

Sarah Fangman
Sanctuary Superintendent
Florida Keys National Marine Sanctuary
33 East Quay Road
Key West, FL 33040

Re: Docket Number NOAA-NOS-2019-0094

Dear Ms. Fangman,

Florida Keys National Marine Sanctuary is a national treasure, protecting extraordinary species and the places they call home. The Florida Keys' marine ecosystem protects more than 6,000 species of marine life; 800 underwater historic sites; 1,800 miles of mangrove-fringed islands; 1.4 million acres of extensive seagrass beds; and the only coral barrier reef in the continental U.S.

This beauty and accessibility makes the Keys a world class diving location. Annually, recreational diving in Florida generates more than \$1 billion in revenue, more than a quarter of a billion dollars in wages and almost 12,000 jobs, and with more than 1.6 million divers and snorkelers visiting the Florida Keys annually, much of this revenue is generated there. Diving and the dive industry depends upon sustainable interaction with the marine environment for its very existence. We serve as strong stewards for the marine environment and in this stewardship ethic is the need to protect the marine environment and marine life.

But, the threats to the Florida Keys' marine environment are greater than ever. Impacts include degraded water quality and marine debris from proximity to a large population center, increased vessel traffic, boat groundings, derelict vessels, improper anchoring, commercial and recreational fishing pressures, and wildlife disturbances. The sanctuary protects a complex, interconnected ecosystem with different habitats and wildlife. A comprehensive, science-based evaluation and effective management plan that allows reasonable access for user groups while maintaining the health of the resource are needed to protect the marine environment. The Florida Keys Restoration Blueprint offers an opportunity to address these issues, restore habitats and protect marine wildlife.

Following are specific actions we encourage the National Oceanic and Atmospheric Administration to take in the final Restoration Blueprint.

Address Degraded Water Quality: While we recognize that many of the other deleterious factors contributing to a decline in Sanctuary water quality originate from beyond the boundaries of the Sanctuary, we encourage Sanctuary managers to partner with US EPA and Florida DEP to reinvigorate efforts to communicate the importance of local water pollution, to promote collaborative projects and leverage resources to support remediation efforts, and to continue to seek out and eliminate the sources of this pollution via the Sanctuary's Water Quality Protection Program. We also call upon the Sanctuary to make a renewed commitment to participating in and extending influence over external processes impacting water quality, including coordination with the South Florida Water Management District. We urge the Sanctuary to play a larger role in advocating for progress in Everglades restoration through increased participation with the South Florida Ecosystem Restoration Task Force, Working Group, Science Coordination Team, Biscayne Bay Regional Restoration Team, and current efforts to develop a Combined Operations Plan for Southern Everglades projects.

Enhance Enforcement: Like other employment sectors in the Florida Keys, law enforcement entities struggle with the high cost of living, recruiting, educating, and maintaining officers. Given that law enforcement on Keys waters is imperative to protecting marine resources, we strongly encourage NOAA and the State of Florida to work collaboratively to address the issue with improved Joint Enforcement Agreements and additional funding.

Support the existing idle speed/no wake zone along all residential shorelines to include 100 yards of all shorelines Sanctuary wide, except in marked and traditional channels and routes that do not conflict with natural resource and public safety protection. This is a commonsense approach to minimizing negative impacts on bottom and shoreline habitat, fish and bird populations, vessels, and user safety. It may also eliminate the need for boundary signs at Wildlife Management Areas where idle-speed is the prescribed regulation.

Consider additional no-take zones, in specific areas, to protect habitats and biodiversity:

Scientifically-designed no-take zones that do not unnecessarily restrict non-extractive activities, such as the Dry Tortugas Ecological Reserve have been shown to increase biomass and wildlife diversity. These benefits are also known to spill over to adjacent waters, aiding in habitat recovery. To realize the greater benefits of these protected areas, consider requiring the prior completion of an online education program, for those utilizing no-take areas for non-extractive activities. Such an education program can identify the conservation issues within the no-take area and provide an opportunity for all potential users to participate in the designated conservation measures. The additional requirement of completing an education program prior to use would likely also reduce the overall number of potential users, while reinforcing the need to prohibit discharge, fishing, touching and anchoring on coral, and making this zone type ideal for diving.

Strengthen the Mooring Buoy Network: Mooring buoys balance sustainable use by preventing anchor damage on sensitive habitats like coral reefs and seagrass beds, while facilitating public access for research, recreation, and tourism. Anchoring has been documented to cause reductions in fish density, coral cover and reef structural complexity as well as richness of marine life. We strongly suggest increasing the use and maintenance of mooring buoys, including rotating buoys periodically to prevent overuse of particular dive sites.

Strengthened Protections in Sanctuary Preservation Areas: A strengthened mooring buoy network would permit expansion of no anchor zones throughout the Sanctuary Preservation Areas. The Restoration Blueprint also proposes to remove the exceptions for trolling to catch and release fish in SPA zones and eliminate permits that allow for baitfish capture within SPA zones, to separate conflicting uses and protect benthic habitats. The Restoration Blueprint proposes to make all SPA zones idle speed/no wake.

