

February 24, 2016

Ms. Meghan Balling
Fishing, Diving and Other Uses (Coral Reefs Conservation Programs)
Florida Department of Environmental Protection

RE: SEFCRI

NOTE...

➤ Denotes particularly important points in this letter and throughout RMA comments attached.

Dear Ms. Balling and Other Interested Parties:

In response to your email to me on February 9th I am pleased to proffer the following comments and opinions. Parts of your email seemed somewhat defensive in tone while also inferring I was disseminating misinformation about SEFCRI. As I explained on the phone when we spoke later, whatever I said or distributed was based directly on or taken directly from the SEFCRI informational website. You further suggested I attend one of the public hearings where you were sure my "fears and concerns would be alleviated".

Your first impression may be that I am an obstructionist. Yes and no. On the one hand, yes, I am intending to be an obstructionist to stop or slow down this inarguably overreaching juggernaut. To the extent there are viable or practical or realistic and effective suggestions, I am glad to so acknowledge. However, to the extent the ideas are over-the-top 'save the earth' or are over-reaching and are otherwise an abuse of power or relinquishment of rightful authority, I will also point this out.

On the other hand, I am not an obstructionist and have occasionally demonstrated such with my support of Florida's net ban and the banning of long-lines off our coasts. When able, I have also been a contributor to the RFA, CCA, and the Billfish Foundation. But unlike SEFCRI, these and other environmental matters are essentially very specific one-off items which are easy to research, follow and understand... compared to SEFCRI with sixty (68) eight separate proposals involving hundreds of pages of information created over two years (or ten depending) by dozens and dozens of bureaucrats and well-meaning volunteers amassing some 6000 man-hours.

It is an interesting coincidence that when I learned of SEFCRI I was reading a book on Winston Churchill about some of his writings and policies and I could not help but notice a few quotes by him over 70 years ago are more accurate than ever. Speaking of bureaucrats...

"Their manner of rule, including the way they convey information is oft times impenetrable... a kind of vague jargon and officialese... They multiply rules to the point they can not be read or followed..."

And you expect those whom or who could be adversely affected or benefited by all this to actually read all this stuff. In my thoughts, here is but a partial list of potential stakeholders:

> DIVERS > DIVE CLUBS > DIVE OPERATORS > DIVE STORES > RECREATIONAL FISHERMEN > MARINAS
> FISHING CLUBS > CHARTER BOATS > BEACH AREA MOTELS > RESTAURANTS > AREA RETAILERS/SHOPPES
> BOAT ENGINE MECHANICS > BOAT REPAIR/MAINTENANCE > BOAT MANUFACTURERS > BOAT STORAGE
> COASTAL CITY AND COUNTY COMMISSIONS

Really, let's get serious, how many of the above 1000s of people are either aware of SEFCRI or have the time to read the SEFCRI material or have the time to actually attend a 'Public Hearing' ? Not many. It has been on more than one occasion that when a rule or law was later adopted and the public cried out against it, the response was why didn't you get involved. Why didn't you attend a 'public hearing' and get your voice heard. Perhaps more often than not, 'Public Hearings' are simply cya hearings for later on (?). And once a new law or policy is implemented, it is there forever. In fact, laws and policies, like taxes, have a way or growing and growing just on their own. Again, Churchill on government oversight and remedial intervention...

"[affords] the pretext of establishing even more controls and an even larger bureaucracy. They (the government) makes mistakes which makes things worse [and] as things get worse they claim yet more power to make them right."

Bio

I am a native of Broward and have fished and dived its waters since I could ride a bicycle to the beach in the early 1960s. Among other things, I am a Captain (100 ton with SCTW cert) and have been PADI certified since 1975 (and also have free dive training to 60').

- I and countless others like me, those who dive and fish these waters, those who see the degradation of the reefs, those who want their children and grandchildren to enjoy these waters, have more interest in protecting the reefs, are more conscientious of their activities and willingly exercise more protective measures on their own, without 'force' and without any government edict, than any legislatively-imposed restrictive measures could ever possibly accomplish. The overwhelming loss off reef and corals along our shores is due not to divers. Not fisherman. Not even close.

Meeting Observations

On February 16th I attended the noon SEFCRI meeting at Holiday Park.

At the meeting, it was emphasized all parties should be respectful of others' opinions. Notwithstanding the disproportionate well intentioned efforts of those in attendance (seemed like more 'blue' shirts than attendees) and others who have contributed their volunteer efforts and government salaried time to 'the cause', I and others not so committed or invested expect the same courtesies and respect in return as well.

I heard from several 'blue shirts' of their disappointment with a lack of input or feedback specifically from the fishing community (and also from the recreational diving community). Well, I am of that community and I would be pleased to explain...

First, despite your belief that the public announcements of SEFCRI meetings and its website for comments is actually reaching those affected, I can assure you it is not.

Second, of those who may have heard of the 'latest' reef protection efforts and activities, most all have "heard it all before" over the last decade or two and do not give it any real attention because none of the prior activities actually had any meaningful support or any meaningful opposition or any meaningful or specific proposals that had any chance of moving forward. Having sort of a 'been there, done that' attitude and having been involved before to no particular outcome, the few folks who actually might have heard of SEFCRI simply are not interested in wasting their time yet again.

And thirdly, and perhaps the more relevant, the simple truth is that unlike government employees where this kind of stuff is their job day in and day out, we out here are working our own jobs and supporting our own lives and families and in these tough economic times we plainly do not have the time. It matters not whether you are a small boat weekend warrior bringing your young son or daughter out to catch their first fish (these folks are living paycheck to paycheck, often working two jobs) or the major tournament angler in a 60' sportfish battlewagon with all the trimmings (these folks are busy running their businesses and their affairs and investments and also have not the time to spare)... just because you and others have the time, just because you and others are committed via employment specifically for these things, do not think that others also have the time. They, we, do not.

- So, it is not that the SEFCRI folks should be disappointed at the lack of input, feedback, or pushback by the fishing and diving communities, it is that they really need to understand (1) the world does not revolve around them or their cause and (2) more importantly, they need to realize that silence or lack of input from outside their circle does not mean SEFCRI's efforts and activities and plans are endorsed by the public at large, nor by the recreational fishing and diving communities specifically.

As mentioned above, you had suggested that if I attended a meeting all would be explained and I would better understand SEFCRI allaying my 'fears and concerns'. To the contrary, what I observed only solidified my concerns... the whole thing, with all the fresh young faces and eager volunteers and government agency folks (all in blue shirts and as many blue shirts as there were attendees) gave the whole thing a surreal stereotypical environmentally-correct caricature of itself. It started off with a middle school lecture about the reefs' ecosystems. Now I won't say I didn't learn some interesting things from others who spoke or with whom I met, but considering the attendees in attendance probably had several combined centuries of experience and knowledge themselves, the intro enviro lecture seemed unneeded and amateurish at best, condescending at worst. No offense intended here, just responding to requests for meeting feedback.

There was also a running loop prior to the meeting of Bouncer Smith and Guy Harvey and a few others rambling over and over and over. I know Bouncer and Guy myself and respect both immensely, but it almost seemed while one was waiting for the meeting to commence there was some kind of introductory brainwashing going on. I know there wasn't, but you might want to get some fresh or more material.

Recommended Management Actions (RMAs) SEE ATTACHED COMMENTS

While I am only going to make comments on some proposed RMAs, I typed the SEFCRI website summaries of ALL sixty (68) to emphasize both the sheer size of this octopus and its many tentacles. As you may be getting the drift by now, my and others biggest concern is that pretty much no one has the time to actually read and study all what is proposed and written by SEFCRI – much less the time to reply. Which it seems may well be the intention.

