



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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Trish Murphey, Chair | Jessica McCawley, Vice Chair
John Carmichael, Executive Director

March 12, 2025

Beth Dieveney
NOAA's Office of National Marine Sanctuaries
Eastern Region

Dear Ms. Dieveney,

Thank you for providing the South Atlantic Fishery Management Council (Council) an opportunity to review the draft Memorandum of Agreement for the purpose of Coordination of Fishing Regulations in Florida Keys National Marine Sanctuary (MOA). The Council reviewed the MOA at its March 2025 meeting and recognizes the importance of coordinating fisheries regulations across the multiple entities with jurisdiction in portions of the Florida Keys National Marine Sanctuary. The Council appreciates and supports the effort to update the MOA.

The Council provides the following suggestions for the MOA:

1. Revise Section IV to include a definition of Habitat Support Structure or Artificial Reef
2. Insert a new section V.C. with the following language:

Section V. C. Habitat support structures to enhance marine resources in Monroe County

The Parties acknowledge and agree that permitting for Habitat Support Structures can be handled through the same process used in State Waters outside of the Sanctuary. The Parties agree that permits for Habitat Support Structures will be obtained from the Florida Department of Environmental Protection and the Army Corps of Engineers without any further requirements from FKNMS or ONMS. The Parties further agree that any installations that do not require excavation shall not require an archeological survey.

I look forward to continuing to work with you to complete the MOA. Please feel free to contact me if there are any questions about the Council's comments.

Sincerely,

A handwritten signature in black ink that reads "John Carmichael".

John Carmichael
Executive Director

cc: SAFMC Members
Monica Smit-Brunello, NOAA GC
Carrie Simmons, GMFMC

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