



Janet Coit  
Assistant Administrator for Fisheries  
National Oceanic and Atmospheric Administration  
1315 East West Highway  
Silver Spring, MD 20910

Re: Proposed North Atlantic Right Whale Vessel Strike Reduction Rule

Assistant Administrator Coit,

On behalf of the Outdoor Recreation Roundtable (ORR) – the nation’s leading coalition of outdoor recreation trade associations made up of 36 national trade association members and additional nonprofit organizations and business entities serving more than 110,000 American businesses – I am writing to urge the National Marine Fisheries Service (NMFS) to pause its rule regarding vessel speeds.

Outdoor recreationists are fervent stewards of the environment and the original conservationists. Simply put, our industry would not exist without proper conservation and management of America’s public lands and waters, including the animal life that calls them home. As such, we understand the necessity of protecting the endangered North American Right Whale and agree that an effort to protect the species is critical. However, given the lack of data, scientific assessment and stakeholder engagement, we request that NMFS suspend the rule until additional analysis and engagement can be conducted.

Recreational boating and fishing are major economic drivers, contributing \$30.8 billion to the nation’s economy in 2020 according to the Bureau of Economic Analysis, the largest contribution of any recreational economic sector. Additionally, more than 50 million Americans participate in fishing each year. Unfortunately, the proposed rule would have significant negative impacts on this crucial sector without science behind the impact the sector has had on the species. The expanded mandatory speed restrictions set forth by this rule would impact tens of thousands of recreational boaters and anglers, the businesses and communities that rely on them and the entire \$689 billion recreation economy in these areas.

Given the myriad benefits of recreational boating and fishing to the nation and the uncertainty and lack of stakeholder engagement around this rule, we believe more study and stakeholder engagement is necessary and could result in less restrictive measures that also meet conservation goals. ORR and our members stand ready to work with NMFS to ensure conservation and recreation work hand-in-hand to protect endangered wildlife while ensuring all Americans have access to high-quality recreation experiences for generations to come.

Sincerely,

Jessica Turner  
President