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Florida Keys National Marine Sanctuary
Advisory Council

PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: MICHAEL BELITZKY **Organization:** Personal Watercraft Industry Association (PWIA)

Email: [redacted]

If you would like to be added to the marine zoning and regulatory review email updates, please indicate your choice below:

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TOPIC TO BE ADDRESSED

Permit System, Limited Access

PUBLIC COMMENT

The Personal Watercraft Industry Association (PWIA) commends and appreciates the work and commitment of the Ecosystem Protection Working Group. PWIA believes the working group is well-balanced to represent all of the various user groups with a vested interest in maintaining access as well as protecting the vast and unique marine resources.

When establishing the National Marine Sanctuaries System, Congress made it clear that sanctuaries are to be managed in a way that maintains environmentally sustainable public and private access. 16 U.S.C. § 1431(b)(6); Florida Keys National Marine Sanctuary and Protection Act, Public Law 101-605, § 7(a)(1), (1990). PWIA understandably recognizes the unique natural resources within the Sanctuary and recommends that any development of management activities

Such as a special-permit system maintain sustainable public access to sanctuary resources.

Initially there was a concern of limiting access for personal watercraft (PWC) use within the Sanctuary. The sanctuary engaged stakeholders expressing user conflicts among PWC tour operators and fishing guides, In December 2012 the Lower Keys PWC Tour Operators and the Lower Keys Fishing Guides Association resolved these conflicts and presented a cooperative agreement which was subsequently approved by the Sanctuary Advisory Council (SAC) and recommended the agreement be included within the recommendations submitted to FKNMS.

PWIA continues to advocate against restriction or limitation of PWC use — both personal and rental.

Additionally, PWIA, in conjunction with NOAA developed the Blue Rider Ocean Awareness and Stewardship Program. This ongoing partnership ensures that people who rent PWC in the Florida Keys understand, embrace and practice good ocean environmental stewardship when operating/riding in the Sanctuary. Blue Rider has eliminated user conflict issues as well as promoted PWIA's commitment to education, outreach and responsible ridership. PWIA opposes unsupportable and unworkable special use permits and encourages the working group and SAC recognize the success of Blue Rider.

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Florida Keys National Marine Sanctuary
Advisory Council

PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: MICHAEL BELITZKY **Organization:** Personal Watercraft Industry Association

Email: [redacted]

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☒ already a subscribed

TOPIC TO BE ADDRESSED

Special Permit System, Limited Access

PUBLIC COMMENT

Florida state law maintains that "a vessel is a vessel" and that it is unsound public policy to discriminate against any one type of vessel. Pursuant to this policy, the Florida Legislature explicitly prohibits local ordinances that discriminate against personal watercraft. Fla. Stat. § 327.60 (2) (d).

PWIA recommends the working group and SAC incorporate this state policy to the extent practicable in sanctuary management.

PWC whether personally operated or rented are deemed in the same legal manner as all vessels and therefore should not be unjustly targeted and restricted.

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Florida Keys National Marine Sanctuary
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PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: MICHAEL BELITZKY **Organization:** NATIONAL MARINE MANUFACTURERS ASSOCIATION (NMMA)

Email: [redacted]

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TOPIC TO BE ADDRESSED

Effective Management Will ~~Ensure~~ Ensure Sustainability and Protect Marine Resources

PUBLIC COMMENT

NMMA ~~commends and~~ appreciates the work and commitment of the Ecosystem Protection working group. The working group is well-balanced to represent all of the various user groups, businesses, community members and all of those interested and concerned with the future and sustainability of the Sanctuary. ~~Recreational boaters and anglers~~ NMMA commends the efforts taken to ensure proactive management of growing ~~[illegible]~~ sanctuary-wide recreation in order to sustain the natural and cultural assets of the Sanctuary, and agree wholeheartedly that healthy, viable marine ecosystems are fundamental to successful ~~[illegible]~~ marine recreation and tourism.

As part of our fundamental mission to grow boating and angling participation, we recognize the need to ensure the environmental health of our waterways, especially

the unique and treasured FL Keys. The continued vitality of recreational boating and fishing as popular American part-time relies upon its ability to get people out on the water. However, if implemented improperly, Marine Reserves could greatly affect anglers and recreational-fishing dependent businesses in the area and have implications for the broader sport fishing community at large.

Use Current Scientific Data for Management

Marine Reserves are one tool among the suite of resources available ~~for~~ for effective fisheries management. In nearly all cases, well-regulated recreational fishing can be allowed while still ensuring sustainability of fish stocks and habitat. Marine Reserves or no-take zones are the most restrictive management tool, and should be considered only when recreational fishing poses a clear and demonstrated threat to the sustainability of fisheries resources and only after conventional fisheries management measures (e.g. size limits, bag limits, quota, gear restrictions) have failed. While we fully support improving the health of fisheries resources, ~~we~~ NMMA opposes fisheries management activities that unnecessarily close areas to fishing activities with little scientific basis and when other fisheries management tools can effectively support healthy and sustainable fisheries.

