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Aug. 24, 2019

To all concerned about the Florida Keys Marine Environment,
Note; I will update this document as necessary. All feedback is welcome.

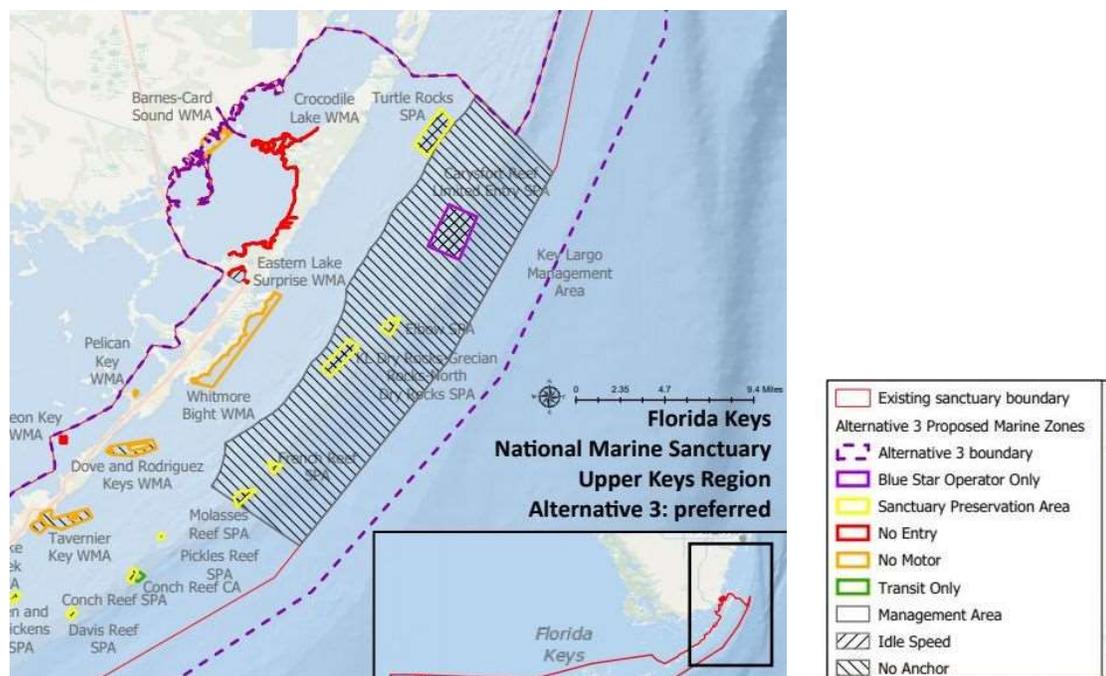
After a preliminary review of the Florida Keys National Marine Sanctuaries new management plan (A Restoration Blueprint <https://floridakeys.noaa.gov/media/blueprint/deis-fknms-restoration-blueprint.pdf>).

Maps and other documents can be found at <https://floridakeys.noaa.gov/blueprint/deis.html> .

I have found the following issues;

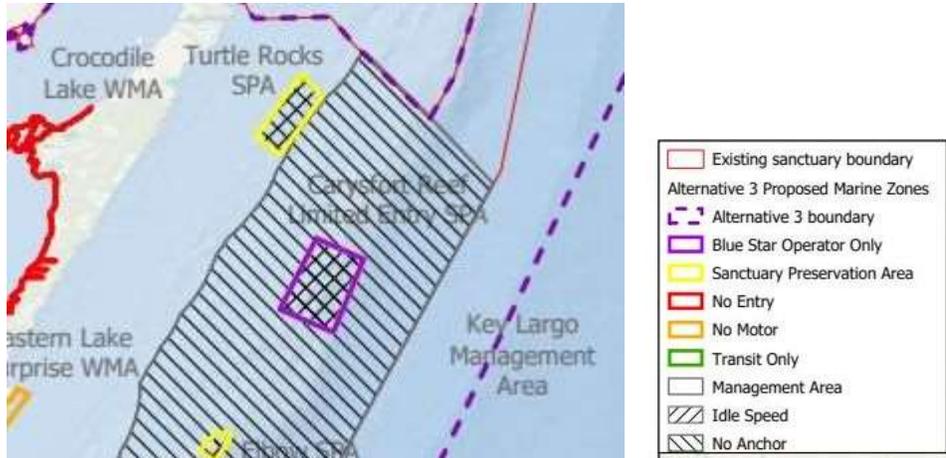
1. In alternative 2, 3 and 4, in the upper keys. There is a “No Anchor Zone” from 3 miles offshore to the outer deep reef which is approximately 400 feet and from molasses reef to the Monroe Miami-Dade County line.

