

September 27, 2023

The Honorable Gina Raimondo
Secretary of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

RE: \$82 million in Inflation Reduction Act funding for North Atlantic right whales

Dear Secretary Raimondo:

A Uf]bY'F YWYU]cb'7ca a i b]m]g Detailed Recommendations for Allocating Inflation Reduction Act Funding for North Atlantic Right Whale Conservation

In the proposed vessel speed (VSR) the National Oceanic and Atmospheric Administration (NOAA) acknowledges that technology can play a role in this issue *stg. I B A : G'Ugc'fM]b]n]ghYfc'Y whale avoidance technologies may play in preventing vessel collisions and remains open to the future application of these hYMc`d]Yg'Zdfq Yb`d]Y'UbX'YZM]j Y'i* This statement underscores our primary interest in finding opportunity that the money be used to explore effective technologies that prevent vessel collisions.

The recreational fishing and boating community must be active partners as these funds are rolled out. NOAA acknowledges the need to engage the recreational fishing industry by stating in the National Saltwater Recreational Fishing Policy *Engaging with the recreational fishing community to i bXfghUbX'UbX'fX' W]bhfUM]cbgk Jh`dfc'WX'gM]Vg'i* the importance of *X U W K H U P R U* Endangered Species Act for the North Atlantic right w

class of vessels, such as large, oceangoing steel-hulled vessels. Projects must have benefits for the entire fleet. There are ways of addressing the inherent challenges of scaling up technology to reach all recreational boats through better communication and information sharing capabilities. As experts in our industry, we are asking to partner with NOAA on these important details.

Considering these comments, we would like to offer the following

ports of Wilmington, Charleston, and Brunswick were exceptionally low, never reaching over 20% since 2008. Since the 2008 rules are largely directed to commercial vessels where the operator is not the owner, outreach to the maritime community could advance compliance. If compliance with existing regulations can be substantially improved, particularly in the waters frequently frequented by female and calf NARW, there should be measurable conservation benefits. Simply educating operators on rules that have been in place for over 15 years. The same can be said for the voluntary dynamic management zones (DMZs) that are triggered by an acoustic detection and/or visual observation of three or more NARW. Reporting on DMZs found even lower compliance, 15% or lower. A logical first step would be to use some of this funding to improve compliance through outreach and education. By investing in such initiatives, we can ensure that recreational boaters are well informed and engaged in responsible practices. S. D. Walden, a leader in this area can facilitate the dissemination of essential information and foster a sustained culture of responsible coexistence between boaters and marine mammals. Outreach and engagement with the recreational sector were also identified as a priority by NOAA and included in the National Saltwater Recreational Fisheries Plan published in March 2022.

In conclusion, we view this funding opportunity as a much-needed and hopefully groundbreaking