



# MARINE MAMMAL COMMISSION

9 December 2019

Ms. Adrienne Thomas  
Paperwork Reduction Act Officer  
National Oceanic and Atmospheric Administration  
151 Patton Avenue, Room 159  
Asheville, NC 28801

Dear Ms. Thomas:

The staff of the Marine Mammal Commission (the Commission) has reviewed the National Oceanic and Atmospheric Administration's (NOAA) request for comments (84 Fed. Reg. 54119) on the proposed collection of information under regulations implementing vessel speed restrictions to reduce the threat of ship collisions with North Atlantic right whales. The staff, on behalf of the Commission, supports the revision and extension of the vessel logbook requirements to collect information in limited circumstances when a vessel needs to transit at a speed above 10 knots to maintain safe maneuverability within Seasonal Management Areas (SMAs).

Under the vessel speed restrictions adopted to reduce the incidence and severity of ship collisions with North Atlantic right whales (73 Fed. Reg. 60173), most non-sovereign vessels 65ft. or longer are required to travel at a speed of 10 knots or less within SMAs along the U.S. East Coast at certain times of year. In limited circumstances when a vessel needs to transit at a speed above 10 knots to maintain safe maneuverability, the regulations require that to be entered into the vessel's logbook, along with the reasons for the deviation, the speed at which the vessel was operated, and the area, time, and duration of the deviation.

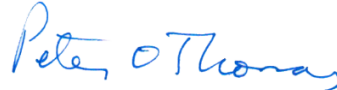
In supporting the proposed collection of information, the Commission:

- (a) affirms that the proposed collection of information is necessary for NOAA to meet its responsibilities under the Marine Mammal Protection Act (MMPA) and has practical utility. Laist et al. (2014) determined the vessel speed rule has been effective at reducing right whale deaths. Information on deviations from the 10 knot speed limit within SMAs is needed in order for NOAA to evaluate the continued effectiveness of the vessel speed restrictions;
- (b) agrees that the agency's estimate of the burden of the proposed collection of information, including hours and cost, seems reasonable concerning the amount of time required for vessel logbook entries;
- (c) has no additional suggestions of ways to enhance the quality, utility, and clarity of the information to be collected; and

- (d) agrees that the burden of the collection of information on respondents is minimal and reasonable, given the critical need for this information for evaluating the effectiveness of this rule and related management measures, and for better understanding mortality and serious injury of right whales when vessel collisions do occur. Automated collection of this information would be a helpful supplement to documentation in the vessel logbook; however, logbook entries with the date and signature of the Master of the vessel are important to retain.

Thank you for the opportunity to comment, and please get in touch if you have any questions regarding these comments.

Regards,



Peter O. Thomas, Ph.D.,  
Executive Director

## Reference

Laist, David W., Knowlton, Amy R., and Pendleton, Daniel. 2014. Effectiveness of mandatory vessel speed limits for protecting North Atlantic right whales. *Endangered Species Res.*, Vol. 23: 133–147, 2014 doi: 10.3354/esr00586