The consequences of this proposed rule would essentially prevent all bottom fishing and yellowtail fishing on the outer reef in this designated area of the upper keys because you cannot anchor up. This “No Anchor Zone” would also preclude the ability to anchor up in the sand and snorkel or scuba dive a patch reef from Molasses to north of Ocean reef. This is an extremely punitive rule for the boaters of the Upper Keys.



2. Blue Star Operators Only ~ In alt 3, three SPAs (Carysfort (see purple SAP below), Sombrero, and Sand Key) that would be limited use areas, accessible by Blue Star Dive Operators only.

The consequences of this proposed rule would exclude the general public from selected areas of the Sanctuary. It's only a small area of the sanctuary NOW that they would be exclusively accessed by Blue Star Operators only. However, in my opinion, this is a foot in the door for the Sanctuary Management to exclude the general public from a large portions of the Sanctuary by decree. I believe this is probably an illegal licensing scheme.



There are only 22 Blue Star Dive Boat Operators & 12 Blue Star fishing guides in the entire Keys approve by FKNMS, which IMO should not be granted exclusive right to these SPAs.

<https://sanctuaries.noaa.gov/bluestar/operators.html>

Blue Star Frame work

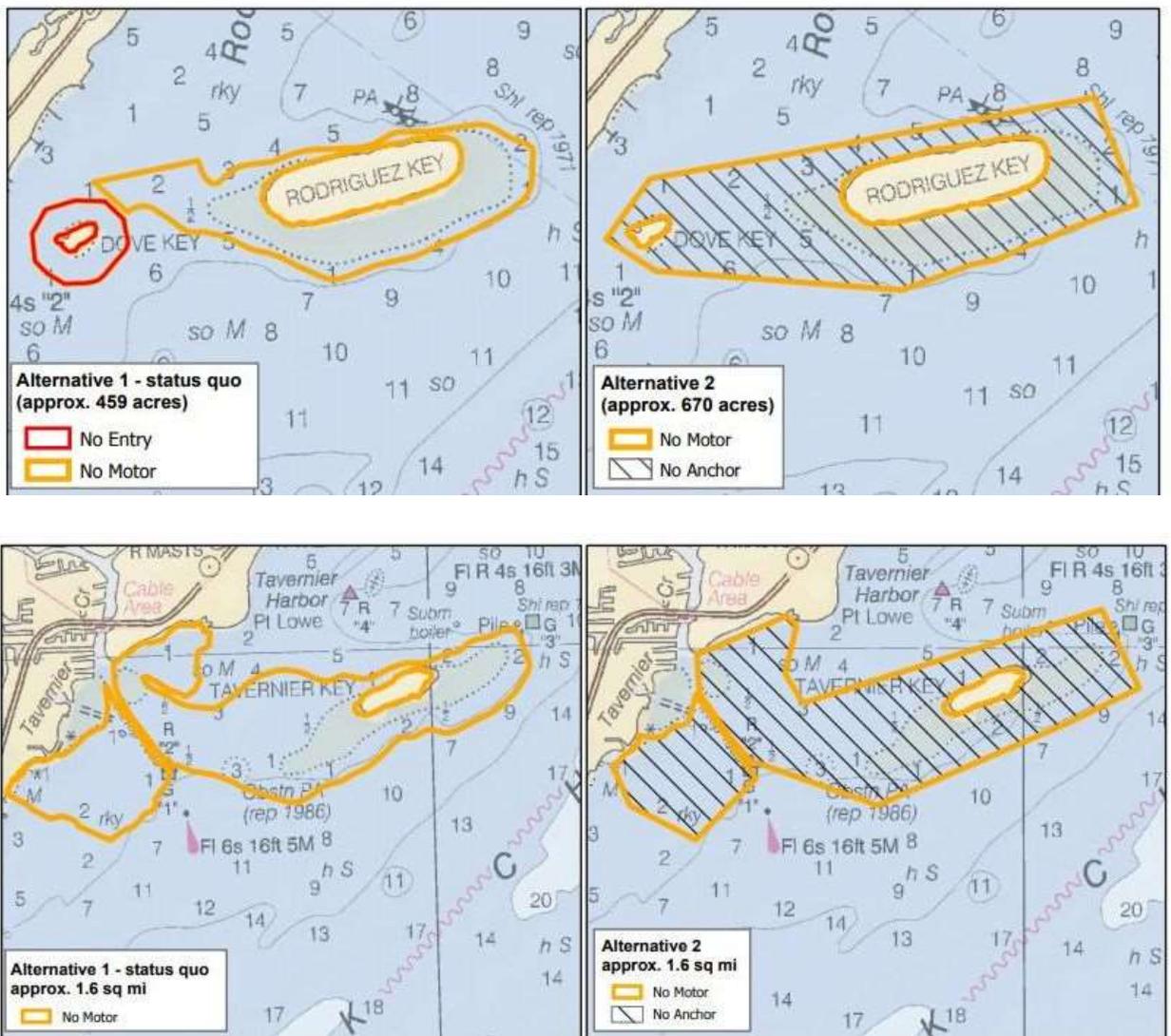
<https://nmssanctuaries.blob.core.windows.net/sanctuaries-prod/media/archive/bluestar/pdfs/framework.pdf>

