



February 26, 2021

NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

RE: Comments on Docket No. 201221-0351

Dear NOAA Fisheries:

Surfrider Foundation Georgia appreciates the opportunity to comment on the proposed modifications to the Atlantic Large Whale Take Reduction Plan to address entanglements in fishing gear.

The Surfrider Foundation is dedicated to the protection and enjoyment of the world's ocean, waves and beaches, for all people, through a powerful activist network.

Surfrider Foundation Georgia considers the right whale as critical to Georgia's coastal ecology. We are deeply concerned by the recent increase in preventable deaths caused by entanglement in lobster trap gear.

Research shows that targeted vertical line closures where whales congregate and interact with heavy, lethal fishing gear are the fastest and most effective management tool available to prevent the unlawful deaths and likely extinction of the North Atlantic right whale. But the proposed closures to vertical buoy lines are too small, and too short in duration. Also, the proposed rule relies on the use of ineffective gear modifications, called "weak rope" to reduce risk. Weak rope has not been thoroughly evaluated and has not been proven to reduce risk.

We are thankful for the great deal of effort that NOAA Fisheries has put into developing this proposal. We look forward to working with you to ensure the protective measures are strengthened in the Final Rule. With fewer than 400 remaining whales, unless action is taken by your agency this critically important species will be lost forever. Thank you for your time and consideration.

Sincerely,

Surfrider Foundation Georgia

/s/ Clay Davidson
Government Affairs, Director