Furthermore, when at the meeting I and others questioned a couple of learned blue shirts about *specific* proposals regarding “areas of interest”, for example, the answer was we don’t have any yet. Really? After two years and 6000 man-hours (of which SEFCRI seems very proud having mentioned it several times), and after our taking time to at least review the SEFCRI data and RMAs, and after asking for our comments, with nothing *specific* in the way of *specific* proposals to comment on, only, apparently, SEFCRI “goals” (and in some instances maybe somewhat general goals at that), I ask you just what we are doing there? How, exactly, is SEFCRI actually going to achieve its 68 goals? What are we supposed to comment on when even SEFCRI does not know what they want to do? I suspect in some instances they do know and that they do have very specific intentions and some very specific rules and legislation planned, but they don’t want to say.

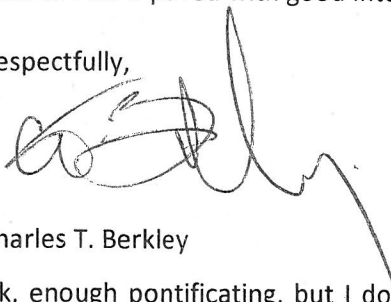
Again, I am NOT going to comment on all 68 RMAs. I do not have the time to research each one effectively, nor really the time to even read each and every working paper on same. In other words, I and others, simply do not have 6000 hours.

Final Words

- Despite the time and human capital spent to date, do NOT let the time invested become its own driving force. These things have a way of taking on a momentum of their own. Know that government people, as well as those committed to a particular issue or cause, often live in their own little bubble and think ‘everyone’ thinks like they do. Remember, this is not so. And it is not just marginally not so, it is hell not so. Again, no offence intended by the strong language; but only using it to drive home the fact there are thousands, maybe tens of thousands out there who will be affected by what you do over the next months.

And finally, one should always beware of what one wishes for. I forget who said it, but ever so true: The road to Hell is paved with good intentions... I would add naïveté .

Respectfully,



Charles T. Berkley

Ok, enough pontificating, but I do hope you and other readers of this letter will take the above, and below, to heart. In many instances I could have added additional thoughts, but, again, who has the time?!!!!

CC: Lighthouse Point City Commission c/o Kyle Van Buskirk
 Pompano Beach City Commission c/o Lamar Fisher
 Marine Industries Association of South Florida

Fort Lauderdale City Commission c/o Chip Lamarca
Lighthouse Point Saltwater Sportsman Assoc.
State Representative George Moraitis, Jr.

This will affect you personally. . .

- > DIVERS > DIVE CLUBS > DIVE OPERATORS > DIVE STORES
- > RECREATIONAL FISHERMEN > FISHING CLUBS > MARINAS
- > CHARTER BOATS > BEACH AREA MOTELS > RESTAURANTS
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- > BOAT STORAGE > BOAT MANUFACTURERS > AREA RETAILERS/SHOPPES
- > COASTAL CITY AND COUNTY COMMISSIONS

If you are concerned with yet another GOVERNMENT OVEREACH implementing
**SERIOUS DIVING AND FISHING RESTRICTIONS ALONG BROWARD'S COASTS
AND REEFS, you need to read this and ACT NOW!**

Although these kinds of plans and initiatives have been talked about for decades, over the last few years policy wonks and others (many from out of the area and many tied to Washington and the present administration) have been aggressively pursuing the possible establishment of...

No Take Zones and Other Serious Restrictions, Including No Spearfishing and No Fishing off Broward to 150' Depth.

Sailfish, tuna, dolphin, wahoo don't know the depth... what if you catch a sailfish in 170' and it swims into 140' depth... what do you do, cut it off, and what about the trailing line? This also means no spearfishing and no lobsters. Are sailfish and kingfish tournaments off Broward a thing of the past?

All this and more in the name of "protecting the reefs". I am a Fort Lauderdale native and have dived and fished its waters since the early 60s and there is no denying degradation of the reefs, but such draconian measures will not solve the problem. These bad proposals are 'easy' but not correct and will have serious detrimental effects on the local economy and thousands of jobs. The biggest threat to our reefs has been and remains polluted land run-off. Not divers. Not fisherman. Not even close.

Yes, there have been public hearings and there are still a couple more, but unless you just happen to come across an announcement most everyone who has a stake in the matter has no idea some form of massive restrictions to coastal diving and fishing is about to be formally adopted.

THE TIME TO SPEAK UP AND GET INVOLVED IS NOW. Go to the next Public Hearing at:

TUESDAY, FEBRUARY 16TH
Holiday Park Social Center
1150 G. Harold Martin Drive
Fort Lauderdale, FL 33304

WEDNESDAY, FEBRUARY 17TH
Newman Alumni Center
UM/Coral Gables Campus
6200 San Amaro Drive
Coral Gables, FL 33146

Or go **NOW** to: <http://ourfloridareefs.org/fishing-diving-other-uses-restoration/>

Or write **NOW** to:

| | |
|---|--|
| Florida Dept of Environmental Protection, Coral Reef Conservation Program (SEFCRI) 3900 Commonwealth Blvd. MS 49 Tallahassee, FL 32399 ATTN: Francisco Pagan | SE Florida Coral Reef Initiative (SEFCRI) Coral Reef Conservation Program 1277 NE 79 th Street Cswy. Miami, FL 33138 ATTN: Lauren Waters |
|---|--|

SIGN UP FOR TIMELY INFO AS AN INTERESTED STAKEHOLDER AT: coral@dep.state.fl.us
➤ **AND PASS THIS ALONG NOW TO ANYONE YOU THINK NEEDS TO KNOW!**

EDUCATION AND OUTREACH DRAFT RMAs

N-5: Enhance Marine and Ecosystems Curriculum in Schools

Enhance the Southeast Florida Coral Reef Initiative (SEFCRI) Florida reefs and ecosystems curriculum, including educating educators on available resources, and mandate that it be taught once in elementary school, once in middle school and once in high school (every school year) to provide science-based foundation for making future decisions to protect coral reefs.

More brain-washing of the youth. General bio sciences, sure. But too many times I have seen the use of school curriculum to promote a particular agenda. Who establishes the curriculum? The same ones at SEFCRI who decry no feedback from the diving and fishing public? If the diving and fishing public don't know of or don't have time to pursue SEFCRI, who thinks they'll have any input into school classes? Anyway, the best teachers of the reefs and oceans are those who are the closest. Not all kids are involved or interested in diving or fishing; statistically probably just a couple percent. Trust me, the kids I know of my peers are on the frontline re protecting the reefs and fisheries... and they didn't get it from 'school', they got it from their parents – who care a heck of a lot more about the future of our waters than some “educator”.

- In your white paper, it is suggested a budget of \$50-100k... with no identified funding source. And it is the norm that most every government projection is off to the actual final costs by at least a factor of three!

N-14: Enhance Distribution of Educational Materials about the Value of Florida Reefs

Enhance distribution of educational materials (continue current activities) highlighting the economic and recreational values of southeast Florida reefs to enhance awareness by residents, elected officials, and visitors. Source reports are optimally updated every five years, if funded.

Seems innocuous enough, seems really more of a Chamber's of Commerce kinda' thing, but dig a little deeper in SEFCRI's own data and...