IMO, Blue Star Operators do not represent less impact on a SPA than the operation of my private boat and passengers. I have a private (non-commercial) 45ft Lagoon Sailing Catamaran. My impact in the Sanctuary is minimal. I usually only have 6 passengers. My boat is limited to 6 scuba divers because I only have 6 tanks. However IMO, a Blue Star operator running a 30 to 45ft diesel or OBS powered dive boat with 6 to 25 divers has a much greater impact. . So, why should I be denied access to any SPA.

3. Rodriguez Key and Tavernier Key. In alt 2, there is a large significant no anchor zone around Rodriguez Key and Tavernier Key.

The consequences of this management rule would be to preclude anchoring up on the sand bar which has become a popular recreational activity. In my opinion, the human activity on the Rodriguez Key and Tavernier Key sand bars has minimal impact on the Florida Keys National Marine Sanctuary and should be allowed.

The unintended consequence of this rule probably would be that all these boaters will go to another area in the sanctuary that is more environmentally sensitive, and they would have a greater negative impact than they would at the sandbars.



BACKGROUND

My background is that I was born in Miami in 1945. And as a young child I came to the keys often with my family. I learned to swim in a saltwater pool with fish and seagrass at Hall's camp in Marathon when I was 5 years old (1950). I can remember it vividly. There were so many lobsters around the seawall of the pool that you couldn't count them. In high school in the 1960s, I can remember snorkeling around Carysfort Reef which had very large patch reefs of healthy Staghorn coral and Elkhorn coral. I have lived in Key Largo for the last 39+ years. So, my perspective of what is happening in the Sanctuary is based upon 70 years of fishing and diving in the water of the Florida Keys.

SANCTUARY STILL DECLINING

In my opinion, the Florida Keys National Marine sanctuary has been in decline since it was created in 1990. This decline has been caused by regional and global conditions not specifically by human activities of the FKNMS. Sure, the local South Florida boater do over fish the waters of the Florida Keys. However, that doesn't explain the degradation of the coral and other marine life in the sanctuary, in the Bahamas, or for that matter in the entire Caribbean.

