

# Key West Committee for Safer, Cleaner Ships

May 8, 2023

Mayor and Commissioners:

We request the City of Key West oppose the lease modification sought by Pier B Development Corporation from the State of Florida. We believe opposition is reasonable based on the following:

- The people of Key West have demonstrated an interest in limiting the size of cruise ships in the port. The lease area now authorized for the Pier B Cruiseport effectively establishes a maximum size limit for cruise ships calling at Pier B, with a max length of 1005' and max width of 110.' The proposal would increase the maximum to 1047' long and 160' wide, in opposition to the public interest.
- The proposed expansion would bring the Pier B Cruiseport immediately adjacent to the City's submerged lands at Mallory and allow larger cruise ships to operate within the 25-foot setback area. We believe these operations may limit the City's options for potential revenue-generating uses for Mallory, impede access to Key West Aquarium, and negatively impact the visitor experience at Mallory. The Mallory Strategic Plan now underway has not contemplated such a significant change-of-use in the adjacent Pier B Cruiseport.
- Federal and State regulatory permits which authorize the Pier B Cruiseport's operation are limited to the area of the current lease and explicitly prohibit expanding the lease area. Neither Pier B nor the State has addressed apparent conflicts with US Army Corps Permit # 199803786 (LP-VA) or FL DEP Environmental Resource Permit No 44-0142062-004.
- The Pier B Cruiseport is in a highly environmentally sensitive area, designated as Outstanding Florida Waters and within the FL Keys Area of Critical State Concern and the FL Keys National Marine Sanctuary. This area is federally designated critical habitat for two coral species listed under the Endangered Species Act (Staghorn and Elkhorn coral); and is proposed to be designated as critical habitat for five additional ESA-listed corals: Lobed star coral, Mountainous star coral, Boulder star coral, Pillar coral, and Rough cactus coral. Colonies of two of these federally listed threatened species were documented by City-contracted engineers within 500' of the Pier B cruiseport in 2020. Neither Pier B nor the State has addressed how larger ships using the larger lease area may impact sensitive marine resources including endangered species.
- The Pier B Cruiseport berthing structure was designed to mitigate cruise ship-generated turbidity and reduce the potential for serious environmental harm. Engineering studies did not consider ships larger than those authorized by the current lease. Neither Pier B nor the State has addressed how larger ships using the larger lease area may impact turbidity levels in local waters and associated environmental harm.

Thank you for your consideration of this important matter.

## Committee for Safer, Cleaner Ships

Evan Haskell, President

Arlo Haskell, Treasurer

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Capt. Will Benson, Vice President

David Dunn, Secretary