UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Office of National Marine Sanctuaries
1305 East-West Highway
Silver Spring, Maryland 20910

October 30, 2014

Friends of the Matanzas
1093 A1A Beach Boulevard, PMB 205
St. Augustine, FL 32080-6733

Dear Ms. Matthaei, Mr. Greenberg, and Mr. Hamilton,

Thank you for submitting the nomination for the proposed Eubalaena Oculina National Marine Sanctuary. We greatly appreciate your interest in protecting this special place – it is clear you care deeply about the unique resources in and around northeast Florida. We also appreciate the effort you and your colleagues put into preparing this nomination.

The Office of National Marine Sanctuaries (ONMS) has completed its sufficiency review and concluded the nomination, as submitted, is not sufficient. The sufficiency review determines if the nomination provides enough of the information required to proceed with a more in-depth review. The nomination did not adequately identify a broad community support, as defined within the final rule under management consideration #7. Per this consideration, a sanctuary nomination must demonstrate support for the national marine sanctuary concept from a breadth of community interests. In our final rule, we define a community as individuals or locally-based groups (e.g., "friends of" group, chamber of commerce); local, tribal, state, or national agencies; elected officials; or topic-based stakeholder groups, at the local, regional or national level (e.g., a local chapter of an environmental organization, a regionally-based fishing group, a national-level recreation or tourism organization, academia or science-based group, or an industry association).

When considering this aspect of a nomination, we are not looking for unanimous support from all potential interests, but rather representation from a diverse cross section of the community. For example, nominations that include state or tribal lands should include support from at least one relevant state or tribal agency. Similarly, organizations or industries that depend on the resources in a nominated area (such as divers, fishers, or boaters) should also be represented within the nomination.

While we value and acknowledge the support letters you provided from individuals, conservation organizations, and researchers, the nomination did not indicate interest or support from the state of Florida, from counties in the region, or from a number of the local governments adjacent to the nominated area. The views of these entities are particularly important for this nomination given its inclusion of near-shore and state waters. Similarly, the nomination should also include support from some of the many organizations or individuals who depend on this area for livelihood, recreation, and, economic opportunity. Academia is an important component of this community, but we believe the nomination must include the support of others as well.

The challenges associated with organizing support for an area that covers over 200 miles of coastline are significant. Consequently, when revising your nomination, you may wish to consider a smaller area or a series of small areas that encompass the specific natural and historical resources you consider to be of highest value; consider focusing on areas that may already be subject to existing management efforts under other state or Federal authorities; and/or consult with state authorities on areas that may be of mutual benefit, should you choose to include state waters in a revised nomination.

As you reconsider your nomination, staff from our Southeast and Gulf of Mexico Regional Office, as well as our headquarters, stand by to address any questions you have. Thank you again for your interest in NOAA's national marine sanctuaries. We look forward to continuing work with you on this important nomination.

Sincerely,

Daniel J. Basta
Director, Office of National Marine Sanctuaries

cc: Matt Brookhart, ONMS Headquarters
John Armor, ONMS Headquarters
Billy Causey, ONMS Southeast Atlantic, Gulf of Mexico and Caribbean Regional Office