

Fishing, Diving & Other Uses Response Document April 2016

***For context on this document, please see meeting minutes from April 2016.**

Title:

N-59: Ban the practice of spearfishing on SCUBA to enable sustainable use of our Florida reefs.

Background:

- This recommended management action relates to all four Southeast Florida Coral Reef Initiative (SEFCRI) counties.
- This recommended management action is being put forth in order to eliminate the targeting of certain species of fish by spearfishers, as well as the discriminate removal of commercially and ecologically important “trophy” reef fish species and individuals of reproductive size.

Objective:

- The intended outcome of this action is to increase protection of and reduce impact to highly targeted reef fish species by recreational spearfishers to increase populations and size-class structures of highly-targeted reef fish species.
- An exception for lionfish will be made to support the continued removal of this species.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action include a reduction of the successful targeting of large, highly fecund fish, which would potentially increase populations and size-class diversity of those species on coral reefs.
- Some anticipated negative impacts associated with this recommended management action include the potential loss of revenue for dive boat operators and dive shops from spearfishermen.
- The duration of the benefits of this recommended management action are variable. Legislative changes would be a one-time activity, and the need for enforcement would be ongoing.
- If this recommended management action is not implemented overfishing of vulnerable species and highly fecund individuals will continue.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action would be Florida Fish and Wildlife Conservation Commission (FWC).
- Other potential agencies or organizations who could be involved include the National Oceanic and Atmospheric Administration Fisheries and the South Atlantic Fisheries Management Council.
- Key stakeholders for this recommended management action are dive clubs, spearfishing clubs, some dive shops, and dive boat operators who target spearfishermen.
- This recommended management action is likely to be supported by operators and businesses that focus on non-extractive diving and snorkeling.

- There are no legislative considerations to take into account with this action.

Permitting/ Enforcement Requirements of RMA:

- There are no permitting requirements for this recommended management action.
- Enforcement requirements for this recommended management action include FWC monitoring and enforcing regulations.
- A means of demonstrating success of this recommended management action would include documented increases in targeted reef fish populations and increases in diversity of their size-class structure.

Cost:

- Implementing this recommended management action would require a one-time process to establish legislation followed by ongoing enforcement.
- There are no potential funding sources known at this time.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is 2 years if this action is immediately incorporated into the FWC Work Plan.

Miscellaneous Info:

- This recommended management action could be enhanced by N-146, which calls for establishment of a marine protected area zoning framework within the SEFCRI region.
- Some uncertainties or gaps with this recommended management action include the unknown relative number of large fish taken by spear versus angling, and the unknown total numbers of fish taken by spear. It is a cryptic fishery.
- There is strong evidence to support this ban both ecologically and economically in the future. There are many publications to support the efficacy and objectives of this recommended management action.
- Many nations, both Caribbean and otherwise, have success stories with respect to banning scuba spearfishing (some of which ban spearfishing all together): Bonaire, Bahamas, United States Virgin Islands, Dominican Republic, Puerto Rico, Cozumel (Marine Park), Aruba, Curacao, Bermuda, Belize, Panama, Honduras (and Islands), Jamaica, Columbia, Grenada, Tobago, Mariana Islands, Guam, Australia, Mexico, most of the United Kingdom, most Pacific Islands, and Hawaii.
- There are no known current efforts to ban spearfishing on SCUBA in the SEFCRI Region, but Florida currently bans powerheads in most areas.
- FWC has implemented a ban on spearfishing while on a rebreather. If thought of as a tiered approach, banning on SCUBA would be the next logical step to conserve these vulnerable groups of targeted fish species.

Goals/ Objectives to be Achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- Goals and Objectives were not identified within this recommended management action.

****Note: there is no RMA Comment Report for N-59**

Title:

N-64: Require registration and tagging of lead lines 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 for retrieval, for commercial and recreational fisherman, within St. Lucie Inlet Preserve State Park to prevent and track lost gear (ghost nets).

Background:

- This recommended management action relates to St. Lucie Inlet Preserve State Park including all relevant habitats (nearshore hardbottom, coral reefs, and seagrass beds).
- This recommended management action is being put forth because of the existing presence of derelict fishing gear with no way to track its source. The lack of stewardship and awareness of the impacts of abandoned fishing gear is a problem. This action provides a way to identify a responsible party for abandoned or lost gear and identify a partner in the removal process.

Objective:

- The intended outcome of this action is to prevent and track lost gear (marine debris), reduce impacts to coral reefs from lost gear, including a decrease in incidental fishing pressure and bycatch, identify responsible parties for marine debris and resource impacts, and to promote greater responsibility and stewardship.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action would include: (1) reduction in direct impacts to coral reefs and associated marine life, (2) reduction in marine debris with facilitated marine debris removal, (3) engaged stakeholders in good stewardship practices, (4) identifying potential problem areas with high concentrations of lost gear, and (5) identifying the owner(s) of that lost gear for recovery and reuse.
- Some anticipated negative impacts associated with this recommended management action include high opposition from recreation and commercial fisherman who may face major economic hardships. The preserve is already a highly regulated area that excludes all fishing by nets of more than 500 square feet.
- The duration of the benefits of this recommended management action are variable. The act to require registration and identification is a discrete action, but the process would be ongoing yearly as new people register their gear.
- If this recommended management action is not implemented, future reef damage (without being able to identify the source) and continued user conflict in the area during Spanish mackerel fishery aggregations could result.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action would be Florida Fish and Wildlife Conservation Commission (FWC).
- Other potential agencies or organizations that could be involved include Florida Department of Environmental Protection (FDEP) and Florida State Parks. Reporting would be to the Southeast Florida Action Network (SEAFAN), which is a marine debris reporting system and collaborative effort. Retrieval would need to depend on funding and available efforts. (e.g. SEAFAN, annual reef cleanup events, etc.)

<http://www.dep.state.fl.us/coastal/programs/coral/debris1.htm>

- The key stakeholders for this recommended management action would be the commercial fishing industry, recreational fishing industry, and marine industries.
- There are no legislative considerations to take into account.

Permitting/ Enforcement Requirements of RMA:

- It is unknown if there will be permitting requirements with this recommended management action.
- There will be enforcement requirements for this recommended management action.
- A means of demonstrating success of this recommended management action is to verify either reduction of ghost traps and nets, or verify the retention of harvest gear on an annual basis.

Cost:

- The estimated direct cost of implementing this recommended management action is \$50,000 - \$100,000.
- There are no potential funding sources known at this time.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is, conservatively, one year to allow public work-shopping and rulemaking.

Miscellaneous Info:

- This recommended management action is not linked with any other proposed action.
- An uncertainty or gap with this recommended management action is that the cost of gear labels to fishers is unknown.
- In 2014, Florida began working on developing a marine debris action plan for the state, which includes guidance and input from National Oceanic and Atmospheric Administration, FDEP, FWC, county representatives, non-profit organizations etc. Derelict fishing gear was one of the priority marine debris issues identified by the group, who will be working to develop goals and strategies to improve prevention in the amount of gear lost and removal efforts.
- Currently the maximum net size allowed is 500 square feet. Cast nets are limited to a maximum of 14 feet in diameter. All large nets were outlawed in state waters in the 1995 Net Ban. Fishermen are only allowed to fish two cast nets at one time.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities Goal D2 / FL Priorities Goal D2 Obj. 2.

N-64 Public Comment Report:



Fishing, Diving, Boating, and Other Uses/Restoration

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).

Quick Stats:

- Total number of comments on this RMA = 16
- This RMA was called out by Fishing Rights Alliance, Coastal Conservation Association, and Marine Industries Association of Palm Beach County via letters of opposition and was supported by Miami Waterkeeper.
- One personal letter was written in opposition.
 - ***CWG Response to FRA: regarding the comment that this RMA provides no benefit...this RMA would result in less ghost nets being left on the reef to destroy coral reef habitat.
 - ***CWG Response to CCA: this RMA is not suggesting a gear restriction, merely a way to report and remove lost gear so that it will not damage the habitat.
 - ***CWG Response to MIA PBC: this RMA is intended to be addressed by FWC.
 - Based on these comments, the CWGs have amended the title and intent to address voluntary reporting and labeling of gear in this area.
 - Background: St. Lucie St. Park extends offshore 1 mile (rather than the standard 400 feet). Modified cast nets are deployed to catch Spanish mackerel and results in nets being left behind on the reef. This is shallow water cast netting. They can't afford to lose nets and will retrieve them if at all possible. Often the nets arrive there from other places. Fisherman feel like the tagging is an extra step and penalizes those who are already doing the right thing. They agree with the reporting and retrieval program though.

Long Responses:

1. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	I believe that people should be responsible for their actions, especially when their deliberate negligence impacts other people and communities.	1270	Agree.
Support	I have seen copious amounts of lost fishing gear such as nets, This could make a significant change	751	Agree.
Support	this will eliminate harmful fishing and especially nets and illegal	33	

	fish traps in our area		
Support	Companies need to be held accountable for their actions and for their impacts on our marine resources. I would like to see penalties for lost nets/fishing gear	337	Do to feedback from the fishing community, CWGs are recommending a voluntary approach to the issue before regulatory penalties would be recommended. By reporting lost nets, the penalty would be removed.
Oppose	CCA FL opposes N-64.	1255	
Oppose	I support no cast netting within the preserve. Registration of gear is kind of ridiculous though. Registration of some commercial traps should be done, but of all gear is likely not the best solution.	1141	
Oppose	<p>This action is next to useless. The only fishermen that use cast nets in this area are commercial Spanish mackerel fishermen. Seldom do they lose the lead line, when a net is hung up. Therefore an ID on the lead line would be ineffective. It's the webbing that is lost and causes the damage as it now becomes a gill net catching reef fish, stone crabs, and lobsters. As they die they act as chum attracting more into the net. In addition the fishermen would not report the lost gear in fear they might be required to retrieve it or pay for its removal or be fined. The best thing is to BAN THE CAST NETS because they do damage to both the hard and soft corals growing on the reef as they are retrieved.</p> <p>The FWC has rules for both com trappers as well as recreational trappers requiring all traps to be marked with ID tags with permit numbers for commercial trappers. Recreational fishermen's name, address, phone number, are required to be attached to the trap. This part of the rule is not needed.</p>	687	

Oppose	Meeting with the net fishermen and focus on the impact of ghost nets advise to them their negative impact could result in this action	81	
Oppose	impractical: put a bounty and pay cash for ghost nets to divers who retrieve/mark them	100	
Other	Make fishing with unsafe equipment illegal.	924	
Other	You should ban fresh water dumping into our Florida estuaries you are destroying everything including peck lake park reef with polluted fresh water ... The fisherman harm nothing compared to the state of Florida who dump polluted freshwater ..think about that	717	
Other	Eliminate all cast nets in the St Lucie State Park no exceptions	715	
Other	The enforcement of this proposal if it became law would be minimal at best/lead generally sinks into the sand quickly as a result of water surge	258	
Other	If you require registration of fishing gear, don't just limit the area to St. Lucie Preserve. Other protected areas/habitats should also be included. Unfortunately this seems to be an extremely difficult task to enforce & regulate.	60	

2. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	I like many fish and I don't want them to die off because of the carelessness of humans.	924	
Support	Should be expanded to additional areas!	357	
Oppose	This idea sound good but it won't work - real world.	100	
Other	Ban freshwater dumping first that would help out our beautiful Florida other than that recreational fishing should also be ban let the commercial fisherman work the ocean... This is not a playground...God made fish to eat	717	
Other	Ban all cast nets in the St Lucie State Park they are ruining are reefs just dive the reefs during mackerel season the cast net webbing is killing turtles fish and many crustaceans	715	
Other	Ban THE CAST NETS.	687	

***CWG FDOU DECISION:

Amend title to "Encourage voluntary labeling of lead line for all cast nets over six feet, as well as reporting the day, time and coordinates of any lost nets to St. Lucie Inlet Preserve State Park staff, SEAFAN, or participating local dive shops (e.g. Stuart Scuba) for retrieval on an as needed basis, for commercial and recreational fisherman, within the preserve to prevent and track lost gear (ghost nets)."

Amend intent to improve the ability to remove the nets so that they are causing additional damage to the reef. This may include increasing the frequency of yearly net removal efforts (after season).

Registration is not the objective. Derelict gear removal is. Don't want to deter people by imposing a penalty for reporting lost gear.

Amend to include language to include a number to call and only a penalty for nets which are found that were NOT reported.

Title:**N-70: Protect and restore mangroves, seagrass beds, oyster reefs and other estuarine habitats.****Background:**

- This recommended management action relates to all counties in the Southeast Florida Coral Reef Initiative (SEFCRI) region and 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.

Objective:

- The intended outcome of this action is to establish a connection between estuarine health and coral reefs health at higher levels, including regionally specific instructions/materials for estuarine habitat protection/restoration on private property.
- To increase habitat on private property, living shorelines programs in other regions provide leverage to private property and should include initiatives and incentives. To date in the SEFCRI region, such programs have been focused on public property.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action include: (1) increased ecosystem services provided by these habitats, (2) more fish habitat and, in particular, juvenile fish in shallow water habitats, (3) improved water quality, clarity and nutrient cycling, (4) redirected freshwater flows, and (5) increased fish recruitment to coral reefs. Over 75 percent of the commercially harvested reef fish (snappers, groupers, etc.) depend on estuaries and mangroves as nursery habitat, and their numbers, as well as the productivity of the fishery, would likely increase from the development and improvement of estuaries and mangrove habitats.
- Some anticipated negative impacts associated with this recommended management action include: (1) ongoing costs of monitoring to determine restoration, (2) potential user conflicts related to coastal development, and (3) the potential loss of political will to support efforts.
- The duration of the benefits of this recommended management action is variable. Each restoration/habitat creation is a discrete activity, however, there will be a constant need to restore or create new habitat due to impacts by coastal development. Annual maintenance is usually required for restoration projects. Redirecting freshwater flows makes this recommended management action a recurring activity as well.
- If this recommended management action is not implemented there will be a high risk of continuing adverse impacts by not restoring habitats.

Agencies/ Organizations:

- The lead agencies for implementation of this recommended management action would be Florida Fish and Wildlife Conservation Commission (FWC), Florida Department of Environmental Protection (FDEP), local coastal governments (county), and non-governmental organizations.
- Other potential agencies or organizations who could be involved include the National

Oceanic and Atmospheric Administration (NOAA), United States Fish and Wildlife Service (USFWS), South Florida Water Management District (SFWMD), United States Army Core of Engineers (USACE), United States Geological Survey, and academic institutions.

- The key stakeholders for this recommended management action would be fisherman, divers, birders, and water sports enthusiasts. Miami- Dade County may support the idea of providing some sort of incentive for private property owners to add habitat under docks and along seawalls.
- Legislative action is required to appropriate funding if alternative funding sources are not available. This could be a stakeholder initiative.

Permitting/ Enforcement Requirements of RMA:

- Extensive, costly and time-consuming permitting requirements for most restorations are required. Efforts underway to streamline restoration permitting have had some success.
- Enforcement requirements would be necessary during construction for this recommended management action.
- A measurable way of demonstrating the success of this recommended management action is a long-term increase in habitat acreage, as well as increases in fish and wildlife diversity and density.