Support Innovative Partnerships for Active Ecotourism: Dive businesses in the Keys and around the world are taking a more proactive role in stewardship and social responsibility by engaging visitors and communities alike to be a part of conservation solutions. We encourage the sanctuary to think about innovative public-private partnerships that connect dive businesses as leaders in the community to connect people to these wondrous places and engage in active ecotourism development to support restoration and protection of the marine environment that we are integrally tied to, including coral restoration, invasive species removal, fish or coral surveys, underwater marine debris removal, and beyond.

Promote Stewardship Education Programs: Education programs and additional resources offered to different users, including operators and businesses as well as residents and visitors, can be effective ways to advance stewardship, enhance resource protection, and complement enforcement. Building upon existing conservation education programs developed by the Florida Keys National Marine Sanctuary, the State of Florida, and other partners is critical to balance public access with responsible use and resource protection.

Blue Star (Dive and Fishing) Programs - The sanctuary's Blue Star program recognizes operators for their commitment to training their staff, educating their customers, and participating in conservation activities to support the marine ecosystem. The Blue Star program could be strengthened with annual evaluations of program success for effectiveness in messaging to ensure more users on the water understand their impact, promote responsible use and stewardship, and change behaviors that are detrimental to the resources.

Boater Education Programs - In 2019, the Sanctuary released a voluntary program intended to educate boaters about relevant regulations that provide the framework for boater safety and resource protection in the Sanctuary. Participation has been very limited despite efforts to encourage it. Given demonstrated damage to sensitive natural resources caused by uneducated boaters, we support making the boater education program mandatory for all those boating in Sanctuary waters. This mandatory program could be modeled after the program that exists in Everglades National Park.

The Florida Keys National Marine Sanctuary is a national treasure and a world class diving location. But, it is under immense stress globally and locally. Diving and the dive industry depends upon a strong, healthy, and vibrant marine environment. We stand ready to serve as strong stewards and connect people to this special underwater world and the marine life that calls it home. We stand ready to be part of the solution for balancing sustainable and responsible enjoyment of our marine resources with the need for stronger conservation measures.

Sincerely,

Marshall Goldman, 20,000 Leagues Scuba and Aquatics

Robert Cox, Alabama Reef Foundation

Vernon Brock, Aqua Lung America

Diana O'Brien, Auburn Skin Divers Association

Jenna Meistrell, Body Glove

Spencer Slate, Capt. Slate's SCUBA Adventures

Tim Webb, Caradonna Adventures

Neal Sands, Coastal Defense Inc.

Dan Orr, Dan Orr Consulting, LLC

Pat Hammer, Dive Right in Scuba

Tom Ingram, Diving Equipment and Marketing Association (DEMA)

Cathy Church, Diving Equipment and Marketing Association (DEMA), Academy of Underwater Arts & Science, Women Divers Hall Of Fame, and International Scuba Diving Hall of Fame

Jay Haigler, Diving With A Purpose

Erik Denson, Diving With a Purpose Maritime Archaeology Program

Steve Weaver, Dream Weaver Travel

John Swanson, Float n' Flag Dive Centre

Della Scott-Ireton, Florida Public Archaeology Network

Tony Young, Forever Young Charter Co.

Robert Cox, Gulf Coast Divers

Lisa Mongelia, History of Diving Museum

Mike Huish, Huish Outdoors

Chuck Fultz, Innovative Scuba Concepts

Michael Creese, Island Ventures

Mike Goldberg, Key Dives

Cortney Benson, Key Dives

Bob Holston, Keys Association of Dive Operators

Tom Leaird, Leaird's Underwater Service

Donovan Domingo, Maui Dreams Dive Co.

Rachel Domingo, Maui Dreams Dive Co.

Shannon Colbert, National Marine Sanctuary Foundation

Maria Lewis, NAUI Green Diver Initiative

Myra Kurn, Ocean Enterprises Inc.

Mae Lon Ding, Old Broads Dive Club

Robin MacFadden Parish, Our World-Underwater Scholarship Society

Kristin Valette-Wirth, PADI Worldwide

Nick Jenny, PADI Americas

Pat Hammer, Ralph Erickson Educational Foundation

Christopher M. Kerr, Sail Fish Scuba

Jennifer K. Kerr, Sail Fish Scuba

Tom Benson, Scuba Center, Minnesota

Tom Leaird, Scuba Educators International

Bill Cole, Sea Experience, Inc.

Lynn Costenaro, Sea Saba Dive Center

Charles Bush, Sherwood Scuba

Carrie Roach, Silent World Dive Center

Mike Johnson, Solstice Productions

Greg Ogle, Southeastern Divers, Inc.

Stuart Cove, Stuart Cove's Dive Bahamas

George Constantino, Swamo Diver Adventures

David Woods, PE, TECreation Development, LLC.

John Miller, Texas Dive Center

Ed Tiedemann, Tiedemann's Diving Center

Pat Hammer, Tim Early Foundation

Carol Bradovchak, Travel Resource Solutions, Inc.

Cc: The Honorable Ron DeSantis, Governor
Florida Fish and Wildlife Conservation Commission