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Docket Management Facility  
U. S. Department of Transportation  
400 Seventh St., SW  
Washington, D.C. 20590

Dear Sir/Madam:

I would like to comment on the Port Access Routing Study (PARS) which would alter ship routes to protect the endangered North Atlantic right whale. As a resident of Cape Cod, Ma. we are blessed to have this whale species as a seasonal resident, with whale watching being an important component of our tourist-based economy. Since 4 right whales have been killed this year alone by ship strikes, the Coast Guard needs to make dramatic changes as a result of their PARS analysis. This should adjust shipping routes to Boston Harbor to accommodate the critical habitat of right whales in Cape Cod Bay (CCB), especially the Stellwagen Bank National Marine Sanctuary (SBNMS) and Race Point area off of Provincetown.

The Center for Coastal Studies research suggests that right whales tend to avoid areas in CCB with *Phaeocystis* blooms and concentrate in areas rich in *Calanus finmarchicus* (their preferred food source). Since the spatial/temporal occurrence of these biological events changes from year-to-year, the Coast Guard needs to adopt a precautionary approach. The National Marine Fisheries Service (NMFS) utilizes seasonal and dynamic area management (SAM and DAM) to adjust the areas in which fixed fixing gear occurs in order to reduce the likelihood of right whale gear entanglements. NMFS has also held regional meetings under an Advanced Notice of Proposed Rule Making to address the issue of changing shipping lanes to reduce ship strikes. The SBNMS is revising it's Management Plan to address the issues of gear entanglements and ship strikes within the sanctuary boundaries. The Coast Guard PARS analysis should utilize the information and any proposed mitigation measures that emerge from the NMFS and SBNMS endeavors.

Back in 1991 I was a tourist on Grand Manan Island in the Bay of Fundy and went on a whale watching cruise. The whales congregated on the edge of the shipping channel. The Canadian government subsequently moved the ship channel to reduce the potential for ship strikes killing right whales. The Coast Guard needs to consider similar bold action in the Gulf of Maine (GOM) region during the summer and in winter in the region off of Georgia/Florida (Ga/FI) where the right whales congregate. Since right whales migrate close to the coast as they travel between the GOM and Ga/FI, the Coast Guard should consider moving the coastal shipping lanes further offshore during the migration period. Simply warning large ships of when right whales are in the area is not sufficient to reduce ship strikes, given the inability of the ships to alter course quickly and the tendency of right whales to feed at the surface and be oblivious to ships moving at high speed (naval vessels, high speed ferries, large freighters and tankers; etc.).

Thanks for your consideration in this matter.

Yours truly,  
*David Dow*  
David Dow