



July 6th, 2023

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

Re: Petition to Establish a Vessel Speed Restriction and Other Vessel-Related Measures to Protect Rice's Whales (NOAA-NMFS-2023-0027)

Dear Administrator Coit:

The Marine Retailers Association of the Americas (MRAA) writes today to express its concern regarding the Petition to Establish Vessel Speed Restrictions and Other Vessel-Related Measures to Protect Rice's Whales and the severe economic impact this proposed regulation stands to have on marine dealers and other small businesses across the Gulf Coast.

The MRAA submitted comments on June 21, 2023, (ID NOAA-NMFS-2023-0027-5607, [link](#)) with other leading organizations in the recreational boating and fishing community. This comment letter will expand on Topic 5 and provide additional input regarding the potential economic impact of the regulation put forth in the petition. Ultimately, the MRAA asks NOAA Fisheries to work with all stakeholders in the Gulf of Mexico on a comprehensive solution to recover Rice's Whales.

The Marine Retailers Association of the Americas is the leading trade association of North American small businesses that sell and service new and pre-owned recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 3,500 individual marine dealership and retail locations and conducts advocacy efforts on their behalf.

As an industry that depends on healthy fresh and saltwater ecosystems, the recreational boating and fishing community can be considered America's original conservationists. Our industry has a history of working hand-in-hand with federal and state natural resource management agencies to collaboratively develop policies and support projects to conserve wildlife and critical habitat, while expanding access and providing additional opportunities to America's boaters and anglers. This close collaboration ensures the greatest benefit to our nation and ecosystems and supports the \$230 billion recreational boating industry and the more than 50 million American anglers.

Enclosed, please find formal comments to expand on Topic 5, "Information regarding potential economic effects of regulating vessel interactions."

Topic 5: Information regarding potential economic effects of regulating vessel interactions

The MRAA surveyed its members along the Gulf Coast — who have dealerships on or near the Gulf and who sell recreational vessels used in the Gulf — to determine the potential economic impact of the regulations proposed in the petition, and the results were unsettling. Based on responses to this survey, the proposed regulations will have a severe economic impact on small businesses and coastal communities at large throughout the gulf.

In summary, marine dealers believe that if put into effect, this regulation will have a significant impact on their business, resulting in a loss of boat sales and potentially forcing some dealers to sell their businesses, close locations, and scale down amid what they believe will be a drastic reduction in demand for recreational vessels. Below, findings from the survey are explained and expanded upon.

Impact to boat sales and business

When asked if the proposed regulations will have an impact on boat sales at their dealership all respondents (11) said yes. Furthermore, all respondents agreed that if put into effect the regulation will negatively impact demand for recreational vessels. This can likely be attributed to users not being able to access fishing grounds in a timely manner or due to the fear that the size and scale of the speed zone is increased, further impeding access.

Furthermore, respondents believe that they will lose, on average, at least **96** individual boat sales per year, which is a major blow to most marine dealers. The respondent from the dealership which stands to lose the most believes they will lose at least 200 sales, while the least impacted expects that it would lose 10 sales.

These losses stand to have a significant economic impact on marine dealers on the Gulf Coast. According to the National Marine Manufacturers Association 2021 U.S. Recreational Boating Statistical Abstract¹, the average price of a new traditional power boat is \$70,502. Thus, dealerships are likely to lose at least **\$6,768,192** each year due to the impact on boat sales. This does not factor in the loss of revenue from not selling trailers, accessories, or the service required for properly commissioning a new vessel.

When asked what measures will have to be taken by marine dealers if the regulation is put in place, **36%** of respondents noted that they will have to make major changes to business operations, including closing locations, reducing staff, and even potentially selling the business altogether.

18% of respondents highlighted a concern that this regulation will also push current and potential customers to other hobbies, leaving boating behind and instead doing something else with their free time. Being a leisure activity, the recreational boating market is extremely susceptible to changes to access and even the slightest impediment to boating can cause folks to shy away.

Conclusion

The input from dealers across the Gulf highlight the severe negative economic impact this will have at marine dealers and other businesses throughout the region. This proposed regulation threatens to spell economic disaster for the many small businesses who rely on boat sales and service to survive. In turn, this reduction in demand for recreational vessels throughout the Gulf will have rippling effects through many coastal communities and ancillary businesses, including marinas, restaurants, boat yards, charter businesses and more. Considering these unsettling findings, the MRAA asks the following of NOAA as the process moves forward:

- Work with partners to address knowledge gaps on this rarely observed species in order to inform future recovery planning and strategies.

¹ [NMMA 2021 U.S. Recreational Boating Statistical Abstract](#)

- Allow the recreational fishing and boating industry to meaningfully contribute to the right whale recovery plan.
- Develop a Recovery Implementation Strategy with input from all Gulf of Mexico stakeholders.
- Full compliance with the Regulatory Flexibility Act to ensure impacts to small entities are fully understood and considered.
- Facilitate a stakeholder roundtable with members of the recreational boating and fishing community to discuss the petition and potential technological solutions.

Thank you for your time and attention to this comment. If you have any other questions about the potential economic impact to marine dealers please do not hesitate to reach out to Chad Tokowicz, MRAA Government Relations Manager, at chad@mraa.com.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Tokowicz', written in a cursive style.

Chad Tokowicz
Government Relations Manager
Marine Retailers Association of the Americas