

Attention George Detweiler:
Reference # uscg 2005-20380

Because right whales are critically endangered and their
>>numbers
>>are declining, protecting them is of paramount importance, even if
>>shifting routes results in increased costs to commercial ship
>>traffic.
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>>* The United States has both the obligation and the authority
>>under its domestic laws to regulate ship traffic entering U.S.
>>ports.
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>>* In its PARS analysis the Coast Guard should, at the outset,
>>analyze all of the routing measures that were put forth by the
>>National
>>Marine Fisheries Service in its Advanced Notice of Proposed
>>Rulemaking
>>last fall, not just Cape Cod Bay, as suggested in the Federal
>>Register
>>notice.
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>> * The Coast Guard should also consider expanded protection,
>>beyond
>>the times and areas suggested in the Advanced Notice of Proposed
>>Rulemaking. Specifically, they should consider routing measures to
>>protect whales within the Cape Cod Bay Critical Habitat as well as
>>the
>>adjacent area called "off Race Point" from December through May of
>>each
>>year, to protect right whales as they enter and leave this vitally
>>important area.