Cost:

- 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, Florida Inland Navigation District, FDEP, FWC, USFWS, National Marine Fisheries Service, USACE, and the SFWMD.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is greater than ten years.

Miscellaneous Info:

- This recommended management action is linked to N-116 and N-129.
- Creating and/or restoring estuaries of a particular habitat may be an issue. The following information is still required:
 - 1) spatial database layer to see where restoration is occurring,
 - 2) restoration successes on a case-by-case basis, and which ones were most effective, and
 - 3) small-scale projects that are limited to that region.
- This recommended management action could be enhanced by adding data layers from a shoreline resilience application currently being developed by The Nature Conservancy to include estuaries.
- We must consider the added cost to private land owners. There must be a potential for incentives to interest people.
- Supporting and relevant data includes the following resources:

- SFWMD Restoration efforts including Everglades Restoration : http://my.sfwmd.gov/portal/page/portal/xrepository/sfwmd_repository_pdf/spl_ev_everglades_progress.pdf and also see for 2014: http://www.sfwmd.gov/portal/page/portal/xrepository/sfwmd_repository_pdf/nr_2014_122
- FDEP's National Pollutant Discharge Elimination System Stormwater Permit Program: <http://www.dep.state.fl.us/water/stormwater/npdes/>
- FDEP's Total Maximum Daily Load Program: <http://www.dep.state.fl.us/water/tmdl/index.htm>
- Extensive efforts are currently underway to restore corals, mangroves, seagrasses and oyster beds in all counties.
 - There is a Northern Everglades Restoration currently underway. Funds have been allocated to Lake Okeechobee and Indian River Lagoon this past year.
 - Broward County has an integrated plan and Loxahatchee River has a water management plan.
 - SFWMD provided to FDEP a list of the programs and projects currently underway. In addition, the SFWMD and NOAA through a cooperative agreement released a document specific to estuary water quality health and restoration (see NOAA site for details).

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities Goal C2 Obj. 2 / FL Priorities Goal D1.
- FDEP CRCP Coral Reef Ecosystem Conservation Goal A.
- SEFCRI LAS MICCI Issue 3 Goal.

N-70 Public Comment Report:

Fishing, Diving, Boating, and Other Uses/Restoration

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



Quick Stats:

- Total number of comments on this RMA = 23
- This RMA was called out in opposition by Marine Industries Association of Palm Beach County and in support by Miami Waterkeeper (because two agencies DEP and FWC already manage this).
 - ***CWGs agree that this is important for coral preservation. It doesn't matter which agency is in charge so long as it gets done. It is currently not being done to a great enough extent. Additional steps need to be taken to protect nursery grounds and habitat.

Long Responses:

3. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	It seems that restoring many ecosystems would facilitate a positive cycle. If one ecosystem can recover and thrive, it is likely the rest will follow.	1278	Agree
Support	Absolutely at all cost protect the estuary. This is important to the habitats of fish and inshore fishing. YES YES YES!!	1142	Agree
Support	Inshore habitats are vitally important. We need more protection for these areas, from land-based sources of pollution, damage from boats, etc.	1127	Agree
Support	I support this RMA as the protection of these areas are of paramount importance due to their unique ability to protect and promote spawning.	1071	Agree
Support	I live in Brevard and we are actively working on those sorts recommendations for the Indian River Lagoon. Add one recommendation....The Brevard Zoo has been working quite successfully on restoring oyster beds	752	Agree
Support	Part of the bigger picture	745	Agree
Support	estuary and seagrasses	36	Agree
Support	Need stronger protection, these are strong nurseries	112	Agree
Support	I do support restoration and protection. Leverage to private properties must be sanctioned by property owners with proper incentives.	328	Agree
Support	I support the protection of these sensitive habitats. I would like to see enforcement of protection of these habitats. I am also concerned that time and resources will be contributed to restore these habitats and the land will be sold and paved over. I would like to see me permanence to it.	329	Agree
Support	We need to protect the entire ecosystem!	1498	Agree
Oppose	Do a little more research on the cause of what's eating our seagrass beds (manatees)	92	OFR does not address additional research. This would have to be implemented by another process or agency. Manatees are part of the

			ecosystem and their eating habits support the system.
Other	There are not enough details as to how this goal will be accomplished to voice an opinion. I would recommend that this be put on hold until a detailed framework for implementation can be proposed. Otherwise, I don't know what I am commenting on other than a vague aspiration.	1165	Info provided by Tier 1 & 2 worksheet
Other	Make fishing with unsafe equipment that can harm fish illegal.	925	Irrelevant to this RMA
Other	Not sure of the scope and size of this program as well as the details of how it would be implemented	259	See Tier 1 & 2 worksheets
Other	Why limit to private property?	281	This RMA is not limited to private property.

4. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	I, like many people, like a variety of fish and we don't want them dyeing off because of the carelessness of humans.	925	Irrelevant
Support	This must be part of the management plan	688	Agree
Support	31 species of reef fish nursery. The seagrasses. 22 species of reef fish depend on oyster habitat for their nursery	36	Agree
Other	In my opinion the greatest threat to the estuarine habitats is over-development, poorly planned development and illegal practices of developers. As a geographical region highly prized by developers we must institute strong controls over what developers are allowed to do. The very things that make south Florida an amazing place to live to visit to appreciate are being destroyed daily by heartless greedy developers.	238	This is addressed in MICCI already. This was addressed in those Tier 1 & 2 documents.

***CWG FDBOU DECISION: CWGS DO NOT WISH TO CHANGE ANYTHING AT THIS TIME FOR N-70

Title:

N-137: Designate the entire Southeast Florida Coral Reef Initiative region as a Particularly Sensitive Sea Areas (PSSA) and/or an Area to be Avoided (ATBA).

Background:

- This recommended management action relates to all four Southeast Florida Coral Reef Initiative (SEFCRI) counties, including coral reef, seagrasses and all associated habitats.
- This recommended management action is being put forth to ensure physical impacts to the reef framework and organisms are minimized.
- A Particularly Sensitive Sea Area (PSSA) is an area that needs special protection through action by the International Maritime Organization (IMO). These areas are designated as a PSSA because of their significance for recognized ecological, socio-economic or scientific reasons and which may be vulnerable to damage by international maritime activities (www.imo.org). If the SEFCRI region were to be designated as a PSSA, direct impacts to benthic habitats from shipping activity in the region will be greatly reduced as shipping activity and access by large vessels would be limited to designated areas.
- The PSSA is an area that needs special protection through action of the IMO, the United Nations specialized agency with responsibility for the safety and security of shipping and the prevention of marine pollution by ships.
 - <http://www.imo.org/en/OurWork/Environment/PSSAs/Pages/Default.aspx>
 - The Great Barrier Reef was designated a PSSA in 1990.
 - The sea around the Florida Keys was designated a PSSA in 2002.
- Many incidences have been documented of shipping vessels negatively impacting coral reefs either by groundings, anchoring, or dragging cables in tug operations. Vessels regularly navigate close to the coastline over these habitats and unreported impacts are frequent. Prohibiting ships from traversing near these sensitive habitats would help prevent future impacts to the benthic communities.
- Areas to be Avoided (ATBA) are delineated areas in which navigation may be hazardous or which encompass sensitive ecological resources and should be avoided by either all ships or certain classes of ships.

Objective:

- The intended outcome of this action is to create the boundary lines of the reef area, which should be protected as a sensitive area from Key Biscayne to St. Lucie Inlet. This would establish a perimeter within which to define a smaller ATBA. (The PSSA has to have exceptions for Port access). It would also reduce potential for direct impacts to benthic habitats in the SEFCRI region from shipping activity, tug/barge cable drags and vessel groundings.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action include reduced impacts on Florida reefs caused by heavy shipping activity in the region.
- Some anticipated negative impacts associated with this recommended management action include opposition from the shipping industry. Ongoing education would be necessary.
- This would be a permanent and recurring action. Designation process should occur within 3 years. Management as a result of this designation would be ongoing. The PSSA

designation process happens at a United Nations/international level and is not a fast process.

- If this recommended management action is not implemented there will be a high threat of future physical and water quality impacts.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action is the United States Coast Guard (USGS).
- Other agencies and organizations that could potentially be involved include the Florida Department of Environmental Protection's Office of Water Policy and Ecosystem Restoration, Florida's Coastal Office, National Estuarine Research Reserves, Florida Keys National Marine Sanctuary (FKNMS) in partnership with the National Oceanic and Atmospheric Administration (NOAA) Coral Reef Conservation Program and Florida Coastal Management Program.
- The key stakeholders for this recommended management action would be the marine industry, divers and fisherman.
- There are no legislative considerations to take into account with this action.

Permitting/ Enforcement Requirements of RMA:

- Permits might be required from different agencies, such as the United States Environmental Protection Agency, Florida Fish & Wildlife Conservation Commission (FWC), NOAA, and the USGS. Permitting depends on the lead agency and interactions with other agencies having jurisdiction.
- Enforcement implications for this recommended management action would come from the USGS and FWC.
- Means of demonstrating success of this recommended management action include documenting fewer incidences and reports of ships impacting reefs.
 - Note: Determining the direct correlation of improved reef condition with only this recommended management action will be difficult due to the many confounding factors in the region.

Cost:

- The estimated direct cost of implementing this recommended management action is likely greater than \$250,000.
- A potential funding source can be acquired through an additional fee for boat registrations. For example, the federal inland navigation is funded by a small fee added to property taxes. Fees for special use could add a 1% sale tax on marine equipment. The people who are using the reefs and polluting the watershed but benefiting from a healthy reef would then be contributing to this effort.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is 2 - 5 years.

Miscellaneous Info:

- This recommended management action is not linked to any other proposed action.

- No uncertainties or gaps in information were identified for this recommended management action.
- Supporting and relevant data include the following:
 - The creation and management of the Florida Keys Sanctuary, Biscayne National Park and all the other Marine protected area in the world. Walker et al. 2012.
 - IMO document to apply in The United States: <http://www.gc.noaa.gov/documents/982-1.pdf>
 - The FL Keys PSSA eastern boundary definition is approximately 5nm from the shallow (25ft.) reef line. The ATBA definition follows the same boundaries but with exceptions for channel access to the Port of Key West and for the channel between The Marquesas and The Dry Tortugas. There are also exceptions for military ships. For the SEFCRI region, we would have exceptions for access to Port of Palm Beach, Port Everglades and Port of Miami. We could also allow the same exceptions for military ships. The northern boundary for SEFCRI would be just north of St. Lucie inlet, the northernmost limit of tropical corals, 27° 12' N. The southern boundary would coincide with the northern boundary of BNP and FKNMS. The PSSA and ATBA applies to vessels longer than 50m (165 ft.).
 - Contact: Peter Oppenheimer, Chief - International Section, Office of the General Counsel, National Oceanic and Atmospheric Administration (NOAA), United States Department of Commerce to prepare the application to the IMO. http://www.gc.noaa.gov/gcil_oppenheimer_bio.html.
 - Local 'Coast Pilot' publication about the Keys PSSA/ABTA and can confirm the following:
 - The Keys PSSA comes up to just south of Government Cut (i.e. actually covers part of the SEFCRI region).
 - The prohibition is vessels over 50m length and all 'Tank' vessels (i.e. Tankers carrying fuel/oil/chemicals &c.).
- SEFCRI is currently initiating this.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities C1 / FL Priorities C2/ FL Priorities D2 / FL Priorities D4.
- FDEP CRCP Coral Reef Ecosystem Conservation Goal B / FDEP CRCP Coral Reef Ecosystem Conservation Goal C / FDEP CRCP Coral Reef Ecosystem Conservation Goal E.
- SEFCRI LAS FDOU Issue 3 Goal Obj. 1 / SEFCRI LAS FDOU Issue 3 Goal Obj. 2 / SEFCRI LAS FDOU Issue 3 Goal 3 / SEFCRI LAS LBSP Issue 4 Goal / SEFCRI LAS MICCI Issue 1 Goal / SEFCRI LAS MICCI Issue 2 Goal.

N-137 Public Comment Report:

Fishing, Diving, Boating, and Other Uses/Restoration



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

Quick Stats:

- Total number of comments on this RMA = 33
- This RMA was called out by Marine Industries Association of Palm Beach County, Fishing Rights Alliance via letters of opposition and was supported by Coastal Conservation Association and Miami Waterkeeper.
- One personal letter was written in opposition.
 - ***CWG Response to MIA PBC: MIA PBC only opposes because they think that the reef track status quo for protection is acceptable. The additional designation would allow for increased awareness of WHERE the reefs are and how to avoid them by promoting better shipping channels.

Long Responses:

5. “What do you support, or how could this RMA be changed to an action you could support?”:

Category	Comment	Ref #	CWG response
Support	Because coral worldwide is in such dire decline, all areas should be PSSA.	1281	Agree
Support	CCA is in support of N-137 as it would discourage or possibly prohibit large commercial vessels form anchoring in these areas. Likewise, if implemented correctly, the use of mooring balls for divers and recreational fisherman would create less disturbance to the reefs. CCA does not support temporary or permanent closures for fishing/diving/boating on the reef.	1256	Agree
Support	It would draw more attention to the environmental resources of the area and really is a precious resource for education our population about the importance of Coral reefs and the great thing we have here in South Florida. I would happily pay a small percentage of extra property tax for living within x miles from the coast. I now live near an inter coastal and would love to see it beautiful again and the ocean reefs in better condition. This could provide the attention needed to gain more community support.	1143	Agree
Support	It is safe to say that minimizing damage to the reefs in every way will in turn promote healthy living coral growth.	1072	Agree

Support	I work on cargo ships offshore and I don't see any problem with keeping commercial traffic off our reefs.	1022	Agree
Support	I have seen the effects of dragging. I do hope this proposal is limited to large commercial vehicles	753	Agree
Support	no brainer	279	Agree
Support	support protecting coral reef area along Miami-Dade county	289	Agree
Support	I support reduced commercial impacts on our reefs	330	Agree
Support	We need to protect our local treasures (the coral reefs) for the future generations.	1499	Agree
Oppose	This goal has no details on how the designation will be used. It can be used for purposes I would agree with or purposes I am opposed to. Until SPECIFIC plans are put forth, I cannot support such an open ended regulation with no limits on its power and authority.	1166	PSSA and ATBA requirements are very specific. Details provided in Tier 1 & 2 docs.
Oppose	Marine spatial planning, as it's practiced elsewhere, applies zoning principles that generally avoid blanket designations. There is no evidence to suggest the keeping boats out of the entire region, or even parts of the region, will have any impact on the coral reef ecosystem.	386	Does not apply to boats. Only applies to SHIPS over 50m in length. There is good evidence that keeping ships away from sensitive coral reef habitat will have a positive impact on the ecosystem.
Other	This is a good proposal as long as it applies to vessels that are written and not used on all boaters using the area.	83	Does not apply to all boaters. Only large vessels.
Other	I could support areas that experience reduced harvest levels. Eliminate commercial harvest from those areas.	262	Irrelevant. Nothing to do with harvest.

