



October 10, 2014

Denver Service Center
Morgan McCosh Elmer, Planning
12795 West Alameda Parkway
PO Box 25287
Denver CO 80225-0287

Re: Biscayne National Park General Management Plan

Dear Superintendent Carlstrom:

On behalf of the recreational boating and fishing community, we welcome the opportunity to provide additional comments to Biscayne National Park, as you seek to finalize the General Management Plan (GMP). The undersigned organizations have been deeply involved in this multi-year GMP review process and appreciate the deliberative nature and public input the National Park Service (NPS) has sought.

As stated in previously submitted comments, the recreational boating and fishing community is entirely opposed to Alternative 4 and its establishment of a 10,000 acre marine reserve and vast coastline non-combustion engines zones. Alternative 4 would implement draconian management principles that vastly restrict boating and fishing access. As you are aware, Biscayne National Park is the nation's largest marine park in the National Park System. Located off the coast of Miami, Florida, Biscayne National Park draws visitors from throughout the metropolitan area, Florida, and world. National parks should be maintained for the use and enjoyment of the American people. Management practices to preserve and protect the National Parks are valid endeavors. However, management plans must balance the interests of conservation with public access. The policies proposed in Alternative 4 do not ensure robust public access and rather limit the use and enjoyment of park waters to recreational boaters and anglers.

While we fully support improving the health of the park's fisheries resources, we are opposed to fisheries management activities that unnecessarily close areas to fishing activities with little scientific basis and when other fisheries management tools can effectively support healthy and sustainable fisheries. We strongly believe that there is not sufficient basis for implementing marine reserves at this time given the range of appropriate and effective alternatives that can be employed. Marine reserves are just one tool among the suite of resources available for effective fisheries management, and should be considered only after more conventional and less restrictive management strategies (e.g., size limits, bag limits, quotas, gear restrictions) have failed. The

recreational community applauds the efforts of the National Park Service in revising the initial GMP and proposing a Supplemental GMP earlier this year. Since 2011, it is our understanding NPS has been working collaboratively with Florida Fish and Wildlife Conservation Commission (FWC) to address the concerns of the original GMP, and in particular the vast opposition to Alternative 4. To revert back to a highly opposed management option, after several years of collaborative work with the FWC and stakeholder partners, would be to ignore strong public input and disregard the considerable work that went into developing more reasonable management tools. FWC is arguably the nation's leading state fisheries management agency and a GMP which is not supported by FWC will be judged harshly by the recreational boating and fishing communities. FWC's own opposition to Alternative 4 and the establishment of a marine reserve should carry significant weight in the finalization of this process.

The boating and fishing communities believe Alternatives 6 and 7 provide workable solutions, and we encourage you to consider pursuing these options rather than a reversion to Alternative 4. Permitting and seasonal closures are far superior management tools than a marine reserve in ensuring a healthy fishery and balanced public access. Short term permits and/or limited seasonal closures help to alleviate resource burdens while ensure continued public access to park waters. It is critical, for a finalized management plan to seek the input and involvement of FWC to be truly effective.

A GMP for Biscayne National Park should take a holistic approach to fisheries management and not be determined solely on the self-interest of a small group of wealthy landowners. While the Special Recreation Zone (SRZ) proposed in Alternatives 6 and 7 is larger in size than the initially proposed marine reserve, we believe the potential for greater access is balanced by a larger SRZ. As stated in previous comments, the prohibition on anchoring in the SRZ or any finalized GMP should consider a phased-in approach to ensure the restriction is accompanied by sufficient mooring fields.

We maintain that the two management factors that would provide the greatest benefit to the aquatic resources in Biscayne National Park are improved enforcement and education. Many of the management proposals within Alternative 6 and 7 will create additional requirements for enforcement, including the SRZ. We urge the National Park Service and the Florida Fish and Wildlife Conservation Commission to redouble enforcement efforts within the park to ensure compliance with regulations.

Similarly, educating the public of existing and new regulations is a necessity. As part of the park's education efforts, we believe resource management goals could be greatly benefitted by instituting a program to educate anglers about practices to improve the survivability of caught and released fish. The FishSmart program (www.FishSmart.org) provides a wealth of information, including "best practices" and other educational materials that can be incorporated by the National Park Service to better promote sustainable fishing activities by anglers in Biscayne National Park. Many of the fish caught in Biscayne National Park are released back into the water rather than harvested, and anglers can take steps (e.g., using circle hooks, employing descending devices to release fish at the depth they were caught) to better ensure the survival of the fish, which will result in improvements to fish populations. Such education and management tools would go a long way to improving the overall resource while allowing for robust access of angling and boating visitors.

We appreciate the opportunity to provide these additional comments to the Park Service and implore you to not take a step back in the collaborative process. Adoption of Alternative 4 would be a mistake to the sound management of the park waters and public access of this national park.

Sincerely,

Mike Nussman, President and CEO
American Sportfishing Association

Margaret Podlich, President
BoatUS

Jeff Angers, President
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Patrick Murray, President
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Jeff Crane, President
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Steve Stock, President
Guy Harvey Ocean Foundation

Rob Kramer, President
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Thom Dammrich, President
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