

SERENITY YACHTS

July 26, 2024

Re: E.O. 12866 Meeting 0648-BL86: Designation of Critical Habitat for Rice's Whale Under the Endangered Species Act

Thank you for this opportunity to support the critical habitat designation for the Gulf of Mexico Rice's whale.

In my capacity as Co-Founder of Serenity Yachts, I support the proposed critical habitat designation for the Rice's whale. Founded in 2017, Serenity Yachts is a full-service shipyard and marine manufacturer that has maintained an active commercial presence in Florida since 2018. Serenity strongly supports the critical habitat proposed as consistent with the Endangered Species Act, Serenity's business interests, science, and common sense.

Conservation of marine wildlife is central to Serenity's mission as a sustainability-focused ship manufacturer. Driven by a passion for protecting marine resources, Serenity has focused a significant portion of our manufacturing and marketing activity on electric, solar-powered, and solar-hybrid vessels. Serenity is committed to reducing the ecological footprint of the marine industry and, accordingly, produces innovative vessels that are both sustainable and functional. Our signature line of solar-powered catamaran yachts exemplifies this ethos. The desire to enjoy pleasure cruising without harming the oceans or their wildlife drives customers to purchase Serenity's yachts; thus, wildlife protection is not only a passion for our company, but meaningful for our business. As a marine industry stakeholder, we feel strongly that any burden that may arguably be imposed upon our company and customers by the proposed critical habitat and Rice's whale protections generally is ultimately strongly outweighed by the critical conservation needs of this important and extremely endangered species.

Designation of critical habitat for the Rice's whale is not only required under the Endangered Species Act, but it is a common-sense and well-tailored measure urgently needed to conserve this critically endangered species. **The critical habitat consists of a narrow strip running along the 100 – 400 meter depth area off the continental shelf break, and given that the primary species of fish that the whales eat is also supported by this habitat, this designation is patently sensible and tailored to conserving the whale while minimizing burden upon marine industries.**

It is critical that the entirety of the proposed critical habitat be designated, as well, as multiple lines of evidence indicate that this territory is essential for the conservation of the species. **This habitat is designation well-supported by the best available science, including multiple peer-reviewed papers from NOAA Fisheries. Over 1,900 days of**

<https://www.serenityyachts.com>

etaylor@serenityyachts.com

+1 407 629 7000

SERENITY YACHTS

acoustic data show that the whales persistently occupy the northern Gulf along the proposed critical habitat. The presence of the whales in the western and central Gulf is being further established, including by two 2024 papers and sightings off the coast of Corpus Christi, Texas, in April of this year. The claim coming from the fossil fuel industry that the whales do not exist in the western and central Gulf is patently untrue and has been repeatedly disproven.

Serenity understands that the best estimate of the Rice's whale population, as per NOAA Fisheries' own science, is only 51 animals; the agency has thus concluded that this whale is at a high risk of extinction. **We understand that the Rice's whale is the most endangered large whale in the world, and losing even a single reproductive female could mean extinction for the species. This already happened in 2009, when a commercial shipping vessel brought a dead, lactating female Rice's whale into Tampa Bay harbor.** We also understand that the threats faced by the Rice's whale are incredibly serious, given the extreme levels of industrial activity in the Gulf. These threats range from oil and gas exploration, oil spills, anthropogenic noise, vessel collisions, fisheries interactions, derelict fishing gear, and more. The US Government estimates that 22% of the already-small Rice's whale population was lost with the Deepwater Horizon oil spill. To state the point in plain English, these whales needed protection for their habitat years, maybe decades, ago. Critical habitat protection for these whales is extraordinarily urgent and essential. A letter to the Biden Administration submitted by a large coalition of scientists in October 2022 highlights the urgent and scientifically-demonstrated need for these protections.

Thank you for the opportunity to provide this testimony. On behalf of Serenity Yachts, we as a marine industry stakeholder support the proposed critical habitat as consistent with science, common sense, and the big-picture interests of our business and customers.



Elizabeth Neville Taylor
Co-Founder, Serenity Yachts