

Dear Mr. Payne:

With this letter Orca Network submits comments on the proposed satellite tagging permit modification application by NMFS (File # 724-1824-01).

Orca Network is a 501-c-3 non-profit organization based in Greenbank WA dedicated to raising awareness about the whales of the Pacific Northwest, and the importance of providing them healthy and safe habitats.

We are basing our comments in part on the information included in comments submitted by Ken Balcomb of the Center for Whale Research, Val Viers and Jenny Atkinson of The Whale Museum, Andrew Jones of the North Island Marine Mammal Stewardship Association (NIMMSA) and the detailed response to NIMMSA provided by Dr. Hanson. These sources and others have been very informative and are considered here.

Boiled down to its essence, the question appears to be: Does the value of the data resulting from attachment of satellite tags to SRKW justify the stress and potential injury from the procedure?



Examination of the short and long term consequences of tag attachment, as described in the above comment letters, appear to be potentially serious despite the observations of only slight flinching at the time the tag is attached. Although pain and discomfort are often highly variable and difficult to assess or predict even in ourselves, the insertion of barbed points extending 2.5” into tissue would almost certainly result in some discomfort at minimum, and possibly some considerable level of pain from the time the tag is attached until the tag drops off and the wound completely heals, especially if the wound becomes infected as the tissue around the tag decomposes and the tag exits the wound. If significant blood vessels are affected, or if the immune systems of the tagged animals are compromised by persistent toxicity, it seems plausible that the animals could suffer systemic infections or illnesses.

Although more comprehensive and higher resolution data on prey species during fall and winter could prove useful to guide SRKW recovery efforts, the potential injuries required to gather the data appear to outweigh the potential for beneficial results of the data gained from the tags.

Sufficient data exist now for assessing the probable routes of travel of SRKWs. Filling in more points, even if some occur beyond the known travel ranges, would not be likely to provide information germane to efforts needed to protect and restore these whales' dietary requirements - primarily Chinook salmon. Rather than focus attention and resources on discovering or confirming the whales' travel routes, we would prefer that NOAA devote more resources to restore and enhance wild salmon populations.

Thank you for this opportunity to comment on the permit application.

Howard Garrett
Susan Berta
Orca Network

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