CONCLUSION - DENYING ACCESS WILL NOT SOLVE THE PROBLEM

In my opinion the Florida Keys National Marine Sanctuary's "Restoration Blueprint", is misguided and focusing on just controlling and restricting human activities in the Florida Keys, which really will not prevent further degradation of the Florida Keys Marine Environment. This management plan will just inconvenience a lot of people at the very least and will not improve the environmental conditions of the FKNMS. I support Alt #1

REAL RESTORATION SHOULD BE THE FOCUS

The only glimmer of hope that I have seen in recent years of the actual restoration and an improvement of the Florida Keys National Marine sanctuary has been Ken Nedimyer's coral restoration project. Which is now morphed into the Coral Restoration Foundation. In my opinion, the FKNMS should focus and support restoration projects like the CRF. There should be comprehensive and scientific restoration projects to restore long spines sea urchins, seagrass, sponges, conch, shrimp, Florida crawfish, and other scales fish including hog fish, mangrove snapper, grouper and others. This is being done all over the world for the benefit of the environment and for commercial aquaculture. IMO, once the FKNMS embraces projects like this, then the new management rules could be truly called a Restoration Blueprint, now the new management plan should be called, "Let us deny access, people are the problem".

International Symposium on Stock Enhancement and Sea Ranching

In fact, Mote Marine in Sarasota, Florida has symposium on International Symposium on Stock Enhancement and Sea Ranching. (<http://www.searanching.org/>). From the website;

The ISSSR series began in Norway in 1997. The series was stimulated by continuing concern over the decline of fisheries, coupled with emerging technologies in marine aquaculture and new efforts to quantify the effects of stocking aquacultured organisms into the sea. These symposia, which are held every 4 to 5 years, have connected scientists and others interested in the efficacy of using aquaculture to help sustain, replenish, enhance or investigate exploited fish and invertebrate populations.

Many of the world's marine fisheries no longer yield the benefits they once did, due to over fishing and degradation of the supporting ecosystems. Governments are responding to the fisheries crisis by reducing fishing efforts and protecting fisheries habitats. However, fisheries managers are also asking whether the advances in aquaculture, that now enable juveniles of many species to be produced en masse, can be applied to speed up recovery of some stocks, or increase the production of others.

The 2019 [International Symposium on Stock Enhancement and Sea Ranching](#) will be Co-convened with the [Florida State University William R. Mote International Symposium on Fisheries Ecology](#) at Mote Marine Laboratory in Sarasota, Florida, USA.
10 to 14 November 2019
(On-site registration and Traveler's Meet & Greet on 10 Nov 2019;
symposium presentations begin at 9 AM on 11 Nov 2019)

Sincerely,

GlennPatton

I will update this document as necessary.

Please, Submit comments and get Involved;

ONLINE

Go to the Federal eRulemaking Portal, www.regulations.gov. Use docket number NOAA-NOS-2019-0094.

MAIL

Comments may be mailed to:

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

INFORMATIONAL SESSIONS

Five informational sessions will be held for the public to learn more about the proposals and provide input. **Written comments** will be accepted at the sessions in Key West, Marathon, and Tavernier, while the sessions in the Miami area (Coral Gables) and Fort Myers will include additional opportunities for **oral public comments**. Sessions start at 6 p.m.

September 23

Key West, FL
Key West High School
2100 Flagler Avenue

September 30

Marathon, FL

Marathon Middle High School
350 Sombrero Beach Road

October 7

Tavernier, FL

Coral Shores High School
89901 Old Highway

October 28

Coral Gables, FL

University of Miami Newman Alumni Center
6200 San Amaro Drive

November 4

Fort Myers, FL

Holiday Inn Airport at Town Center
9931 Interstate Commerce Drive

Members of the public may provide oral comments on the proposals during the [Sanctuary Advisory Council meetings](#) in October and December in the Keys. Meetings start at 9 a.m. These meetings will also be streamed live on the [Sanctuary Advisory Council's YouTube channel](#).

- October 15, 2019
- December 10, 2019

Location: Isla Bella Beach Resort, 1 Knights Key Boulevard, Marathon, FL 33050