

## FRIENDS OF MATANZAS

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September 2, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910  
[sanctuary.nominations@noaa.gov](mailto:sanctuary.nominations@noaa.gov)

Re: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Director:

The Friends of Matanzas, Inc. (Friends), is a Florida non-profit corporation dedicated to the protection of the environment and the quality of life in St. Johns and Flagler Counties. We would appreciate your consideration of our enclosed proposal to nominate a National Marine Sanctuary that would lie along the coast of Florida, from the northeast to the central section of the state.

The Friends recognizes the uniquely high environmental quality and maritime heritage of our estuarine and marine areas: our waters, marshlands, and surrounding uplands nurture remarkable biological and cultural resources. We also recognize that these resources are not limited to two counties. Thus, an extended National Marine Sanctuary designation would give the citizens and institutions of our state an opportunity to study, present and discuss these resources and the potential threats that they face, and would provide a process through which a management plan could be created. We feel that meaningful, sustainable management can be achieved in a way that still allows people to enjoy these natural resources. Finally, a National Marine Sanctuary program -- through a highly coordinated outreach component -- would increase public awareness of the outstanding ecological system on its east coast.

Sincerely,

Marcella H. Matthaei  
Director, Friends of Matanzas, Inc. National Marine Sanctuary Program (904) 347-7332 tel.

Michael J. Greenberg  
President

Patrick S. Hamilton  
Vice President

## SECTION I - BASICS

**Nomination Title:** The Eubalaena Oculina National Marine Sanctuary

**Nominator Name(s) and Affiliation(s):** Friends of Matanzas, Inc.

**Nomination Point of Contact:** Marcella Matthaei - Director of National Marine Sanctuary Program, Friends of Matanzas

## SECTION II - INTRODUCTION

**Narrative Description** – The northeast coast of Florida nurtures remarkable biological, historical, and cultural resources which serve as an important economic stimulus for tourism, research, education, and recreation. This area encompasses a vital section of federally designated critical habitat for the highly endangered North Atlantic right whale – its calving grounds; a considerable portion of the newly designated critical habitat for the threatened loggerhead sea turtle; habitat for the endangered leatherback, Kemp’s ridley, and Atlantic green sea turtles; and economically significant fish habitat including the Oculina reef. St. Augustine, the nation’s oldest city and port, and Cape Canaveral, home to the lost French fleet of Jean Ribault whose story is also the story of the birth of our nation, are nationally significant archeological and maritime archeological areas.

**Goals Description** - The National Marine Sanctuaries Act protects nationally significant places and especially addresses the need for long-term protection of marine ecosystems and cultural resources. While local and state agencies may have overlapping regulations or other management authorities aimed at protecting specific marine resources, no other federal agency is directly mandated to comprehensively conserve and manage special areas of the marine environment like the Office of National Marine Sanctuaries. We believe that a National Marine Sanctuary designation would maintain and enhance the critically endangered population of the North Atlantic right whale, preserve and underline the significance of important fisheries habitat including the Oculina reef, the Matanzas River Basin, and the Indian River Lagoon Basin, and insure that significant maritime archeological material is managed and protected. By identifying the nominated area to the public as one of enormous national significance worthy of conservation, a designation would provide the opportunity to establish a baseline for this biologically vital area and afford monitoring for anticipated changes due to human activities such as uninformed overuse, acoustic variables, climate change, and ocean acidification.

**Location Description** - We propose the Eubalaena Oculina National Marine Sanctuary to be located in north/central eastern Florida with boundaries extending south from the south side of the mouth of the St. John’s River in Jacksonville (at 30.397°N, 81.393°W) to Fort Pierce (at 27.45°N, 80.32°W), and east to 79.93°W (see attachment A). The suggested coordinates to protect and expand North Atlantic right whale critical habitat and Oculina coral will be finalized by expert and public input during the public process.

## **SECTION III – CRITERIA INFORMATION**

### **Criteria 1**

#### **North Atlantic right whale**

The North Atlantic right whale (*Eubalaena glacialis*), is a baleen whale, belonging to the genus *Eubalaena*. Right whales were once a preferred target for whalers, who reportedly considered them the "right" whales to hunt because of their tendencies to stay close to the coast, their docile nature, their slow surface-skimming feeding behaviors, and their high blubber content because once harpooned they stayed at the surface of the water, making them easier to harvest than other whale species. They are currently among the most endangered whales in the world, and they are protected under the U.S. Endangered Species Act and the Marine Mammal Protection Act. Ship strikes and fishing gear entanglement (which when combined account for almost 50% of all North Atlantic right whale mortality since 1970) are their two greatest threats to recovery. The whales migrate back and forth from their feeding grounds in the Gulf of Maine and their winter calving areas off Georgia and Florida, a dangerous route filled with heavy shipping traffic.

The proposed area's natural resources and ecological qualities are of special significance and contribute to the biological productivity of the critically endangered North Atlantic right whale, a species with only around 450 animals remaining. While the right whale has just recently shown evidence of an increasing population, the species has not recovered and substantial protections are needed to ensure the whale's survival and recovery. A national marine sanctuary would maintain and enhance portions of the critical calving habitat of the North Atlantic right whales south of Jacksonville, Florida<sup>1</sup>. In 2011, the Marine Mammal Commission submitted a letter to Dr. Lubchenco in support of a national marine sanctuary containing the core of the right whale's calving and nursery ground (see Attachment B).

#### **Sea Turtles**

Sea turtles are some of the Earth's most ancient creatures. The seven species that exist today (five of which occur in the proposed area) have been around for millions of years, since the time of the dinosaurs. Sea turtles spend most of their lives in the water. Most of what is known about sea turtle behavior is obtained by observing hatchlings and females that leave the water to lay eggs. Sea turtles, like salmon, will return to the same nesting grounds at which they were born to have their own offspring. Only females come ashore where they dig out a nest in the ground with their back flippers, bury their clutch of eggs and then immediately return to the ocean. After hatching, the young may take as long as a week to dig themselves out of the nest. They emerge at night, move toward the ocean and remain there, solitary, until it is time to mate. Sea turtles and their habitat face threats from climate change, coastal development, and increasing human use. Even when these threats do not directly kill sea turtles or destroy habitat, the added environmental stress and habitat degradation decreases nesting success, hatching success, and hatchling survivorship – all of which decrease loggerhead sea turtles' potential for reproduction and recovery.

The proposed area falls within the recently designated critical habitat for the Northwest Atlantic Ocean Distinct Population Segment (DPS) of the loggerhead sea turtle and encompasses near-



shore reproductive habitat, winter area, breeding areas and migratory corridors (Critical Habitat, 2014). A globally significant loggerhead sea turtle population exists within the proposed area (Witherington et. al, 2009). A National Marine Sanctuary designation would contribute to the maintenance and enhancement of sea turtle habitat for endangered species of sea turtles (leatherback, Kemp's ridley, Hawksbill and Atlantic green). Protecting this nesting habitat is essential to recovering the aforementioned threatened and endangered sea turtles from risk of extinction.

### **The Crescent Beach Submarine Spring**

The Crescent Beach Submarine Spring is located 4 km off the northeast coast of Florida. It offers a unique opportunity to examine ground-water discharge because the discharge greatly exceeds first order spring discharge and is confined to one prominent solution feature. The Miocene confining unit as well as Plio-Pleistocene and younger overburden has been eroded away and therefore the principal Eocene artesian aquifer is in direct communication with the Atlantic Ocean<sup>2</sup>.

### **Fish Habitat**

Reef areas off of St. Augustine Florida are important fish habitats. They are very complex and support a high diversity and abundance of fish (Schobernd and Sedberry 2009). Hogfish, Bank Sea Bass, Sand Perch, Tomtate, Red Snapper, Vermilion Snapper, Gag, Greater Amberjack, Knobby Porgy, Red Porgy, Gray Triggerfish, Red Grouper, Tilefish, Snowy Grouper and Scamp are commonly seen and caught on hard-bottom reefs off St. Augustine. Spawning of Gag, Scamp, Tomtate, Vermilion Snapper, Hogfish and Gray Triggerfish has been documented at the shelf-edge reef off St. Augustine (Sedberry et al. 2006; Schobernd and Sedberry 2009). Speckled Hind, a rare grouper of particular conservation concern, have been seen and caught off St. Augustine (Sedberry et al. 2006; Schobernd and Sedberry 2009)<sup>3</sup>.

In addition, the Oculina Reef provides a high level of biodiversity and significant spawning sites for many species including economically important groupers. A national marine sanctuary designation which included an area of the Oculina Bank HAPC and which extended east beyond the HAPC would encourage public awareness of the habitat, its fragility, and its value<sup>4</sup>.

### **Estuaries**

The proposed area also encompasses two significant estuarine areas. The Indian River Lagoon and the Matanzas River Basin are cradles of biological diversity and productivity: 32 of the 33 known animal phyla can be found in ocean and coastal waters and of these, 15 phyla occur exclusively in estuarine or marine environments<sup>5</sup>. The Indian River Lagoon is one of the most biologically diverse estuarine systems in the continental United States. Spanning 156 square miles, its habitats support more than 3,500 documented species of animals, plants, fungi and protists<sup>6</sup>. The Matanzas River Basin occupies 186 square miles and also supports significant fish and wildlife resources. It contains the last relatively undisturbed and intact tidal marsh creek systems along Florida's east coast and is home to one of only three open oyster harvesting beds in northeast Florida.

