March 20, 2015

Sally Jewell, Secretary
United States Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Jewell,

We, the undersigned scientists, explorers and ocean advocates, are united in our support for the creation of a marine reserve in Biscayne National Park to protect its incredible marine biodiversity for the use and enjoyment of current and future generations. We are committed to the conservation of the extraordinary wildlife, landscapes, and outdoor experiences protected by our national parks and firmly believe that the National Park Service must take strong action to preserve Biscayne's spectacular underwater resources.

Biscayne National Park is a national treasure and is home to a portion of the third largest barrier reef ecosystem in the world and the only living reef tract in the continental United States. It is the largest marine park in the National Park System, created to protect "a rare combination of terrestrial, marine, and amphibious life in a tropical setting of great natural beauty" for present and future generations. Located in the backyard of one the largest metropolitan areas in the nation, Biscayne provides visitors with access to an underwater world that they might never otherwise be able to discover. The park is also a significant economic driver, supporting a variety of economic and recreational activities, such as fishing, diving, snorkeling, and boating. According to a National Park Service Report, nearly half a million visitors to Biscayne in 2013 spent over $29 million and sustained 374 jobs in the local area.[1] These economic benefits are dependent on a healthy, sustainable Biscayne National Park.

Unfortunately, Biscayne's once vibrant coral reefs and abundant reef fish populations have deteriorated in health over the last several decades. The approximately 6% of Biscayne's reefs that remain alive continue to be under stress from derelict fishing gear, warming seas, and the absence of a stable, healthy ecological food web resulting from overfishing.[2] Back in 2001, scientists warned of the imminent collapse of many fisheries resources without immediate proactive management.[3] Now 14 years later, we in desperate need of strong leadership on the part of the Department of the Interior and National Park Service to show a commitment to preserving our nation's most cherished places.

The establishment of a marine reserve is the best, most effective method for protecting Biscayne's severely threatened coral reef ecosystem. Marine reserves work quickly, improving

[1]Cullinane, T. C., Huber, C., & Koontz, L. *2013 National Park visitor spending effects: Economic contributions to local communities, states, and the nation.* 2014, Natural Resource Report NPS/NRSS/EQD/NRR—2014/824, National Park Service, Fort Collins, Colorado.
[2]National Park Service South Florida / Caribbean Network. 2013. Annual administrative report (FY 2012) and work plan (FY 2013) for inventories and Vital Signs monitoring: South Florida / Caribbean Network. Natural Resources Report NPS/SFCN/NRR—2013/702. National Park Service, Fort Collins, Colorado.
[3]Ault, J. S., Smith, S. G., Meester, G. A., Luo, J., & Bohnsack, J. A. *Site characterization for Biscayne National Park: Assessment of fisheries resources and habitats.* NOAA Technical Memorandum 2001 NMFS-SEFSC-468.

the size and quantity of fish stocks and protecting habitat.[4] A marine reserve in Biscayne National Park would accomplish four goals: provide an area where declining reef fish can recover; provide an area to protect internationally endangered coral reef communities; provide visitors with the opportunity to experience the wonders of a vibrant coral reef ecosystem that is relatively unaltered by extractive activities; and establish a baseline that can be used to compare the effectiveness of other management strategies.

We understand that the Park Service is alternatively considering a seasonal closure of fishing in what is called a Special Recreation Zone (SRZ). One of our major concerns with this proposal is that fishing effort may merely be redistributed to periods when the area is open to fishing, known as the derby effect.[5] If this occurs, any gains made in improving fisheries and protecting habitat may be reversed due to intensive fishing effort at the end of the closed season.[6] The derby effect may actually harm resources even more than leaving the area open all year, especially when anglers respond to the end of the closed season with destructively high force, which happened with grouper and snapper fisheries in the Gulf of Mexico.[7]

