

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

October 26, 2022

Dear Superintendent Fangman,

On behalf of our 59 undersigned organizations, we write to express our support for the advancement of conservation strategies included in the Florida Keys National Marine Sanctuary ("Sanctuary") Restoration Blueprint.

Established in 1990, the Sanctuary protects 3,800 square miles of unique and nationally significant marine resources, extending south of Miami westward to the Dry Tortugas and bordering Biscayne, Everglades, and Dry Tortugas National Parks as well as four national wildlife refuges. It protects most of one of the world's largest barrier reef ecosystems and the only living coral barrier reef in the continental United States, seagrass beds that are among the greatest acreage in the world, 1,800 miles of mangrove-fringed shoreline, and more than 6,000 species of marine life. The Sanctuary also protects approximately 800 underwater cultural and historical sites. Of these, 14 sites are on the National Register of Historic Places.

In addition to its ecological and historical importance, the Sanctuary is also important economically. The Sanctuary supports approximately 43,000 jobs in a county containing about 75,000 residents and contributes an estimated \$4.4 billion annually to the state's economy. The Sanctuary is a major driver of tourism and recreation dollars, with a total of 5.3 million visitors in 2019 and around 4.5 million boaters, with 1.86 million divers and snorkelers, and 2.7 million anglers enjoying its resources annually.

Unfortunately, the Sanctuary's natural resources and the people who depend on them are facing a range of threats, including impacts from increased use (e.g., boat groundings, anchor damage, fishing gear and diver damage to corals), marine debris, pollution, intensifying storms, disease outbreaks, rising ocean temperatures and acidification.

In 2011, the Sanctuary's condition report concluded that this national treasure's resources were in fair/poor or poor condition, and were generally in decline. Other impacts have occurred and additional declines documented, including:

- Nearly 90% of live coral cover has been lost.
- More than 56,000 acres of seagrass beds have been damaged by propeller scarring; nearly double the amount scarred just 20 years ago.
- Recurring sponge die offs linked to seagrass death and algal blooms plague Florida Bay and frequently expand over the reef tract.
- Vast areas of mangroves were killed by Hurricane Irma in 2017.

Many of the actions proposed in the Restoration Blueprint closely align with the Administration's America the Beautiful plan to conserve 30% of America's lands and waters by 2030 through expanding Sanctuary boundaries; increasing the climate resilience of the region through enhanced protections for corals; sequestering additional carbon by protecting seagrass meadows and mangroves; and fostering biodiversity and healthier populations of fish and wildlife.

The proposed rule and management plan update put forward by the Sanctuary takes the first steps towards a better future for the Florida Keys, but there is more to do to protect this special place in perpetuity.

To that end, we urge Sanctuary managers to prioritize ecosystem health and conservation of ocean life as the Sanctuary finalizes its rule and management plan, and want to highlight the following specific recommendations that will be particularly impactful:

- **Ensure large, contiguous habitats within the Sanctuary are protected**

We urge NOAA to include large, contiguous highly protected areas in its final rule, like the Tortugas Corridor, and the two shore-to-reef protected areas from Key Largo to Carysfort Reef and Long Key State Park to Tennessee Reef, as proposed in alternative 4 of the DEIS. The Tortugas Corridor would protect fish transiting from the nearshore waters and shallow banks of Dry Tortugas National Park, which are essential juvenile fish nurseries, to the deeper adult fish spawning habitat in the Tortugas South Ecological Reserve (Tortugas South Conservation Area). Protecting marine life in the Tortugas Corridor helps ensure that the entire Florida Keys marine ecosystem continues to receive abundant supply of coral and fish larvae. In addition, the protection of shore-to-reef zones will allow scientists and managers to better understand what safeguards are needed to preserve and restore each ecosystem (i.e., coral, seagrass, mangroves) used by marine life at different life cycle stages. Specifically, this scientific understanding will be fostered by prohibiting fishing and all other activity besides transit. This would also allow each of these areas to recover levels of biodiversity and abundance that will spill across their boundaries, and, over time, will actually increase fish size, diversity and abundance and benefit other resources available to Sanctuary users elsewhere.

Furthermore, we urge NOAA to keep regulations consistent in Sanctuary Preservation Areas by prohibiting all fishing and anchoring within these zones, as proposed.

