



October 26, 2022

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

Re: Restoration Blueprint Draft Rule

Dear Superintendent Fangman:

On behalf of the Congressional Sportsmen's Foundation (CSF), we welcome the opportunity to provide comments on the Florida Keys National Marine Sanctuary (FKNMS) Restoration Blueprint draft rule. We appreciate the consideration and incorporation of many of our previous comments on the Draft Environmental Impact Statement (DEIS) into the latest draft rule, and we would like to offer the following additional suggestions on improving the Restoration Blueprint moving forward.

Established in 1989, the Congressional Sportsmen's Foundation (CSF) works with the Congressional Sportsmen's Caucus, the largest, most active bipartisan caucus on Capitol Hill with nearly 250 Members of Congress from both the House and Senate. Fifteen years ago, CSF extended the legislative network from Washington, DC to states across the country, establishing the bipartisan National Assembly of Sportsmen's Caucuses, which today is made up of 49 state legislative caucuses, and includes over 2,500 legislators. Ten years ago, CSF established a bipartisan Governors Sportsmen's Caucus, which includes more than half the governors from throughout the country. Together, this collective force of bipartisan elected officials works to protect and advance hunting, angling, recreational shooting and trapping for the nearly 40 million sportsmen and women who spend \$90 billion annually on our outdoor pursuits.

In general, we support the emphasis on improving water quality, enforcement, and education in this draft of the Management Plan, which is foundational to the success of the Restoration Blueprint as a whole. We also support the Management Plan's emphasis on habitat and coral restoration, which are central to healthy fisheries in the FKNMS. However, we encourage the incorporation of artificial reefs as a tool to improve fisheries habitat and support the overall conservation of marine resources in the FKNMS. In addition to the socioeconomic benefits of providing additional angling opportunities, artificial reefs could benefit coral reef restoration efforts by more broadly distributing angling effort while potentially serving as donor sites for outplanted corals.

The Sportsman's Voice in the Nation's Capitols

From an existing habitat protection perspective, we support the use of additional in-water navigational aids to assist boaters and anglers with responsible access that prevents accidental impacts to sensitive habitat areas and disturbance of wildlife. We also support the use of additional mooring buoys as a tool to encourage responsible access to the FKNMS. However, we believe responsible, low-impact access can be successfully balanced with wildlife management goals by changing the “no entry” zones in wildlife management areas (WMA) to “no motor” zones out to 300 feet from shore.

Furthermore, the draft rule defines “anchoring” as “securing a vessel to the seabed by any means.” We have concerns that this definition would apply to the use of push poles and power poles, which have a single point of contact with the bottom and have traditionally been used as a way to access sensitive habitats without the use of motors and with virtually no impact to the habitat. The definition of anchoring should be clarified to allow the use of push poles and power poles throughout the FKNMS.

From the Zone Management perspective, we were pleased to see that the unnecessary no anchor/slow speed zones and/or no fishing zones that included the Key Largo Management Area, Long Key Tennessee Reef, and Tortugas Corridor proposed in the DEIS were not included in this draft rule. While there are circumstances where closed areas are appropriate, they should only be implemented when other management tools have failed, have the support of cooperating fisheries management authorities (i.e., Florida Fish and Wildlife Conservation Commission and the regional fishery management councils), and be for the shortest duration possible to achieve management goals.

Accordingly, reasonable access, such as catch and release trolling, should be allowed at Conch Reef, Alligator Reef, Sombrero Key, and Sand Key Sanctuary Preservation Areas (SPAs). Recreational fishing in the upper section of the water column will not have an impact on efforts to protect coral reefs and Endangered Species Act listed species at these locations.

Finally, as the Protocol for Cooperative Fisheries Management between FKNMS, the Florida Fish and Wildlife Conservation Commission (FWC), Gulf of Mexico Fishery Management Council, South Atlantic Fishery Management Council, and NOAA Fisheries is being revised, we highly encourage the FKNMS to continue to defer to these fishery management authorities for decisions impacting angling access within the sanctuary. They have the scientific expertise and historic knowledge necessary to make informed decisions on the management of our public trust fisheries resources for the benefit of anglers and for species conservation.

We sincerely appreciate the opportunity to provide additional comments on the Restoration Blueprint, and we look forward to continuing to work with the FKNMS in meeting the management challenges for the sanctuary while ensuring anglers continue to have the ability to access one of the nation’s most important fishing destinations.

Sincerely,



Chris Horton
Senior Director, Fisheries Policy

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