

Date: July 15, 2016
Subject: TGCC's Position Statement - FGBNMS Expansion Proposal
To: TGCC clubs and members
From: Frank Burek – TGCC President

The proposed expansion of the FGBNMS boundaries is an important issue for TGCC clubs and their members.

TGCC Recommendation – That you support Alternate 2 of the FGBNMS Expansion Proposal (Expansion from an existing boundary of about 56 square miles to about 281 square miles).

Summary Statement:

- Alternate 1 – No change in the FGBNMS boundaries and is an option to consider if losing areas for spear fishing is the most important issue for you.
- Alternate 2 – Small expansion and includes 3 additional recreational diveable banks. The best alternative for divers. This is the alternative we have supported for over 10 years.
- Alternate 3, 4 & 5 – Advantages for researchers and environmentalist. They add greater responsibilities and requirements on the FGBNMS that will increase federal expenditures, reduce individual freedom, and damage the economy of the Gulf Coast area.
- When will all this be done and why should I comment? – The governmental procedure is an endurance run and may go on for several more years. You should comment because your reasons, preferences and the amount of interest shown by the local community influences the final decision made by the NMS. Your resolve is tested at every stage of this process. If they feel no one cares or that no one is paying attention – they will simply do Alternative 5.

Reasons that Alternate 2 is the best alternative for TGCC members:

1. Can be handled and managed with no increase in existing sanctuary staff and budget.
2. Contrary to Chapter 3 "Description of Alternatives" – Option 2 is the current, recorded position of the SAC representatives! It is the only one our members had been told about.
3. Has been developed by representatives of the diving, fishing, oil & gas, educational and environmental community as a compromise with which they all can live with.
4. Encompasses all the benefits that our divers can get from the sanctuary system. Managed, mooring buoy diving systems for:
 - a. East Flower Gardens Bank (No change)
 - b. West Flower Gardens Bank (No change)
 - c. Stetson Bank (No change)
 - d. Bright Bank (New)
 - e. Sonnier Bank (New)
 - f. Geyer Bank (New)
5. Any additional expansions will:
 - a. Reduce the available funds and management attention needed to add additional mooring buoys to recreational diveable banks.
 - b. Needlessly impede divers interested in diving or fishing platforms within reasonable travel time from Galveston or Freeport.
 - c. Begin to impact the economic well-being of our communities.
 - d. Are not in the interest of recreational divers.

Why Alternate 2 rather than the Sanctuary recommended Alternate 3:

1. Alternate 2 is for 281 square miles. Alternate 3 is a land grab of 383 square miles.
2. No additional recreational diving areas are added with Alternates 3, 4 or 5.
3. Alternate 2 was worked out by the Sanctuary Advisory Committee and the FGBNMS personnel over a period of 10 years. Alternate 3 came in out of the blue and is indicative of "bad faith" and

“hidden agenda” work by the governmental agency that we have been keeping abreast with the desires and needs of our dive community. Alternate 2 was carefully designed to:

- a. Minimize costs
- b. Maintain the philosophy of smallest footprint to achieve the maximum benefits.
- c. Avoid needlessly taking existing platforms into the new boundaries.

How can I comment - Written comments will be accepted until August 19, 2016 and can be submitted online or through the mail to the sanctuary:

- Responsible Official: John Armor Acting Director, Office of National Marine Sanctuaries
- Sanctuary Official: George Schmahl, Superintendent
- Visit the federal eRulemaking portal at <http://www.regulations.gov>
In the search window, type NOAA-NOS-2016-0059, click the "Comment Now!" icon.
- Mail: Flower Garden Banks National Marine Sanctuary 4700 Ave. U, Bldg. 216, Galveston, TX 77551.
- Verbal input can be made at public meetings:
 - Galveston – July 12th
 - Houston – July 13th
 - New Orleans – July 19th
 - Mobile – July 20th
 - Lafayette – July 21st

Additional detail on the proposed FGBNMS Expansion Alternatives:

1. No action – Existing sanctuary – Stetson Bank, West Flower Garden Bank, East Flower Garden Bank
(Total 56.21 sq. miles)
2. Advisory Council Recommendation – Add Horseshoe Bank, MacNeil Bank, Rankin Bank, 28 Fathom Bank, Bright Bank, Geyer Bank, McGrail Bank, Sonnier Bank, and Alderdice Bank.
(New sanctuary of 281.15 sq. miles)
3. FGBNMS Staff Recommendation – To 1 & 2 above add Elvers Bank, Bouma Bank, Bryant Bank, Rezak Bank, Sidner Bank, and Parker Bank.
(New sanctuary of 383.19 sq. miles)
4. High Priority Mesophotic and Deep Coral Sites – To 1, 2, & 3 above add Hidalgo Basin Rim, Assumption Dome, St. Tammany Basin Rim, Henderson Ridge North, Henderson Ridge South, Biloxi Dome, Mountain Top, Viosca Knolls West, Gloria Dome, Alabama Alps, 36 Fathom Ridge, West Addition Pinnacles, Dauphin Dome, Shark Reef, Double Top, Triple Top, Viosca Knolls East, Ludwick-Walton and West Delta Mounds, Yellowtail, Cat’s Paw, Roughtonge, Corkscrew, Far Tortuga, Desoto Canyon/West Florida Escarpment
(New sanctuary of 633.76 sq. miles)
5. High Value Habitats and Cultural Resources – To 1, 2, 3, & 4 above add USS Hatteras, Claypile Bank, Galvez/Frye Basins Ridge, 29 Fathom Bank, “Monterrey” Wrecks, Tunica Mound, Jeanerette Dome, Jakkula Bank, Penchant Basin Rim, Ewing Bank, Henderson Ridge Mid-South, Gulfpenn, Whiting dome, “Mardi Gras” Wreck, Horn Dome, and Anona.
(New sanctuary of 935.18 sq. miles.)

* Editor’s note:

A link to DiveNews Network article with pictures etc.: <http://flippubs.net/publication/?i=319808&p=44>