(cont'd next page)

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Florida Keys National Marine Sanctuary
Advisory Council

PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: MICHAEL BECITZKY **Organization:** NATIONAL MARINE MANUFACTURERS ASSOCIATION (NMMA)

Email: [redacted]

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* already a subscriber

TOPIC TO BE ADDRESSED

PUBLIC COMMENT

Maintain Public Access

When establishing the National Marine Sanctuaries System, Congress made clear that sanctuaries are to be managed in a way that maintains environmentally ~~sustainability~~ sustainable public and private access, 16 U.S.C. § 1431 (b)(6); Florida Keys National Marine Sanctuary and Protection Act, Public Law 101-605, § 7(a)(1). 1990. The public understandably wants to enjoy the FKNMS's unique natural resources, and such enjoyment should be maintained, NMMA recommends that any development of management activities maintain sustainable public access to Sanctuary resources,

Promote Stewardship and Ocean Awareness

Few marine environments compare to the Florida Keys in terms of natural beauty and resources, The Florida Keys are →

intimately linked to a marine ecosystem that supports one of the most unique and diverse assemblages of fish species in the world. Many recreational users share strong conservation values and recognize the importance of sustaining the ecosystems and cultural sites they choose to visit. Responsible boaters, anglers and businesses support well-considered, workable boating and fishing regulations that will promote environmental sustainability and protect important marine environments for future generations. NMMA recommends that the working group and Sanctuary Advisory Council engage recreational boaters and anglers to develop educational materials that encourage sustainable recreation and promote conservation so future generations can enjoy this national treasure

NMMA believes that sensible management backed by current scientific and socioeconomic data will protect the resources and will ~~encourage~~ encourage ocean stewardship among boaters and anglers.

~~We strongly~~

Florida Keys National Marine Sanctuary
Advisory Council

PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: Julie Dick **Organization:** Everglades Law Center

Email: [redacted]

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TOPIC TO BE ADDRESSED

Lower Keys & Marquesas Region

PUBLIC COMMENT

These comments are submitted on behalf of Florida Keys Environmental Fund and Last Stand.

This process provides a unique opportunity to apply science to establish protected areas and implement zoning. The 2011 Sanctuary Conditions Report indicated the majority of sanctuary resources in fair/poor condition. The status of key species was found to be in poor conditions. Increased protections and zoning are needed. The science tells us that large interconnected marine zones benefit the resource and allow them to recover. Some corals show resilience to ocean acidification and warming. Restoring and protecting these corals from impacts that can be controlled locally is vital for the ongoing wellbeing of the ecosystem, now and in the years to come.

This process provides and opportunity to improve the condition of the sanctuary through additional protections. Without adding additional protections it is likely the Sanctuary will degrade further.

As the status of resources often improve as a result of increased reserve areas the experience of users does as well. Fisherman in places like Cyprus and the Australian Great Barrier reef have voiced support for marine reserves in those places because they have seen increase in the size and quantities of fish as a result of marine reserve protections. I urge this working group to make recommendation today that will allow for recovery of the sanctuary by increasing protections in the Lower Keys and Marquesas region.

We support extending the Tortugas Ecological Reserves, extending the Sanctuary boundary and increasing enforcement of all the zoning and regulations.

The concept of a sub-issues management council specific to the Florida Keys makes a lot of sense given the qualities of species found in the Keys. We believe such a sub-council should include representation from the separately managed areas within the ecosystem.

We support no anchoring in the SPAs and fisheries management plan areas. Please note for the record that environmental and conservation groups are under represented on this working group. Thank you.

Florida Keys National Marine Sanctuary
Advisory Council

PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: Kasey Foy **Organization:** The Florida Keyskeeper

Email: [redacted]

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TOPIC TO BE ADDRESSED

Zoning Ideas and Recommendations

PUBLIC COMMENT

Looe Key - There are many commercial dive/snorkel charter boats such as Strike zone, Looe Key, Inner Space, UnderSeas, and others that are taking around 50 people a trip doing 3 or 4 trips a day to Looe Key S.P.A zone. These establishments are profiting greatly off of this unique Resource. I Recommend that the LARGE commercial dive/snorkel charter boats pay a User Fee to charter to very popular areas like Looe Key. The user fees will go towards the presenation and Restoration/Research for Coral Reefs in the area or other places where it is needed. I also think this should apply to large dive/snorkel charter boats in Key West. I would also like to suggest better stewardship (mandatory) for these establishments and for the public.

Western Sombas - I think the present area should remain the same, but make it TRANSIT only. IF the area is extended North east this will keep flats fisherman out from Bonefishing.

