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May 12, 2020

To: Key West City Commission and Mayor Johnston

Dear Commissioners and Mayor Johnston,

I would like to comment on the proposed resolution before the commission regarding the City's full endorsement to the FWC's comments and recommendations regarding the Florida Keys National Marine Sanctuary's (FKNMS), Draft Environmental Impact Statement (DEIS) also known as the Restoration Blueprint.

I have sat on the FKNMS Sanctuary Advisory Council (SAC) for over twelve years, and I am currently the Chair. I had been involved with the Restoration Blueprint process since its beginnings eight years ago. Let me also point out that the impetus of the Restoration Blueprint arose from the 2011 Condition Report, which showed the entire Sanctuary system in decline. Updated reports show coral cover down to a mere 2%, which makes for a very unhealthy marine ecosystem. The coral reef ecosystem is the backbone of our community's economy, and it is in serious trouble. The Restoration Blueprint addresses a multitude of issues from overuse and water quality to fish habitat and the education of the Keys' 75,000 residents and 5+ million annual visitors.

The SAC has met, cumulatively, for hundreds of hours, with every affected stakeholder group. The SAC has been presented dozens of scientific presentations from numerous NGOs, various colleges, and universities, as well as several governmental entities, outlining the current conditions our resources are facing and the options available to stop its decline. Much of the science on which the Restoration Blueprint proposals are based come from the FWC's Fish and Wildlife Research Institute.

The FKNMS has received thousands of public comments, all available to read at regulations.gov. The sentiments of these comments span from wanting the FKNMS to leave entirely and having no rules, to those who feel the Restoration Blueprint does not go far enough in protecting and restoring our highly diverse and economically valuable marine environment. The comments provided by the Florida Fish and Wildlife Conservation Commission (FWC) are but one of these perspectives.

The City of Key West, like all of the local municipalities, holds a nonvoting seat on the Sanctuary Advisory Council with access to every meeting, every research paper, and every sanctuary staff member. Sanctuary Superintendent Sarah Fangman made a presentation about the Restoration Blueprint to the city commission last September. And the City, like all other individuals and entities, was afforded the opportunity to make official comments during the more than 5-month public comment period that ran August 20, 2019, to January 31, 2020.

Part of the federal rulemaking process requires the FKNMS to now go back and consider all provided comments and to use these to improve the Restoration Blueprint for a draft rule, which is currently in development. Once this version is released, there will be another round of public comments that will help shape the final product.

The FKNMS and the SAC have repeatedly heard that improved water quality is of paramount importance in helping our ecosystem's restoration. There is an entire section of the Restoration Blueprint, which speaks to the importance of improved water quality, and the FKNMS continues to work with its partners in this effort. Partly due to the sanctuary's efforts, Monroe County is no longer on septic systems. Now the focus is on cleaning the water outflow through the Everglades and Florida Bay, and eventually, our reef, which is mostly a state issue and beyond the direct control of the FKNMS.

Law enforcement will always be a challenge due to the vastness of Keys waters and the lack of affordable housing in the Florida Keys. NOAA provides some funding to the

FWC for law enforcement, but it is ultimately the state's role to fill the many FWC law enforcement positions that are often vacant here.

Fishing plays an important role in the Florida Keys for commercial catch as well as recreation, with only 6% of the sanctuary's 3,800 square miles currently closed to fishing. The Restoration Blueprint proposes a slight increase to 8% as a means of protecting critical habitat such as spawning aggregation sites. FWC and NOAA research shows Riley's Hump in the Tortugas Ecological Reserve is a prime example of how protecting essential habitat pays dividends for the broader ecosystem.

There are numerous things that the FKNMS can do to improve our resources, all of which have been backed by science. It is incumbent on the FKNMS and, frankly, all of us, to do everything within our control to advance those improvements.

I feel that if the City endorses just one perspective, that of the FWC, albeit an important one, that the City ignores or discounts all of the other valuable comments, science, and measures provided to enact the kind of change which is needed to restore our natural resources. The marine ecosystem is the lifeblood of the Keys economies, tourism, and fishing, and without its health, our future is bleak. I ask that our City stand with the FKNMS and all its partners in holistic efforts to address our environmental crisis, and not endorse just one perspective.

Respectfully submitted,

Clint Barras