



June 15, 2023

Assistant Regional Administrator  
Protected Resources Division  
NMFS, Southeast Regional Office  
263 13th Avenue South  
St. Petersburg, FL 33701

To Whom It May Concern:

We are writing to state our opposition to the petition for rulemaking “to establish a year-round 10-knot (kn) (5.1 meters/second) vessel speed limit and other vessel-related mitigation measures in the Rice’s whale “core” habitat area.” We have serious concerns regarding the adverse impacts this rule would have on our communities, port operations and overall economy.

The Bay County Chamber is gravely concerned about the impacts this rule would have on Florida’s Joint Gulf Training Range Complex. It is the largest military training range in the continental United States and provides military training activities that are essential to our national security. Threats to this unique military testing and training area on, above and below the surface of the water, would jeopardize Florida’s appeal to retain or attract military installations, missions, training and defense contractors. Loss of such activities would negatively affect the 96.9 billion defense related economic impact in the State.

Additionally, this rule would have detrimental effects on Florida’s economy. Much of the Gulf of Mexico fishing grounds is used by the recreational and commercial fisherman would fall under the 10-knot rule. Florida’s 16 seaports that support cargo and cruise activities contribute \$117.6 billion in economic value to the state as well as support 900,000 direct and indirect jobs. Maritime activities in Florida account for nearly 13% of the state’s GDP and contributes \$4.2 billion in state and local taxes. Requiring a vessel to operate at a maximum speed of 10-knots and halting nighttime vessel transits, would greatly reduce the significant impact of these activities on the state’s economy.

While protecting endangered species is important, restricting marine activity is not an effective or reasonable option. There appears to be limited data in regards to Rice’s whales’ population and lifespan. Additionally, there is limited data showing vessel strikes are contributing to whale mortality rates. Instead of limiting marine activity, we advocate for conducting real-time monitoring of Rice’s whales through tagging, acoustic detection and pushing location information to operators. Furthermore, we support development of avoidance technology, outreach/education and increasing compliance with existing regulations would help develop effective conservation strategies for Rice’s whales.

Sincerely,

Bay County Chamber Board of Directors