- **Better protect shallow habitats from vessel impacts**

While we were glad to see a number of shallow areas, home to seagrass meadows and fish nurseries, protected with idle speed or no motor zones, these safeguards still leave too many shallow areas of the Sanctuary at risk. We urge NOAA to adopt a Sanctuary-wide regulation that would require idle speeds within 100 yards of all shorelines throughout the Sanctuary, which would reduce benthic impacts and wildlife disturbance in these important habitats.

- **Conduct regular updates to Sanctuary regulations and management plans and utilize adaptive management to respond to urgent needs**

We urge NOAA to update the Sanctuary condition report, Sanctuary regulations and management plan at least every five years to allow for a comprehensive understanding of and response to changing conditions, and to adopt rules to allow for adaptive management that can meet immediate threats facing ecosystems and ocean life.

The Sanctuary faces innumerable stressors including pollution, disease, and mounting user pressures, all of which are exacerbated by climate change. Given the gravity of these threats and the uncertainty of future climatic conditions in the Sanctuary, it is

crucial that NOAA employ adaptive management as outlined in the draft rule. Additionally, the breadth of proposed changes within the draft rule (and ancillary impacts upon implementation) require managers to respond accordingly to urgent threats within the Sanctuary. Adaptive management will also allow the Sanctuary to respond to resource needs and area use. For example, if a nesting bird colony were to move to a new and un-zoned island, it may be necessary to employ adaptive management to account for zone protections to reduce nest flushing and disturbance. We support the temporary regulation for emergency and adaptive management as a key regulatory tool in the wake of climate change and best practice for Sanctuary management.

- **Expand the Sanctuary boundary to include the deep corals at Pulley Ridge:**
We strongly support the proposed expansion of the Sanctuary boundary to include Pulley Ridge, a unique area that shelters the northernmost mesophotic (shallow water corals living at the extreme depth range of available light) coral gardens in US waters. In addition, we support the proposal to make Pulley Ridge a no anchoring zone, in order to better protect this critically important coral habitat. By adding Pulley Ridge and further protecting it from anchor damage, oil drilling, and other threats, the Sanctuary can protect upstream coral populations with demonstrated resilience to climate extremes as well as fish populations that seed the Dry Tortugas, the Florida Keys and beyond via the Loop Current.

We commend Sanctuary staff for the efforts they have already undertaken to protect the Keys, and urge you to make the most of this opportunity for the Sanctuary to chart a healthier course for America's barrier reef. A strong final rule and management plan will be a step towards ensuring people can enjoy the beauty and inspiration of this national treasure forever.

Sincerely,

Alaska Environment

Audubon Everglades

Azul

Cabrillo Marine Aquarium

Conservancy of Southwest Florida

Conservation Alliance of St. Lucie County

Conservation Law Foundation

Creation Justice Ministries

Defenders of Wildlife

Earthjustice

Endangered Species Coalition

Environment America

Environment California

Environment Colorado

Environment Connecticut

Environment Florida

Environment Illinois

Environment Maine

Environment Maryland

Environment Massachusetts

Environment Missouri

Environment New Jersey

Environment Oregon	Environment Texas
Environment Virginia	Environment Washington
Environmental Action	Florida Oceanographic Society
Florida Right to Clean and Healthy Waters (floridarighttocleanwater.org)	Florida Rights of Nature Network (FRONN.org)
Florida Wildlife Federation	Greenpeace USA
Healthy Ocean Coalition	Hispanic Access Foundation
Inland Ocean Coalition	Marine Conservation institute
Miami Waterkeeper	Mission Blue
Mystic Aquarium	National Aquarium
National Audubon Society	National Mississippi River Museum & Aquarium
National Ocean Protection Coalition	National Parks Conservation Association
National Wildlife Federation	National Wildlife Refuge Association
Natural Resources Defense Council	Only One
PennEnvironment	Sachamama
Save A Turtle of the Florida Keys	Sea Turtle Conservancy
Shedd Aquarium	Sierra Club
Surfrider Foundation	TAO (Tethra Advisors and Officers)- The Blue Tech and Circular Economy Consultancy
The Everglades Foundation	The Florida Aquarium
The Ocean Project	