

October 11, 2022

The Honorable Gina Raimondo
Secretary
Department of Commerce
1401 Constitution Ave NW
Washington, D.C. 20510

Dear Secretary Raimondo,

As the Presidents and Chief Executive Officers of over 70 marine industry companies and associations, we write to underline the urgency of revising the National Oceanic and Atmospheric Administration's (NOAA) proposed changes to vessel speed regulations to protect North Atlantic right whales. **The proposed changes pose numerous consequences to the \$170 billion recreational boating and fishing industry and would virtually shut down the largest driver of the outdoor recreation economy along the Atlantic Coast.** NOAA's proposal lacks input from key stakeholders – including marine businesses and boat manufacturers, marinas, and recreational anglers – and severely underestimates the economic impact of its proposed rule. NOAA must incorporate key revisions to its proposed rule change to achieve our shared goal of protecting North Atlantic right whales without unnecessarily closing recreational boating and fishing access and causing wide ranging economic harm.

Driven by the recreational boating and fishing industry, the outdoor recreation economy is a major contributor to the U.S. economy, generating \$689 billion in economic output, nearly 2% of U.S. GDP, and 4.3 million American jobs. The role of recreational boating and fishing in our economy has only grown more significant as Americans flocked to new outdoor activities amidst the COVID-19 pandemic. In fact, estimates project the outdoor recreation industry will near \$1 trillion in an upcoming economic analysis by the Bureau of Economic Analysis (BEA).

Over 100 million Americans go boating each year, with more than 70 percent of all boat outings involving fishing, including thousands of offshore fishing trips that occur each year along the Atlantic Coast. NOAA's proposal to broaden the current 10-knot (roughly 11.5 miles per hour) speed restriction to include vessels 35 feet and larger will make these fishing trips nearly impossible, and in some instances would quadruple the travel time for a vessel, making daytrips non-viable for a vast majority of the angling community. Lowering the mandatory speed restriction threshold will impact over 63,000 registered recreational boats, which is significantly more than NOAA's estimate of only 9,200 vessels.

Further, NOAA's suggestion to extend these go-slow zones as far out as 90 miles from shore will effectively cancel any and all offshore fishing and recreational boating trips, as vessels routinely travel as far as dozens of miles from shore to enjoy a day on the water.

At a time when Americans continue to flock to the great outdoors and our nation's waters in droves, it is imperative fair boating and fishing access is maintained. Left unchanged, the proposal would curtail thousands of recreational boating and fishing trips each year, jeopardizing billions of dollars

of economic impact, thousands of jobs and businesses, and the pastimes of tens of millions of Americans.

We urge the administration to press pause on its proposed rule to better incorporate feedback from recreational boating and fishing stakeholders, including:

- Return the mandatory speed restriction threshold to vessels 65 feet in length or move it closer to 65 feet in length.
- Forgo a blanket approach to establishing speed zones in favor of targeted, data-driven speed zones supplemented by science-based dynamic speed zones.
- Revise enforcement periods to mitigate conflicts with marquee recreational fishing seasons and peak transient seasons.
- Develop an action plan to improve enforcement of existing regulations.

We thank you for your attention to this important matter. The boating and angling community looks forward to working alongside you and your team on this issue.

Sincerely,

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President
National Marine Manufacturers Association

David Foulkes
Chief Executive Officer
Brunswick Corporation

Glenn Hughes
President
American Sportfishing Association

Aine Denari
President
Brunswick Boat Group

Jason Crawford
President
Arco Marine

Dirk Hyde
President
Brunswick Aluminum Boat Group

Jim Wolf
President and Chief Executive Officer
Avalon Manufacturing

Benoit Verley
Venture Group President
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Ben Mallett
General Manager
Bennett Marine

Brett Dibkey
President
Brunswick, Advanced Systems Group

David Ritchie
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Bonnier Corporation

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