6. "Other comments or input":

Category	Comment	Ref #	CWG
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			response
Oppose	This plan is a means to give virtually unlimited authority to impose regulations without any oversight or approval and I oppose such a plan.	1166	This RMA is very specific in authority and has very specific regulations.
Oppose **Same comment from 10 individuals	This is not good for the state of Florida people to make no entry and use restriction zones. These are resources that are for all to us young and old. The use of these are diverse in hunting, fishing, exploring or boating. The FWC has good regulation in place that renew these areas. It would also affect the Florida economy adversely.	1107-1114, 1116-1117	Irrelevant to this RMA. Relevant to N-146.
Other	anything that prohibits spearfishing in a large area is a bad idea for too many reasons to list here	188	Does not prohibit spearfishing or fishing of any kind. Move to N-59
Other	focus on the largest threat to our reefs - sewer outfalls	262	Move to LBSP. Not relevant to this RMA.

***CWG FDBOU DECISION: CWGs would like to clarify title to include Designate the entire Southeast Florida Coral Reef Initiative region as a Particularly Sensitive Sea Areas (PSSA) and/or an Area To Be Avoided (ATBA).

Title:

S-2: Create and fund one SEFCRI-wide mooring buoy program as a more coordinated and cost-effective way of protecting reefs from anchor damage.

Background:

- This recommended management action relates to Miami-Dade, Broward, Palm Beach, and Martin (St. Lucie Inlet Preserve State Park) counties, as well as all coral reef habitats located within these counties.
- This recommended management action is being put forth because of the current, high costs associated with maintain existing buoys.

Objective:

- The intended outcome of this action is to create a single mooring buoy authority for the Miami-Dade, Broward, Palm Beach, and Martin counties, with consequent lower costs.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action include lower installation and maintenance costs per buoy, with better buoy planning that will further reduce damage caused by anchoring.
- A possible issue that may arise with implementation of this management action is that Miami-Dade, Broward, Palm Beach, and Martin counties may perceive this as a loss of control.
- The duration of the benefits of this action to create one authority is discrete, however the mooring buoy program itself is recurring. If costs become too expensive, counties may abandon their buoy programs.

Agencies/ Organizations:

- The lead agencies for implementation of this recommended management action would be Broward County's Environmental Protection and Growth Management Department, Martin County's Engineering Department, Florida Department of Environmental Protection (for the St. Lucie Inlet Preserve State Park), Miami-Dade County's Department of Regulatory and Economic Resources, and Palm Beach County's Department of Environmental Resources Management.
- Other potential agencies or organizations who could be involved include the future South East Florida National Marine Sanctuary authority.
- The key stakeholders for this recommended management action would be the fishing and diving community and other users.
- No legislative considerations were identified for the recommended management action.

Permitting/ Enforcement Requirements of RMA:

- There are no new permitting requirements for existing buoys. However, any new or additional buoys would require permits.
- There are no enforcement requirements for this recommended management action.
- A means of demonstrating success of this recommended management action is by a single mooring buoy authority being established with responsibility for planning, installation and maintenance of all buoys in Miami-Dade, Broward, Palm Beach, and Martin counties.

Cost:

- The estimated direct cost of implementing this recommended management action is \$0 - \$50,000.
- If buoy maintenance costs in Martin, Palm Beach, and Miami-Dade counties can be decreased to those of Broward County, the savings for the existing 214 buoys are expected to total more than \$46,000 per year.
- No potential funding sources have been identified at this time.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is 2 - 5 years.

Miscellaneous Info:

- Uncertainties or information gap with this recommended management action include the exact costs of maintenance for Martin, Palm Beach, and Miami-Dade counties. An estimate is \$1,000 per buoy. Miami-Dade quotes \$1500 maintenance per buoy per year.
- There is plenty of evidence to support mooring buoys. In this case, it is the economic evidence that is more compelling.
- Currently, all four counties have their own mooring buoy programs. There is no planned action to combine these programs.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities Goal D2, Obj. 1 / FL Priorities Goal D4, Obj. 1.
- SEFCRI LAS FDOU Issue 3, Goal Obj. 2.

S-2 Public Comment Report:



Fishing, Diving, Boating, and Other Uses/Restoration

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

Quick Stats:

- Total number of comments on this RMA = 31
- This RMA was supported by Fishing Rights Alliance, Coastal Conservation Association, and Miami Waterkeeper via letters of support.

Long Responses:

7. “What do you support, or how could this RMA be changed to an action you could support?”:

Category	Comment	Ref #	CWG response
Support	Anchor damage to hardbottom and seagrass resources is a major issue and a preventable one. Mooring buoy networks may alleviate the issue; however care should be taken to prevent these from becoming hazards to navigation in high-traffic areas.	1405	Agree
Support	Great idea!	1287	Agree
Support	This is a great idea. It can help reduce overall cost of doing the same thing in multiple counties. I support this recommendation as it stands.	1148	Agree
Support	Its such an easy thing to do. Each mooring ball can cost less than \$250 to deploy and can be implemented almost overnight.		The cost is much higher - \$3500 for mooring buoy (anchor pin and manta anchor screwed into the sand) installment.
Support	I am in favor of this RMA as long as it can achieve its objective. (Lowering maintenance costs). I'm also wondering why it costs so much to maintain a buoy. \$1500/year? What exactly makes up the \$1000 or \$1500 cost?	823	Agree
Support	Unifying this plan is a great idea....If we ever get a program moving in the counties north of you (Brevard, Indian River) this would certainly be #1 on the agenda	760	Agree
Support	Finally, one idea out of all of these that will help. Mooring buoys will help people enjoy the reef system without having to anchor and deal with the danger of damaging the reef.	703	Agree
Support	Mooring buoy programs are successful parts of coral reef management efforts, worldwide. Mooring balls will help focus diving and fishing effort, but this also means that they can have unintended consequences. Yes, they reduce anchor damage. But by focusing fishing and diving to smaller areas they can cause local impacts on the ecosystem that are negative. They would be especially useful if used in conjunction with areas of special interest, such as high coral cover sites, A cervicornis stands, coral gardens, places with high topography and rugosity where anchors are frequently lost, and any places with higher than average fish abundances and sizes.		Agree
Support	This will help avoid and/or eliminate casual damage to the worm reefs in our area. Most of our mooring buoys have been lost or removed. Our county can afford them.	34	Agree
Support	Anchors damage the reef. Too many people un knowingly drop	141	Agree

	anchors on live reef, mooring buoys will improve the reef life		
Support	Creating and maintaining mooring buoys will reduce coral damage due to anchor dragging. A single mooring buoy authority will lead to better maintenance and more buoys	319	Agree
Support	I like the idea of a common mooring buoy system. I'm not sure how more buoys would lower the cost. I think you will still have damage to the reef from those who attempt to anchor away from the buoys as they do now.	1515	Agree
Support	Absolutely! This is a must! We need to be consistent in the four counties since fisherman, boaters and divers use the reef in all four counties. Ensures reef protection and makes it easier for the boat operator. This is a MUST! Surprised it has not been done already!	1512	Agree
Oppose	This RMA reminds me of a cure looking for an illness. Each county has their own mooring buoy program and they are all functioning well. I see no benefit to remove local control over the programs to another level of bureaucracy. Keep the programs under local control.	1173	Counties are not losing control just making an effort to coordinate things... economy scale (bulk will be cheaper)
Other	mooring ball project in the north shore park mooring area	264	? More info needed to move forward with suggestions. To be considered in the S-2 spatial plan.
Other	Allow volunteers to "adopt" moorings, maintain them and report problems/losses.	61	ReefGuard and Guy Harvey already do this. Already being done in some areas. That is one of the main benefits to coordinate buoys across county programs.

			CWGs agree. Adoptee would put money in for maintenance- not maintain personally.
Other	Put buoys on SPECIFIC high valued coral formation in 30-35' range.	130	These areas were considered as a part of the spatial plan.

8. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	Install more buoys!	136	Agree
Support	Helps reef in huge and varied ways	178	Agree
Support	Need many mooring balls in the north shore park area including areas between 65st and Collins and 85 St and Collins	264	Agree
Support	If corals in south Florida are protected, the livelihoods of all who live and work here could be positively impacted. The economic power of the coral reef would thrive	278	Agree
Support	Mooring buoys also can encourage diving which can lead to increased awareness of the importance of protecting coral	319	Agree
Oppose	<p>The numbered needed would be too many, too expensive, and be in the wrong places for most users.</p> <p>I believe the use of all anchors should be banned on reefs EXCEPT for properly rigged reef anchor (grapnel type) with a break away tie so the anchor comes out backwards with minimal or no damage to the reef.</p>	694	<p>Already illegal to anchor on coral (CRPA 2009). Comment is based on lack of info and/or misunderstanding. Comments are addressed in Tier 1 & 2 documents. DST identifies appropriate areas for new buoys.</p>
Other	One entity with complete control over mooring and marker buoys is a good idea.	1148	Coordination rather than one entity with all control is actually what is being proposed. Safety, standardization,

			and cost effectiveness will all result from this idea. See response to comment #1173.
Other	Use funding to enforce already existing anchoring laws.	706	There are already RMAs to address funding for Enforcement.
Other	Regarding this general category (fishing, diving...), it strikes me that it was prepared using highly restrictive regulations as the "straw man." None of the proposed regulations are presented under the guidelines of marine spatial planning. That said, I will take a closer look at other elements of the RMAs, including the section on Place-Based strategies.	390	Not relevant to this RMA. This comment refers to N-146. We be addressed in a later CWG meeting.
Other	There needs to be a secure funding source for the mooring buoy program (tax payer dollars?)	331	Agree

***CWG FDBOU CONSENSUS: NO PROPOSED CHANGES TO S-2 AT THIS TIME

Title:

S-8: 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.

Background:

- This recommended management action relates to all four Southeast Florida Coral Reef Initiative (SEFCRI) counties, including coral reefs, sandy bottom, and nearshore hardbottom habitats.
- This recommended management action is being put forth because it will address the degradation of the reef and improve quality, health and function over time by increasing coral propagation and larval recruitment.
- This recommended management action would use diverse/resilient corals from degraded locations with resilient populations to restock and improve natural coral population to regionally appropriate densities, establish recovery zones where impacts are not allowed for restocking populations, and enhance genetic diversity of degraded sites and restored areas.
- The output of this recommended management action will be site-level design to incorporate relevant criteria for how to judge successful management practices and strategies (which will be based on what the outcome is intended to be). The outcome will be to restore and enhance coral reef and nearshore hardbottom to maintain and improve ecosystem services, such as fisheries, tourism and shoreline protection.

Objective:

- The intended outcome of this action is to help overcome recruitment limitation to degraded sites and improve coral stocks for restoration. Recovery zones could serve ecological functions of natural reefs and enhance and accelerate the recovery of the system in light of increased pressure in the future.
- Artificial reefs at appropriate locations can enhance marine habitat and help control erosion. They can also provide substrate for coral recruitment and habitat for essential fish species and serve as destination dive sites, which would boost the diving tourism industry.
- This recommended management action would address declining populations of endangered coral species, declining reef quality, and a need to restore reef function and overall reef health. An Endangered Species Act (ESA) listing implies that the species is imperiled and provides a legal mandate to orchestrate 'recovery'.
- Finally, this recommended management action will create a unified monitoring and reporting system for existing and new artificial reefs to allow evaluation of success and help develop new reef plans. Share information between all parties and agencies involved.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action would include contributing to recovery of ESA listed coral species, enhancing structure and reef systems, as well as increased fish habitat. If restocked corals are successful in the long term, these benefits will be perpetual. Any restoration activity involving artificial structures would benefit the fishing and diving industry, the public who participate in these activities, and generally raise awareness for these types of projects.
- Some anticipated negative impacts associated with this recommended management action include the potential for spreading disease upon transplanting propagated colonies in close proximity to natural colonies, and a primary focus on artificial structures would divert funds

from more direct measures to conserve and restore natural reefs.

- The duration of the benefits of this recommended management action are recurring. Maintaining and enlarging nurseries is continuous activity. Outplanting from nurseries should be a large, active, continuous component of a nursery effort. Existing artificial reefs need to be reexamined for what is working and what is not. New artificial reef decisions and plans should be based on results from previously created reefs and may include closures for fishing/diving/boating for temporary times based on the quality of the reef in specific areas.
- If this recommended management action is not implemented, there will be continued degradation of the reef tract. Seven Atlantic/Caribbean corals are already listed as threatened under the ESA, and if the causes of the initial decline are not managed or removed from the system before restoration or enhancement begins, then the restoration or enhancement could fail to achieve its goals and objectives. Artificial structures used for mitigation or restoration should be based on the best available science in order to provide maximum environmental, and long-term economic, benefits.

Agencies/ Organizations:

- The lead agencies for implementation of this recommended management action would be local coastal governments, Florida Department of Environmental Protection, non-governmental organizations, and the Florida Fish and Wildlife Conservation Commission (FWC) through special activities licenses.
- Other potential agencies or organizations who could be involved include the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service, United States Army Core of Engineers (USACE), and the academic institutions already involved in coral culture/restocking (e.g., University of Miami, Nova Southeastern University, Florida International University, etc.).
- The key stakeholders for this recommended management action would be any entity involved in reef preservation, restoration or mitigation, as well as the recreational boating and fishing industries. Professional fishermen, lobster fisherman, fish collectors for aquariums may oppose it. Dive charters would likely support it.
- This could be a stakeholder initiative.
- Legislative action is required to appropriate funding if alternative funding sources are not available, but legislative or Board of Trustees action is not required.
- This recommended management action is supported by the NOAA Recovery Plan and the Recovery Plan for elkhorn (*Acropora palmata*) and staghorn coral (*Acropora cervicornis*).

Permitting/ Enforcement Requirements of RMA:

- There will be lots of permitting considerations but FWC, and USACE are the primary players in the SEFCRI region.
- Enforcement would be required to ensure regulations for this recommended management action are followed.
- A measurable way to show success with this recommended management action is monitoring the artificial structures, or perhaps nearby natural reefs, for any changes in fish and coral populations. Long-term benefits to coral populations on natural reefs are unlikely to be measurable on a reasonable time frame. However, increased recruitment could be monitored. Data/photos would be taken at the start and end of the off-limits period (e.g. 6 months - 2 years) to determine if the intended result is achieved.

Cost:

- 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. Note: Refer also to recommended management action proposals regarding creative mitigation (banking, no-net-loss, etc.) to help fund ESA restocking activities.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action would vary depending on the scope and scale of the project. Implementation would be immediate for the support of existing nurseries, and could be several years for support for new or enlarged nurseries. Individual projects could be implemented in a two-year time frame, but ongoing projects may take 5 - 10 years.

Miscellaneous Info:

- This recommended management action is linked to S-15.
- Some uncertainties or gaps with this recommended management action include long-term survivability of outplanted corals, the potential for disease transfer with outplanted corals, and the need to identify ecological, environmental and physical factors which define a "good" outplant sites. In order to gain support and funding for this action, it may be necessary to demonstrate linkages between increasing fishes or corals on artificial structures and benefits to natural reefs.
- Supporting and relevant data include the following:
 - There is a rapidly developing science that supports coral culture/restocking. See case studies in:
 - Johnson, M. E., Lustic, C., & Bartels, E., Baums, I.B., Gilliam, D.S., Lirman, D., Miller, M.L., Nedimyer, K., Schopmeyer, S. (2011). Caribbean *Acropora* restoration guide: best practices for propagation and population enhancement. The Nature Conservancy, Arlington, VA.
 - For larval recruitment/enhancement, see:
 - Guest, J. R., Baria, M. V., Gomez, E. D., Heyward, A. J., & Edwards, A. J. (2014). Closing the circle: is it feasible to rehabilitate reefs with sexually propagated corals? *Coral Reefs*, 33(1), 45-55.
 - MICCI 2 gives guidance on restoration after a grounding, which may or not be a useful resource, in parts, depending on the direction this action takes. http://www.dep.state.fl.us/coastal/programs/coral/reports/MICCI/MICCI_Project2_Guidelines.pdf
 - NOAA Acropora Recovery Plan: http://sero.nmfs.noaa.gov/protected_resources/coral/documents/acropora_recovery_plan.pdf
- Currently in situ staghorn coral nurseries and outplanting are ongoing in Miami-Dade and Broward counties. These staghorn nurseries are currently not actively propagating other ESA listed coral species.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- Goals and Objectives were not identified within this recommended management action.