## **Criteria 2**

The proposed area contains the port of St. Augustine, America's oldest continually occupied port, once used by the prehistoric Native American, the Timucuan, French, Spanish, and English colonists, enslaved Africans, eighteenth-century Greek, Italian and Menorcan. It is still in use today. The physical remains of many shipwrecks and archaeological sites lie near- and off-shore. The port is currently awaiting congressional approval of the designation of "Nation's Oldest Port National Heritage Area," which would be encompassed by a proposed National Historic Area.

The archeological maritime connection between St. Augustine and Canaveral National Seashore (including Merritt Island National Wildlife Refuge) is the current oceanographic endeavor to locate the lost French fleet of Jean Ribault<sup>7</sup>, which sank during a history-changing hurricane off Florida's Canaveral National Seashore<sup>8</sup>.

The following historic resources within the Canaveral National Seashore are already listed in the National Register of Historic Places (NR) some of which have special or sacred meaning to the indigenous people of the region or nation:

- Old Haulover Canal (NR# 78000262)
- Ross Hammock Site (NR# 81000083) an extensive midden, salt works and two burial mounds
- Turtle Mound (NR#70000193), both a shell mound and a sand burial mound
- Seminole Rest (NR#97000231), a shell mound and two historic houses
- Moulton-Wells House (NR#01001247)

Other coastal National Historic Landmarks contained within the proposed area are the: St. Augustine Town Plan Historic District (NR#70000847), Ponce de Leon Inlet Light Station (NR# 72000355) Cape Canaveral Air Force Station (NR#84003872), Pelican Island National Wildlife Refuge (NR#66000265) and Windover Archeological Site (NR#87000810).

## **Criteria 3**

Tourism is the primary economic engine for Florida and ecotourism is the most rapid area of growth within this sector. Ecotourism depends completely upon conservation and management.

The Indian River Lagoon is a diverse, shallow-water estuary stretching across 40 percent of Florida's east coast. Spanning 156 miles from Ponce de Leon Inlet in Volusia County to the southern boundary of Martin County, the lagoon is an important commercial and recreational fishery and economic resource. The total estimated annual economic value of the lagoon is \$3.7 billion, supporting 15,000 full and part-time jobs and providing recreational opportunities for 11 million people per year<sup>9</sup>.

While fishing in Florida is a \$5 billion dollar business<sup>10</sup>, wildlife viewing, which includes snorkeling and diving, whale and dolphin watching, sea turtle nesting tours and shore birding, has burgeoned into a significant market. In 2011, a wildlife viewing activity generated more than \$4.9 billion and supports 44,623 full- and part-time jobs. That is more jobs than the entire air transportation industry (35,268 jobs) statewide<sup>11</sup>.

Florida ranks in the top five in the U.S. for the number of residents who participate in all types of wildlife viewing, including trips away from home and feeding or viewing wildlife around the house. The 3.6 million wildlife watchers who live in Florida exceed the population of every metropolitan area in Florida except the Miami – Fort Lauderdale – Pompano Beach area.

In 2011, more visitors traveled to Florida to see wildlife than any other state. The number of nonresident wildlife watchers in Florida has grown each year since 2001, by 52% from 2001 to 2006 and by 11% from 2006 to 2011. The number of participants who make day and overnight trips away from home specifically to view wildlife grew substantially in the five-year period from 2006 to 2011 (22% increase)<sup>12</sup>.

In 2011, Florida residents who enjoyed viewing wildlife around their homes (3.3 million) outnumbered the population of 28 states<sup>13</sup>.

The total spent annually in Florida for wildlife viewing is two and a quarter times greater than the value of the state's annual orange crop harvest, \$1.2 billion in 2011<sup>14</sup>. Travel-related spending associated with wildlife viewing in Florida has increased from \$675 million in 2001 to more than \$1.4 billion in 2011; the overall economic effect of wildlife-viewing travel (food, fuel, lodging, etc.) equipment and accessories in Florida was \$2.7 billion in 2011. Tax revenues in 2011 related to wildlife viewing in Florida amounted to nearly \$285 million at the state and local levels and nearly \$397 million at the federal level<sup>15</sup>.

The FWC's Florida Wildlife Legacy Initiative, states the following: "Part of the foundation of Florida's economy is Florida's wildlife and habitat diversity. The combined revenue from hunting, fishing, wildlife viewing, boating and commercial enterprises exceeds \$25 billion in value annually."

"The Initiative is important because it promotes pro-active efforts to conserve wildlife and habitat before they decline further. And the Initiative saves millions of tax dollars by preventing wildlife declines before they become more rare and costly to protect. The Initiative promotes and builds partnerships. Working together partners can pool time, money and staff to more effectively address the challenges facing wildlife today. At its heart, the Initiative is a promise to future generations of Floridians that they, too, can enjoy Florida's rich and diverse wildlife heritage and family traditions<sup>16</sup>."

FWC's Coral Reef Initiative directs that by 2014 a comprehensive coral reef restoration plan for Florida be developed that will outline the essential strategies necessary to affect a well-coordinated, comprehensive coral reef restoration effort in Florida<sup>17</sup>.

Another aspect to consider is the economic benefit that surfing areas bring to beach communities. An estimate of the economic scale of the surfing industry, including travel, surf-branded clothing and the manufacture of surfboards, is on the order of \$10 billion per year and reaches into most countries on the planet. While this is an impressive number, it is likely to significantly under-account for the total economic value of recreational surfing<sup>18</sup>. Surfing represents a very profitable market, a growing industry, and a reason people move to coastal areas. Surfing plays a major part in the recreation and tourism strategies for many coastal



locations. Any negative impact to the surfing amenity in these locations may have serious consequences for the resident surfing population, visitors to the area, the local surf industry and the entire local coastal economy. The estimated economic value of surf tourism is \$21 million dollars a year in Brevard County alone.

#### **Criteria 4**

The north/central eastern coast of Florida prides itself on accessible public beach access. Miles of clean beautiful beaches attract millions every year from around the world<sup>19</sup>.

Substantial investments have been and are being made in preserving Florida's on-shore natural resources enabling visitors to easily view and access these beaches including three of Florida's Scenic Byways which occur along the north central eastern coastline covering 258 miles: The A1A Scenic and Historic Coastal Byway<sup>20</sup>, the Ormond Scenic Loop & Trail<sup>21</sup>, and the Indian River Lagoon National Scenic Byway<sup>22</sup>. These designated scenic highways 'promote a heightened awareness of the state's exceptional resource and unique history through educational and visual experience<sup>23</sup>.'

As the public continues to expand their interest in and support of Florida wildlife, membership in local and grassroots wildlife-based organizations continues to grow. The attraction of surfing, diving and snorkeling clubs, of becoming a 'citizen scientist,' master naturalist, or volunteer for sea turtle and right whale festivals is undeniable to those coming from around the country and even the world to participate. A few examples include, the 6<sup>th</sup> annual Right Whale Festival (a celebration of the North Atlantic right whale 'homecoming') had an attendance of 7,000 people in 2013. There are 1,368 individuals monitor the area's beaches throughout the summer as FWC-designated sea turtle permit holders.

### **SECTION IV – CONSIDERATION INFORMATION**

#### **Consideration 1**

The St. Augustine Lighthouse oversees the Lighthouse Archeological Maritime Program<sup>24</sup> currently searching for the remains of Jean Ribault's fleet, linking Jacksonville and St. Augustine with Cape Canaveral.

The following institutions are also vested in marine science in the area:

- The University of Florida's Whitney Laboratory for Marine Bioscience  
<http://www.whitney.ufl.edu/>
- The Guana Tolomata Matanzas National Estuarine Research Reserve  
<http://www.gtmnerr.org/>
- Florida Atlantic University Harbor Branch, <http://fau.edu/hboi/>
- The University of North Florida <http://www.unf.edu/>
- The Florida Department of Environmental Protection's Florida Maritime Heritage Trail  
<http://flheritage.com/archaeology/underwater/maritime/lighthouses/light.cfm?name=CapeCanaveral>  
<http://flheritage.com/archaeology/underwater/maritime/shipwrecks/shipwrecks.cfm>



- The Smithsonian Affiliations <https://affiliations.si.edu/> and <http://www.sms.si.edu/IRLSpec/index.htm>

## **Consideration 2**

Numerous educational programs contribute to education or enhance education, for example,

The St. Augustine Lighthouse & Museum offers two programs, the Lighthouse Archeology Maritime Program and the First Light Maritime Society, which explore underwater archeology, researching over 170 shipwrecks lost in the waters off the area. St. Augustine Museum is in the second year of bringing Smithsonian scholars to enhance cultural offerings to the community. <http://www.staugustinelighthouse.com/LAMP/index.htm>

Marine Science Research Institute at Jacksonville University <http://www.ju.edu/msri/>

Flagler College <http://www.flagler.edu/>

The University of Florida's Whitney Lab <http://www.whitney.ufl.edu/>

The Guana Tolomata National Estuarine Research Reserve <http://www.gtmnerr.org/>

Florida Atlantic University's Harbor Branch Oceanographic Institute <http://fau.edu/hboi/>

The University of North Florida <http://www.unf.edu/>

IFAS Sea GRANT <http://flseagrant.ifas.ufl.edu/>

## **Consideration 3**

Threats to be considered in this area are accelerated, unmanaged use of the area and lack of public awareness about the fragile North Atlantic right whale calving grounds habitat, sea turtle nesting habitat, important fisheries habitat and manatee byways, climate change, ocean acidification, trawling reef destruction, fishing tournaments held during spawning season, sonic, seismic and other 'exploratory' acoustics which have not been adequately evaluated as to their detriment to the area's inhabitants.

