



NANTUCKET PLANNING AND ECONOMIC DEVELOPMENT COMMISSION



June 10, 2024

Senator Ed Markey
255 Dirksen Senate Office Building
Washington, D.C. 20510

Senator Elizabeth Warren
309 Hart Senate Office Building
Washington, D.C. 20510

Congressman William Keating
2351 Rayburn House Office Building
Washington, D.C. 20510

RE: Amendments to the North Atlantic Right Whale Vessel Strike Reduction Rule

Dear Senators Markey and Warren and Congressman Keating:

The Nantucket Planning & Economic Development Commission is writing to you to express our extreme opposition to the inclusion of Nantucket and Vineyard Sound in the Amendments to the North Atlantic Right Whale Vessel Strike Reduction Rule as proposed by the National Oceanic and Atmospheric Administration (NOAA).

As proposed, the amendments to the rule, while intended to further reduce the likelihood of mortalities and serious injuries to endangered right whales from vessel collisions, are misplaced in their applicability to Nantucket and Vineyard Sound. It is our understanding that a right whale sighting has not been confirmed in Nantucket and Vineyard Sound during the time period during which NOAA began documentation, and our local fisherman and ferry operators have also confirmed that no local sightings have occurred.

The required reduction in vessel speed November 1 through May 1 would have catastrophic effects on the residents of Nantucket. Being geographically isolated approximately thirty (30) miles south of Cape Cod, high speed passenger and traditional vehicle ferry travel is the primary transportation source to and from the island. Passenger travel by plane, once the preferred method, has been almost entirely replaced by ferry travel during the off-season, which is when this speed reduction rule would be in effect. The proposed amendments would eliminate all high speed (1 hour one-way) ferry service and reduce traditional vehicle ferry service from 3 round trips per day to 2 round trips per day, with each one-way trip being extended from approximately two hours and fifteen minutes to two hours and fifty minutes. While this may not seem important from a distance, residents have an entirely different point of view.

The combination of fast ferry elimination and slow ferry service reduction will have significant economic and quality of life impacts to Nantucket residents and businesses. Negative quality of life impacts include, but are not limited to: delivery of necessities such as food, medical supplies, fuel, and other materials, access to off-island medical care, school age children would no longer be able to participate in sports, social interactions such as a trip off island for the day to shop, see friends or family, or attend an event would no longer be possible. Last but certainly not least, the residents who can least afford these impacts – the economically disadvantaged and underserved residents within areas designated as environmental justice communities - will be most individually affected.

Economic impacts, which we argue far exceed the amount estimated by NOAA, include significant shoreside impacts – none of which were considered. The high cost of living on Nantucket is a major impediment to island life that is partially addressed by a commuting workforce who rely on year-round and daily fast ferry service. A reduction in the labor force would have a trickle down effect on all local businesses. Aside from the removal of year-round and daily high speed ferry service, the delay and reduction in goods brought to the island via the traditional vehicle ferry service would have far reaching impacts, particularly when weather conditions cause delays and cancellations. Nantucket has successfully extended the tourism “shoulder season” to bolster the economy through the off-season with events such as Nantucket Noel throughout the months of November/December and Nantucket Daffodil Festival in April – both of which would likely no longer be possible.

The Nantucket Planning & Economic Development Commission is entirely supportive of the protection of endangered species such as right whales where the proposed regulatory impacts would have a benefit. In the case of Nantucket and Vineyard Sound, no such benefit has been confirmed. While well intentioned, the proposed rule seems to only have negative consequences to Nantucket and would effectively leave the island isolated with unnecessarily limited access to the mainland.

Please use your influence and support to recommend that Nantucket and Vineyard Sound is removed from the proposed rule. Thank you, in advance, for your attention to our concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barry G. Rector".

Barry G. Rector,
Chairman