S-8 Public Comment Report:

Fishing, Diving, Boating, and Other Uses/Restoration

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.

Quick Stats:

- Total number of comments on this RMA = 35
- This RMA was called out by Keep America Fishing, Marine Industries Association of Palm Beach County, Fishing Rights Alliance, and American Sportfishing Association/Keep Florida Fishing via letters of opposition and was supported by Miami Waterkeeper and Coastal Conservation Association.
 - ***CWG Response: this strategy has nothing to do with closing down areas to fishing. It could be picked up under N-146 to include no take zones, but this is not currently listed as a goal/objective. If maintained as a separate RMA, it would not include no take zones.

Long Responses:

9. “What do you support, or how could this RMA be changed to an action you could support?”:

Category	Comment	Ref #	CWG response
Support	Creating shallow water coral gardens would help to get people involved in the protection of coral. It provides a unique educational opportunity, and would be invaluable. On the coral side, it would provide an opportunity for us to attempt to alleviate some of the pressures out on coral and to potentially create hardier strains.	1282	Agree
Support	Great! This would be awesome. I've seen this at tropical resorts. Great for tourism and awareness. I support	1145	Agree
Support	Huge supporter of this idea!!! Near shore reefs or coral gardens available to snorkelers is the first step toward better education and awareness. The snorkel trail at Blue Heron Bridge is a wonderful example of success.	1144	Agree
Support	This should have been done 10 years ago. It's a VERY simple idea and has NO negative effects on anyone.	1130	Only negative effect is that it might take funding away from other restoration activities.

Support	I support RNA S-8 because it is one of the best options for coral reef restoration. I think areas are needed where coral restoration can be accomplished without undue disturbance.	1123	Agree
Support	Anything that we can do to take a pro-active approach to include coral transplantation and close monitoring of our corals will greatly benefit the marine ecosystem overall. The marine ecosystem is relatively fragile. There are several aspects that can negatively affect it, some of which are weather, fertilizer runoff, dumping waste of any kind, beach renourishment initiatives and anchoring.	1073	Agree
Support	This is I'm opinion the best recommendation in this category	754	Agree
Support	Adding artificial reefs, including living coral reef gardens will promote coral growth and thus have a positive impact on the reef system and the animals that call it home.	410	Agree
Support	Need to rebuild more coral production	110	Agree
Support	Having coral reef gardens in the north shore park area	290	Agree
Support	Yes by creating strict guidelines around these specific gardens, areas etc...	326	Agree
Support	Absolutely! Absolutely! I support this entire idea! I have seen firsthand how artificial reef projects attract fish and other species including corals.	1500	Agree
Oppose	The exclusion of wrecks for artificial reefs needs to be removed from this recommendation since these wrecks are cleaned to the standards set forth by FDEP and they do become hard bottom areas.	721	Does not pertain to this RMA.
Oppose	my concern would be taxing fisherman and boast purchase there are plenty of people in this area that could voluntarily donate money toward this cause	84	Does not pertain to this RMA.
Other	In concept, S-8 is acceptable unless such designations will cause access issues for recreational angling. CCA does not support temporary or permanent closures for fishing/diving/boating on the reef.	1257	There is no designation for closures at this time. Not relevant to this RMA.
Other	I support the idea of transplanting corals to areas where they are depleted. However, the RMA does not mention if these areas of transplanted corals would then be off limits to uses for fishing, diving, etc. If the public is removed from these areas then I would not support this RMA. If the public will still be permitted to access and use these areas as they had before the coral transplants, then I would support this RMA.	1167	Does not apply to this RMA. Without these newly added reef areas, fisherman wouldn't be fishing the sand.
Other	You're wasting your time and money. As long as the	615	Not relevant

	Government keeps dumping the Everglades and Lake Okeechobee into the ocean each summer, the reefs will be covered with algae and die. Stop the discharge first or you're wasting your time. I wish you luck on stopping it, Big Sugar has more money and lobbyist than you do.		to this RMA.
Other	Coral restoration holds potential, but reefs in this region are similar to hardbottom habitats that are found to the south, in the Florida Keys for example. Attempting to create reef structure or habitat that is not typical for the region is misguided. Restoration as an educational tool, as a mitigation tool, and to improve habitat quality in damaged areas makes sense. So, I support the recommendation, but not because it will improve the ecosystem, generally.	387	Not true. There used to be Acer and Apalm in this area. We would be recommending the creation of new reefs while understanding the limitation of restoration activities. We are not doing what this comment suggests.
Other	Support building more artificial reefs	37	Outside scope of this RMA.
Other	Add an element of community diving programs/ certification through post-cert diving and focus dives on the gardens	291	This would be an option but not critical to this RMA. We would encourage local business to capitalize on this.
Other	Should include data and research shared with others in the Bahamas-Caribbean area	358	

10. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	Every study from around the world, shows that fishermen increase their catch after setting aside these types of zones. Why can we do this in Jamaica but not here?	1130	***duplicate reference number. Check

			this. Not applicable to this RMA. Applicable to N-146.
Support	Very important to restore damaged area of the reefs. Do it.	689	Agree
Support	How can I help?	137	Agree
Support	Needs to be ramped up	179	Agree
Support	these areas should be monitored by trained personnel with passes for these areas	326	These are not being proposed as limited use areas. Agree that it should be monitored by trained personnel however.
Support	Coral reef gardens are cool. Gardens for corals can replenish a lot of species with down and low numbers	355	This would be an option but not critical to this RMA. We would encourage local business to capitalize on this.
Support	Great way to get classrooms of kids interested!	358	Agree
Other	Eliminating or properly supervising beach renourishment programs would also have a great positive impact on our reef systems - particularly the hard bottom and the 'first reef', which is located closest to the shore. Renourishment programs generally result in the first reef being inundated and covered with sand, which kills the reef. As a real estate broker, I understand the importance of maintaining good beaches, however, there would seem to be better ways to widen the beach that would NOT result in burying the reef in the process.	410	Relevant to MICCI not this RMA.
Other	Andrew Red Harris foundation.org builds artificial reef modules as a non-profit. Jupiter - partner with PB county	37	Not relevant to implementation this RMA, but he has coral reef modules to place corals on if this becomes an option.
Other	Presently there is not enough incentive to volunteer in water support for reef tract plants or maintenance. The few that do	318	Not part of what is being

	often require divers to pay for their volunteer support.		proposed.
Other	How will these areas be protected? These areas need to be protected from fishing, diving, and anchor damage how many will there be? There needs to be multiple sites all along the tract chosen by scientists for optimal placement	332	At some point you would have to give the same protection to every other reef area. Still illegal to anchor on or damage as per CRPA 2009. Ideally, Reef Gardens would be built in protected areas.

*****CWG FDBOU DECISION:**

Add to content: This RMA is not intended to prohibit extractive use. There would be no fishing or diving restrictions associated with this RMA.

This RMA was not intended to address artificial reefs...merely restored reefs. This RMA is not intended to address no take areas or artificial reefs. Any language regarding this should be removed from the Tier 1 & 2, report summary and half pagers documents.

Remove bullet points from RMA Report Summary→ Objectives Bullet 2:

- **DELETE THIS BULLET FROM REPORT SUMMARY: Artificial reefs at appropriate locations can enhance marine habitat and help control erosion. They can also provide substrate for coral recruitment and habitat for essential fish species and serve as destination dive sites, which would boost the diving tourism industry.**

Title:

S-54: 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.

Background:

- This recommended management action relates to Miami-Dade, Broward, Palm Beach, Martin and Monroe counties, Biscayne National Park, Dry Tortugas National Park, St. Lucie Inlet Preserve State Park and the John Pennekamp Coral Reef State Park, including all coral reef, seagrass and mangrove habitats.
- The disappearance of coral reefs is a global problem. It is not a coincidence that half the coral cover has been lost on the Florida Reef Tract in the last 30 years, exactly the same amount of coral cover that has been lost from The Great Barrier Reef in Australia in the same time period. While local protection measures must be implemented, it is important not to lose sight of the global issues threatening our coral reefs.
- This recommended management action is being put forth to address the lack of awareness among the general public concerning the value and importance of the Florida Reef Tract. Greater awareness leads to a general rise in the level of the protection and conservation given to heritage properties. A country may also receive financial assistance and expert advice from the World Heritage Committee to support activities for the preservation of its sites.
- The United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Convention was ratified by the USA on Dec. 7th, 1973. The United States of America was the first country to ratify the treaty. The Convention sets out the duties of state parties in identifying potential sites and their role in protecting and preserving them. By signing the Convention, each country pledges to conserve not only the World Heritage sites situated on its territory, but also to protect its national heritage.

Objective:

- The intended outcome of this action is to add the Florida Reef Tract to the UNESCO World Heritage list in order to preserve the rich Caribbean biota, maintain the cultural and historical importance of the reef, including its many shipwrecks, increase global and local awareness of the spatial extent, interdependence, and ecological and cultural importance of the Florida Reef Tract, as well as enacting a comprehensive management plan, which will benefit the entire reef tract by coordinating all of its separate management units.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action would include all those listed above under the designation of the UNESCO World Heritage Site.
- There are no anticipated negative environmental impacts, nor are there any threats of adverse environmental, social, or economic effects from this action.
- The duration of the benefits of this recommended management action is long lasting and permanent.
- If this recommended management action is not implemented, there will be continued ignorance of the general public concerning the importance of the Florida Reef Tract.

Agencies/ Organizations:

- The application to UNESCO must be made by the United States government. The Dept. of State will have to sign the application. However, the National Parks Department of International Affairs (Department of the Interior) is responsible for the application. The Dept. of State contact is: Official Relations (UNESCO/ERI) Source: UNESCO/ERI H. E. Mrs. Crystal Nix-Hines Ambassador,

Permanent Delegate Permanent Delegation of the United States of America to UNESCO Web Site: <http://unesco.usmission.gov/> United States National Commission for UNESCO Web Site: <http://www.state.gov/p/io/unesco/> .

- Other potential agencies or organizations who could be involved include a joint working group comprising representatives from Florida Keys National Marine Sanctuary, Biscayne National Park, Dry Tortugas National Park, Florida Department of Environmental Protection, the four counties (Miami-Dade, Broward, Palm Beach, Martin) and the Southeast Florida Coral Reef Initiative (SEFCRI) to prepare the application.
- The key stakeholders for this recommended management action would be every individual person. This designation may face opposition with those involved with coastal development if they believe this designation would limit their ability to impact coral reefs (e.g., port expansion).
- There are no legislative considerations to take into account.

Permitting/ Enforcement Requirements of RMA:

- There are no permitting requirements with this recommended management action.
- There are no enforcement requirements with this recommended management action.
- Success is measured for this recommended management action when the Florida Reef Tract is added to the UNESCO World Heritage list.

Cost:

- The estimated direct cost of implementing this recommended management action is \$0 - \$50,000.
- A potential funding source may be the cruise lines, which love to have World Heritage sites on their itineraries.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is 5 - 10 years.

Miscellaneous Info:

- This recommended management action is directly linked to S-59 and S-2, and is also indirectly linked to N-114, N-146, and N-149.
- This would be a step toward addressing awareness issues, but not a solution in itself. The listing would provide excellent content for further outreach efforts.
- Supporting and relevant data includes the following:
 - See: United Nations Educational, Scientific and Cultural Organization. Success Stories. <http://whc.unesco.org/en/107/>.
 - Designation of at least parts of the Florida Reef Tract as a UNESCO World Heritage site would increase resource value and awareness. A number of reefs have this designation, including portions of the Great Barrier Reef and the Belize Reef – see: United Nations Educational, Scientific and Cultural Organization. World Heritage List. http://whc.unesco.org/en/list/?search=reef&searchSites=&search_by_country=%C2%AEion=&search_yearinscribed=&themes%20=&criteria_restriction=&type=&media=&order=country&description=.
- Currently, this effort does not exist for the SEFCRI Region.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities, Goal A2 Obj. 1.
- FDEP CRCP Education and Outreach, Goal A / FDEP CRCP Education and Outreach Goal B / FDEP CRCP Education and Outreach Goal C / FDEP CRCP Education and Outreach Goal D.

S-54 Public Comment Report:



Fishing, Diving, Boating, and Other Uses/Restoration

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.

Quick Stats:

- Total number of comments on this RMA = 28
- This RMA was called out by Keep America Fishing, Coastal Conservation Association, Marine Industries Association of Palm Beach County, Fishing Rights Alliance, and American Sportfishing Association/Keep Florida Fishing via letters of opposition and was supported by Miami Waterkeeper.
- One personal letter was written in opposition.

Long Responses:

11. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	You guys are doing some really important work, keep it up.	1290	
Support	Any awareness and give-a-damn we can draw to this tract is best. A world heritage site would certainly help to accomplish this feat.	1289	
Support	THIS WOULD BE GREAT FOR EVERYONE!!!!!! Definitely a great first step to awareness at a low cost and low risk. Definitely worth pursuing!!!	1146	
Support	We have a HUGE barrier reef that no one knows about. Why aren't we marketing it and protecting it like Australia does?	1131	
Support	Any organization that has the means of benefitting our coral reefs is worth recruiting their efforts to increase awareness and protection	1074	
Support	Worldwide can only help to bring financial, scientific and educational public awareness to aid to the reef system. This situation is too large for just the state of Florida to resolve.	747	
Support	I fully support any action which will result in increased education and awareness of our beautiful reefs and their environmental importance. Regarding treasure hunting and historical shipwrecks, I would not support any governmental seizure of citizen claims. Instead, maybe more specific guidelines that further protect the reef and the ecosystem surrounding wrecks.	665	

Support	would bring more focus on the importance and fragility of our reef system	317	
Support	Include mangroves and seagrass beds	333	
Support	What we have here in SE FL is so unique to the USA and the world, it should be given any designation that will help with protection.	1501	
Oppose	This is more of a "feel good" proposal than something that would actually have an effect. Given that only two coral reefs are currently proposed at UNESCO World Heritage sites (Great Barrier Reef and Mesoamerican Barrier Reef), it is questionable whether the SEFCRI reef tract would meet the standards.	1406	
Oppose	CCA does not support S-54. It objectionable in so far as it would lead to limitations on user access. CCA does not oppose recognition of our resources, but opposes any such designation that would restrict access or uses. Those decisions are best left to the FWC and Florida law.	1258	
Oppose	I do NOT support UNESCO designation of the SE Florida reef tract. As SE Florida residents, we have no input into UNESCO designations and once an area is so designated, limitations can be put in place restricting access and usage by residents SE Florida. I feel the potential negatives outweigh any potential positives.	1168	
Oppose	Why do we need an outside organization to monitor OUR waters? Giving that power away will only lead to more limitations on what we can and cannot do in our own territorial waters!!! Have a certain percentage of money we spend in FWC license fees go to this instead.	664	
Oppose	Florida does not need the invasive involvement of foreign governing bodies. I would NOT support ANY measure involving UNESCO.	409	
Oppose	I'm not sure that nay of the ten criteria used to designate World Heritage sites are met by the habitats found in this region. This is a transitional region. To my knowledge, no unique habitat types are found in this region, except perhaps for the Acropora cervicornis stands and their significance remains to be determined.	388	
Oppose	Our reef protection is for the united states of America to resolve the united nations shouldn't be involved	80	
Other	May be a lot of effort with little payback	755	
Other	Explore linking UNESCO to the 2008-ish effort to declare a Nat'l Natural Landmark	59	
Other	I am not sure of the reasons for inclusion	256	

12. "Other comments or input":

Category	Comment	Ref #	CWG
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			response
Support	This is very important work. It will definitely help our reefs.	1271	
Support	Great idea! These reefs need to be protected! Especially the first reef, which is being buried by beach expansion in Lauderdale by the Sea.	1157	
Oppose	You cannot raise awareness in a positive way by impacting its users in a drastically negative way.	705	
Oppose	control of state water should reside with the state of Florida	89	

Title:

S-65: Nominate the Southeast Florida Coral Reef Initiative 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.