## **Consideration 4**

A national marine sanctuary would bring international recognition to the calving grounds of the North Atlantic right whale and further protect this critically endangered species. It would protect the mouths of two significant estuaries, vitally important for the biological cycles of fish. It would preserve reef fish habitats, where undersized and juvenile fish congregate, protect and preserve four species of endangered sea turtles and one species of threatened sea turtles, provide safe transit for manatees traversing the coastline and would provide recreational fishing while simultaneously re-nourishing the fish supply.

A national marine sanctuary would also preserve the as yet undiscovered artifacts in and around the Crescent Spring. It would further enhance and preserve maritime archeological history and artifacts, both known and to be discovered and would provide and conserve an extraordinary research area of national significance.

A national marine sanctuary would complement and further conserve the sizeable investments made by institutions such as the University of Florida's Whitney Laboratory for Marine



Bioscience, the Guana Tolomato Matanzas National Estuarine Research Reserve and the Florida Atlantic University's Harbor Branch Oceanography Institute, none of which are sustainable without a functioning, healthy ocean. It would also protect living marine resources and life history stages and would serve as an area for special research and monitoring particularly for low, artificial noise.

A national marine sanctuary would bring recognition to the ocean as an unfathomably biologically diverse and rich yet fragile environment and provide an educational forum which, properly managed, would attract education, research, tourism, recreation and further enhance Florida's attractiveness to the public.

### **Consideration 5**

1) NOAA's National Marine Fisheries Service - recover the North Atlantic right whale species with a goal of down listing the species status from endangered to threatened.

2) St Johns River Water Management District- In April 2013, the St. Johns River Water Management District launched the Indian River Lagoon Protection Initiative, a multi-year program to protect and restore the water quality and the ecology of the 156-mile-long estuary. In fiscal year 2013–2014, the District budgeted \$9.48 million for science and construction projects that support the Initiative

3) Guana Tolomato Matanzas National Estuarine Research Reserve - The GTM Research Reserve was formed through a collaboration of Florida's Department of Environmental Protection and the National Oceanic and Atmospheric Administration. It covers 74,000 acres of coastal lands in northeast Florida from Ponte Vedra Beach to Palm Coast. The GTM Research Reserve is part of a national system of research reserves that focus on research, education and stewardship.

The GTM Research Reserve has a 21,000 square foot Environmental Education Center which includes interpretive exhibits, aquariums, classrooms, teaching and working laboratories, an auditorium and an outdoor amphitheater overlooking the Guana River Aquatic Preserve. Education staff offer programming for all ages on the importance of estuarine ecosystems. A Coastal Training Program offers training for professionals on issues of concern in our local community including watershed, invasive plants and much more.

4) DOI's National Park Service (Canaveral National Seashore) - Public Law 93-626, which established Canaveral National Seashore as a new unit on January 3, 1975, stated that the national seashore was established to "preserve and protect the outstanding natural, scenic, scientific, ecological, and historic values of certain lands, shoreline, and waters of the State of Florida, and to provide for public outdoor recreation use and enjoyment of the same." Earlier, on December 11, 1974, the Senate Committee on Interior and Insular Affairs reported that the national seashore's enabling legislation was intended "to ensure the continuing protection of the

natural features and to afford opportunities for leisure activities in an undeveloped uncrowded setting.”<sup>25</sup>

5) U.S. Fish and Wildlife Service (Merritt Island Wildlife Refuge) - The U.S. Fish and Wildlife Service is the primary federal agency responsible for the conservation, protection, and enhancement of the Nation’s fish and wildlife populations and their habitats. Although the Service shares some conservation responsibilities with other federal, state, tribal, local, and private entities, it has specific trustee obligations for migratory birds, threatened and endangered species, anadromous fish, and certain marine mammals. As part of its mission, the Service administers the National Wildlife Refuge System, a national network of lands and waters established for the management and protection of these resources<sup>26</sup>.

6) Florida Fish and Wildlife Commission’s Fish and Wildlife Research Institute - FWRI conducts aerial surveys each winter in an effort to reduce ship strike collisions with right whales. FWRI biologists respond to reports of dead, injured, and entangled whales and conduct research including photo identification and genetic sampling of right whales. Through the use of GIS technology FWRI creates maps and other products used in right whale management and conservation efforts<sup>27</sup>.

#### **Consideration 6**

There are several opportunities within the project area that provide possible commitments for partnership opportunities. Due to the preliminary nature of the nomination, it is the intentions of the petitioners to ensure this is a “from the ground up” process. It is our vision that once we are selected as a site, everyone is brought to the “table” as a stakeholder to develop that most appropriate strategy moving forward. With that said some possible commitments include:

- The Whitney Marine Laboratory for Marine Bioscience
- Jacksonville University’s Marine Science Research Institute
- Florida State University Coastal and Marine Laboratory

#### **Consideration 7**

The proposed Eubalaena Oculina National Marine Sanctuary has a broad base of support at the local, state and national levels. Much of the local community-based support for the nomination represents a diverse group of interested businesses, individuals, organizations, and governmental entities. The following are a list of supporters at the time of nomination submittal:

- |  |                                    |
|--|------------------------------------|
| • Captain Brendan Burk                 | • Jacksonville University’s Marine |
| • Center for Biological Diversity      | Science Research Institute         |
| • Eastman Environmental                | • Dr. Mark Martindale, Director of |
| • Environmental Youth Council          | University of Florida’s Whitney    |
| • Florida State University Coastal and | Laboratory for Marine Bioscience   |
| Marine Laboratory                      | • Matanzas Riverkeeper             |



- Florida Wildlife Federation
- Friends of Matanzas, Inc.
- Genung's Fish Camp
- Captain George Geiger, Chairman of Marine Protected Area Federal Advisory Committee
- Southern Horticulture
- Southern Realty
- St Augustine Eco Tours

More supporters and partners will be added to Consideration 6 and 7 after the official submittal of the nomination application.

<sup>1</sup> [http://www.nmfs.noaa.gov/pr/species/mammals/cetaceans/rightwhale\\_northatlantic.htm](http://www.nmfs.noaa.gov/pr/species/mammals/cetaceans/rightwhale_northatlantic.htm)

<sup>2</sup> <http://sofia.usgs.gov/publications/ofr/00-158/>

<sup>3</sup> [http://sero.nmfs.noaa.gov/maps\\_gis\\_data/fisheries/s\\_atlantic/index.html](http://sero.nmfs.noaa.gov/maps_gis_data/fisheries/s_atlantic/index.html)

<sup>4</sup> [http://sero.nmfs.noaa.gov/maps\\_gis\\_data/fisheries/s\\_atlantic/images/oculinabank.pdf](http://sero.nmfs.noaa.gov/maps_gis_data/fisheries/s_atlantic/images/oculinabank.pdf)

<sup>5</sup> <http://www.sms.si.edu/IRLSpec/index.htm>

<sup>6</sup> <http://indianriverlagoon.org>

<sup>7</sup> <http://jacksonville.com/news/metro/2014-07-10/story/archaeologists-mount-search-lost-french-fleet-1565>

<sup>8</sup> <http://www.archaeology.org/news/2302-140711-jean-ribault-fleet>

<sup>9</sup> <http://floridaswater.com/itsyourlagoon/>

<sup>10</sup> <http://www.floridatrend.com/article/16082/florida-is-the-fishing-capital-of-the-world>

<sup>11</sup> US Bureau of Economic Analysis

<sup>12</sup> U.S. Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting and Wildlife-Associated Recreation

<sup>13</sup> U.S. Census Bureau

<sup>14</sup> Florida Dept. of Agriculture and Consumer Services

<sup>15</sup> [http://floridabirdingtrail.com/index.php/business/birding\\_economics1/](http://floridabirdingtrail.com/index.php/business/birding_economics1/)

<sup>16</sup> <http://myfwc.com/conservation/special-initiatives/fwli/taking-action/>

<sup>17</sup> <http://myfwc.com/conservation/special-initiatives/fwli/taking-action/marine/>

<sup>18</sup> [http://www.surflife.com/surf-news/how-important-is-your-wave-to-your-local-economy-surf-econ-101\\_16834/](http://www.surflife.com/surf-news/how-important-is-your-wave-to-your-local-economy-surf-econ-101_16834/)

