



October 18, 2022

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

Re: Restoration Blueprint Draft Rule

Dear Superintendent Fangman:

The undersigned organizations, representing the conservation and recreational fishing community at local, state, and national levels, write to offer our vision of future management of Florida Keys National Marine Sanctuary (FKNMS) and priorities for the Restoration Blueprint draft rule. Collectively, we represent anglers, guides, captains, manufacturers, retailers, wholesalers, advocacy organizations, and others in the recreational fishing community who enjoy and depend on healthy Florida Keys ecosystems and fisheries. Recreational fishing has long been part of the cultural fabric of the Florida Keys and is a major economic driver in Florida, where recreational fishing has a \$13.8 billion economic impact and supports 119,678 jobs. Undoubtedly, the marine resources in the Florida Keys help make Florida the Fishing Capital of the World and conservation of these resources is critical. We recognize the challenges facing the FKNMS and support the overarching goal of balancing user access with the needs to the resource. As such, our coalition offers the following broad principles of agreement on management of FKNMS resources in the Restoration Blueprint.

First, we view water quality, education, enforcement as foundational to meeting the goals of the Restoration Blueprint and improving the Florida Keys ecosystem. We thank you for recognizing these critical needs in the FKNMS Restoration Blueprint Revised Draft Management Plan.

We also believe allowing for responsible access and historical uses should be a high priority in implementing the Restoration Blueprint, the forthcoming updated version of the Protocol for Cooperative Fisheries Management, and overall FKNMS management. For example, access to the world-class sailfish fishery at Alligator Reef should be allowed because this fishery does not conflict with the goal of protecting the reef and Endangered Species Act-listed species found at this site. Similarly, we believe the historical practice of cast netting for bait fish at Boca Grande can be accommodated without disturbing wildlife on the beach. We also support use of idle speed zones and marked running lanes throughout the FKNMS to promote responsible access and navigation that is safe for boaters, reduces damage to sensitive habitats such as seagrass flats, and reduces impacts to fish behavior. Responsible access and historical uses can also be better balanced with wildlife protections at wildlife management

area (WMA) zones proposed as “no entry” by changing these zones to “no motor” out to 300 feet from shore. If scientific evidence indicates further protections are needed in any such zone to minimize disturbance of nesting birds or other wildlife, a narrow (50 foot) “no entry” buffer along the shoreline, in which fishing lines could be cast, could accomplish such protections while allowing for existing, low impact use.

Our organizations recognize that habitat and coral restoration are extremely important to maintaining the world class fisheries in the FKNMS. We commend NOAA and FKNMS co-trustees’ commitment to restoring coral reefs in the FKNMS and responding to stony coral tissue loss disease through efforts such as Mission: Iconic Reefs. The issue of coral reef degradation in the FKNMS is multifaceted and requires a comprehensive approach. We support consideration of the strategic placement of artificial reefs within the FKNMS to compensate for the loss of high-quality, structured habitat that historically supported numerous fish species and other reef-associated fauna. Appropriately designed artificial reefs may also serve as donor sites for outplanted corals, aid in shoreline protection, and may also create new fishing opportunities, all while providing numerous socioeconomic opportunities for the Florida Keys community. Artificial reefs are a potentially valuable tool in comprehensive restoration efforts, and we strongly support the exploration of their potential benefits and placement in the FKNMS.

Not surprisingly, fisheries management in the FKNMS is of utmost importance to the recreational fishing community. We understand that the Protocol for Cooperative Fisheries Management between FKNMS, the Florida Fish and Wildlife Conservation Commission (FWC), Gulf of Mexico Fishery Management Council, South Atlantic Fishery Management Council, and NOAA Fisheries is being revised in parallel to the Restoration Blueprint to modernize this agreement, define activities that are considered “traditional fishing,” and set the process for managing marine fisheries in the FKNMS moving forward. Recognizing the missions of FWC, the councils, and NOAA Fisheries in managing fisheries, we encourage the FKNMS to defer to these fisheries management experts in developing fisheries regulations for the FKNMS and encourage cooperation among all of the above parties. In addition, we also ask that the recreational fishing community and the public have the opportunity to review and provide input on the proposed revisions to the Protocol for Cooperative Fisheries Management.

Lastly, we support using adaptive management in the FKNMS to provide NOAA and its co-trustees the flexibility to address resource concerns as they arise and encourage the FKNMS to engage the recreational fishing community as partners as part of this approach. Dialogue between FKNMS staff, co-trustees, co-managers, the recreational fishing community, and other stakeholders is essential to developing reasonable solutions that are understood and supported by resource users.

We greatly appreciate the opportunity to provide comments on the Restoration Blueprint and look forward to continue collaborating with you and your staff to improve the marine resources of the Florida Keys National Marine Sanctuary. Thank you for your consideration.

Sincerely,

Martha Guyas, Southeast Fisheries Policy Director
American Sportfishing Association

Brett Fitzgerald, Executive Director
Angler Action Foundation

Kellie Ralston, Vice President for Conservation and Public Policy
Bonefish & Tarpon Trust

Trip Aukeman, Director of Advocacy
Coastal Conservation Association Florida

Commodore Steve Friedman
Florida Keys Fishing Guides Association

Jason Schratwieser, President
International Game Fish Association

Captain Greg Eklund
Islamorada Charter Boat Association

Andrew Tippler
Lower Keys Guides Association

Captain Chris Mendola
Far Out Charters

Captain Rush Maltz
Odyssey Sportfishing

Captain Robert Trosset
Spindrift Charters