Background:

- This recommended management action relates to Miami-Dade, Broward, Palm Beach, and Martin counties and would include coral reefs, mangrove areas and seagrass bed habitats.
- This recommended management action is being put forth in order to fix the current piecemeal approach to management and protection by four different county's jurisdictions.

Objective:

- The intended outcome of this action is designate the Southeast Florida Coral Reef Initiative (SEFCRI) Region as a National Marine Sanctuary (NMS) – Marine Protected Area (MPA).

Intended Benefits and/or Potential Adverse Effects:

- A NMS would identify the SEFCRI region as a special and unique area that should be managed in a holistic manner. Designation as a NMS would set in place a series of steps where an advisory council would be assembled, representing all user groups, and would meet to determine the optimal management strategies for the Sanctuary and decide if these management strategies should be applied to the entire region or require a more targeted place-based implementation. Designation in and of itself does not result in any predetermined action in any specific area.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action would be the SEFCRI Community Working Group (CWG). See <http://www.nominate.noaa.gov/> for details: "Community Builds a Nomination - Every nomination starts at the community level. A group of people who care passionately about protecting an area of our nation's marine or Great Lakes waters comes together to develop a nomination. This consists of gathering key information about the special place they wish to nominate and developing broad community support for the nomination." Ultimately, the National Oceanic and Atmospheric Administration (NOAA), more specifically the Office of Marine Sanctuaries, is responsible for the establishment of a new sanctuary unless it is created by an executive order of the President.
- Other potential agencies or organizations who could be involved include Miami-Dade, Broward, Palm Beach and Martin counties, as well as Florida Fish and Wildlife Conservation Commission, which would all be asked to support the nomination. The Florida Department of Environmental Protection cannot play a role here because they will be involved with NOAA to make the decision on whether or not the application should be accepted.
- The key stakeholders for this recommended management action would be fishers, divers and other reef users.
- Actions implemented under a NMS could complement the Endangered Species Act, Magnuson-Stevens Act, and other environmental legislation.

Permitting/ Enforcement Requirements of RMA:

- Permitting requirements would depend on the recommended management actions implemented under the NMS (e.g., installation of mooring buoys would require permitting).
- Enforcement requirements for this recommended management action would be variable depending on NMS-MPA. Initially a public relations campaign will be required to inform the public, and monitoring to measure compliance with regulations will be necessary. Only then may additional enforcement be required when specific measures are put in place for defined management areas or

zones. Enforcement represents a follow-up cost that would occur subsequent to the successful completion of this recommended management action.

- A measurable way to show success with this recommended management action is that NOAA will place the southeast Florida reef in an inventory of areas it could consider for potential designation as a national marine sanctuary. Eventually the southeast Florida reef would become the Southeast Florida National Marine Sanctuary - Marine Protected Area.

Cost:

- The estimated direct cost of implementing this recommended management action is \$0 - \$50,000 if a social media campaign can be creatively and successfully employed by volunteers to generate a tsunami of public support.
- Without support, the cost of a marketing campaign that would result in either state support to NOAA, or a presidential executive order, for designation would be very costly. For an example of the latter, see Oceana's current effort to convince the president to declare a marine national monument for the deep-water coral communities off New England at http://act.oceana.org/sign/obama_ne-marine-monuments_2015?source=mailing&t=4&akid=5912.781040.xzShNh.
- Funding sources would not be necessary for the nomination, but if subsequent actions are taken, potential funding may be acquired through NMS, NOAA's National Ocean Service. NMS are able to respond to requests for proposals that the federal government is eligible to apply for. Operational funding is subsequent to the successful completion of this recommended management action.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is between 2 - 10 years for application process and approval.

Miscellaneous Info:

- This recommended management action is not linked to any other proposed actions.
- It is uncertain how long the public consultation process will take once the SEFCRI region application for nomination is accepted.
- Supporting and relevant data include the following:
 - The following is a quote from the NOAA NMS website: <http://sanctuaries.noaa.gov/about/faqs/welcome.html>, "The primary objective of a sanctuary is to protect its natural and cultural features while allowing people to use and enjoy the ocean in a sustainable way. Sanctuary waters provide a secure habitat for species close to extinction and protect historically significant shipwrecks and artifacts. Sanctuaries serve as natural classrooms and laboratories for schoolchildren and researchers alike to promote understanding and stewardship of our oceans. They often are cherished recreational spots for sport fishing and diving and support commercial industries such as tourism, fishing and kelp harvesting."
 - National Marine Sanctuaries. Publications. <http://sanctuaries.noaa.gov/science/char/resources.html>.
- This effort is not currently ongoing.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities Goal D2: Obj. 1.
- SEFCRI LAS FDOU Issue 2 Goal Obj. 6.
- Reduce benthic habitat impacts by implementing, among other actions, the potential use of no-take zones, no-anchor zones, no-motor zones, mooring buoy systems, education, etc.

S-65 Public Comment Report:



Fishing, Diving, Boating, and Other Uses/Restoration

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.

Quick Stats:

- Total number of comments on this RMA = 54
- This RMA was called out by Keep America Fishing, Marine Industries Association of Palm Beach County, Fishing Rights Alliance, Coastal Conservation Association, American Sportfishing Association/Keep Florida Fishing, and West Palm Beach Fishing Club via letters of opposition.
- Miami Waterkeeper wrote a letter of support.

Long Responses:

13. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	Absolutely! This is the single best idea that I can think of to protect our local coral reefs!!	1507	
Support	Full support for this	1291	
	GREAT IDEA!	1284	
Support	Living in South Florida since 1953 I have seen the oceans off Florida go dead Revive our oceans	870	
Support	Our Florida Reefs efforts need to be commended for without their efforts the coral reef structures in South Florida waters would not stand a chance.	1075	
	You might look to the island of Bonaire as an example of the success of this. (Many countries/islands have copied Bonaire's example). If SEFCRI could become a NMS then all scuba/free divers wishing to dive within it would have to pay a nominal "tag" fee purchased from the local dive shops, the tag is displayed on your buoyancy compensator or other gear. This money could be used to maintain the mooring buoys or for other needs.		
Support	I support establishment of a Marine Protected Area in the SEFCRI region for the purposes of conserving our marine resources. As with the Florida Keys National Marine Sanctuary, Special Use Areas would need to be established, creating a	786	

	<p>range of protection within the overall sanctuary footprint. It is important that people are still granted access to the reef, and can continue to fish, dive, and boat relatively freely. It is assumed that creating an MPA will promote better usage practices for all of the above, while only restricting or more firmly regulating activities within a very small portion of the resource (if at all). Granting certain sensitive and/or highly productive areas greater protection will likely have beneficial ecological spillover effects onto the entire reef system. And even if it does not produce the desired ecological spillover effects, the condition of the reef resources within the protected areas should be improved, which can create spillover effects into the economy in the form of increased diving tourism. The general trend of coral reef health in the SEFCRI region has been steadily decreasing as the local human population and influence on our marine ecosystems increase. I have been watching this happen with a critical eye on reef resources with my own eyes over the last 10 years while doing >1,500 dives in the SEFCRI region. There are only going to be more people in Southeast Florida, and therefore even greater pressure applied to the already struggling reef system. Granting greater protection to this resource in order to maintain its economic usefulness and ecological function, even at the risk of telling a few people that they can't fish everywhere they want, seems like a very small price to pay. The good of the many outweighs the good of the few.</p>		
Support	If the Sanctuary is managed well, it will be successful. The Keys Sanctuary is a perfect example	756	
Support	I am an avid scuba diver. More than 4 years ago, my wife and I bought a townhouse in Hypoluxo in order to enjoy the fabulous diving in SE Florida. I'm highly in favor of establishing SEFCRI as a NMS in order to improve and preserve the Florida reef system.	619	
Support	this would strongly increase protection	111	
Support	The sealife comparison between palm beach and broward is so very sparce compared to the protected areas in the keys. The difference speaks loud and clear- we need more protected areas! We need SE FL to be a national marine sanctuary!	148	
Support	I would like for it to include our deep-water reef systems as well	334	
Support	I support S-65 the nomination of SE fl coral reef initiative as a national marine sanctuary as it would support reef protection for all concerned	343	
Oppose	The issue I have with this RMA is that there are already draft RMAs put forth by OFR aimed at establishing No-Take Marine Protected Areas and implementing fishing or boating restrictions; however these are intended to be placed before	1403	

	voters at the state and local levels. A National Marine Sanctuary however would be designated at the federal level, possibly without public or legislative input. While this can in some circumstances be a necessary and positive action, it would not go over well directly off the coast of a major metropolitan area hosting upwards of 6 million residents, a number of whom use the waters for recreational or commercial purposes. This may be perceived (correctly or not) as a "nuclear option" for conservation interests to override a rejection of RMAs that would be approved at the state and local level.		
Oppose	<p>STRONGLY OPPOSE</p> <p>The State is best suited to manage our nearshore waters. The NMS process is an unnecessary level of bureaucracy largely populated preservationists and academia , not fisheries managers.</p> <p>The FKNMS has proven to be angler unfriendly and its has wallowed in its own mess,</p> <p>The meetings times favor paid NGO staff and not average citizens.</p>	1279	
Oppose	S-65 is an unnecessary delegation of state authority over its sovereign waters to a Federal agency. The state has an excellent record of managing its fisheries and resources. The sanctuary process is cumbersome and there are existing procedures for state action when needed.	1260	
Oppose	I do NOT support the proposed designation as a National Marine Sanctuary/Marine Protected Area. This designation would allow removal of areas from use by residents of SE Florida. One needs only to look at the Florida Keys and Dry Tortugas for examples of areas where residents are not allowed to fish, dive or use the areas for any purposes. If there is a proposal to restrict usage of a particular area then we can consider the pros vs cons of that particular designation. This RMA is too broad and gives far too much authority to designate areas as off limits without public input or participation. I would prefer to have local control of our reefs and NOT national (NOAA) or internation (UNESCO) control over our reef tracts.	1169	
Oppose	Education of users to insure their actions do nothing to injure the reef structure or growths thereon. The reefs are important to the people who have chosen to live near the waters where the reefs exist. They are also important to the many visitors who like to vacation in our climate and geographic location. Much of our economy is dependent on being attractive to people who migrate to our location and those who visit. If we restrict use of, or visitation to our valuable environment, we will destroy our attraction. I wonder if the stewards charged with protecting our reefs just want to take the easy way to	1026	

	manage. Close it, restrict it, prohibit the use of it, to the extent they can remain in their air conditioned offices, do nothing to educate people to allow the proper use of the area, and continue to collect salary. Closing everything is easy. Managing is difficult, but much more valuable.		
Oppose	Far too limiting and encompassing!	916	
Oppose	My grandkids are only young for a short time and I want them to have full use of the ocean to fish or dive as I did. Stop the commercial interests and we will all be better off!	912	
Oppose	I can't support any total shut down of fishing in any area of southeast Florida. Closing an area to fishing only puts more pressure on the other areas that are not closed. Once a closure goes into effect it will never be rescinded regardless of the data. Conservation groups will not be satisfied until all areas are closed to fishing.	909	
Oppose	So many other things can be addressed, run off, beach renourishment, air shows, education! Before taking away these reefs from users that actually try to protect it! Dumb move!!!	886	
Oppose	There is no peer reviewed biomass and economic data presented by SEFCRI. RMA S-65 should be eliminated	867	
Oppose	Those of us that use the reef responsibly should not be penalized and restricted from enjoying it in order to appease those that do not understand and have never even visited our reefs.	850	
Oppose	Cannot be changed must be dropped all together.	845	
Oppose	MPAs will not help the reef or help fish stocks recover. Recreational fisherman are not the problem but can help in the solution. Closing the reef to fishing will only alienate recreational fishermen. Concentrate on closing the outfalls, freshwater discharges from Lake O, fertilizer leaching, and other sources which cause harm to the reef. There are a number of angler based organizations who would love to help but you are already alienating us. We should all be attacking the ACOE together.	829	
Oppose	We do not need another Marine Sanctuary. There are other ways to go about this.	818	
Oppose	This is another example of people trying to allow the government to over reach its authority. There are a number of other ways we can accomplish many of the same goals without having the government force it on the state of Florida and American people	777	
Oppose	I vehemently oppose SE Florida to be nominated for a national marine sanctuary. I am in favor of seeing our coral reefs continue to thrive but it should not come at the expense of denied access to our fishing areas.	774	
Oppose	The research is absolutely foolish. The lagoon is completely ruined and you want to protect a reef? Circle hooks and no	718	

	mooring would be great. Let's have a talk about protecting our estuaries so we have fish to protect. Recreational fishing is NOT the problem.		
Oppose	this should not be allowed it has potential to become a tool to restrict peoples freedom	79	
Oppose	foolish to invite federal government to get involved in our local resources. Those guys could mess up anything.	101	
Oppose	there are at least 4 levels of protection available before resorting to this action.	255	
Other	<p>Education and Boating Seamanship License as a requirements for all existing and special NEW boaters, for the respect and proper use of the vessels.</p> <p>This alone will protect in a more sensitive, I dive over 100 times a year and more damage to our reef can be observe by improper anchoring techniques, abusive boating over sensitive shadow areas, accumulative trash from boaters and beach goers... also the usage of marine fishing gear and traps over LIVE reef areas instead of at the sand edges of the reef.</p> <p>Abandoned fishing gear and ropes from Commercial fishermen all end in our beautiful reef and they become a demolition wrecking machine for years , as they get tangle and wrap around our hard and soft corals and beat on and around the reef for very long time.</p>	891	
Other	Why not build artificial reefs along the coast. This would jump start fish habitats. More habitat, more fish M	892	
Other	It really doesn't do any good to make areas off limits to fishing without dealing with waste and storm water run-off or dealing with the discharges from Lake Okeechobee. This is like putting cows in a corral so they can't get out and no one can get in and then machine gunning them from a distance. Fisherman are responsible and rules should be sought that still allows them to use the resource. In fact fisherman are probably do less harm and far less evasive than SCUBA divers whose boats anchor damage reefs, they touch living coral and reef material that can permanently damage these living rocks and organisms, they slit over living rock with poor buoyancy control and scare away organisms that create a healthy symbiotic relationship with the rock and coral.	896	
Other	Close fishing for specific spices during spawning and limit total take at other times	904	

14. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	Agree that our reefs need protection. And the protection has to	1149	

	<p>be strong enough to limit land based activities (namely beach renourishment and building on the barrier island) from continuing to destroy what ever protections are already in place for our reefs.</p> <p>Because I am so fond of turtles and have volunteered for years with hatchling rescue, I see first hand how the lack of enforcement of existing ordinances, the looking away by authorities at the local, state, and federal levels have allowed developers, businesses, and home owners to continue to conduct business as if the beaches are only for the almighty tourist dollar.</p> <p>I became a sea turtle rescue volunteer because I am a diver. I've been diving for over 20 years on these reefs. I've seen the destruction of the reef in Hollywood when they last did the beach renourishment. I fear for the inner reefs of Ft. Lauderdale as they will be smothered by the current beach renourishment project. I see the slow death of Hollywoods reefs (one of my favorite beach diving places) as the outfall pipe spews its waste and it washes toward shore, and the red algae covers the reefs. It's a wasteland in most areas.</p> <p>A very thorough and extensive campaign will need to be implemented to help change the attitudes of the locals and tourism trade of the importance of our reefs and beach habitat. Unfortunately, the government agencies involved seem to cater to those with the most money instead of protecting the oceans as they were hired to do.</p> <p>It's a sad time for the reefs. I hope Our Florida Reefs will change that.</p>		
Support	I fully support this action.	1274	
Support	<p>Florida spends 2 million to remove 700,000 tires from the ocean puts out a bid to remove all the tires based on price per tire NO MINIMUM number to be removed! LUDICROUS leaving 600,000 tires in the ocean after 2 years and 2 million spent!</p> <p>NOAA begins commercial shark killing off Jupiter, Florida LUDICROUS</p>	870	
Oppose	I agree with CCA's criticisms of this proposal	895	
Oppose	<p>FWC has the charter to ensure that Marine life is protected and that we continue to maintain sustainable fisheries stock. I get the no anchor zones to protect coral, but the 'no take' is simply the draconian, lazy way to accomplish the stated goal of protecting reefs. Dramatically up the penalties for infractions (undersized catch, over limit catch, illegal spearig, anchoring) to include mandatory confiscation of boat, trailer and vehicle.</p>	890	

	Hefty fines and some jail time would also be appropriate. If FWC deems stocks to be low, they can, and do, alter fishing dates until stocks rebound. This is a tried and true method used by staqtes nationwide with very good results.		
Oppose	To protect coral and fish, we need to protect the water quality first. It's like wiping your butt before you poop, pointless. Also, we need to protect our baitfish, the mullet harvests are growing, and the menhadden are so far gone it may be too late. Your science and data are WAY off. Recreational fishing isn't the problem,	718	
Oppose	This will negatively impact tourism while doing nothing to protect the reef habitat	846	
Oppose	control of state water should reside with the state of florida	90	
Oppose	1. leave management to FWC. 2. score/evaluate each of 68 ideas on effectiveness and efficiency (of implementation) stack rank by score.	101	
Other	<p>KEEP AMERICA FISHING has released a set of talking points for its supporters to use in voicing their opposition to any level of protection suggested for the SEFCRI region. After reviewing these talking points, I believe most of them have been formed around shaky arguments and some leftover bad blood from creation of the sanctuary in the Florida Keys. What follows is a direct quotation from their material, followed by my personal comments:</p> <p>"We all want to ensure that our coral reefs continue to thrive but this shouldn't come at the expense of access to our fishing resources. In some cases, limiting fishing can be an effective management tool. But that's not necessary here!"</p> <p>--- Local fisheries resources are not inexhaustible. Some of the supply comes from upstream, but much of it comes from right here. There are many hooks and lines in the water, every day, rain or shine. More and more people are moving to South Florida, and this will undoubtedly result in even greater fishing pressure. For fishermen, including myself, to say that they deserve free and open access to 100% of the reef and to balk at any suggestion of taking steps to preserve/conserve/protect it seems a bit selfish.</p> <p>"Because they are they are so extreme, "no-take zones" should be considered only when recreational fishing poses a clear and demonstrated threat to the sustainability of fisheries resources and only after conventional fisheries management measures, like seasons and bag and size limits, have failed. Neither of these is true for the proposed Marine Protected Areas (MPAs)."</p> <p>---MPA creation implies several options along a gradient of protection. It doesn't mean "no-take" right out of the gate. This</p>	786	

	<p>process will be a lengthy one and both sides will have to concede something for the greater good.</p> <p>"In Florida, our state fisheries are in great shape due to effective state management."</p> <p>---The coral reefs of the SEFCRI region are not managed on a holistic level. They are barely, if at all, managed on a local scale. Many of our fisheries are severely overexploited, even with species-specific regulations in place for many years. My team of fish counters only encountered a handful of Red Groupers over the past 4 years while doing >2,500 fish surveys. The true state of the reefs of Southeast Florida look almost nothing like the sportfish-laden posters and t-shirts of local celebrity marine artists. Most people who spend their time fishing from their boats on the surface of the ocean have a very limited understanding of what is actually going on below. I have seen fewer and fewer commercially and recreationally important species during my 10 years of diving here. Our fisheries are distinctly NOT in great shape.</p> <p>"The main threats to our coral reefs in Florida come from increased water temperatures, water quality, and sedimentation - not fishing activities."</p> <p>---Water temperature, water quality, sedimentation, nutrient loading, undesirable boating practices, pollution, the list goes on and on and on...Yes, these are all definitely having negative impacts on our marine environment. However, they are not alone in their role as degraders of reef health and sustainability. All of these issues have a cumulative affect on the marine ecosystem, but fishing is also on this list. Fishing pressure is widely acknowledged as one of the most influential factors affecting reef fish communities in tropical seas worldwide - Florida is no exception. Removal of the upper-trophic level members of the fish population has a negative effect on the whole system. Healthy reef systems have a large constituency of apex predators and carnivores. Here in Southeast Florida they are becoming more and more scarce. Snappers and Groupers taste good. Everyone with a boat and a fishing pole wants to catch one for dinner when they go out, and they should always have that right. They should also have a reasonable chance of coming home with something to feed their family as a reward for their efforts after a long and expensive day on the water. Protecting part of the reef so that more fish are available over the entire region seems like a very small price to pay.</p> <p>"There are no fisheries resource issues identified in any of these proposals or any science-based reasoning behind their selection.</p>		
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	<p>The desire to exclude recreational fishing is coming from a select group of individuals with their own agendas."</p> <p>---Incorrect. I have been doing science-based and unbiased assessments of reef fish resources in the SEFCRI region for going on 5 years now, and have been working with others who have been doing it for even longer. We have seen first-hand what it looks like on the front lines below the waves. I also fish, dive, and boat for pleasure whenever I can. I have no desire to exclude recreational fishing any more than is necessary to maintain sustainability. I want to take my kids out on the water and let them catch a fish, and to dive with them and show an incredible underwater experience full of rich marine life. There is no reason that all of this and more cannot still be accomplished if some level of protection is granted to the reefs of our area. In fact, if something is not done to protect these declining resources, then I believe it will be far less likely that I will be able to take my kids out to catch a fish, and less likely that the underwater sights I want to show them will still exist as they do today. People already reminisce about the way the reef used to be. Think about what this area will look like 10, 20, or 50 years from now as more and more people pile into Southeast Florida. Everyone who values these resources should be jumping up and down in frustration that more has not already been done to improve our marine ecosystems, and if they are not then they have not been paying attention. If someone wants to pigeon-hole me as a member of "a select group of individuals with their own agendas", then I will wear that badge with honor.</p> <p>"There is no plan to review whether these "no-take zones" are actually working and no plan to ever re-open these areas to fishing."</p> <p>---As I understand it, the concept of an MPA in the SEFCRI area is still very much in the formative phase of development. I see no reason why continued and/or enhanced monitoring of marine resources cannot provide enough information to evaluate the effectiveness of these proposed management actions should they actually become implemented in the future.</p> <p>National Parks and Protected areas have historically put our natural terrestrial resources of particular value and concern further up in the collective consciousness of society. To put a name on something and declare it as worth saving draws attention for all the right reasons. This concept should be applied to our marine ecosystems more in the future. The ocean is a very large place. People shouldn't choke on the prospect of considering protection for a very small portion of it. We will all benefit from it in the long run.</p>		
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Title:

S-86: 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.

Background:

- This recommended management action relates to the state of Florida and includes pelagic, ocean, nearshore, and offshore habitats.
- This recommended management action is being put forth in order to address the issue that many sharks that otherwise could be released after being caught are instead suffering mortality. This will increase shark populations and apex predators that are currently overfished.

Objective:

- The intended outcome of this action is to reduce shark mortality through the promotion of proper catch-and-release fishing techniques and to change federal law to ban live mounts. There must be a ban on the practice of taking sharks out of the water to take measurements to make mounts. The law must include language that measurements must be taken in the water with the shark being released immediately (the shark cannot be taken to the dock for measurements).

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action include an increase in shark populations, which will improve overall ecosystem health.
- Some anticipated negative impacts associated with this recommended management action include that charter fishermen may try to harp on the result that some species of sharks die after release anyway. Charter fishermen will provide pushback.
- The duration of the benefits of this recommended management action are recurring and would require ongoing enforcement.
- If this recommended management action is not implemented, the result will be continued unintended mortality of shark species, which can cause an ecological cascade (trickle down) effect on the ecosystem.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action would be Florida Fish and Wildlife Conservation Commission (FWC).
- Other potential agencies or organizations who could be involved include non-governmental organizations (NGOs).
- The key stakeholders for this recommended management action would be the charter and recreational fishing industries, which may be opposed, as well as conservation organizations and NGOs, which would likely support this proposal.
- This recommended management action supports current FWC regulations.

Permitting/ Enforcement Requirements of RMA:

- There are no permitting requirements for this recommended management action.
- There would be a need for ongoing enforcement efforts for this RMA.

- Measurable Outcomes/Success Criteria/Milestones were not referenced in the recommended management action.

Cost:

- The estimated direct cost of and potential funding sources associated with implementing this recommended management action have not been identified.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is 2 years from the time it makes it onto the FWC work plan.

Miscellaneous Info:

- This recommended management action is not linked to any other recommended management action.
- There are no known uncertainties or information gaps with this proposed action.
- Supporting and relevant data for this recommended management action were not indicated.
- Currently, FWC is working on a shark outreach campaign that emphasizes safe handling and how to increase survival with catch-and-release shark fishing.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- Goals and Objectives were not identified within this recommended management action.

S-86 Public Comment Report:

Fishing, Diving, Boating, and Other Uses/Restoration

Ban live mounts of all shark species (catch for the sole purpose of taxidermy/mounting or marketing with no intention to retain) in order 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.

***CWGs will wordsmith in April CWG meetings

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. (Original Title)



Quick Stats:

- Total number of comments on this RMA = 29
- This RMA was called out in opposition by Marine Industries Association of Palm Beach County and in support by Miami Waterkeeper.
 - *****CWG Response:** live harvest does not equal live mounts. This RMA addresses those species that are NOT sustainably and legally able to be harvested to ensure that no individuals are taken out of the water or to the docks as live mounts. This RMA also addresses those that are legally landed with no intention to keep and eat but merely used as marketing tools to promote charters. If you can't mount- boat won't bring it to shore to use as advertising tool. Measuring IN THE WATER is done in the Keys and with migratory pelagics and could easily be applied to shark species.

Long Responses:

15. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	Even a ban on shark fishing would be great but this is a step in the right direction	1285	Agree
Support	Measurements can be take of fish while in the water. There is no reason to remove the fish to be released from the water to get measurements for mountings.	1170	Agree
Support	I concur with this initiate as it benefits the declination of shark populations. This in turn would provide beneficial information to shark researchers.	1078	Agree
Support	I support this effort to decrease shark mortality. Apex predictors should be protected.	988	Agree
Support	I support this	1147	Agree
Support	Sharks, like other apex predators, are in steep decline. They typically take a long time to reach sexual maturity. They are slow growing. They are being removed at an unsustainable rate. Live sharks are a huge draw for divers in Southeast Florida, and are more importantly a critical component of a healthy functioning ecosystem. We need sharks.	787	Agree
Support	This should also feed into education	757	Agree
Support	Sharks are very important and I support their protection	113	Agree
Support	Shark management needs immediate attention to circumvent depletion of species and attending loss of sick fish culling by sharks	322	Agree
Oppose	I support sound biological harvest of marine species including sharks. Full protection of any species swings the pendulum the wrong direction and has proven to be as harmful as over harvest. Most Sharks are sustainable for harvest without	884	This RMA does not focus on harvest. It is

	deleterious impact. Balance in nature is proven to be most successful.		focused on a wasteful practices that result in unnecessary shark mortality.
Oppose	When is the last time anyone from your organization spent time fishing on the deeper reef line off Palm Beach or the Sand Pile or Bull Shark barge off Stuart. Shark populations may be declining worldwide but they aren't off our coast. Shark finning is not a problem here and replica mounts that don't require killing the shark are what Grey's and the other companies are all moving to. This legislation is an overreaction. Shark dives and snorkeling trips that attract and feed the shark are a problem, because they alter sharks natural feeding instincts and they lose fear of people, which endangers the average swimmer. If you want to do something worthwhile with your resources put a stop to those type companies.	614	Bold print is what the RMA agrees with and promotes with this RMA. Currently illegal to feed sharks in state waters.
Oppose	I think population is rapidly growing to the point they are a nuisance.	78	CWGs respectfully disagree. Need science to back up this claim.
Other	With respect to proper handling and release, get FWC to issue regulations regarding required handling and release of sharks caught from shore so that caught sharks are not allowed to be dragged up on the beach and left to sit for trophy photos.	1480	Outside scope of this RMA but CWGs agree. Goals consistent with this RMA however.
Other	I would like this to go further and ban shark fishing as a practice. I would like to see shark-fishing illegal in our waters.	824	Outside scope of this RMA but CWGs agree. Goals consistent with this RMA however.
Other	Ban kill of all sharks throughout the Florida reef area. Catch and release only	35	Outside scope of this RMA but

			CWGs agree. Goals consistent with this RMA however.
Other	More education about the role sharks play in ecosystems	335	Agree. MOVE TO EDUCATION
Other	The public needs education to understand why this is important, then they will support it more	359	DECISION: add public education component to address this comment.

16. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	No need to live mount any fish any more. They make replicas if people want.	1147	Agree
Support	Prevent capturing and attracting sharks	113	Agree
Oppose	There are too many sharks on the ledges and wrecks where I fish. Too many sharks are not healthy for the coral reefs.	1294	Sharks are a component of a healthy coral reef ecosystem. Top predators are necessary for function.
Oppose	There are currently unforeseen and unpopular consequences with full protection of Goliath Grouper. Repeating full protection of any non-threatened or un-endangered marine life, like shark species, would prove ignorance from not learning from past poor decision-making.	884	**884 is a duplicate number. Check out. This RMA does not propose full protection of any species.
Oppose	Few sharks are killed by charter boats to insure a customer mounts a shark or brought to the dock for pictures, I can think of only one in the Miami area that is guilty of these practices, Few are taken for food on the East Coast in contrast to the West Coast of Florida where they are regularly eaten. Most fishermen cut the leader as close to the shark as possible without ever	690	This is not consistent with Tier 1 & 2 documents goals and is not based on

	<p>touching the animal.</p> <p>Many of us fishermen believe there are too many coastal sharks as on some of the reefs as we can hardly get a fish into the boat.</p> <p>Rule is completely useless.</p>		science.
Oppose	<p>If it is legally allowed to harvest a short or any fish by state or federal fisheries managers it is basically their right to do so. Ethical charter boats already encourage the release of sharks and many other species but it is intrusive to create laws beyond the very thorough process of creating these regulations. I know because I am involved in that process.</p>	254	<p>This comment addresses take of sharks. This RMA addresses mounts of sharks. Comment not consistent with RMA goals. Responsibility would then fall on the taxidermist to ethically and legally not accept live mounts.</p>
Other	Alternative: ban longline bottom (reef) cable/hook that decimate shark populations	97	Irrelevant
Other	Shut down Mark the Shark!!!	335	<p>Agree. Someone should do this.</p>

*****CWG FDBOU DECISION: add public education component to address comment #359**

Title:

S-87: Modify or enhance existing regulations to increase protection for parrotfish and other important herbivores for coral ecosystem protection.

Background:

- This recommended management action relates to all four counties of the Southeast Florida Coral Reef Initiative (SEFCRI) Region, including all coral reef and nearshore hardbottom habitats.
- This recommended management action is being put forth because extensive research has already established the key role of parrotfish as herbivores that reduce algal coverage that can dominate reef systems and reduce reef ecosystem function and condition if not controlled. The removal of all species in this family of reef fish should be prohibited in state waters.

Objective:

- The intended outcome of this action is to improve enforcement and education for parrotfish to ensure better compliance with existing regulations and eliminate illegal harvest of all individuals and species of the parrotfish (*Scaridae*) family.

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action include: (1) improved ecosystem function, (2) increased populations of parrotfishes on the reef, (3) improved coral reef condition, (4) improved habitat suitability for recruitment of juvenile corals, (5) improved experience for non-extractive users of reef system, and (6) increased economic and ecological productivity of the reef system in southeast Florida.
- Some anticipated negative impacts associated with this recommended management action include opposition from recreational fishers that target parrotfish or commercial fisherman that are allowed to sell a portion of bycatch. Communities unaware of these environmental regulations could make it challenging to enforce.
- The development of new regulations to eliminate the removal of parrotfish from the reef system is a discrete action that should take less than one year to implement. Implementation and enforcement of that regulation would be ongoing.
- If this recommended management action is not implemented, there will be a risk of poor coral recruitment if algal growth has occurred in places where parrotfish are few in number.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action would be Florida Fish and Wildlife Conservation Commission (FWC) for the rulemaking component.
- Other potential agencies or organizations who could be involved include academic institutions, non-governmental organizations, local, state, and federal government staff, who could also be added to the education and outreach effort component.
- The key stakeholders for this recommended management action would be commercial marine life endorsement holders, such as Florida Marine Life Association, which would be among those stakeholders most impacted. Recreational aquarium hobbyists who collect species using recreational fishing licenses, as well as commercial spiny lobster fishermen, who sell parrotfish as bycatch in lobster traps would be affected.
- There are no legislative considerations to take into account.

Permitting/ Enforcement Requirements of RMA:

- There are no permitting requirements for this recommended management action.
- Enforcement requirements for this recommended management action include an ongoing presence on the water to enforce regulations, as well as potential efforts on land (markets, food stores, etc.).

- There is no stock assessment schedule for parrotfish in Florida. Any changes in population may be detected by commercial landings or independent monitoring by researchers.

Cost:

- The estimated direct cost of implementing this recommended management action is unknown, but there would need to be a consideration for staff time and public workshop costs for outreach.
- No funding is needed for rulemaking. However, outreach efforts for current rules could be completed by any organization with staff and time.

Time Frame & Extent:

- The timeframe depends on the needed action. Rulemaking can conservatively take one year, while outreach can be put into practice much sooner.

Miscellaneous Info:

- This recommended management action is not linked to any other recommended management actions.
- Some uncertainties or gaps with this recommended management action include:
 - The level of fishing pressure on this fishery is unclear at present.
 - Part of this is the unknown of illegal fishing pressure. This action should focus on education and enforcement for current rules if illegal fishing is found to be an issue.
 - It is unclear if non-fishing pressures are impacting parrotfish (if indeed there is a population concern). For example, parrotfish species are highly dependent on mangrove and seagrass nursery habitats, which only exist as a fraction of what the environment used to contain.
- Supporting and relevant data include the following publication:
 - Mumby, P. J., Edwards, A. J., Arias-González, J. E., Lindeman, K. C., Blackwell, P. G., Gall, A., Gorczynska, M. I., Harborne, A., Pescod, C. L., Renken, H., Wabnitz, C. C., Llewellyn, G. (2004). Mangroves enhance the biomass of coral reef fish communities in the Caribbean. *Nature*, 427(6974), 533-536.
- The parrotfish family (*Scaridae*) is protected under FWC marine life regulations:
 - Can only be caught by hand-held net or slurp gun (i.e. illegal to catch by spearfishing or hook and line).
 - Maximum size limit of 12 inches.
 - Must be kept alive at all time on the water in an aerated, circulating tank.
 - Recreational bag limit of 5 fish of any one species, with no more than 20 aggregate marine life species able to be collected per day.
 - Currently, there is no limit to commercial harvest, but it requires a marine life endorsement. It is a very small, selective fishery.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities Goal D1.



S-87 Public Comment Report:

Fishing, Diving, Boating, and Other Uses/Restoration

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

Quick Stats:

- Total number of comments on this RMA = 26
- This RMA was called out by Coastal Conservation Association and Marine Industries Association of Palm Beach County via letters of opposition and was supported by Miami Waterkeeper.
- One personal letter was written in opposition.
 - ***CWG Response to MIA PBC: the goal of OFR is to get this issue on the radar of FWC. This RMA was developed for FWC consideration.
 - ***CWG Response to CCA: this RMA was not written to address gear restrictions specifically. There is a bycatch issue as well as an ornamental issue. This RMA seeks to ban the take of parrotfish of any size with any gear to increase the health of the ecosystem. This would include prohibiting the sale of bycatch at fish markets, which is made allowable based on the loophole in the legislature.

Long Responses:

17. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	The time is now to protect	1447	Agree
Support	I could count on one hand the number of times I've seen parrotfish on MC reefs. They absolutely need protection.	1286	Agree
Support	Keeping the population of herbivores high is important for the reef but reducing the amount of algae on the reefs by controlling land based pollution (sewerage, fertilizers, etc) would decrease the algal growth and would be even more important.	1171	Agree
Support	The fish need more protection to keep the reef healthy.	1132	Agree
Support	Parrotfish are an important fish species as they provide a service such as cleaning parasitic organisms from the coral reef. To be completely honest, I do not see any dietary benefit to include parrotfish on a menu.	1076	Agree
Support	Parrotfish and other herbivorous species are essential to maintaining the balance between slow growing corals and rapidly growing undesirable macroalgae. The system is already out of balance in this respect, given the amount of nutrients (fertilizer for macroalgae) that are discharged from our inlets onto the reef. Parrotfish are not heavily targeted by fishermen	815	Agree

	and collectors, although their combined influence does make a difference. Protecting parrotfish will likely not make a huge difference in the overall condition of SEFCRI area reefs, but it is through the combined power of many small actions that positive change will be brought about. This may seem like a small thing, but it will help in the long run.		
Support	Parrot fish should not be harvested. They are crucial to reef health.	115	Agree
Support	Crucial to reef survival	116	Agree
Support	Sensible it seems if they don't feed on coral itself. I believe that I have seen them eating coral and excreting sand???	253	They do eat coral. They also eat the algae that grows on coral. This plays a role in creating substrate for settlement. This is not a destructive force on the ecosystem. Parrotfish may have an effect on the system if numbers are too high but that is not the case.
Support	Educate and enforce non-taking of parrotfish to help coral overcome algae smothering	321	Agree
Support	We absolutely need to protect the species that protect the coral reef ecosystem.	1510	Agree, could also be addressed by N-146
Oppose	CCA opposes RMA S-87. S-87 should be referred to the FWC as it is tasked with fisheries management and presently have effective regulations in place on a specie by specie basis.	1263	CWG is asking FWC for increased regulations.
Oppose	I don't see where human interaction is adverse affecting these species	758	Relevant data for concern outlined in Tier 1 & 2 docs. CWGs acknowledge

			d that there is not a lot of data on this species. CWGs also ask that a study such as this be carried out.
Oppose	There is no evidence that existing fishing efforts is having a negative impact on any of the herbivores that might be included in this regulatory change. Coral reef dynamics are complex. Hardbottom habitat in this region are characterized by low coral cover and high species diversity of other functional groups, such as octocorals and sponges. There is no evidence to suggest that change or stasis in this region has been impacted by changes in herbivore populations. To my knowledge, there is no evidence that macroalgal populations have increased due to pollution, or that they are negatively impacting corals or any other organisms.	389	Parrotfish are important to coral. The goal of this is to protect coral settlement and growth. Increasing parrotfish would increase overall system health. Tier 1 & 2 docs will have supporting info. Asking FWC to address this issue.
Other	Our reefs need to be protected more so that new organisms can evolve and so species populations will increase.	913	Agree, could also be addressed by N-146.
Other	Ensure all reef herbivores have the same protection. Just because other species haven't been studied so intensively doesn't mean they shouldn't be protected!	336	The largest family of herbivores is parrotfish so this will be the biggest bang for your buck. The RMA calls out other important herbivores.

18. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	Unfortunately, most fishermen break the rules so we need to be more strict to account for the rule breakers. Please ban it outright	1132	This is an enforcement issue. Not relevant to this RMA.
Support	our ecosystems should be better protected	913	**duplicate numbers Agree
Support	Very important	177	Agree
Oppose	This action is in FWC domain and should be left to them to regulate.	691	Agree.
Other	this recommendation needs to be rewritten to discuss commercial take of parrotfish	96	That is what the loophole focuses on. This RMA is concerned with all take of parrotfish.
Other	Also additional education and enforcement	115	
Other	Jetty and pier fishermen need education as to why this is important	360	

***CWG FDOU DECISION:

Step 1 should be an assessment of the parrotfish population.

Must amend language to include the ban of all sale of all parrotfish harvested in SE FL waters at fish markets. Follow up by impose fines to markets selling any such fish. Most "bycatch" is alive when it is collected...doesn't have to be harvested.

Amendments include: the recommendation is to consider focusing on a ban of the sale of dead parrotfish for food rather than the catch of live juveniles (under 12") for the ornamental aquarium trade.

Add to title: Prohibit the sale of Florida parrotfish for consumption. Allow FWC to determine how to best do this.

Title:

S-97: Maintain lobster mini season but reduce the bag limit to six lobsters per person per day to be consistent statewide, and require the review of educational materials and completion of an educational quiz in order to receive an annual license.

Background:

- This recommended management action relates to the entire state of Florida, including coral reefs and associated habitat for lobsters, hardbottom, artificial reefs, and mangroves, as well as nearshore and offshore habitats.
- This recommended management action is being put forth in order to decrease damage to coral reef habitats from diving and boating activity associated with lobster mini season, and to simplify regulations with consistent bag limits.

Objective:

- The intended outcome of this action is to reduce direct impacts to coral reefs from lobster mini season by reducing fishing effort on the reefs and to simplify regulations with consistent bag limits. This would be implemented through a Florida Fish and Wildlife Conservation Commission (FWC) regulatory change. The mini-season bag limit should be 6 lobsters per person per day throughout Florida.
- If the requirement to take a quiz in order to get a license is not feasible, the recommendation would be to provide educational materials along with license that include info on:
 - Coral as living organisms
 - Illegal to disturb coral per Florida Coral Reef Protection Act of 2009
 - Size and bag limits

Intended Benefits and/or Potential Adverse Effects:

- Benefits of implementation of this recommended management action would include reduced physical damage to coral reefs from diving and boating activity associated with lobster mini season and simplified regulations statewide. Additionally, there would be reduced opportunity for misunderstanding and misinterpretation of regulations in all of Florida.
- Some anticipated negative impacts (social/economic) associated with this recommended management action include resistance from FWC, diving and fishing communities, dive clubs, tour operators and dive shops that could suffer a decrease in revenue.
- Changing the regulation is a discrete action, while the result of this discrete action is ongoing. Enforcement would be recurring during every mini season.
- If this recommended management action is not implemented, impacts to the reefs from intense user pressure during this two-day event will continue.

Agencies/ Organizations:

- The lead agency for implementation of this recommended management action would be FWC for rulemaking.
- Other potential agencies or organizations who could be involved include the Florida Department of Environmental Protection Coral Reef Conservation Program and the National Oceanic and Atmospheric Administration.
- The key stakeholders for this recommended management action would be the diving,

fishing, and tourism industries.

- The legislative considerations to take into account include enacting changes to local and state law that FWC already has in place.

Permitting/ Enforcement Requirements of RMA:

- Permitting requirements for this recommended management action would be that each person collecting lobsters would be required to hold a permit (lobster stamp) on their saltwater fishing license. This currently exists.
- There would be a need for ongoing enforcement for this recommended management action.
- A measurable way to demonstrate success of this recommended management action is assessing changes in benthic habitat condition in the region.

Cost:

- It is unclear if any additional funding would be necessary. There are no anticipated increases in enforcement costs. The only costs would be to FWC staff time dedicated to the rule change process, as well as to outreach and education to the public on this rule change.
- There are no potential funding sources known at this time.

Time Frame & Extent:

- The anticipated timeframe for implementation of this recommended management action is 0 - 2 years.

Miscellaneous Info:

- This recommended management action is not linked to any other recommended management actions.
- Uncertainties or information gaps with this recommended management action were not identified.
- Supporting and relevant data include:
 - <http://www.fishwatch.gov/profiles/caribbean-spiny-lobster>
- There are currently no existing efforts to change the lobster bag limit during mini season.

Goals/ Objectives to be achieved:

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#)

- FL Priorities Goal D2.
- FDEP CRCP Coral Reef Ecosystem Conservation Goal F / FDEP CRCP Coral Reef Ecosystem Conservation Obj. 4.
- SEFCRI LAS FDOU Issue 1 Goal.

S-97 Public Comment Report:



Fishing, Diving, Boating, and Other Uses/Restoration

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.

Quick Stats:

- Total number of comments on this RMA = 82
- This RMA was called out by Marine Industries Association of Palm Beach County, Fishing Rights Alliance, Coastal Conservation Association, via letters of opposition.
- Miami Waterkeeper wrote a letter of support.
- One personal letter was written in opposition.