<sup>19</sup> <http://www.dep.state.fl.us/cmp/beachaccess/atlantic/default.htm>

<sup>20</sup> <http://www.fhwa.dot.gov/byways/byways/2477>

<sup>21</sup> <http://www.fhwa.dot.gov/byways/byways/75866>

<sup>22</sup> <http://www.fhwa.dot.gov/byways/byways/16199>

<sup>23</sup> <http://www.floridascenichighways.com/program/resources/intrinsic/>

<sup>24</sup> <http://www.staugustinelighthouse.com/LAMP/index.htm>

<sup>25</sup> <http://www.nps.gov/cana/parkmgmt/upload/CANA-DGMP-August2011-for-CD.pdf>

<sup>26</sup> [http://www.fws.gov/southeast/planning/PDFdocuments/MerrittIslandFinal/Final\\_Merritt\\_Island\\_Final\\_CCP.pdf](http://www.fws.gov/southeast/planning/PDFdocuments/MerrittIslandFinal/Final_Merritt_Island_Final_CCP.pdf)

<sup>27</sup> <http://myfwc.com/research/wildlife/right-whales/conservation/>

## Attachment A



# The Proposed Eubalaena Oculina National Marine Sanctuary



## **Attachment B**





## MARINE MAMMAL COMMISSION

12 July 2011

The Honorable Jane Lubchenco, Ph.D.  
Undersecretary and Administrator  
National Oceanic and Atmospheric Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, NW. Rm. 5128  
Washington, D.C. 20230

Dear Dr. Lubchenco:

The Marine Mammal Commission recently learned that Dr. Michael J. Greenberg of the Friends of Matanzas, an environmental group in St. Augustine, Florida, has written to you requesting that a National Marine Sanctuary be established off the coast of northeastern Florida. Its goal would be to protect the region's archaeological and natural marine resources, including one of the world's most endangered of large whale species – the North Atlantic right whale (*Eubalaena glacialis*). Although the National Marine Fisheries Service has lead responsibility for conserving right whales and is addressing many of the species' research and management needs, experience with existing marine sanctuaries, such as the Stellwagen Bank and Hawaiian Humpback Whale National Marine Sanctuaries, has shown that the authorities of the National Marine Sanctuary Program offer a highly effective and valuable means of supplementing and advancing the goals of whale conservation. Because waters off northeastern Florida, as well as southern Georgia, comprise the core of the only known calving ground currently used by North Atlantic right whales, the requested sanctuary designation would arguably include the single most important habitat for one of the world's most endangered large whales. For reasons noted below, the Marine Mammal Commission supports the petitioned action and recommends that the National Oceanic and Atmospheric Administration vigorously pursue designation of coastal waters off northeastern Florida as well as southern Georgia as a National Marine Sanctuary whose purpose, in part, would be to conserve and promote the recovery of North Atlantic right whales.

North Atlantic right whales were nearly hunted to extinction by commercial whalers between the 11<sup>th</sup> century and the early 1900s. Recent abundance estimates suggest the population numbers 400 to 450 whales. With the possible exception of the North Pacific right whale (*E. japonica*) for which no reliable population estimate exists, this number makes North Atlantic right whales the most endangered large whale species and one of the most endangered mammals in the world. Studies over the past 35 years have revealed that virtually all North Atlantic right whale calves are born in or spend at least a portion of their first few months of life being nursed in waters within about 20 to 25 miles of shore, along a 90-mile stretch of coast from Matanzas Inlet in northeastern Florida to St. Simons Island, Georgia. Although waters out to about 15 miles along this stretch of coast were designated as critical habitat for right whales in 1994, we understand that the areas currently designated are under review by the National Marine Fisheries Service and that consideration will be given to extending its seaward boundary farther off shore because of the frequency of right whale sightings beyond the seaward boundary since 1994. The right whales that occur in this area are principally pregnant or nursing females, calves, and juveniles and they occur

there only during the calving season – generally from the beginning of December through the end of March. To provide a comprehensive approach for sanctuary management, we believe it would be appropriate for the sanctuary to encompass the entire core of the calving and nursery area, including all waters along this 90-mile stretch of coast out to 20 or 25 miles from shore.

The principal right whale conservation issues that sanctuary management could help address in this region are ship strikes, entanglement in commercial fishing gear, the need for additional research on habitat features critical to right whale calving and nursing, and the need to monitor calf production and early survival. To address ship collision risks, the entire 90-mile stretch of coast mentioned above has been included in a mandatory ship reporting system, which has been operated jointly by the National Marine Fisheries Service and the Coast Guard since 1999. This system alerts ships to the presence of right whales and advises operators on ways to avoid them. The area also is subject to a seasonal 10-knot speed restriction pursuant to regulations adopted by the National Marine Fisheries Service in 2007. Mandatory reporting measures apply only to vessels 300 gross tons or larger, whereas speed limits apply only to vessels 65 feet in length or longer. The focus on large vessels was based on initial evidence suggesting that virtually all right whale deaths caused by vessel strikes involved large ships. Since then, however, smaller vessels (less than 300 gross tons and less than 65 feet) have also been documented to cause serious and possibly lethal injuries to right whales. Although some injuries have been reported directly by vessel operators, others have been documented from photographs of calves and identifiable adult females taken just a few days apart, showing the whales before and after receiving propeller scars from small vessels. Given this situation, sanctuary management, in coordination with the Fisheries Service and other involved parties, could provide valuable assistance with ongoing outreach efforts to ensure compliance with existing speed and reporting regulations, and it could expand efforts to reduce the risks of strikes by smaller vessels.

To address risks of entanglement in fishing gear, the Fisheries Service adopted regulations in 2006 prohibiting gillnet fishing in all of the waters along the 90-mile stretch of coast mentioned above. It also holds periodic meetings of the Atlantic Large Whale Take Reduction Team to develop additional measures to reduce serious injuries and deaths incidental to commercial fishing and it funds efforts to disentangle whales found carrying fishing gear. These measures appear to be addressing fishery risks in the calving area effectively. Nevertheless, additional outreach efforts to fishermen and the additional eyes and assets that sanctuary designation could provide to detect and free entangled whales would be valuable.

Whale conservation also depends on research and monitoring to detect and assess problems and to evaluate the success of management actions. Although extensive research on right whales is currently being supported by the Fisheries Service and other agencies and organizations, many important efforts are underfunded or unfunded. Sanctuary designation and management also could provide assistance and support in several ways, including help with: (1) carcass detection, retrieval, and necropsies in the calving area, (2) tagging studies to better define behavior, habitat use, and movement patterns, (3) collection and analysis of tissue samples for genetic and biochemical studies, (4) aerial surveys to detect calves, monitor their condition, growth, and survival, and track changes in whale distribution, (5) monitoring compliance with regulations, and (6) identifying patterns in



Jane Lubchenco, Ph.D.  
12 July 2011  
Page 3

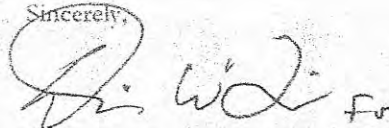
recreational boating and other vessel traffic. These are but a few of the many areas where further support for research and monitoring through sanctuary management could complement and improve ongoing work.

The designation of a marine sanctuary could also help address regional marine mammal research and management needs besides those related specifically to right whales. The most common species in the region's near-shore waters is the bottlenose dolphin, which suffers from interactions with both commercial and recreational fisheries and the effects of contaminants. Humpback whales and manatees also occur occasionally in ocean waters off northeastern Florida and southern Georgia, although the shallow sand flats that characterize most of the area are not considered as uniquely important to the populations of those species as they are to right whales.

Finally, we note that designation of coastal waters off northeastern Florida and southern Georgia as a marine sanctuary would complement, and in many ways help complete a regional system of protection that already includes several significant coastal protected areas established by state and federal agencies. The request by Friends of Matanzas to consider sanctuary designation identifies a number of these other areas along the northeastern Florida coast. By extending the designated area north into waters off southern Georgia, sanctuary management also could complement existing protection provided by the Cumberland Island National Seashore, which comprises almost the entire Georgia portion of the 90-mile shoreline stretch noted above.

In summary, the Marine Mammal Commission believes that designation of a national marine sanctuary containing the core of the North Atlantic right whale's calving and nursery ground and listing right whales as resources intended to benefit from sanctuary management would be a significant contribution to both (1) the conservation and recovery of the critically endangered North Atlantic right whale, and (2) development of a more comprehensive regional network of marine and coastal protected areas. We therefore ask that you consider and act favorably on the Friends of Matanzas' proposal. If you or your staff have any questions, or if there is any way we can help in your consideration of this matter, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read 'D. Boness', followed by the letters 'Fm'.

Daryl J. Boness, Ph.D.  
Chairman

Cc: Daniel J. Basta, Ph.D.  
Billy D. Causey, Ph.D.  
Ms. Marcella Matthaci  
George Sedberry, Ph.D.





