

Coastal Office
428 Bull Street, Suite 210
Savannah, GA 31401
tel 912.447.5910
fax 912.447.0704
coastal@gaconservancy.org
georgiaconservancy.org



September 1, 2022

PRESIDENT
Katherine Moore*

Via electronic submittal <https://www.regulations.gov>

BOARD CHAIR
Virginia Harman, Cave Spring*

Attention: Ms. Caroline Good
National Marine Fisheries Service (NMFS)

BOARD OF TRUSTEES
Carmen Foskey Bergman, Savannah
Mark S. Berry, Douglasville*
Mikita Browning, Smyrna
Fred Daniels, Jr., Stone Mountain
Hardie Davis Jr., Hephzibah
Brian Deisselhorst, Florida
Nick Donkar, Atlanta
Richard S. Downey, Atlanta*
Jennifer Gilmer, Atlanta*
Holly Hill, Atlanta
John Hutchins, Atlanta
Byron Kirkpatrick, Atlanta*
Mike LaFerle, Marietta
Tim McKinley, Atlanta*
Chris Miller, LaGrange*
John R. Mulcahy Jr., Atlanta
Gerald Pouncey, Kennesaw
Ebony Preston, Powder Springs
Stacy Shailendra, Atlanta
W. Michael Stubbs, Macon
Charles E. Thomas, Mableton
Jennifer Winn, Atlanta

RE: NOAA–NMFS–2022–0022
Amendments to the North Atlantic Right Whale
Vessel Strike Reduction Rule

Dear Ms. Good,

The Georgia Conservancy is pleased to provide this letter of comment for the proposed Amendments to the North Atlantic Right Whale Vessel Strike Reduction Rule. Our organization supports the proposed rule with the sincere hope that compliance with this rule will help in the recovery of our critically endangered State Marine Mammal, the North Atlantic right whale. Numerous studies have indicated that slowing the speed of vessels reduces the risk of lethal vessel collisions with right whales, particularly in areas where the species is abundant ¹.

The Georgia Conservancy has served our state's conservation interests for fifty-five years and for decades has played a major role in helping Georgians understand and protect this whale that spends part of the year off of our shores.

The North Atlantic right whale migrates south from New England each winter to calving grounds off our coast. The species is critically endangered, but their population can rebound if we lower human-caused deaths using updated ship navigation practices and updated marine technologies.

Mother and calf pairs are at high risk of vessel strikes because they frequently rear and nurse nearshore and close to the water surface. The first three months of a calf's life are spent on the Atlantic shores of the Southeast, so the reduced speed is important in our waters.

ADVISORY COUNCIL
Claire L. Arnold, Atlanta
Braye Boardman, Augusta
Joel Cowan, Peachtree City
Ann Q. Curry, Atlanta
C. Edward Dobbs, Atlanta
Amir Farokhi, Atlanta
Chet Hurwitz, Atlanta
Elliott Levitas, Atlanta
J. Lacey Lewis, Atlanta
Hank Linginfelter, St. Simons Island
Leslie Mattingly, St. Simons Island
Leopoldo Miranda, Marietta
Joe Montgomery, Rome
Marc Collier Overstreet, Atlanta
Laura Turner Seydel, Atlanta
Ron Shipman, Macon
Jim Timmons, Atlanta

*Executive Committee Member

¹ <https://www.fisheries.noaa.gov/national/endangered-species-conservation/reducing-vessel-strikes-north-atlantic-right-whales>

In addition to the regulations, we support additional funding for compliance. As indicated in the support materials, there has been systemic noncompliance with the rules, especially at the entry to channels on the Southeast coast.² This issue has been mentioned in other recent studies based on AIS (Automatic Information System) data. The proposed rules and added enforcement will level the playing field and benefit those “good actors” who are already complying with the current regulations.

If this rule is not adopted, we fear more extensive and expensive regulatory action will be needed as the right whale populations further decline. Thus, we see compliance with slower speeds under the proposed rule as an economically sensible choice that could help prevent more draconian measures if the precipitous decline of the last few years continues.

Thank you for seeking comments and using a process that allows for input from stakeholders. Please let me know if you have any questions or need any information.

Thank you very much for your consideration.

Sincerely,



Charles H. McMillan, III
Coastal Director
Georgia Conservancy



Katherine Moore
President
Georgia Conservancy

² https://media.fisheries.noaa.gov/2021-01/FINAL_NARW_Vessel_Speed_Rule_Report_Jun_2020.pdf?null
https://media.fisheries.noaa.gov/2021-01/FINAL_Appendix_A-Figures_and_Tables.pdf?null