Likely at a cost of \$250-\$400k. "...would include economic valuations of the reef for coastal protection, property values, carbon sequestration, nutrient removal, recreation, fisheries, ecotourism, and other ecosystem services." Seems like interesting information enough... but what is the purpose and to what end is the value. Gathering information and statistics is great (provided, of course, no bias), but all this info to just send around to folks seems a waste of time... One doesn't need a \$400k study to learn our coastal reefs are a major draw and economic benefit to the South Florida community... common sense and anyone who has either lived here or vacationed here already knows this... simply to learn as to what degree seems a waste of time. Save some time and I'll give the answer for free: itza' lot. Look at some of SEFCRI's own 'blather' on this and you can't tell me this isn't for just a bunch of eggheads who are working on their thesis or who just like to hear themselves talk.

From the SEFCRI white paper:

The goals of this recommended management action are: (1) to provide economic data to highlight the economic value of the Florida Reef Tract, (2) inform decision-making, (3) empower stakeholders to make a difference in coral reef conservation and restoration; (Economic data could be used as a reference for future study parameters or funding requests.), (4) increased appreciation of economic and recreational value of reefs by residents, elected officials and visitors, (5) provide necessary data for funding opportunities, (6) provide information on solutions for tackling reef stressors, and (7) empower target audiences to make a difference.

Z z z z z z . . .

- So let's see... in only the first two SEFCRI RMAs, we're looking at a half-mil in needed funding.

N-15: Promote Citizen Supported Organization (CSO)

Promote citizen supported organization (CSO) Friends of Our Florida Reefs to enable better community engagement in coral reef efforts and target funding for conservation activities more effectively and efficiently.

Essentially private or foundational and charitable based... all for civic activism, go for it.

N-18: Include Multi-cultural Fishing Practices in Fishery Educational Programs

Augment existing fishery and coral reef education programs to incorporate multi-cultural fishing practices including addressing environmental ethics.

This RMA... "to include passing down sustainable fishing practices and eco-conscious behaviors (using less plastic and more reusable bags, proper trash disposal, etc.) and an increased understanding of marine habitats."

Language barriers and cultural customs re fishing techniques can indeed pose isolated concerns and it is always a good practice to keep folks informed. If communicating in native languages is all that is needed to tell people to use circle hooks on billfish or to not throw trash overboard, so much the better. After reading the 8 pages on the SEFCRI site on this, seems a simple post card at boat ramps or dive shops or thru FWC would do the trick.

N-19: Distribute Nautical Charts with Natural Resource Information to Boaters

Make nautical charts featuring benthic natural resources coverage in the Southeast Florida Coral Reef Initiative (SEFCRI) region available to boaters.

From the SEFCRI white paper:

Legislative considerations were not identified for this recommended management action.
There are no permitting requirements associated with this recommended management action.
There are no enforcement requirements with this recommended management action.

Measurable Outcomes/Success Criteria/Milestones were not identified for this recommended management action.

Supporting and relevant data for this action were not identified.

No current efforts have been identified with this recommended management

And specifically how is all this going to, per SEFCRI, “[improve] availability of information on the location of natural resources made available to the boating community and maritime industry, as well as a reduction in direct impacts to benthic resources from boat groundings and anchoring.” As mentioned in my cover letter, if SEFCRI does not know where it is going, how are we stakeholders supposed to comment.

N-21: Distribute Reef Information to New Florida Residents

Develop and distribute welcome information, digital video, or image packages for new Florida residents that provide information on impacts to reef systems and how they can be addressed to raise awareness and influence behavior change to reduce impacts to reefs.

Aside from not identifying funding source, go for it. There is already out there a plethora of footage and information, so probably would not need to do from scratch... making it available for dissemination by all. Besides SEFCRI’s distributive suggestions at visitor welcome centers, Chambers of Commerce, etc... free videos/CDs could also be available at local dive shops and tackle stores – but more importantly available online for better targeted distribution by social media.

N-23: Create a Voluntary Marine Industry “Blue Star” Certification Program

Following the example and spirit of successful “Blue Star” programs in Florida and other developed areas of the world, create a voluntary marine industry education/certification program in the Southeast Florida Coral Reef Initiative (SEFCRI) region, to increase professional and consumer user awareness, responsibility, and personal pride, leading to voluntary reduction of typical user reef damage and negative impacts.

From SEFCRI’s white paper:

Documents (training materials) and training for commercial operators would be required to promote ethical stewardship for marine ecosystems. The agency or entity responsible for creating the training program and materials would need to be identified. Presentations, pre-fishing briefings, pre-diving briefings, glass bottom boat tour briefing, etc., are examples of how these objectives could be delivered.

It is widely accepted that not all businesses in the same field are created equal, especially when natural resource exploitation is at the heart of the business. While some may run a “tighter ship” and conduct business efficiently (thereby staying in business), this may include cutting corners and/or sacrificing safety, resource health and integrity. Besides price, advertising and convenience, tourist and local consumers may not have a way to discern operators who do their best to conserve/protect the resource from those who do not do their best or, perhaps, do not bother at all.

Wow. Where do I begin. Someone at SEFCRI must have a real bone to pick. Dive businesses, like most businesses, already must comply with a variety of rules and laws and insurance requirements, etc. Personally, I do not know of any operator who does not take safety seriously and who does not already do pre-dive briefings and such. I do not know of any operators who do not recognize and appreciate the fact that our living reefs are the reason they are in business and take care to protect and preserve same as is their means of their business's survival. In the event there are or may be less than scrupulous operators, then word will indeed get around in today's social media and by other word-of-mouth and if they are in violation of any number of laws there are plenty of agencies already in place to address these things... these folks will not be in business for long.

- **But the interesting tone of this RMA and these white paper comments is its not so subtle anti-business undertones.** (Whoever drafted this beauty must be a Bernie Sander's supporter.)

N-37: Improve Existing FWC Hotline for Reporting Marine Incidents

Continue to improve existing Florida Fish and Wildlife Conservation Commission (FWC) hotline and significantly increase (at least double existing investment) marketing about the hotline and the phone application to more efficiently report emergencies or violations, send pictures, and be able to report a problem to assist agencies to enforce the regulations that protect our coral reefs.

The FWC is a good group of folks who are out there and 'get it' and it is true they can not be everywhere. To the extent concerned anglers and divers see or become aware of a material infraction, a quick and easy call to FWC might help them to respond faster – especially in the event of an emergency. Seems like a reasonable and effective, low cost, RMA suggestion.

N-41: Develop a Voluntary Fee to Fund Education and Conservation Programs

Develop a voluntary "Florida Reef Tract Stewardship and Job Creation fund" fee to fund education and conservation programs.

From the SEFCRI white paper:

This recommended management action is being put forth due to a current lack of funds for education (including lack of awareness and appreciation) and conservation. A fund would help brand the "Florida Reef Tract."

The intended outcome of this action is increased funding for coral reef education and conservation. A voluntary fee would be assessed to hotel bills for those staying in the four counties. The citizen support organization Friends of Our Florida Reefs could possibly administer the fund.

Some possible issues that may arise with implementation of this recommended management action include public resistance to new fees and pushback from industries who feel their business would be hurt by this new fee

This recommended management action is linked to N-25.

What education programs? What does 'administer' the fund mean? And to what end? Also seems a bit redundant to other RMAs.

N-123: Develop a Finance Plan to Support Reef Conservation

Develop and implement a sustainable finance plan to support coral reef conservation efforts in the Southeast Florida Coral Reef Initiative (SEFCRI) region.