P. Brendan Burke  
919 Lew Boulevard  
St. Augustine, FL 32080

August 28, 2014

Mr. Daniel Basta, Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

Re: Eubalaena Oculina National Marine Sanctuary Proposal

Dear Mr. Basta

I am writing you to express my support for the creation of the Eubaleana Oculina National Marine Sanctuary. There are several points which I would like to elucidate that, I believe, strongly argue for a sanctuary in the waters off northeast Florida.

*a. Shipwreck Protection*

My background is as a trained maritime archaeologist and I have worked for the St. Augustine Lighthouse & Museum since 2007 as such. In this capacity, and as a citizen of St. Augustine, there has been much I have learned about the history of this area. Singularly, the depth of maritime connection to St. Augustine and northeast Florida is unparalleled anywhere else in the United States. As our nation's oldest port, St. Augustine has hosted oceangoing merchants, warships, and ships of exploration for almost 450 years. This traffic has led to loss of ship, and life, off our coast for nearly half a millennia. Thus, local waters hold one of the most comprehensive and vital building blocks to our nation's history. It is therefore important that we protect these wrecks from treasure hunting, salvaging, and looting. Historic shipwrecks are a nonrenewable resource and part of our shared past. Similarly, they are often gravesites that deserve respect and attention due this type of site. Removing, for profit, these wrecks and/or their cargoes is simply unethical. I therefore wholly support a national marine sanctuary whose mission it is to implement, clearly and with intent to enforce, the complete prohibition of treasure hunting, so-called 'commercial archaeology', salvaging of shipwrecks over fifty years old, and any other activity that willingly disturbs submerged cultural heritage.

The Thunder Bay NMS has established a precedent for wreck protection that works, and ensures the dissemination of knowledge about Great Lakes shipping and commerce. Florida has long been home to treasure hunting, as the name 'Treasure Coast' implies, and is therefore most at risk to lose pieces of our past to profit-seeking companies. A marine sanctuary located here off Florida could serve to expand protection to a wider area, and introduce more people to the story of humans and the sea. Furthermore, the sanctuary would join a presently-existing state shipwreck preserve in St. Augustine's



offshore waters (<3nm), an initiative taken by Florida in 1968 to recognize some of the most at-risk areas for shipwrecks and submerged cultural heritage.

*b. Maritime History*

Northeast Florida is responsible for the development of the commercial shrimping industry and supplying it with the bulk of the shrimp trawlers during the heyday of commercial shrimp fishing. Commercial shrimping here is much diminished from what it was decades ago but it nonetheless perseveres as part of our culture. While the industry has certainly created environmental issues, many great strides have been made to lessen the fishery's impact on local fish and turtle populations. This balance of human versus environmental needs, which has become more and more popularly understood as a single, entwined need, has largely been met by combining the science of the oceans with the science of fishing. As such, we continue to celebrate ever-increasing numbers of successful sea turtle nests on our local beaches and higher recruitment numbers for some species of fish as bycatch numbers reduce.

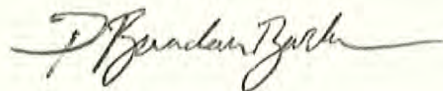
While shrimping history is only a portion of our local maritime history it is one of the most important. Shrimping and trawler building changed local economies and affected distant economies. Trawlers left Florida's coast to begin fleets in over 23 foreign countries on every continent except Antarctica. This may not seem like fodder for the creation of a marine sanctuary but we have to include all parts of our maritime history here in order to understand where we are, and where we want to go. I am in support of a Eubaleana Oculina National Marine Sanctuary that incorporates not only this history into its management plan, but actively seeks the participation of the shrimp industry to increase its sustainability for man and fish alike.

*c. Cetaceans*

Having spent a considerable portion of my professional and personal time on or by the sea, I somehow never saw a whale until December 17<sup>th</sup>, 2010. While off St. Augustine aboard our research vessel, it happened. A mother and calf right whale surfaced to breath only a couple hundred feet away. They were joined by a third whale and it was that moment that I realized how much they have filled our lives with their presence in literature, in history, and in our environment. Similarly, I realized how very empty the oceans would be without them. Protection for right, and other, whales has increased without a doubt during the past fifty years but we can afford to do more since we cannot afford to lose them. For this reason I support the creation of a Eubaleana Oculina National Marine Sanctuary.

For the above reasons, and many more, I hope you consider the establishment of a national marine sanctuary in the waters of north Florida. As our population grows, and coastal populations become more dense, we must rely on staunch conservation methods to enjoy a healthy environment for ourselves as well as leaving a lasting legacy of healthy oceans.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. Brandon Barth", with a stylized, flowing script.

Cory Carter  
602 S.W. Pine Tree Lane  
Palm City, Florida 34990

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11<sup>th</sup> Floor  
Silver Spring, MD 20910

Dear Sir or Madam,

I am writing to endorse the creation of the Proposed Eubalaena Oculina National Marine Sanctuary. I am a native Floridian, and resident of Martin County for many years, who believes we must be good stewards of our environment.

The impact of the proposed Atlantic seismic exploration for offshore oil and gas drilling will negatively impact all marine wildlife, including Right whales, sea turtles, and other endangered and migrating sea creatures. Underwater seismic waves carry for thousands of miles -- and emit deafeningly loud blasts of noise, seriously hurting marine animals that depend on their hearing for survival. Loss of marine productivity is already a concern in our seas. Tourism, fishing, both commercial and recreational, along Florida's east coast, would be negatively impacted by the results of seismic testing.

Any support you can provide towards the creation of the Eubalaena Oculina National Marine Sanctuary will be greatly appreciated.

Respectfully submitted,

*Cory Carter*





*Sent via email*

August 26, 2014

Dan Basta, Director of the Office of National  
Marine Sanctuaries  
NOAA National Marine Sanctuary Program  
1305 East-West Highway, 11<sup>th</sup> Floor  
Silver Spring, MD 20910  
[dan.basta@noaa.gov](mailto:dan.basta@noaa.gov); [sanctuaries@noaa.gov](mailto:sanctuaries@noaa.gov)

Dr. Kathryn Sullivan, Administrator  
National Oceanic and Atmospheric  
Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, NW, Rm 5128  
Washington, DC 20230

Billy D. Causey, Regional Director  
Southeast Atlantic, Gulf of Mexico and  
Caribbean Region  
NOAA Office of National Marine Sanctuaries  
33 East Quay Road  
Key West, Florida 33040  
[Billy.Causey@noaa.gov](mailto:Billy.Causey@noaa.gov)

**Re: The Eubalaena Oculina National Marine Sanctuary**

Dear Director Basta,

I am writing in support of the request of Friends of Matanzas, Inc. to establish a National Marine Sanctuary off the coast of St. Augustine, Florida, called The Eubalaena Oculina National Marine Sanctuary. This designation is much needed to acknowledge and protect the region's biological and archaeological resources. A particularly critical aim is to provide consolidated management for the endangered North Atlantic right whale (*Eubalaena glacialis*). The waters off northeastern Florida are the some of the only known calving grounds used by the whales, and the expertise and oversight of the National Marine Sanctuary Program could offer additional conservation benefits.

The mission of the National Marine Sanctuaries Program is to conserve, protect, and enhance the biodiversity, ecological integrity, and cultural legacy of our nation's system of marine protected areas. The Secretary of the Department of Commerce is authorized to designate discrete areas of the marine environment as national marine sanctuaries to promote comprehensive management of their special conservation, recreational, ecological, historical, research, educational, or aesthetic resources. Designation of this area would surely be consistent with the mission of the National Marine Sanctuaries Program. For example, the area includes numerous submerged historic shipwrecks, the vital Crescent Beach submarine spring, and the Matanzas Inlet – the last undredged, unjettied inlet on Florida's Atlantic coast. Several studies of the area's ecology and biodiversity are ongoing, and designation of a sanctuary would also result in great conservation

benefits to breeding and nesting sea turtles and shorebirds, a variety of marine mammals, and especially to the nesting colony of least terns (*Sternula antillarum*) at the southern end of Anastasia Island, the largest such colony on Florida's Atlantic coast..

Almost all North Atlantic right whale calves are born in or spend a portion of their first few months of life nursing in waters about 20 to 25 miles off shore Florida, along a 90-mile stretch off the coast from Matanzas Inlet in northeastern Florida to St. Simon Island, Georgia. Sanctuary management of this area could help address ship strikes and entanglement in commercial fishing gear, and lead to additional research on habitat features critical to right whale calving and nursing and monitoring of calf production and early survival. Because sanctuaries can serve as secure habitat for species close to extinction – like the North Atlantic right whale – I encourage you to consider designating this area as a sanctuary. Bottlenose dolphins, humpback whales, and manatees could also benefit from this designation.

Furthermore, sanctuary designation and management could provide assistance on research and monitoring through (1) carcass detection, retrieval, and necropsies in the calving area; (2) tagging studies to better define behavior, habitat use, and movement patterns; (3) collection and analysis of tissue samples for genetic and biochemical studies; (4) aerial surveys to detect calves, monitor their condition, growth, and survival, and track changes in whale distribution; (5) monitoring compliance with regulations; and (6) identifying patterns in recreational boating and other vessel traffic. This research and monitoring will facilitate better management of this important marine resource and aid the Department of Commerce in achieving important Endangered Species Act recovery goals for the North Atlantic right whale, and potentially other imperiled species.

