



301.608.3040 | 8601 Georgia Avenue, Suite 510, Silver Spring, MD 20910

G.P. Schmahl
Superintendent
Flower Garden Banks National Marine Sanctuary
4700 Avenue U, Bldg. 216
Galveston, TX 77551

Re: Docket Number NOAA-NOS-2019-0033

Dear Mr. Schmahl:

The National Marine Sanctuary Foundation supports the National Oceanic and Atmospheric Administration (NOAA) proposed rule to expand Flower Garden Banks National Marine Sanctuary ("sanctuary") in the Gulf of Mexico. Expanding the sanctuary boundaries to include 14 additional reefs and banks will protect ecologically significant areas in the Gulf of Mexico. Scientists are constantly discovering new wonders in the additional expansion areas, including new species of corals and sponges, new hotspots of biodiversity, and new hope as deepwater corals seed reefs throughout the Gulf of Mexico Loop Current and beyond. Sanctuary management would extend to these areas and minimize destructive impacts of activities related to fishing with bottom-tending gear, ship anchoring, certain oil and gas exploration and production, and salvage activities.

Located far off the coast of Texas and Louisiana, Flower Garden Banks National Marine Sanctuary includes the northernmost coral reefs in the continental United States and plays an essential role in the health of the Gulf of Mexico. Flower Garden Banks NMS includes some of the healthiest and most resilient coral reef communities in the entire Caribbean and western Atlantic region. Those who visit the sanctuary can see coral heads bigger than cars and an abundance of marine life, including whale sharks, sea turtles, manta rays, mollusks, crustaceans, sea birds, and hundreds of species of fish.

Flower Garden Banks is part of a larger network of critical deepwater reefs and banks, structurally linked by ridges and outcrops, extending along the continental shelf. These areas serve as a corridor for fish and other animals to move throughout the larger Gulf of Mexico ecosystem. The reefs and banks provide important habitats for recreationally and commercially important fish, including red snapper, mackerel, grouper, and wahoo. Likewise, they are stopover points for threatened, endangered and protected species of sea turtles, manta rays, and whale sharks that migrate through the Gulf of Mexico, Caribbean and Atlantic Ocean.

Recent history shows how important a healthy ocean is to the Gulf of Mexico economy. In 2010, the Deepwater Horizon oil spill impacted a wide range of habitats and biological resources across the Gulf of Mexico region. Scientists documented significant injury to deepwater coral areas in the vicinity of the wellhead, reefs of the Pinnacles area and other seafloor habitats. Expanding Flower Garden Banks NMS supports several important aspects of Deepwater Horizon-related and wider Gulf of Mexico habitat restoration. In the Gulf of Mexico Ecosystem Restoration Task Force's "Gulf of Mexico Regional Ecosystem Restoration Strategy" and Deepwater Horizon Open Ocean Trustee Implementation Group's Open Ocean Restoration Plan, under the Natural Resources Damage Assessment, the Flower Garden Banks NMS region is specifically mentioned as one of the critical areas that should be managed as part of a network of ecologically significant offshore sites to enhance the Gulf's overall biological productivity and resilience.



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Since its creation in 1992, Flower Garden Banks National Marine Sanctuary has played an essential role in understanding and improving the health of the Gulf through research, exploration and conservation. The productivity, health, and resiliency of the marine environment in the Gulf of Mexico serves as the foundation for a multitude of economic benefits and industries. Expanding Flower Garden Banks benefits commercial fisheries, local tourism and recreation operators like dive shops and recreational fishing charters, the scientific community, and future generations.

The National Marine Sanctuary Foundation strongly supports Flower Garden Banks National Marine Sanctuary expansion to protect rare coral assemblages, critical fish habitat, unique geological features, and other important resources to ensure the Gulf of Mexico remains a healthy and productive ecosystem.