From the SEFCRI white paper:

At present, SEFCRI is dependent on annual funding from the National Oceanic and Atmospheric Administration and the State of Florida.

The cost to implement this recommended management action ranges from \$30,000 - \$50,000. This might be a one-time cost, but could be recurring if maintaining the plan and revenue stream requires paid management.

How much does SEFCRI receive from NOAA and the State of Florida? Looking at all the blue shirts at the SEFCRI meeting I attended and in light of all the references made there, there must be dozens if not hundreds of other government employees or government supported organizational employees who are involved in one way or another with the reef environment. Impressions are that we already have enough 'management' types and that SEFCRI and other State enviro agencies are people-heavy. There must be some place 'within' to find a paltry \$30-50k if this is such an important RMA (?).

S-52: Create a Reef Protection Mascot/Logo Campaign

Create an effective reef protection mascot/logo campaign to increase awareness for protection.

From the SEFCRI white paper:

This recommended management action is being put forth because a logo depicting coral reef protection provides the campaign with a design that will help provide recognition of its focus on coral reef protection... A graphic logo effectively depicting coral reef protection will provide immediate and extensive recognition for distinct stakeholders and the public at large.

So?

At SEFCRI's estimate of \$50-\$100k seems like a waste of money to draw a cartoon character... I am sure there are any number of local enviro- or politically-correct artists who would jump at the chance for nothing. Hey! I just found you the \$50 grand you wanted for N-123 above!

S-67: Provide Incentives to Eradicate Invasive Species

Provide incentives to divers and fishermen to eradicate invasive species of marine organisms proliferating the Southeast Florida Coral Reef Initiative (SEFCRI) coral reef system to provide a natural ecological balance of marine and plant life for the coral reef system.

Lionfish are a definite problem and a problem needing to be addressed. The near and long-term damage to reefs and reef fishes by lionfish may be immeasurable and anything to help eliminate them is

worth looking into. The problems and concerns SEFCRI apparently has with divers is, in my opinion waaay overblown and pales to insignificance with this particular invasive fish. This is an RMA worth pursuing further.

Lionfish is a good eating fish and if some "marketing" could turn it into a "delicacy" and "craze" (like blackened redfish a few years back), then the problem would likely take care of itself. Some form of 'reward funding' might be helpful, but how much and paid by whom? Also, there is the safety and liability concerns of 'officially' promoting a lionfish harvest.

S-75: Create a Voluntary Reef-User Donation Fund to Support Reef Conservation

Initiate voluntary donation program from all reef users via licensed dive boats or fishing boats/charters. This donation would support reef conservation programs or projects.

SEFCRI has already identified in its white paper concerns with funds collections and management or mismanagement, but a voluntary contribution is, well, voluntary... so go for it, but, per the SEFCRI white paper on same:

The intended outcome of this action is to fund critical conservation initiatives. The proposed fee could provide funding for conservation projects or increased law enforcement agents.

What initiatives and what projects?

S-91: Develop an App for Reporting Marine Incidents

Develop a telephone application to allow the public to photograph violations and document time, boat numbers, GIS coordinates, and violation to state Florida Fish and Wildlife Conservation Commission (FWC) and federal enforcement personnel to improve regulatory compliance and enforcement and improve public involvement, outreach and education concerning coastal protection in Florida.

From the SEFCRI white paper:

This mobile phone application will allow public surveillance and participation in resource management. The public can use mobile phones to photograph violations and transmit related information

to allow the public to text/upload photographed violations and document time, boat numbers, GPS coordinates, and violations to Florida Fish and Wildlife Conservation Commission (FWC) or federal enforcement personnel.

Even if no officers are able to respond, they can send a notice to the violator after the fact (based on Florida boat registration numbers) referencing the violation and providing an educational reminder about regulations. The application is intended to automatically transmit violation information and photographs to the appropriate enforcement personnel.

People photographing illicit activities may be at risk of retribution or injury if detected by offenders.

- This is just 1984 Big Brother Orwellian creapy. Its one thing to notify FWC or law enforcement (via RMA N-37, for example), but to turn the general public into a bunch of mall security guards – I mean, what could *possibly* go wrong? No thanks.

ENFORCEMENT DRAFT RMAs

N-7: Offer an Online Exam to Receive a Discount on Fishing Licenses

Offer an online exam to receive a discount on fishing licenses (create an incentive-based program).

I don't see where this is really needed or if it truly has any meaningful effective benefits... Per SEFCRI:

...online exam with questions about the Coral Reef Protection Act, Florida Fish and Wildlife Conservation Commission (FWC) rules, and basic boating laws that will be given to people purchasing fishing licenses in the state of Florida. This exam would be required for children under the age of 16, but optional for adults over the age of 16. This would also include an increase in the cost of fishing licenses. However, those who voluntarily take the course would receive a discount back to the original price.

This incentive-based program would consist of a single online exam with at least 50 questions to answer. In order to pass, the exam must have a final score of 75 percent.

Seems like just another hassly-hoop to jump through... and the kids I know under 16, as was true when I was a pre-teen, they are more adept at vessel operations and know maritime rules and customs far in excess than your typical weekend warriors or some inconsiderate old ponytailed atty in a go-fast boat with a thonged babe at his side.

N-25: Strengthen Penalties for Reef-Related Violations

Strengthen penalties and fines for non-compliance of reef-related regulations to discourage illegal activities, and to express that violations will not be tolerated.

Given the rather limited choices FWC officers have, there may well be something to this if it affords them more discretion and if they themselves believe it would be helpful... I would concur with this RMA PROVIDED it is endorsed by FWC and only if they have direct input.

N-27: Establish Co-Management Agreements to Address Staff Capacity Gaps in Enforcement Agencies

Establish co-management agreements with capable and responsible local communities and non-governmental organizations to address staff capacity gaps at Florida Fish and Wildlife Conservation Commission (FWC) and the Florida Department of Environmental Protection (FDEP).

SECRIF white paper:

...increased community involvement in marine resource management, with more eyes and ears to monitor and report violations.

The lead agency for implementation of this recommended management action would be Florida Fish and Wildlife Conservation Commission to coordinate programs to train and engage local governments and communities in a community watch-type program. Other potential agencies or organizations who could be involved include city and county governments, as well as local non-governmental organization partners.

More 'Big Brother' trying to get "local non-governmental organization partners" to do law enforcement's job. And as to "...other potential agencies or organizations...include city and county governments...", what are they going to do? Float around in little boats with binoculars?

N-35: Implement Conservation Regulation Training for Marine Enforcement Units

Develop and implement a cross-training program for local marine units and beach patrol officers, to improve recognition of conservation regulations, increase law enforcement presence on the water and provide additional enforcement for peak periods to build relationships between agencies and decrease marine-related violations.

Per SEFCRI white pages:

...a cross-training program for marine patrol and/or hunting could enable local law enforcement to better assist and increase enforcement during high volume seasons and events.

...intended to increase awareness among law enforcement entities so they will know what to do if they come across a conservation violation

As with RMA N-27 above, would defer this to FWC. I can see on heavy traffic days, like mini-season or on holiday raft-ups, etc, that FWC can be stretched a little thin, but what is a city police officer or sheriff in their cars going to do with matters on the water? Maybe assist at boat ramps or at a marina in some way, but only if FWC feels this RMA to be a help vs. a hindrance.

