

MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814

3 June 2003

Mr. David Hankla
Field Supervisor, Jacksonville Field Office
U.S. Fish and Wildlife Service
6620 South Point Drive, South, Suite 310
Jacksonville, FL 32216

ATTN: Proposed Manatee Refuges

Dear Mr. Hankla:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the Fish and Wildlife Service's 4 April proposed rules to designate three new manatee refuges in Florida. The purpose of these refuges is to reduce the risk of collisions between manatees and boats by regulating the speeds of watercraft in areas where the number of watercraft-related manatee deaths has been high. The three areas include (1) portions of the Caloosahatchee River in southwestern Florida, (2) the lower St. Johns River in and around Jacksonville in northern Florida, and (3) the Halifax and Tomoka Rivers along the Atlantic coast in northeastern Florida. All three areas are important travel corridors for manatees, and both the Caloosahatchee River and the St. Johns River near Jacksonville have long ranked among the top three or four areas in Florida for watercraft-related manatee deaths.

Over the past dozen years, the State of Florida has established a complex network of boat speed regulations in all three areas. As with the proposed rules, the purpose of the state's rules was to slow speeds so that manatees would have time to avoid oncoming boats. Unfortunately, the state's regulations have not proven effective in reducing watercraft-related manatee deaths. The Service has therefore proposed a new system of rules for these areas that builds upon and simplifies the current network of state rules. For the most part, the Service's proposed rules would expand the area of waterway outside of marked channels that would be subject to slow speed requirements. In portions of the three areas, they also would extend the period that speed restrictions would be effective and increase the length of marked channels that would be limited to slow speeds.

In recent years, the rate of watercraft-related manatee deaths has risen faster than the

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overall rate of manatee deaths, suggesting that the threat of such watercraft-related deaths is increasing. The proposed rules would address this trend by adopting more protective measures that will be easier for boaters to understand and easier for enforcement officers to enforce. We believe that the proposed rules are appropriate and warranted, and the Marine Mammal Commission therefore recommends that they be adopted.

If you or your staff have questions concerning these comments, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "David Cottingham", with a long horizontal flourish extending to the right.

David Cottingham
Executive Director