On behalf of the Center for Biological Diversity and its members, I fully support the creation of a National Marine Sanctuary off the northeast coast of Florida to conserve and promote the recovery of North Atlantic right whales. Thank you for your consideration of this very important designation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jaclyn Lopez', with a stylized, flowing script.

Jaclyn Lopez  
Florida Attorney for the Center for Biological Diversity





56-A San Marco Avenue, St. Augustine, FL 32084 PH: 904 460 2248

September 1, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

RE: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Sir or Madam,

I'm writing to express my full support of the proposed Eubalaena Oculina National Marine Sanctuary. I only recently became aware of the effort, but I must say I was thrilled to hear about it.

I have owned a professional photography business in St. Augustine for 24 years, and just last year opened a retail store/gallery in downtown St. Augustine featuring imported furniture, décor, and my photography.

More and more, we're learning that visitors to Florida are more interested in history, culture, and pristine natural surroundings rather than the next Disney-like tourist attraction. I can't tell you how often I hear tourists remark on the unspoiled beauty of our corner of northeast Florida, and that observation is nearly always based on our coastal environment. Healthy waterways, beaches and oceans are critical to keeping this economic engine running.

A National Marine Sanctuary would be a wonderful tool to help us preserve and also promote our rich maritime history, cultural resources, and most of all, the incredible marine ecosystems of northeast Florida and its adjacent ocean waters.

I hope you'll do what you can to lead us in the effort to create a National Marine Sanctuary we can call our own. As a business owner and lifelong resident of the state of Florida, I know it's the right thing to do.

Sincerely,

Walter Coker

Coastal Traders  
Coker Photographics







**The Florida State University  
Coastal and Marine Laboratory**

3618 Coastal Highway St. Teresa, FL 32358-2702

Telephone: (850) 697-4120 Fax: (850) 697.3822

website: <http://www.marinelab.fsu.edu>



Mr. Daniel Basta, Director  
Office of National Marine Sanctuaries  
1305 East-West Highway, 11th Floor  
Silver Spring, MD 20910

1 September 2014

Dear Dan:

Having conducted research in marine protected areas for many years – from the Oculina Banks on the east coast to the Madison Swanson and Steamboat Lumps Marine Reserves, the Tortugas, and Pulley Ridge in the Gulf-- and as a member of the selection committee for the Guana Tolomato Matanzas National Estuarine Research Reserve site, I fully embrace the proposal from *The Friends of Matanzas* to form *The Eubalaena Oculina National Marine Sanctuary*.

One of many advantages that this site has is that scientific research –the best available science -- demonstrates the critical value of the proposed sanctuary site to species ranging from whales to corals. It serves as calving grounds for the endangered North Atlantic right whale; as nesting habitat for the endangered leatherback, Kemp's ridley, and Atlantic green sea turtles, and the threatened loggerhead sea turtle; as spawning grounds for economically important fish species that are highly susceptible to overfishing; and as a primary site of deep-water *Oculina varicosa* habitat threatened by trawling.

In a time when NOAA strives to engage citizens in supporting its goal to restore the health and resiliency of marine systems, establishing this National Marine Sanctuary within the Southeastern U.S. Continental Shelf Large Marine Ecosystem clearly would help push this initiative forward. It will inspire local citizens to engage in the protection of the relatively undeveloped Matanzas River Basin and in the restoration of water quality and habitat (e.g., salt marsh and oyster reef) throughout the east coast of Florida, including the heavily eutrophied waters of the St. Johns River System. The potential to improve the capacity of this ecosystem to provide essential ecosystem services to the region is considerable.

I support this nomination with enthusiasm and without reservation.

Do let me know if I can be of any assistance.

With all best wishes,

Felicia C. Coleman, Ph. D.  
Director



*Sent via email*

August 28, 2014

Dan Basta, Director of the Office of National Marine Sanctuaries  
NOAA National Marine Sanctuary Program  
1305 East-West Highway, 11<sup>th</sup> Floor  
Silver Spring, MD 20910  
[Dan.basta@noaa.gov](mailto:Dan.basta@noaa.gov) ; [sanctuaries@noaa.gov](mailto:sanctuaries@noaa.gov)

**Re: The Eubalaena Oculina National Marine Sanctuary**

Dear Director Basta,

I am writing to you today in support of the proposed Eubalaena Oculina National Marine Sanctuary located off the coast of St. Augustine, Florida. As the Executive Director of the non-profit conservation group Eastman Environmental, I implore you to consider establishing this National Marine Sanctuary. Eastman Environmental is dedicated to protecting, restoring and conserving coastal and marine habitats through research, education and community involvement initiatives with a key focus on conserving and protecting the nesting and foraging habitat for marine turtles.

The northeast coast of Florida has remarkable biological, historical, economic and cultural significance. This proposed National Marine Sanctuary encompasses vital federally designated critical habitat for the highly endangered North Atlantic right whale. Additionally, the proposed area includes newly federally designated critical nearshore reproductive habitat for the threatened loggerhead sea turtle; nesting and foraging habitat for the endangered leatherback, Kemp's Ridley, and Atlantic green sea turtles; and economically significant fish habitat including the Oculina reef.

We believe a National Marine Sanctuary designation would sustain and enhance the critically endangered population of the North Atlantic right whale as well as preserve and emphasize the significance of important fisheries and protected marine turtles' habitat including the Oculina reef, the Matanzas River Basin, and the Indian River Lagoon Basin, and insure that maritime archeological material is managed and protected.

On behalf of Eastman Environmental and its members, I fully support the establishment of the proposed Eubalaena Oculina National Marine Sanctuary off the northeast coast of Florida to aid in the recovery of the North Atlantic right whale, all species of protected marine turtles and significant maritime archeological relics. Thank you for your consideration of this very important designation.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Eastman", written over a horizontal line.

Scott F. Eastman  
Executive Director, Eastman Environmental, Inc.

Environmental Youth Council of St. Augustine Florida  
7000 Charles Street  
St. Augustine, FL 32080

August 28, 2014

Director Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

Re: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Madam or Sir,

Environmental Youth Council of St. Augustine, Florida, is an association of citizens concerned with environmental and social issues, locally, nationally, and internationally. We work to bridge the gap between those who are concerned with those who are in action and working on solutions. Our goal is to engage all people and organizations in finding viable solutions to the emerging environmental crisis.

We endorse the creation of the Eubalaena Oculina National Marine Sanctuary as one of those viable solutions.

The declining health and productivity of the Atlantic marine environment is troubling to us. Additional developing threats include the growing list of federally listed endangered species, and the proposed permitting of seismic testing and off shore drilling.

We urge you to consider this application favorably.

Thank you.



Hunter Miller  
Environmental Youth Council  
St. Augustine, Florida







# Florida Wildlife Federation

Keeping the Wild in Florida since 1936!

[www.fwfonline.org](http://www.fwfonline.org)

**Manley K Fuller | President**

P.O. Box 6870, Tallahassee, FL 32314-6870

2545 Blairstone Pines Dr., Tallahassee, FL 32301

Phone: (850) 656-7113

Fax: (850) 942-4431

AFFILIATED WITH THE NATIONAL WILDLIFE FEDERATION

September 3, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway 11th Floor  
Silver Spring, MD 20910

Re: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Director;

On behalf of the Florida Wildlife Federation and our 60,000 supporters and members, I submit this letter strongly endorsing the nomination of the proposed Eubalaena Oculina National Marine Sanctuary. The National Marine Sanctuaries Act protects nationally significant places and especially addresses the need for long-term protection of marine ecosystems and cultural resources. A national marine sanctuary designation would maintain and enhance the valuable marine habitat that includes the critically endangered population of the North Atlantic right whale, preserve and underline the significance of important fisheries habitat including the Oculina reef, the Matanzas River Basin, and the Indian River Lagoon Basin, and insure that significant maritime archeological material is managed and protected.

By identifying the nominated area to the public as one of enormous national significance worthy of conservation, a designation would provide the opportunity to establish a baseline for this biologically vital area and afford monitoring for potential changes due to activities such as fisheries management, acoustic variables, climate change, and ocean acidification.

While local and state agencies may have overlapping regulations or other management authorities aimed at protecting specific marine resources, no other federal agency is directly mandated to comprehensively conserve and manage special areas of the marine environment like the Office of National Marine Sanctuaries.

Thank you for your thoughtful consideration of the nomination. The Florida Wildlife Federation strongly supports the proposed Eubalaena Oculina National Marine Sanctuary.