N-36: Raise the Cost of Recreational Lobster Stamps and Dedicate Funds to Species Enforcement

Develop a stakeholder initiative to raise the cost of recreational lobster stamps statewide and dedicate the additional funds for improved species enforcement in the southeast Florida region (including Monroe County).

Per SEFCRI:

...to help fund more positions within the Florida Fish and Wildlife Conservation Commission (FWC) to ensure officers' presence on the water and inland fishing areas to increase enforcement of laws.

If the intent is to procure additional funding for FWC, why place the burden just on lobster divers when FWC serves in so many other areas. Seems odd to have lobster divers pay for everything else they do... sort of a principal kinda' thing. If more funding is needed for FWC, which is statewide (including hunting, etc.), then the state legislature should budget it.

N-44: Educate Judiciary on Penalties for Environmental Violation

Educate relevant judges and prosecuting attorneys on the importance of imposing penalties for environmental violations that are severe enough to prevent future violations.

SEFCRI:

This recommended management action is being put forth to reduce 'slap on the wrist' penalties with minimal fines, increase follow-through on enforcement actions, and increased application of penalties that will effectively serve as a deterrent.

...there may be less leeway to deal with first offenders or extenuating circumstances.

There may be something to this, though am concerned with taking away judicial exercise on a case-by-case situation. Am against mandatory minimums.

S-92: Protect Reefs from Anchor Damage During Beach and Coastal Events

Protect reefs from anchor damage during beach and coastal events (i.e. festivals, air shows, etc.).

SEFCRI:

The responsibility for this action should fall on the event organizer. A marine plan or coral reef protection plan could require a permit and event organizers should be held accountable.

Common sense answer is of course. But as SEFCRI points out, even if more mooring buoys, big events like 4th of July would be hard to avoid wider anchor damage by the numerous number of boats. SEFCRI also acknowledges that some buoys are ineffective because they are hard to see and suggest 'higher' more visible buoys... agreed. Also see comments re RMA S-2 below.

S-2: Create a SEFCRI-Wide Mooring Buoy Program

Create and fund one SEFCRI-wide mooring buoy program as a more coordinated and cost effective way of protecting reefs from anchor damage.

SEFCRI:

...to create a single mooring buoy authority for the Miami-Dade, Broward, Palm Beach, and Martin counties, with consequent lower costs.

Benefits of implementation of this recommended management action include lower installation and maintenance costs per buoy,

Other potential agencies or organizations who could be involved include the future South East Florida National Marine Sanctuary authority

Seems to make sense, provided counties do not feel they are giving up too much authority and provided such a buoy agency isn't simply another layer of costly bureaucracy.

Other more practical concern is long-term reef wear and tear by repetitive diving at and around just the buoys. Suggestion might be to set up numerous permanent buoy 'bases' and add or relocate various buoys on some kind of cyclical pattern (sort of like when farmers leave fields fallow) in order to let heavier dive areas recover. Many if not most dive operators and bubble-watchers don't anchor anyway.

- And what is the *future* 'South East Florida National Marine Sanctuary' authority?
- See comments on RMAs: S-65, N-137, and S-54 ...but especially S-65.

S-95: Perform a Study to Determine how to Improve Law Enforcement Management

Perform a comprehensive study to determine how to improve law enforcement efficiency to match assets and personnel to public needs to increase efficiency and improve employee retention.

Defer to FWC... seems like unnecessary overreach resulting in maybe too many chefs in the kitchen.

S-98: Simplify FWC Regulations Regarding Catch Limits

Simplify Florida Fish and Wildlife Conservation Commission (FWC) rules and regulations to reduce complexity (fish sizes fork length versus overall – snapper one size, grouper one size, and pelagic) to make rules simpler and standardize catch size limits for important species with similar life histories and appearance to make it easier to enforce regulations and catch within limits.

Per SEFCRI white paper:

On the one hand...

Improve user compliance with fishing regulations by simplifying regulations to standardize how to measure length measurements. ... This modification is to require all lengths to be fork length.

The general public would only having to remember size limits for a few fish (groupings of fish). Currently there are nearly 50 species of fish that are regulated by size limits. Changing the regulations to simplify fork or total length

But on the other hand...

Negative impacts associated with this recommended management action include: (1) simplifying regulations, such as minimum size limits to make groups of similar species the same, may interfere with rebuilding plans currently in place that are specific to the species, (2) this action has no potential to improve coral reef conservation, (3) lumping different species into classes for size limits based on similar appearance will not lead to better fishery management, and (4) this action may lead to serial overfishing of vulnerable species and reduce biodiversity.

So exactly what is SEFCRI asking for here? And since this doesn't really involve reef corals, I am not sure why SEFCRI is interested in this.

S-99: Increase the Number of FWC Enforcement Officers

Increase number of Florida Fish and Wildlife Conservation Commission (FWC) enforcement officers; funding for enforcement; recruitment and retention of on water officers to improve enforcement for better protection of resources.

Per SEFCRI white paper:

This recommended management action is being put forth because the current salaries of law enforcement officers lead to a high turnover rate

...benefits of this recommended management action is long term and recurring, as there would need to be increased long-term funding support ...possible issues that may arise with implementation of this recommended management action could include: an increase in funding necessary to pay for additional officers and salary increases, the challenge of implementing a cost-of-living adjustment due to an expensive location (Southeast Florida), and this proposal could take funding from other programs that need it too.

Funding may be acquired through: State legislature; Existing agencies; Boater Registration Fees; Fishing Licensing Fees; Raise Cost of Lobster Stamp; Reef Impact Fees (or User fees); Fines from violations could be re-directed back into law enforcement programs; (if it can be legally achieved without conflict of interest); etc

First, I have known a number of these FWC guys and gals over the years and they a pretty close knit group... not sure I agree with your premise about turnover... certainly many are promoted or take other higher-up government security positions... but I am not so sure that when they leave it is related to poor pay or low morale. If the state believes there is a problem here, then the state legislature should address this.

S-125: Request that FWC Better Define the Word "Take"

Request Florida Fish and Wildlife Conservation Commission (FWC) to make a rule change in the marine life rule to better define "take" (take, touch, anchor on, or damage in any way) to improve enforcement of the Coral Reef Protection Act.

SEFCRI should have included in its white paper the present definition of 'take'... I do not have time to look it up and do not know if there is a problem here or not. No comment. See comments '>' on RMA N-70.

FISHING, DIVING, BOATING & OTHER USES/RESTORATION DRAFT RMAs

N-59: Ban Spearfishing on SCUBA

Ban the practice of spearfishing on SCUBA to enable sustainable use of our Florida Reefs.

Are you serious? An outright ban on SCUBA spearfishing is stupid, hopefully only born out of ignorance. Some reef fish can only be taken by spear and some are pelagic which have nothing to do with the reef per se'. And in another RMA, SEFCRI is proposing bounties for taking invasive species like lionfish... you going to grab them with your hand?

Though seasonal closures of specific species, size and bag limits, can make sense under objective (not emotional or subjective) considerations.

Ya' know, not everyone can hold their breath... and I suspect there would be more free-dive accidents and deaths as a result – would be an interesting study.

N-64: Require Registration of Fishing Gear in St. Lucie Inlet Preserve

Require registration and tagging of lead line for all cast nets over six feet and traps, as well as reporting the coordinates of any lost nets to Florida Fish and Wildlife Conservation Commission (FWC) for retrieval, for commercial and recreational fisherman, within St. Lucie Inlet Preserve State Park to prevent and track lost gear (ghost nets).

From SEFCRI white paper:

...cost of implementing this recommended management action is \$50,000 - \$100,000.