Long Responses:

19. "What do you support, or how could this RMA be changed to an action you could support?":

Category	Comment	Ref #	CWG response
Support	Would help reduce diver damage to corals and protect lobster population.	1511	
Support	This is brilliant. Too often do I see people having extra people in their boat simply to raise their limit. I especially love the educational aspect with quiz- people often do not realize the impact that they have on the ocean.	1288	
Support	The numbers are way down. I'm out there weekly and see how quickly stocks are depleted in the bay and reefs	1133	
Support	Mini Season exists to increase lobster population. Limiting the number of lobsters to 6 per day-per diver caught during min-season should exist as this parallels the actual goal of mini-season, lobster protection and also helps to minimize diver damage to corals.	1077	
Support	I agree with RMA -46. Even though I am a lobster hunter, I recommend that Mini season should be cancelled all together. Too many deaths, idiots and destruction of the reefs. I would rather see a three month lobster open season only. The divers hunting for lobster are very destructive to our reefs as they drag and handle the reef. Thank you, Kamal Peters	791	
Support	I've been on over 1,500 dives in Southeast FL over the past 10 years. Many of these dives have been around or during lobster	788	

	<p>mini-season. Never have I seen a more concentrated group of unskilled and reckless divers in one place at one time. If you go diving the day after mini-season, it is highly likely that you will encounter ample evidence of wanton destruction of habitat. I have seen it myself many times...coral heads and reef structure broken or flipped over, corals broken, evidence of total disregard for the coral reef habitat. Nothing is scared to many lobster divers during mini-season. It is also not uncommon for one or more diving or boating-related emergencies to occur during mini-season. Is it really worth it? Sure, it draws people and the local economy makes some extra money. And lobsters taste great...I harvest lobsters every year, but in a more responsible manner. If setting the limit at 6 does anything to promote greater safety and responsibility, then I believe it is well worth it. It also leaves more lobsters out there for other divers who avoid the reef during mini-season because of the chaos that comes with it.</p>		
Support	Anything to curb "Lobster Madness"	759	
Support	<p>Regulations do need to be changed regarding lobstering, especially mini-season. Focus more on education. I strongly support making people take a quiz before getting a permit/license. Most of the damage from lobstering comes from people grabbing rocks/coral in order to get to lobster. Again, focus on education and consider only reducing the limit to 8-10 per day. A small limit reduction would have very little impact on chartered dive boat revenue, and increased awareness and education will benefit that industry in the long term.</p>	667	
Support	<p>As a scuba diver who hunts lobster, I do support a limit of 6 lobsters per person during mini-season. We get to enjoy a long season of lobster hunting. As more and more people get certified and start learning how to hunt lobsters, I don't think there is any reason all these people need 12 lobsters on any particular day. There is more than enough time to gather lobsters during the season. I would be devastated to find us out fishing this popular sport due to greed.</p>	623	
Support	Matches up with Monroe County regulations. Completely reasonable as this still allows dozens per boat.	384	
Support	Put an end to mini-season - too many lobsters are damaged by novices. Also damage to reef is staggering	55	
Support	Some people are abusing the process and taking too many lobsters	114	
Support	Mini lobster season is too chaotic and crazy. I would prefer it be eliminated altogether. However, that would probably not gain support. So this is a decent compromise.	143	
Support	Reduction of lobster take would result in less overall exposure from divers in mini season with fewer divers staying in water	320	

	when bag limit is reduced		
Support	I support the reduced limit and mandated learning materials. I would like to see the educational materials include boating information such as where to drop anchor and how to minimize impacts.	323	
Support	I support the fact that they want to limit the amount of lobsters the people are grabbing. The more they grab, the more time they have to break apart the reefs with their boats	342	
Oppose	If the goal is to eliminate the "frenzy" on the reef during these 48 hours, then you need to eliminate mini-season all together. However, one has to weigh having mini-season vs. the economic impact on the local economy. I would vote to protect the local economy over these 48 hours.	1513	
Oppose	CCA opposes RMA S-97. RMA S-97 should be referred to the FWC as it is tasked with fisheries management and presently have effective regulations in place on a specie by specie basis.	1266	
Oppose	<p>I do not support this RMA. This RMA shows a lack of historical knowledge of how the current lobster regulations were developed. The statewide limit was 12 lobsters per person for mini season and mini season was on the weekend. To decrease participation, the season was moved to weekdays. Monroe county wanted to further try to decrease participation in their county by decreasing the limit to 6 lobsters in Monroe County. The goal was then to have the larger limit attract people out of Monroe County to the rest of the state.</p> <p>This RMA will undo any benefit that Monroe County has seen from having a lower limit as the limit will again be the same in Monroe as the rest of the state and may increase the numbers of persons going to Monroe County. In addition, for many people, their only opportunity to get lobsters for personal consumption is before the traps go in the water. If you REALLY want consistency, than have Monroe increase their limit to 12 like the rest of the state. It seems ridiculous to have one county set the limit for the rest of the State. Why not have the limit for the majority of the counties apply statewide (if consistency is really the goal)?</p>	1172	
Oppose	<p>Require people to read and take a quiz, so they can go have fun and lobster? Cut the B.S. and stop.</p> <p>This will solve NOTHING. We do not have a lobster problem. It's actually funny you people even drafted this.</p>	937	
Oppose	I support expanding sport catch of lobster and reducing commercial harvest of lobster. Commercial traps destroy more reef than anchors with sheer volume and cost any re dropping. Illegal harvest of short lobster by commercial harvest and death of trapped lobster and by catch amount to significant	883	

	large waste and violations.		
Oppose	<p>Florida's lobster recruits (babies) come from central and south America. This has been proven by FWC DNA testing. Changing the catch limits has no effect on our lobster productions.</p> <p>There is no peer reviewed biomass and economic data presented by SEFCRI. RMA S-97 should be eliminated.</p>	868	
Oppose	The proposal is beneficial because there will be more trips to the reef, because people will get their bag limit quicker... Does that make any sense? Who is writing this crap?	709	
Oppose	Leave it alone or get rid of miniseason all together. The jerks who flout the law will still do so. Those who don't want to deal with the amateur hour atmosphere avoid those two days on the water anyway. Eliminating it will just move the ridiculousness to August 6.	702	
Oppose	<p>I cannot support this in any form. As a new diver/lobster diver. From what I have seen this has been one of the BEST years for lobster diving and as a "newbie" going out with seasoned hunters this past year, they are respectful, diligent and very respectful of what can and cannot be harvested.</p> <p>If you decrease the limit, the number of licenses being sold will also decrease and from what I saw this past year, the lobster population is thriving!!!</p>	666	
Oppose	What science to do have to support this initiative? Lobster populations are healthy on the Southeast coast and are already managed in a sustainable fashion. Do something more productive with resources.	613	
Oppose	I support more limits on the commercial lobstering when nearly 100% of the catch is shipped overseas.	554	
Oppose	I SUPPORT BETTER ENFORCMENT OF CURRENT REGULATIONS AND NOT MAKING ANY FURTHER RESTRICTIONS, IT'S HARD ENOUGH ALREADY TO KEEP UP ON AND CONFORM THE ALL THE REGULATIONS.	446	
Oppose	I would only support the disappearance of this proposal.	432	
Oppose	<p>I dive every weekend... I've been diving (and catching)(off of our coast for over 25 years...Our Lobster population is VERY healthy.</p> <p>Perhaps add a bonus lobster for every 5-10 lionfish you take... The lionfish are the problem. The lobster population is fine.</p>	424	
Oppose	<p>Why don't you ass hats ban commercial fishing. Recreational anglers don't decimate species commercial anglers do that.</p> <p>Why don't you try to convince the public they don't have a right to a seafood dinner just like they don't have a right to a venison dinner? Only sell aquaculture grown species. No sale of wildlife.</p>	411	
Oppose	Reducing the daily bag limit during mini season will not will improve our coral reef ecosystem. Protecting our reefs from	399	

	beach renourishment would improve our coral reef ecosystem. Limiting commercial lobstering might improve our reefs. More severely punish people who are grossly poaching lobster by the hundreds.		
Oppose	Control the commercial harvesting in a greater way	376	
Oppose	Allow FWC to set bag limits- don't need more regulatory bodies	99	
Oppose	Already have lobster management in place	146	
Oppose	Don't limit the number to 6 statewide by recreational divers. Instead reduce the number of lobster traps and disallow adding short lobster to traps by trappers	252	
Oppose	Lobster mini season is a south Florida tradition and brings people from all over the world, generating tourism revenue and state permit fees.	325	
Other	Some will just bring their lobster's home and go out again. But it is a start	1417	
Other	I would recommend extending the 2 day mini-season to 4 days if a reduction of the bag limit is recommended at 6 per day. The idea would be to extend the 2 days to 4 days but keep the total allowable lobster at 24. This would reduce the "pressure" to get the 12 per day as it is currently allowed.	1196	
Other** Repeated 4x	water pollution	1103- 1104, 1100- 1101	
Other	Each lobster tag should be issued by FWC AFTER a test is completed or vital information regarding harvesting lobsters is presented to the person obtaining the lobster tag. My guess is that most people don't know that you are required to measure your catch underwater before putting it in your catch bag. This would also be a great opportunity to promote awareness to preserve and prevent damage to coral reef. My guess is that most people (weekend warriors) do not know that the coral reef is an actual living structure. Now all you need is \$5 to get your lobster tags, it should require some extra knowledge and understanding. However, I do not agree that there should be a limit on the amount of tags issued.	1029	
Other	If your concern is with the influx of boaters and divers during the 2 day mini-season, then bring the limit to 6 per day and increase the 2 day mini-season to 3 or 4 days. I believe that the real issue is amateur boaters anchoring on the reef during this 2 day mini-season. I suggest to have FWC strongly enforce NO anchoring on the reef during this time AND I would suggest that boaters in Florida be required to take a boater safety course to obtain their boating license. Here they can learn the effects and penalties of anchoring on the reef. I bet most boaters in Florida are not even aware that they're not allowed	1023	

	to anchor on the reef. To me it is crazy (and a little scary) that anyone over the age of 18 can buy a boat and take it out on the water with no proof of understanding boater safety and environmental awareness. I frequently go SCUBA diving offshore on the reef, we ALWAYS drift dive and never drop the hook... keeping minimal contact with the reef.		
Other	12 lobster limit is acceptable. Strict enforcement of size and no females. Reduce commercial limit.	926	
Other	<p>I have been a South Florida full time resident & diver for 38 years. I do agree with the proposed bag limit of six lobsters during mini season, the same as for the rest of the year. Allowing people to take large amounts of lobster during mini season seriously depletes the population for the rest of the season.</p> <p>#2 Any restrictions on fishing should include surface fishing, both recreational & commercial. I have seen many times "head boats come in to dock & just dump dead fish they caught but do not want to eat. These fish are important to the reef system. Recreational spear fishermen only take fish they are going to eat.</p> <p>#3 However, commercial spearfishing should be banned. A number of years ago I noticed fish showing up in retail stores that previously were unavailable to the non-diving public. Commercial spear fishermen chase down fish on powered scooters, sleds, etc. & the fish do not have a chance to out run them & escape.</p> <p>You are not allowed to hunt deer, bear, etc. from vehicles on land because of the unfair advantage, so why should it be allowed under the water?</p> <p>#4 Any other ban on spearfishing with SCUBA should definitely NOT be instituted.</p> <p>#5 Killing &/or eating of lion fish SHOULD be promoted officially & even tournaments should be staged several times per year to promote eradication.</p>	822	
Other	There is enough regulations, problem with our coral reefs is #1 pollution and in Broward county the tires the state put in our oceans, years ago that broke apart and destroyed much of our reef system.	728	
Other	Consider extending mini-season to 4 days with a bag limit of 6 per day. Prohibit anchoring on the reef.	723	
Other	For Southeast Florida change dates to before mini season in the Keys, limit lobster catch to 6 OK but expand from 2 days to three.	589	
Other	Limiting to 6 OK if two days extended to 3 days (6 each day)...1st day would be one day earlier then opening in Monroe county....this might help our counties local shops and	585	

	hotels plus limit take to 6 per day....which might help reefs as to less anchor drops, corals being flipped etc.		
Other	I support additional limits on commercial lobster permits and the number of traps - particularly in the Florida Keys. Two days of 12-lobster limit doesn't have even remotely the same impact as reducing the sheer number of traps that remain in the water for the entire season. Providing additional resources toward enforcing existing limits and minimizing poaching, particularly females with eggs would have a much greater impact.	407	
Other	I believe providing information on reef impact would be best, the alternative should be the result of this action.	77	
Other	Ban commercial fishing it harvests a much larger % of fish and lobster. Bag limits and seasons protect fish species from recreational harvesters, see grouper as the example.	157	

20. "Other comments or input":

Category	Comment	Ref #	CWG response
Support	Monitoring the number of lobsters caught per day-per diver is a difficult task without each diver being honest. Perhaps Charter boats can be mandated to upload quantities of lobsters caught per day. This could also be a stipulation in maintaining their charter boat license.	1077	
Support	Dive boat owner	55	
Support	Ban mini-season all together	56	
Support	Do away with mini season. Shorten season by 2 months at each end. Reason; reduce catching egg bearing females which have to be released. Increase carapace size by 1/4" to increase breeding.	104	
Support	We need greater enforcement during mini lobster season	114	
Support	Great idea!	175	
Oppose **This comments was repeated 11x	The reduction of the limit has no scientific info to warrant it. The 12 lobster per person for these two days has been working for years. The help of the FWC enforcing these has been very good at managing these resources. The observations up and down the coast has been the same on a solid population amount, from our user group this time of year	1094-1104	
Oppose	Sport harvest from scuba diving is a much smaller comparative harvest of a renewable resource and supports sound marine biology. Commercial harvest is damaging to the marine environment and creates large illegal harvest driven by personal greed for money and unethical destruction of by catch.	883	
Oppose	Lobster limits should be left to the FWC not our Our Florida	693	

	Reefs.		
Oppose	Economic impact will be significant. 12 bag limit is only found in areas it is harder to get the lobster. Deeper ledges etc... If the limit is 6 everywhere those areas will suffer as why even dive/go there. Might as well eliminate mini season Rather see an increase in annual fees.	684	
Oppose	I am a recreational lobster diver and have seen no need to further limit recreational harvest. The species seems to be doing great. I am for more money towards enforcement and stiffer penalties for violators!	554	
Oppose	ENACT THIS PROPOSAL AND I WILL MOVE OUT OF FL!	446	
Oppose	Ban the sale of wildlife for human consumption.	411	
Oppose	I am for a study to gain quantifiable data on the subject, but to eliminate mini season with no data to support this act does not seem to be a scientific approach to coming to a conclusion	325	
Other	Might as well get rid of mini season altogether. It's like New Years Eve for divers who want to do nothing but kill some lobsters. In fact, I am in favor of starting the season a month or so later. There are so many egg-bearing females at the beginning of season that get terrorized.	1159	
Other	Help us stop commercial shark fishing if you want to improve our reefs. Help us add more artificial reefs if you want to improve our reefs. Help us stop beach renourishment which smothers our reefs after the first storm.	399	
Other	I feel like they should have a limit of boats and sizes that may go out in areas that have a lot of coral reefs so we wouldn't be too worried about crushing them	342	

***CWG DECISION: Updated title approved.