Sincerely,

Manley K Fuller, III, President

29 August 2014

566 Ponoka St

Sebastian, FL 32958

Mr. Daniel Basta

Director, NOAA Office of National Marine Sanctuaries

1305 East West Highway, N/NMS

Silver Spring, Md 20910

Dear Mr. Basta,

I have been made privy to a proposed sanctuary nomination submittal for an area from Jacksonville to Fort Pierce Florida. I believe the application has merit, and I strongly support, and recommend, its selection for consideration. I believe the habitat protection for endangered species, as well as archeological site protection in the designation merits very strong consideration of the application. The fact it will encompass and join areas already managed as a Marine Protected Area (SAFMC North Florida MPA), an extant Sanctuary (Gray's Reef), and a Habitat of Particular Concern (Oculina Bank) (and continuation to the north and south of that mapped, but currently unprotected, unique deep water coral habitat) is also an important consideration.

The need for designation in part is strongly justified by the need for the expansion of Right whale calving habitat. The species though endangered, and thought to be unrecoverable by some, is of extreme importance and has shown a recent uptick in recruitment; perhaps resultant from the measures put in place by the take reduction team and wide mariner whale notice publicity on NOAA nautical weather radio. It would be shameful to squander potential gains by not closing the loop on important habitat protection, perhaps dooming those very animals saved by other actions.

A concern I have, which has been addressed to the applicants (and I am assured they understand), is the need for a complete, and specific, explanation of a strong NEED and PURPOSE. The benefits to habitat, endangered species, and archeological sites afforded and derived by sanctuary designation must be addressed in detail with citations. As well, specifics with regard to regulation of activities within the sanctuary must be spelled out in detail, with the intent to allay protests from groups already engaged in some form of management within the area. Assured all will be done, I believe this application has merit, is significant to the sanctuary program, and again strongly recommend its approval for consideration.

signed

Captain George J Geiger

Chairman, Marine Protected Area Federal Advisory Committee

Past SAFMC Council Member and Chairman

Past Chairman Costal Conservation Association Florida

Genung's Fish Camp Inc.  
291 Cubbedge Rd  
St Augustine, FL 32080  
August 29, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11<sup>th</sup> Floor  
Silver Spring, MD 20910

Dear Director:

I am a resident and business owner in St Augustine and have lived on or close to the Matanzas River for many years. I would like to extend my full support for the creation of the Eubalaena Oculina National Marine Sanctuary (EONMS).

While the North East Coast is home to our oldest city, it is also a very important habitat for endangered sea turtles and whales.

As a concerned resident, fisherman, and a business owner who depends on the protection these vital areas, I feel that the proposed creation of the EONMS is the only way to effectively manage these areas with a clarity and purpose that local and federal agencies cannot.

Please accept my thanks for the opportunity to be heard. I look forward to the creation of this sanctuary and am happy to extend my support in the future.

Sincerely,



Stephen Woodard  
Genung's Fish Camp Inc.





September 3, 2014  
Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

**RE: Proposed Eubalaena Oculina National Marine Sanctuary**

Dear Sir or Madam,

I am writing you in hope that you will consider adding our support for the creation of the Eubalaena Oculina National Marine Sanctuary (EONMS). As Indian Riverkeeper, I am responsible for the entire 156 miles of the Indian River lagoons from the Mosquito inlet north, to the Jupiter Inlet south. Once America's most diverse estuary, assaults from polluted waters and reductions in State protections have impacted our lagoon severely.

With six inlets communicating with the Atlantic Ocean and directly impacting the proposed NMS it is a concern that the billions of gallons of polluted water being forcibly discharged have and will continue to degrade and impact our offshore ecosystems. The two systems are inextricably connected, and danger to one, is a danger to both. This direct connection, and the dependency of our offshore ecosystems on our estuarine nurseries makes this partnership a win win for all.

I bring to the table the support of my organization and the resources of our dedicated advocates, one of which who has for many years been involved in Right Whale studies and disentanglement projects. I would be proud to be afforded the opportunity to join with our Matanzas Riverkeeper and others in support of these needed protections for Right Whales, Oculina Reefs and the their abundant specie which share inshore, offshore ecosystems.

We are ready to inform and engage our Community in support of this new NMS, and I am confident we can bring may interested parties to the discussion tables to help make this work. Many of the thousands of interested, and active advocates we work with along our Florida Coast are already aware of the need for better protections and are looking for a way to better protect our ever so important offshore ecosystems.

Thank you very much for your time, please feel free to contact me at any time if you have questions. The opportunity to create a meaningful legacy of protections for our children, and their children's future cannot be lost, please help us to bring this wonderful project to fruition.

Best!

Marty Baum  
Indian Riverkeeper  
772.631.5827

**DEMAND CLEAN WATER**

Director of the Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910  
sanctuary.nominations@noaa.gov

August 28<sup>th</sup>, 2014

Re: Proposed Eubalaena Oculina National Marine Sanctuary

Greetings Director,

I am currently the Director of the Whitney Lab for Marine Bioscience of the University of Florida, located in the coastal town of Marineland approximately half way between Daytona Beach and Jacksonville.

As I am sure you know, the Northeast Coast of Florida is one of the least spoiled coastlines in the United States and is an important resource for gaining a better scientific understanding of the origins and stability of biological diversity, particularly in reference to the sustainable stimulation of outdoor recreation, tourism, and a variety of marine fisheries that are all a part of the high quality of life in our region.

In addition to being a unique estuarine interface, our coastline provides critical habitat for a number of species, including calving grounds for the federally designated highly endangered North Atlantic right whale, as well as the leatherback, Kemp's Ridley, and Atlantic green sea turtles which nest along our beaches. The estuaries that feed the intercoastal waterway system as well as the deep water Oculina coral reef system that runs out to the Continental shelf from Daytona to Ft. Pierce Florida provides important breeding ground for commercial and recreational fisheries.

By recognizing the nominated area as one of enormous national significance worthy of conservation for the long-term protection of marine ecosystems and cultural resources, a National Marine Sanctuary designation would provide the opportunity to establish a baseline for this biologically vital area and allow our nation to scientifically monitor anticipated changes due to human activities such as uninformed overuse, acoustic variables, climate change, and ocean acidification.

For these reasons, I support the establishment of the **Eubalaena Oculina National Marine Sanctuary**. The proposal was put together by a large number of highly qualified and concerned citizens and outlines a compelling case for its existence of this federal entity that will not only protect the important fisheries habitat including the Oculina reef, the Matanzas River Basin, and the Indian River Lagoon Basin but provide important habitat for endangered animals (e.g.

whales and sea turtles) that our children and their children's children will be able to experience well into the future. The Northeast coast of Florida is truly a unique part of our history and national identity. It deserves to be protected at the federal level, and I urge you to utilize the full force of your office to establish the Eubalaena Oculina National Marine Sanctuary.

Sincerely,



Mark Q. Martindale, Ph.D.  
Professor and Director  
The Whitney Lab for Marine Bioscience  
The University of Florida  
9505 Oceanshore Blvd.  
St. Augustine, FL  
[mqmartin@whitney.ufl.edu](mailto:mqmartin@whitney.ufl.edu)



# MATANZAS RIVERKEEPER®



August 26, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

**RE: Proposed Eubalaena Oculina National Marine Sanctuary**

Dear Sir or Madam,

I'm writing to you in my role as the Matanzas Riverkeeper (MRK) to add our support for the creation of the Eubalaena Oculina National Marine Sanctuary (EONMS).

The Matanzas River is a small river, 23 miles in length, but it is one of Florida's most culturally and ecologically important rivers. It begins, and ends, with inlets. The southern terminus of the River, the Matanzas Inlet, is one of the last remaining natural inlets on the east coast.

Because of its close proximity to the Atlantic Ocean, and its direct connection to the ocean, it is difficult to separate the health of the Matanzas from that of the Atlantic. Therefore, the health of the coastal zone is critical to the future of the Matanzas watershed.

Because of our concerns about the future health of Florida's East Coastal Zone, and the direct connection between the Atlantic and the Matanzas River, MRK is proud to support this nomination.

We offer our limited resources for a possible partnership with the proposed EONMS, and we will gladly share our limited office space, vessel time, and/or other resources to aid in the conservation and program development of the sanctuary. We also pledge to work within our community to garner support for the EONMS.

Thank you for this opportunity to comment. We look forward to working with you and your staff to make the Eubalaena Oculina National Marine Sanctuary a reality.

For the Matanzas,

Neil A. Armingeon  
Matanzas Riverkeeper



Landscape & Irrigation Contractors • Nursery & Garden Center  
1690 A1A South, St. Augustine, FL 32080 • 904/471-0440 • Fax 904/460-1222

August 26, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

Dear Madam or Sir,

I am writing to endorse the creation of the Eubalaena Oculina National Marine Sanctuary.

I am a lifetime resident/stakeholder of Florida, a local business owner including, among other ventures, a partnership in a local fish camp/marina, a lifetime fisherman, an oyster lease owner and a longtime resident of the barrier island Anastasia Island.

The decline in the health of the local marine environment, including the loss of marine productivity, the listing of federally endangered species endemic to this area, and the future threat to marine health from proposed seismic testing and offshore drilling are compelling reasons to support this effort.

Any considerations you could offer would be appreciated.

Best regards.

Bill Hamilton  
Southern Horticulture  
St. Augustine, Florida



**SOUTHERN REALTY**  
OF ST. AUGUSTINE AND CRESCENT BEACH

August 29, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11<sup>th</sup> floor  
Silver Spring, MD 20910

RE: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Sir or Madam,

I am writing in support of the creation of the Eubalaena Oculina National Marine Sanctuary.