...There are no potential funding sources known at this time.

I question the extent of lost gear in that is it so wide spread it needs \$100k in funding? Or are the problems just occasional and isolated? Seems like a lot of activity by authorities for so little, especially if as SEFCRI says FWC and other authorities are so short-staffed; ie; poor use of manpower and limited resources.

- See Comments on land-based pollution and excessive fresh water dumping.

N-70: Protect and Restore Estuarine Habitats

Protect and restore mangroves, seagrass beds, oyster reefs and other estuarine habitats.

SEFCRI white paper:

The estimated direct cost of implementing this recommended management action is much greater than \$250,000 annually... Potential funding sources include ad valorem taxes (the levying of tax or customs duties in proportion to the estimated value of the goods or transaction concerned), vessel registration fees... Legislative action is required to appropriate funding if alternative funding sources are not available.

...includes seagrass, watershed, mangroves, oyster reefs, inshore reefs, wetlands, and marsh habitats... This recommended management action is being put forth because environmental impacts result in loss of these key habitats and degraded water quality.

- **FINALLY.** Something we can more fully agree on – “degraded water quality”. THIS is the biggest and longest ongoing and most detrimental problem with loss of reefs and living corals. Is NOT divers. It is NOT fisherman. Their combined affects on the overall SE Florida reef system is miniscule compared to decades upon decades of polluted land run-off and mis-management of freshwater dumping. PERIOD. See comments under SEFCRI's 'Land-based Sources of Pollution' RMAs.

Other questions:

How much greater than \$250k annually (and remember all government estimates and cost projections are always short by a factor of at least three!)?

- Also, how does this affect private property owners?... 'wetlands', 'marsh habitats' 'sea-grass' and etc is awfully vague and likely over-inclusive – or maybe that is also intentional? Seems this is another overreach. In another RMA (S-125) SEFCRI was asking for a better definition of 'a taking'... well, when it comes to private property rights, this RMA could well be it!

S-54: Apply for Florida Reef Tract to be Designated a UNESCO World Heritage Site

Apply for United Nations Educational, Scientific and Cultural Organization (UNESCO) world heritage site status for entire Florida Reef Tract to increase awareness and protection of Florida's coral reefs.

- If, according to UNESCO's own website that "...the World heritage Committee, nor UNESCO, nor the United Nations has any power to force changes in Site management upon governments, public agencies, or private parties in the United states or any other country.", why would SEFCRI want to even bother with UNESCO in the first place? UNESCO goes on to say, "...if the problem is serious enough, the Site could be placed on the list of World Heritage in Danger... [whereby] a revision of the boundary to reduce or enlarge the World Heritage Site might be proposed."

Sounds like there is more international influence here than meets the eye.

N-137: Designate SEFCRI Region as PSSA or ATBA

Designate the entire Southeast Florida Coral Reef Initiative (SEFCRI) region as a Particularly Sensitive Areas (PSA) and/or an Area To Be Avoided (ATBA).

- A PSSA (Particularly Sensitive Sea Area) is a designation as defined by the International Maritime Organization (another UN agency) whereby the provisions of UNCLOS (United Nations Convention on the Law of the Sea) may be of relevance... According to their website, "When an area is approved as a particularly sensitive sea area, specific measures can be used to control the maritime activities in that area." Looking at both this RMA and the below RMA S-54, if one does a little deeper research into these organizations, as well as the IUCN (International Union for the Conservation of Nature), I do not see why SEFCRI would even remotely consider getting into bed with these entities.
- UNESCO is a known left-leaning group with a past of having what can only be taken as some anti-Semitic positions and the IUCN is not much more than a wolf in sheep's clothing with incredibly leftist socialistic leanings. And talk about bureaucracies... UNESCO? Really? The IUCN boasts on its website "1300 government and NGO Members and more than 15,000 volunteer experts in 185 countries... supported by almost 1000 staff in 45 offices and hundreds of partners in public, NGO and private sectors around the world." Their list of contributors and trustees reads like a list of who's' who in the extreme radical environmental movement. Why should we entrust our reefs and our sovereign rights and decisions to the influences of the likes of these? What could possibly go wrong with this great idea?

To quote Churchill once more, "...powers over local things should be exercised locally."

- Yes, the southeastern counties and cities from Martin to Dade should have an input, but they also have a past of working together for the overall common good on matters of common interests. Perhaps the State of Florida as well (State waters), due to certain measures being looked into or which may be adopted that would have a considerably more beneficial impact to reef protections; i.e. pollutant/fertilizer runoff from big agribusiness; or better water management in lieu of frequent freshwater dumps from lake Okeechobee; and etc. Certainly, from an oversight or regulatory stance, local and state would be much more effective and, dare I say, maybe even 'responsive' to the needs and questions at hand than, say, oh, I don't know, the United friggig Nations?! I even question the need for Federal (Federal waters) involvement other than for approvals where needed.

An ATBA (Area to be Avoided) is a designation from NOAA that "...defines navigational limits" and which "...does not automatically prohibit fishing...", "...though it is possible depending on the designation and NMSP actions." Which brings us to RMA #S-65...

S-65: Nominate SEFCRI Region as a National Marine Sanctuary

Nominate the Southeast Florida Coral Reef Initiative (SEFCRI) region for consideration as a National Marine Sanctuary to engender protection and benefits, a legal forum, discussion, understanding and collaboration, and balance uses towards sustainable resources.

While a National Marine Sanctuary (NMS) designation sounds good, I mean who would want to harm the reefs and fishes and who wouldn't want to protect them? In theory this might have some teeth regarding excessive freshwater run-off and land-based pollutants, but big agriculture and politics in central Florida and Tallahassee being what they are, this is only in theory... Such a designation would only, and always, falls upon divers and fisherman – trust me. We do not have the lobbyists or pull or attorneys to keep the Feds or state regulators at bay. Start down this road at one's peril.

- **In my cover letter above, I mentioned the blueshirts did not know what they wanted to propose in the way of specific rules or legislation on 'areas of interest', but somehow I cannot help but feel an NMS is exactly where SEFCRI is going. See also '>' comments in RMA S-2.**

S-8: Establish Coral Reefs Gardens

Establish coral reef gardens, which are areas for the recovery, restoration, and recruitment of corals and fish, created under strong guidance from scientists and monitored by the community through an educational campaign.

From SEFCRI white paper:

...would use diverse/resilient corals from degraded locations with resilient populations to restock and improve natural coral population to regionally appropriate densities...

The estimated direct cost of implementing this recommended management action depends on the scale and scope, but would likely be between \$100,000 and \$250,000. Potential funding could be acquired through taxes on boat purchases or fishing licenses

SEFCRI appears to have done its homework on this one and it appears to possibly be one of the most direct RMAs to accomplish SEFCRI's reef recoveries' and protections' goals. Looks feasible and looks like SEFCRI has enlisted the expertise and involvement of numerous qualified persons and educational entities capable of putting this together.

However, the cost of \$100-\$250k seems really *really* low and I am not so sure the best funding mechanisms are by boaters or fisherman... seems the wider parties who benefit (ie: coastal and water-oriented businesses) should all be involved.

I believe this is an RMA may be worth pursuing further, BUT there needs to be waaay more study as to actual costs and funding sources... and remember, every government cost prediction is in the end off by at least 3 times the initial projection. Always.