No area should be closed to flats fishing.. why → ① Nearly NO impact to the fish that are caught and released.
② No impact to the habitat NEARLY since flats fishing consists of trolling motors or poling.
③ It is an iconic and core component of the Florida Keys Culture (roots back to the 1930's)
④ Economic value > $465 million just to the Florida Keys
⑤ Methods used for flats fishing can be used as a viable tool for habitat conservation

I would also like to reccomend Habitat Protection to shallow water areas → ① Speed Restriction
② Pole/Troll/Paddle/Idle zones
③ Sufficient Navigation pathways

I think ALL areas that are closed should be continuedly studied, and closed zoning areas should be rotated so it ~~[illegible]~~ relieves pressures in other areas.

All S.P.A zones should be NO Anchor Zones.

Thank You

Florida Keys National Marine Sanctuary
Advisory Council

PUBLIC COMMENT

*PLEASE PRINT ALL INFORMATION AND DISCUSSION CLEARLY

Name: Caroline McLaughlin **Organization:** National Parks Conservation Association

Email: [redacted]

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TOPIC TO BE ADDRESSED

Anchoring in SPAs, Fisheries Management Plan Areas
Enforcement + Education
Florida Keys Fishery Management Council or Subcommittee

PUBLIC COMMENT

We believe that anchoring should not be permitted within Sanctuary Preservation Areas as these areas have been identified for the protection of coral + anchoring can be destructive to the reefs. Anchoring should also not be allowed within Fishery Management Plan Areas closed to lobster traps gear due to the high amount of threatened + endangered corals

We support the expansion of law enforcement efforts within the Sanctuary, wherever possible. Enforcement is key to ensuring that all of the careful planning efforts undertaken ~~have~~ to achieve effective management of Sanctuary Resources achieve desired benefits. Education is also hugely important in ensuring compliance with Sanctuary Rules + Regulations. We support efforts to use technology and other innovative education methods to increase compliance

Finally, we support the formation of a Florida Keys Fishery Management Council or Subcommittee because of the need to have a separate council to manage the unique + special resources of the Keys. There would be a multitude of benefits to managing the region as a whole and having consistent regulations throughout the entire Keys ecosystem. It would also represent an important step towards ecosystem based management. There also should be considerations as to how the Council could better coordinate with separately managed areas, such as Biscayne National Park, because of the connectivity between these areas.

[redacted]

Subject: Florida Keys Sanctuary public comment
Date: Tue, Jul 8, 2014 7:08 pm

July 8 2014

Subject: Ecosystem Protection Working Group Summary of Suggested Concepts.

Dear Florida Keys National Marine Sanctuary

I attended the afternoon session in Marathon, Florida where the Ecosystem Working Group (EWG) was having one of their last meetings and had these concerns. The Ecosystem Working Group (EWG) has focused on real estate closures but has yet to deal with the problems or even the reason to set aside areas of concern. Setting aside or enlarging areas and prohibiting one or more user groups from using an area for the purpose of preservation is like putting a Band-Aid on a hemorrhage. We are asking the wrong questions it is not what area needs to be preserved because there are problems there , over fished, poor coral growth sea fans, sponges etc. The question that should be asked is, What is causing those issues and how do we address those concerns ?.

I attended a lecture this past May hosted by Billy Causey at the Key Largo library who introduced the lecture on Florida Bay and the Everglades. Superintendent Causey started the lecture with the statement, " We do not have an over fishing problem, we have a Salinity problem". Billy Causey went on to say if we got our water quality right that we would see tremendous improvement in the Florida Bay, our reefs and in the whole sanctuary. Each of the lecturers went on to add information and education in their speciality that if the salinity was corrected by increase fresh water flow out of Everglades National Park coming through Taylor Slough that we would see a great improvement in forage fish, healthier coral, healthier spoon bill population, healthier sea grass beds, a healthier Sanctuary all together and isn't that what our goal should be, not closures so we " think" we are doing something for the environment.

It is interesting to note that even the hand out I received today at the EWG meeting, states this theory on the page marked Middle Keys Region of the committee's work sheet, in the section for Turtle Shoals the statement under Rational say, " Includes ESA and State listed coral species including staghorn, elkhorn and pillar; high stony coral cover and fish diversity. Includes resilient reefs. **This area is more protected from Florida Bay water and environmental conditions than other areas in the Middle Keys."**

One user group should not have more use over another user group. Divers, sport fisherman, commercial fishermen should be treated equal with out prejudice one over the other. Commercial fishermen seem to high light the conversations because they are lease numbered and seem to have become the escape goat for the Sanctuary. Chances are you have eaten seafood this week at a local restaurant in the Keys, that dinner was produces by a commercial fisherman, even though they may be few in over all numbers they produce the seafood we all enjoy at our favorite restaurant. If those in the Eco profession spent more time discussing and addressing the problems and issues of water quality and less time trying to close area of concern we would have a healthier Florida Bay and a healthier reef system and each user group would be able to enjoy the sanctuary.

In closing I again would like say if we would focus on **water quality** more then closures then we all would get better results.

Each user group needs to be schooled in how to care for the Sanctuary that comes with **education**.

We need more **law enforcement** to punish those that abuse the environment and system.

Thank you for your time.

Tom Hill
Key Largo Fisheries