The Dry Tortugas marine reserves established in Dry Tortugas National Park and the Florida Keys National Marine Sanctuary, on the other hand, have had substantial benefits in terms of protecting and restoring degraded resources. Research documented increases in the size and abundance of many over-exploited species within the reserve areas[8] and spillover of more and larger fish occurred outside of reserve boundaries.[9] Furthermore, an economic study indicated that no financial losses were reported by recreation or commercial fishers in the area and commercial catches of reef fish actually increased in the region.[10] Marine reserves also provide the public with an opportunity to better understand the impacts of human activity on a local ecosystem.[11] The creation, enforcement, and administration of a marine reserve would be cost-effective and simple in comparison to other alternatives. When considering the limited resources

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[4]Bohnsack, J. 1994. How marine fishery reserves can improve reef fisheries. Proceedings of the 43rd Gulf and Caribbean Fisheries Institute 43: 217-241; Bohnsack, J., Ault, J. 1996. Management strategies to conserve marine biodiversity. Oceanography, Volume 9, Number 1, pp. 73-82; Halpern, B. 2003. The impacts of marine reserves: Do reserves work and does reserve size matter? Ecological Applications, 13, (1), Supplement. Pp. S117-S137.

[5]Anderson, L.G., *The Economics of Fisheries Management*, 2nd revised ed., Blackburn Press, Caldwell, New Jersey, 2004, 296.

[6]Beets, J., M. Manuel, *Temporal and Seasonal Closures Used in Fisheries Management: A Review with Application to Hawai'i* Department of Marine Science, University of Hawai'i-Hilo, August, 2007.

[7]Coleman, F.C., P. Baker, C.C. Koenig, *A Review of Gulf of Mexico Marine Protected Areas: Successes, Failures, and Lessons Learned*, Fisheries 29: 10-21, 2004.

[8]Ault, J. S., Smith, S. G., Bohnsack, J. A., Luo, J., Zurcher, N., McClellan, D. B., Ziegler, T. A., Hallac, D. E., Patterson, M., Feeley, M. W., Ruttenberg, B. I., Hunt, J., Kimball, D., & Causey, B. *Assessing coral reef fish populations and community changes in response to marine reserves in the Dry Tortugas, Florida, USA.* Fisheries Research 144 (2013) 28-37.

[9]U.S. Department of the Interior National Park Service & Florida Fish and Wildlife Conservation Commission, *Implementing the Dry Tortugas National Park Research Natural Area Science Plan: The Five Year Report*, 2012, 4-13. Ibid., 24-27.

[10]Jeffrey, C.F.G., V.R. Leeworthy, M.E. Monaco, G. Piniak, M. Fonseca (eds.), *An Integrated Biogeographic Assessment of Reef Fish Populations and Fisheries in Dry Tortugas: Effects of No-take Reserves,* Prepared by the NCCOS Center for Coastal Monitoring and Assessment Biogeography Branch, Silver Spring, MD, NOAA Technical Memorandum NOS NCCOS 111, 2012.

[11]Bohnsack, J., Ault, J. 1996. Management strategies to conserve marine biodiversity. Oceanography, Volume 9, Number 1, pp. 73-82.

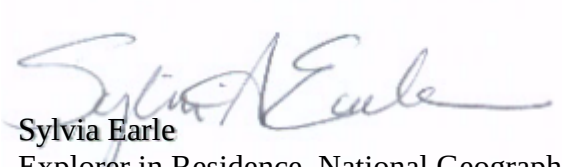
of the National Park Service, effective and inexpensive enforcement and implementation would greatly contribute to the success of resource conservation.

Thus far, the public comment periods on the issue have demonstrated clear public support for the creation of a marine reserve. In 2011, 17,891 comments were received on the Biscayne National Park General Management Plan/Environmental Impact Statement, with over 98% (17,597) of those comments in support of a marine reserve. In 2014, 18,000 comments were received on the Supplemental Draft General Management Plan, with nearly 78% (14,000) of those comments in support of a marine reserve.

It is the responsibility of the National Park Service and ultimately, the Secretary of the Interior to protect the treasures found within our national parks unimpaired for the enjoyment of present and future generations. If swift, decisive action is not taken immediately, some of Biscayne's magnificent marine creatures and habitat may be gone forever. We are counting on your leadership to fully and adequately protect the spectacular marine resources that truly define the character of Biscayne National Park.

Sincerely,

Jean-Michel Cousteau
President and Founder
Ocean Futures Society



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