S-86: Ban Live Mounts and Promote Proper handling and release techniques of All Shark Species

Ban live mounts of all shark species to reduce shark mortality due to charter fishing practices that ensure mount sales and dockside marketing and promote proper handling and release techniques for shark species to reduce mortality in catch & release scenarios.

Pretty much all recreational anglers and almost all charter operators already practice catch and release for most non-edible pelagics – including sharks. I don't know if this is a real issue or not, tend to believe not. Yes, many shark populations are being decimated around the world and other cultures are the obvious cause... the problem is not with a couple charter operators or recreational anglers who occasionally take a shark (and some sharks are already protected and are not taken anyway).

S-87: Increase Protection of Important Reef Herbivores

Modify or enhance existing regulations to increase protection for parrotfish and other important herbivores for coral ecosystem protection.

SEFCRI white paper:

There is no stock assessment schedule for parrotfish in Florida.

The estimated direct cost of implementing this recommended management action is unknown

If this is such a big deal, a simple educational post-card to dive shops and etc should do the trick. Still even if there actually is a modest by-catch problem, nobody really targets parrotfish. Move on and get real.

S-97: Reduce Bag Limit to 6 per Person per Day During Lobster Mini Season

Maintain lobster mini season but reduce the bag limit to six lobsters per person per day to be consistent state wide, and require the review of educational materials and completion of an educational quiz in order to receive an annual license.

At first I thought this was a kind of 'save-the-lobster' campaign (which for a lot of reasons I won't go into is an unnecessary catch reduction), but after reading the SEFCRI white paper I realized this RMA is targeted at mini-season for better protection of the reefs and corals due to so many novice and infrequent divers piling on to the reefs at the same time. Agreed that mini-season brings out the googins and the careless and that every year someone drowns or is run-over during mini-season... yes, stupid people shouldn't breed, but they do.

- Simple common sense reflects that a limit to 6 lobsters will not materially reduce the number of divers and related mini-season reef impact... the same number of divers and boaters will go out, but they will just take six lobsters. I just don't see the logic.

Quizzes notwithstanding, which seem a bit pre-school anyway, some targeted education and increased publicity prior to and during mini-season about not damaging corals might be a help... but, regardless, you can't fix stupid.

LAND-BASED SOURCES OF POLLUTION DRAFT RMAs

For the sake of space and time (recalling I and others don't have a spare 6000 hours) and because these RMAs are more or less related to the same issue, that being polluted land run-off, I am only going to make some general comments to essentially encompass the main point...

- And that point is all of the other SEFCRI RMAs combined will not even remotely accomplish the potential benefits of protecting and growing or revitalizing SE Florida's reefs and corals than would be getting land-based pollutants (and I will add excessive freshwater dumps) under control.
- **If SEFCRI truly wants to have a real impact, it should focus ALL its efforts here...** because this has been a known problem and the known primary cause of reef degradation for some 30+ years. Fifteen years ago I myself attended a seminar or public hearing of some kind regarding our reefs where the overwhelming consensus was that land-based pollutants and excessive fresh water run-off was by far the biggest contributor to loss of reefs and corals. And even back then, the concerned powers that be (conservationists, activists, and governmental) were going to vigorously pursue remedial suggestions and actions.

In order to get any meaningful results SEFCRI will have to take on some rather powerful and entrenched persons, companies, and politicians. I would surmise others of good intent have been attempting this for years – to little or no avail. Now I am not saying it is not worth the effort to fight 'city hall' or big

government (I have done so in the past myself on any number of matters and I am not saying it is not possible to win... in fact, I am fighting the good fight right now with this very letter), but SEFCRI and involved others should know it will take years and lots of money and lawyers to (1) accomplish any meaningful solutions and (2) to actually find the resources and funding to implement or construct them.

To go after the divers and boaters and fisherman is only nibbling around the edges and of no particular benefit or impact – other than being an inconvenience and costing money and time (or wasting money and time) of those who are NOT the problem.

N-1: Educate the Public about Land-Based Sources of Pollution

Educate the public on the effects of land-based sources of pollution to reduce the amount of pollutants entering storm drains and waterways.

N-8: Educate the Public about Eco-Friendly Yard Maintenance

Promote public education programs like “be Floridian”, “rain gardens”, “nature scape”, and “Florida Yards and Neighborhoods” to encourage eco-friendly yard and garden practices to help reduce the amount of nutrients and other pollutants reaching the reefs through residential run-off.

N-68: Regulate Fertilizers and Pesticides

Reduce and regulate fertilizers, herbicides, fungicides, and pesticides to reduce nutrient and pollutant loading to improve water quality and provide protection to the reefs and promote the use of Florida friendly herbicides and pesticides to reduce or eliminate toxic chemicals.

N-69: Provide Incentives to Restore Wetlands and Stop Discharges to Estuaries

Support initiatives and provide financial incentives to restore and preserve wetlands north of Lake Okeechobee to stop discharges to coastal estuaries to protect estuaries and reefs.

N-71: Maintain a Unified Monitoring Program for Sources of Pollution

Maintain and coordinate a unified monitoring program to detect, identify, and eliminate sources of pollution flowing through inlets to improve water quality and protection to reef.

N-75: Offer Free Pump-Out Stations to Boaters

Promote/offer free pump out stations to better water quality and allow boats a better option than dumping waste offshore.

N-78: Reduce Ground Water Pollution from Septic/Storage Tanks

Reduce ground water pollution from sources such as septic and storage tank infrastructure to watersheds associated with priority reef areas to improve water quality and reef health.

N-82: Promote Initiatives to Reduce Negative Impacts of Stormwater Drainage

Support and promote existing and create innovative new initiatives that increase stormwater storage, and reduce stormwater runoff, enhance treatment, increase reuse, and reduce nutrients and other contaminants to the watershed, especially from surface water, to restore healthy estuaries.

N-94: Development a "Green" Club Certification Program for Golf Courses

Develop and implement a "Green" Club certification program for golf courses (similar to Blue Star for dive industry and clean marina programs) to provide an incentive mechanism for golf courses to reduce their impact on the marine environment.

N-97: Implement LBSP Reduction at Pollution Hotspots

Target, prioritize, and implement Land-Based Sources of Pollution (LBSP) reduction activities at identified pollution hotspots within Southeast Florida Coral Reef Initiative (SEFCRI) watersheds to improve coastal water quality.

N-116: Implement Regional "Living Shorelines"

Coordinate and implement regional "living shoreline" objectives to increase the use and protection of natural infrastructure (e.g. coral reefs, native vegetation, mangrove wetlands) to provide natural barriers to storm surge and maintain coastal biodiversity.

N-120: Overturn Current Legislation that Restricts Bans on Plastic Bags

Encourage influential entities to lobby for legislation to overturn current legislation restricting bans on plastic bags to protect marine habitats and wildlife.

S-25: Encourage the Closure of all Wastewater Outfalls by 2025

Discourage public officials from granting or requesting extensions to current ocean outfall legislation to ensure the timely closure (prior to 2025) of all treated wastewater outfall pipes and build/upgrade infrastructure for advanced water treatment and reuse to improve ocean water quality, reduce destructive algal blooms, and increase water reuse in the Southeast Florida Coral Reef Initiative (SEFCRI) region.

S-28: Support Everglades Flow Restoration

Support Everglades flow restoration to reduce land based sources of pollution and improve water quality in estuaries and inlet contributing areas connected to the coral reef ecosystems of southeast Florida.

S-110: Eliminate Over-Beach Discharge of Water

Eliminate over beach discharge of water to eliminate those sources of beach erosion reducing the amount of beach fill needed which may improve near shore water quality.