St. Augustine is celebrating its 450<sup>th</sup> anniversary next year, as the oldest occupied European settlement in the United States. There is a rich multicultural history with obvious remnants everywhere, including the bottom of the sea. The Gullah/Geetchee escaped the English by boat, to the Spanish colonies, and the French Fleet of Jean Ribault was wrecked attempting an attack on St. Augustine. Indigenous people traveled the gulfstream in large dugouts. And supply ships from the Spanish, the Confederates, and early America, litter the sea floor.

As rich as the maritime history is, the biology of Coastal North Florida is equally significant. The endangered Right Whale, Loggerhead and Atlantic Green Turtles are a common site for residents. The sanctuary statutes should enhance measures to sustain their populations. The first magnitude spring (submarine) off Crescent Beach has been flagged by the US Geological Survey as a possible midden site. And the deep water corrals of the Oculina Bank are thousands of years old and provide habitat for migratory and native species.

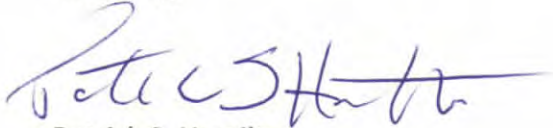
Species and special places are disappearing worldwide. We need a structure to preserve and protect that which is important. A National Marine Sanctuary could provide this for coastal northeast Florida.



I have grown up here, and I surf and fish at the Matanzas Inlet on a daily basis. I built my office, Southern Realty, in 1987 and sell homes, businesses and land to people who come here because of the environmental vibrancy and historical significance.

A National Marine Sanctuary could provide a forum for those of us who live and work here to come together and plan for the future. I wholeheartedly support the Eubalaena Oculine National Marine Sanctuary.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick S. Hamilton", with a stylized, flowing script.

Patrick S. Hamilton  
Owner/Broker



August 29, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

Re: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Director;

The Marine Science Research Institute at Jacksonville University strongly endorses the nomination of the Proposed Eubalaena Oculina National Marine Sanctuary. The National Marine Sanctuaries Act protects nationally significant places and especially addresses the need for long-term protection of marine ecosystems and cultural resource. A National Marine Sanctuary designation would maintain and enhance the valuable marine habitat that includes the critically endangered population of the North Atlantic right whale, preserve and underline the significance of important fisheries habitat including the Oculina reef, the Matanzas River Basin, and the Indian River Lagoon Basin, and insure that significant maritime archeological material is managed and protected.

By identifying the nominated area to the public as one of enormous national significance worthy of conservation, a designation would provide the opportunity to establish a baseline for this biologically vital area and afford monitoring for anticipated changes due to human activities such as uninformed overuse, acoustic variables, climate change, and ocean acidification.

While local and state agencies may have overlapping regulations or other management authorities aimed at protecting specific marine resources, no other federal agency is directly mandated to comprehensively conserve and manage special areas of the marine environment like the Office of National Marine Sanctuaries.

Thank you for your thoughtful consideration of the nomination. The Marine Science Research Institute at Jacksonville University looks forward to the opportunity to work with the Office of National Marine Sanctuaries on the proposed Eubalaena Oculina National Marine Sanctuary.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. Quinton White, Jr.", written in a cursive style.

A. Quinton White, Jr., Ph.D.  
Executive Director



2800 University Blvd. N. / Jacksonville, FL 32211-3394 / Office: (904) 256-7766 / Fax: (904) 256-7960



08/27/2014

My name is Captain Zach McKenna and I am the owner and operator of an environmental education company known as, St. Augustine Eco Tours, Inc. We offer on-water education experiences to local residents and visitors to northeast Florida via kayaks, powerboats, and sailboats. St. Augustine Eco Tours employs a staff of fifteen Interpretive Naturalists who are trained as United States Coast Guard Captains or professional kayak guides. The goal of this organization is conservation through education and we focus our efforts on the unique estuaries and near coastal waters surrounding St. Augustine, Florida.

The purpose of this letter is to support the establishment of a **National Marine Sanctuary** in the waters of northeast Florida. I believe that a NMS in this region would bring awareness and local management to critical habitats and submerged artifacts.

Thank you,

A handwritten signature in black ink that reads 'Zach McKenna'.

Zach McKenna

***Volusia/Flagler Turtle Patrol Inc.  
4738 S. Peninsula Drive  
Ponce Inlet, FL 32127  
seaturtlepatrol@bellsouth.net***

September 10, 2014

Director  
Office of National Marine Sanctuaries  
1305 East-West Highway  
11<sup>th</sup> Floor  
Silver Springs, MD 20910

Re: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Director:

The Volusia/Flagler Turtle Patrol is a non-profit organization that protects the threatened and endangered sea turtles nesting on the beaches of Volusia, Flagler and St. Johns counties. We mark and monitor all sea turtle nests and rescue sick and injured turtles. This includes loggerheads, green turtles, leatherbacks and the very rare kemp's ridley. The loggerhead sea turtles that nest on these beaches are a genetically distinct population not found south of Volusia County and are therefore crucial to the genetic diversity of Florida's sea turtle population.

The ocean, beaches and estuaries these turtles call home are critical to their survival and need to be protected. It has often been said that the health of the marine animals is a good indication of the overall health of our oceans. The decline in sea turtle health and the rise in sea turtle mortalities are disturbing.

We respectfully request your consideration to create the proposed sanctuary for this area to help preserve our precious natural resources.

Sincerely,

Beth Libert  
President  
Volusia/Flagler Turtle Patrol





September 8, 2014

Director of the Office of National Marine Sanctuaries  
1305 East-West Highway  
11th Floor  
Silver Spring, MD 20910

RE: Proposed Eubalaena Oculina National Marine Sanctuary

Dear Director:

I am writing to express my **steadfast support** for the designation of the **Eubalaena Oculina National Marine Sanctuary in Northeast Florida**. I offer my support for this project in two capacities: first, I am a research scientist at the University of Florida's Whitney Lab for Marine Bioscience. At the Whitney lab, I study the development and evolution of marine organisms that serve as bio-indicators for climate change; thus, I am deeply concerned with the health of our oceans and the long-term ability of our oceans to support the diverse aquatic species that depend on this fragile habitat for survival. Second, as Mayor of the Town of Marineland I feel strongly that it is the obligation of the government to ensure protection of the environment such that future generations are able to enjoy it as we have. You may not know this, but the town of Marineland was recently designated "Florida's first remarkable coastal place." Although we are a small community, we are united in our goal of providing a destination for visitors interested in education, science, nature, and otherwise engaging with the environment in a low/no-impact manner. Additionally, Marineland currently serves as the headquarters for the long-term monitoring of Northern Right Whales in the Atlantic and is soon to be home to a new sea turtle hospital! Designation of the waters off the coast of North Florida as a marine sanctuary would fit nicely with our vision for a greener future and would further our efforts to monitor and protect the endangered species that make Marineland such a unique place. I urge you to join me in supporting this project aimed at protecting the health of our oceans!

Sincerely,

Leslie S. Babonis, PhD  
Mayor, Town of Marineland

September 5, 2014

Dear Natural Marine Sanctuary Review Committee,

I am writing to provide my strong and enthusiastic support for an application submitted by the Friends of Matanzas in which they request formation of a National Marine Monument along the Southeastern U.S. Seaboard. This is a grass roots effort with much support from the citizens along the Florida and Georgia coasts. The formation of this National Monument will serve to protect some of the most endangered marine vertebrates in U.S. waters (e.g., sea turtles, manatees and right whales) and help ensure prolonged sustainability of a diverse and valuable set of shoreline communities, including oyster reefs, salt marshes, mangroves, seagrasses and offshore coral reefs.

The biodiversity and economic services generated by this array of ecosystems is among the highest along any U.S. coastline, yet in comparison to the New England and West Coast U.S. Shorelines, it receives the lowest amount of protection, especially in regards to marine protected areas. The establishment of this monument will immediately help correct this disparity and ensure that this disconnect does not widen.

The cultural history of this area is also among the richest in the U.S. and considered by many to be a national treasure. It includes one of the oldest cities in the U.S. – St. Augustine and is site to many historical and archeological sites of national and international interest. There are many state, local and federal agencies that manage small protected areas along this coastline, but their influence is limited and they do not have enough power to fully protect such icons as the endangered right whales whose expansive range necessitates a much larger conservation sphere.

The formation of a National Monument along Georgia and Florida coast will help unify and integrate conservation and resource management on these historical shorelines, solidify protection for critically endangered and iconic marine vertebrates, ensure that many historical U.S. treasures found in this area can be enjoyed by generations to come, and represent one of the best examples of grass-root establishment of national marine monument or national protected area. I give it my highest recommendation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brian Silliman". The signature is fluid and cursive, with the first name "Brian" and last name "Silliman" clearly distinguishable.

Brian Silliman

Rachel Carson Associate Professor of Marine Conservation Biology  
Division of Marine Science  
Nicholas School of the Environment  
Duke University