

**DECLARATION OF MANLEY FULLER  
PRESIDENT, FLORIDA WILDLIFE FEDERATION, INC.**

1. I, Manley Fuller, am over 18 years of age and have personal knowledge of the following facts.

2. I reside at 620 River Plantation Road, St. Marks, Florida, 32327.

3. I am currently President of the Florida Wildlife Federation (“Federation”) and have served in that position for the past 23 years.

4. I joined the Federation because I have a lifetime personal and professional interest in natural resource conservation.

5. The Federation is a Florida statewide non-profit conservation and education organization which is headquartered at 2545 Blairstone Pines Drive, Tallahassee, Florida, 32301. The Federation has over 13,000 members state-wide and many of those members live in counties that border Florida’s Gulf Coast that are currently being adversely affected by the BP Deepwater Horizon oil spill.

6. The Federation’s mission includes the preservation, management, and improvement of Florida’s water resources and its fish and wildlife habitat. The Federation represents its members in state and federal litigation brought to preserve and protect Florida’s coastlines and access to Gulf of Mexico resources as well as its rivers, lakes, and estuaries.

7. Members of the Federation use and enjoy the open waters of the Gulf of Mexico and the coastal and estuarine waters bordering Florida’s shoreline (including the waters currently being adversely affected by BP Deepwater Horizon oil spill) for recreational and commercial fishing and shellfishing, wildlife observation, boating, hunting, birding, canoeing, and swimming and intend to continue doing so in the future.

8. Our organization depends upon the support of Floridians but our members who offer guided nature services and fishing adventures along and within the Gulf of Mexico are seeing less interest from travelers and residents because of the adverse impacts from this devastating spill.

9. In addition, recreational and commercial fishing is an enormously important component of Florida's economy. This is especially true in the Florida Panhandle Region which is currently being adversely affected by the ongoing BP Deepwater Horizon oil spill.

10. For example, the National Oceanic and Atmospheric Administration's Marine Recreational Information Program ("MRIP") stated in its 2008 report that economic impacts from the commercial seafood industry in Florida generated \$5.7 billion in total sales, supporting 108,600 full- and part-time jobs within the industry.<sup>1</sup> Recreational fisheries in West Florida alone produced an additional \$5.65 billion in total sales.<sup>2</sup> According to this same report, recreational fishing activities in West Florida supported more jobs than any other state in the Gulf Region, with approximately 54,600 full- and part-time jobs in 2008.<sup>3</sup> In the Gulf of Mexico, an average of 3.1 million anglers fished annually from 1999-2008, with most of these anglers fishing in West Florida.<sup>4</sup> An average of 22 million fishing trips were taken annually in the Gulf Region between 1999 and 2008. Again, most of these trips were taken in West Florida.<sup>5</sup> This official government publication is attached as Exhibit A to this declaration.

11. The degradation of coastal habitat caused by drilling in the Gulf of Mexico continues to imperil Florida's ecotourism- and fishing-based economy.

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<sup>1</sup> [http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf\\_ALL\\_econ.pdf](http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf_ALL_econ.pdf), p. 118

<sup>2</sup> [http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf\\_ALL\\_econ.pdf](http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf_ALL_econ.pdf), p. 120

<sup>3</sup> [http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf\\_ALL\\_econ.pdf](http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf_ALL_econ.pdf), p. 120

<sup>4</sup> [http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf\\_ALL\\_econ.pdf](http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf_ALL_econ.pdf), p. 121

<sup>5</sup> [http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf\\_ALL\\_econ.pdf](http://www.st.nmfs.noaa.gov/st5/publication/econ/2008/gulf_ALL_econ.pdf), p. 121

12. Part of the Federation's mission is helping people take positive memories from their experiences in nature, and the current spill has impaired our ability to do that. Our organization depends upon the support of Floridians, but our members who offer guided nature services and fishing adventures along and within the Gulf of Mexico are beginning to see less interest from travelers and residents because of the adverse impacts from this devastating spill.

13. A six month moratorium on 31 deepwater drilling operations in the Gulf of Mexico serves Federation members' and the public's interest. Federal law allows drilling in the Gulf of Mexico but only in an environmentally safe manner. Federation members now know from personal experiences that the current safety regulations, current oil spill response plans, and current governmental regulatory oversight of deepwater oil drilling are woefully inadequate. Those inadequacies have resulted in an environmental catastrophe for the Gulf of Mexico.

14. A moratorium on 31 deepwater drilling operations for this short time period will allow a thorough review of environmental risks presented by a worst case scenario blowout, the development of adequate oil spill response plans, and changes in safety regulations necessary to reduce the chances of another uncontrolled blowout.

15. It will also protect Federation members' and the public's interest in reducing the risk the risk of another uncontrolled deepsea blowout at a time when many individuals, including Federation members, are struggling to cope with the first one.

I DECLARE under penalty of perjury under the laws of the United States and the laws of the State of Florida that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

Manley K. Fuller III  
Affiant

STATE OF FLORIDA

COUNTY OF LEON

BEFORE ME, the undersigned authority, personally appeared MANLEY K. FULLER III who is personally known or produced as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 16<sup>th</sup> day of JUNE, 2010.

Kristen M. Standridge  
Notary Public