MARITIME INDUSTRY & COASTAL CONSTRUCTION DRAFT RMAs

As with comments on above 'Land-Based Sources of Pollution Draft RMAs', for the sake of space and time and because for the most part these RMAs are more or less related to the similar issues involving improved ocean-based construction methods and monitoring and more effective beach management/restoration (and also because much of this involves such things as sampling analysis and various engineering procedures of which most of us know very little), I am limited to making only some general comments.

Certainly contractors should be responsible for their actions and there are already laws on the books pertaining to remedial procedures and fines for reef damage and etc. And additional restraints and penalties can easily be incorporated into contracts, as can specific guidelines or procedures. Still, as was the case when the Hillsboro Inlet was widened a few years back, the whole thing ended up as one giant cluster---... One can only hope governmental oversight agencies and the departments which draft and approve such contracts learned from this and have since incorporated these lessons into their policies.

- **Most of us not being scientists or structural or environmental engineers, when it comes to analyzing or monitoring turbidity or best practices re shoreline construction and such, we have not much choice than to trust on the opinions, studies, and recommendations of others. But to earn that trust, those involved and learned others must first exercise transparency and an unbiased attitude and approach to solving the problem (or maybe even properly identifying the problem, or if one actually exists) and the openness to enlist the input of those effected and to involve those with actually real life hands-on experience. To the extent SEFCRI has met these standards, I am not so sure.**

N-113: Eliminate Lake Worth Inlet Port Expansion Project

Eliminate Lake Worth inlet port expansion project to reduce siltation on coral reefs and keep coastal communities and habitat in balance.

N-114: Reinstate Funding for Regulatory Agency Dive Teams to Monitor Reefs as needed

Reinstate funding for regulatory agencies (reinstate Florida Department of Environmental Protection's Southeast District Dive Teams) to provide in water permit compliance monitoring as needed for reef related projects, and assist other agencies with monitoring (fish/coral surveys).

N-117: Improve Impact Minimization and Mitigation Activities for Unavoidable Impacts to Resources

Improve impact minimization and mitigation activities for unavoidable impacts to resources to reduce and offset lost ecosystem function; including the use of non-traditional mitigation strategies.

S-1: Remove Tires and Debris from Broward County Artificial Tire Reef Projects (a.k.a. Osborne Tire Reef)

Remove tires and debris from failed Broward County (Ft. Lauderdale and Deerfield Beach) (a.k.a. Osborne tire reef) artificial tire reef projects and the reef tract to eliminate damage to existing corals.

S-100: Support Redefining the Port of Miami Anchorage to Reduce Anchor Damage to the Reefs

Support redefining the Port of Miami anchorage zone to remove four areas with reported coral from the existing anchor zone, reduce anchor damage currently being caused by ships anchoring zone which includes some coral reef.

S-101: Create a Required Training Program for Coastal Construction Project Contractors

Create a training program based on existing Best Management Practices (BMPs) that will be required for coastal construction on-site project contractors to be implemented by January 1, 2020, as required in a coastal construction permit.

S-102: Integrate Quality Control Procedures and Triggers within Permits to Initiate Corrective Action During Coastal Development Projects

Develop and integrate more effective quality control procedures in the regulatory framework and triggers within permits for corrective action during coastal development projects to insure protection of marine habitat and species.

S-103: Integrate Best Management Practices into Coastal Construction Project Design

Incorporate existing, and adaptively integrate, Best Management Practices (BMPs) into project design and construction practices to avoid and minimize impacts to coral reefs from coastal construction projects.

S-104: Set New Turbidity Standards and Support the Improvement of Turbidity Monitoring Methods

Set new and appropriate water turbidity standards and support the efforts to improve turbidity monitoring methods for marine construction to limit damage from coastal constructions to reefs and associated habitats.

S-106: Establish a Turbidity Monitoring Certification Program

Establish an educational turbidity monitoring certification to improve the quality of turbidity data that are used to evaluate project-related threats to resources.

S-107: Encourage Biological Monitoring of Resources Impacted by Nourishment Projects

Encourage region-wide biological monitoring (e.g. via Beach Management Agreements) to document condition of resources that may be impacted by nourishment projects and inform regulatory decisions to ensure ecological functions are maintained.

S-108: Revise/Create a Uniform Mitigation Assessment Method for Reef Environments

Revise/create Uniform Mitigation Assessment Method for coral reef environments to improve application of this rule to coastal ecosystems, to provide more consistent/accurate calculations, and to ensure ecological functions are maintained.

S-114: Implement a Mechanism that Allows Permitting Agencies to Apply Lessons from Previous Projects to Future Projects

Create and implement mechanisms that allow permitting agencies to apply lessons learned from past projects to future projects to minimize impacts to resources and improve success of mitigation activities.

S-116: Reduce Beach Raking

Maintain the ecological function of the wrack line by reducing beach raking practices.

S-120: Improve Maintenance Activities of Beaches for Sustainability

Improve management and maintenance activities of beaches to reduce impacts to coral reefs (including nearshore reefs), make beaches more sustainable, and minimize need for future renourishment projects.

S-124: Create Regional Ecosystem Based Beach Management Strategies

Facilitate the creation of regional (inlet-to-inlet) beach management strategies, such as can be achieved through a beach management agreement, which takes an ecosystem approach to projects such as beach nourishment and storm-water pipe removal to maintain beaches and protect resources.

PLACE-BASED DRAFT MANAGEMENT STRATEGY (Areas of Interest)

N-146: Implement a MPA Zoning Framework for the SEFCRI Region

Establish and implement a Marine Protected Area (MPA) zoning framework for the Our Florida Reefs (Southeast Florida Coral Reef Initiative – SEFCRI) region of interest that includes but is not limited to no-take reserves, no anchor areas, restoration areas, and seasonal protection for spawning aggregations to enable sustainable use, reduce user conflict, and improve coral reef ecosystem condition.

St. Lucie Inlet State Park to Bathtub Reef
Central St. Lucie Inlet State Park
South St. Lucie Inlet State Park

Blowing Rocks Preserve
Jupiter
Juno Pier

Breakers Shallow

LORAN Tower Ledges
Offshore Martin Deep Ridge

MacArthur State Park
Blue Heron Bridge / Phil Foster
Lake Worth Inlet S. of Peanut Island

Mar A Lago / Bath & Tennis
Breakers Flower Garden

Lake Worth to Manalapan

Gulf Stream Reef

Finks / Delray
Castor Wreck
Finks Grouper Hole

Copenhagen Preserve
Ft. Lauderdale Sunrise Blvd to Lauderdale-By-The-Sea

John U Lloyd

County Line

Key Biscayne

- At the SEFCRI meeting I attended, aerial posters of the above 'areas-of-interest' were provided for comment. These and other reef areas were reportedly identified for their coral diversity and good or poor health. Though any one specific 'area-of-interest' on the poster did not 'appear' to be all that large of an area, each one really does encompass quite a significant portion of the reef(s). Beyond that, taken all together as an entirety, the total 'areas-of-interest' amount to a VERY CONSIDERABLE mass of underwater real estate... covering perhaps the majority of preferential dive spots.
- **While not outrightly spoken and while none of the blue-shirts proffered any actual specifics as to SEFCRI intentions in these areas, the undertones, I believe, and as the scope and number of these SEFCRI RMAs both generally and specifically infer, one cannot help but feel SEFCRI's end-game is a three or four county wide National Marine Sanctuary (NMS).**