



Department of Environmental Protection
Re Big Sarasota Pass dredging project, 0333315-001-JC

April 9, 2015

Dear Mr. Cheng,

I am writing to you on behalf of the Siesta Key Association of Sarasota, Inc. *The Siesta Key Association (SKA) has 66 year history of civic and environmental advocacy on behalf of the Siesta Key residents of unincorporated Sarasota County.*

We ask your consideration of our questions and comments concerning the *Joint Coastal Permit (File No. 0333315-001-JC) which includes a request for authorization to use sovereign submerged lands, pursuant to Chapter 253, F.S. The Applicants are the City of Sarasota and the US Army Corps of Engineers.*

EA / NEPA process

The EA (2004) provided to FDEP and distributed as part of the permit application is not current and inconsistent with the EA (2015) provided by ACOE to Stakeholders on March 30, 2015. We ask FDEP to reissue the Notice of Permit application to include EA (2015) and allow updated input to FDEP prior to your issuance of an RAI.

Regarding the protocols for species protection, we note the EA (2015) does not include protected/threatened Florida beach nesting bird species (Least Terns, Snowy Plovers, Black Skimmers). While there is mention of the American Oystercatcher and Red Knot which are protected within the Federal Endangered Species Act, there is likewise no mitigation or protection management guidelines. It is our understanding species protection guidelines are being developed by DEP within the Florida Beaches Habitat Conservation Plan (HCP). This plan is only now in the drafting stage and has no draft protection chapters at present.

There is no detailed description of turtle or manatee protection, which is highly relevant in the Big Sarasota Pass waters designated for dredging in this Permit application. National Marine Fisheries Service (NMFS) is the regulatory body for governance of off shore species. As an example of biological opinion, we reference for a similar project in our region, issued by the U.S. Fish and Wildlife Service, FWS Log. No. 4190-2012-F-0133. At minimum, a detailed plan of mitigation should be written by the ACOE. This should be described in their application for any coastal habitat modifications, dredging, renourishment and included as a requirement of the FDEP permit.

Pending Coastal Engineering Peer Review by WCIND Regional Stakeholder

In August 2014, The Board of Sarasota County Commissioners unanimously approved budgeted funding of a Natural Resources Staffing review of the ACOE plan. The Independent Peer review is to be



completed by an external independent Coastal Engineering Firm contracted upon availability of the ACOE Permit Application. The ACOE draft design was not available until March 30, 2015 and therefore, a scope of work for such a review developed only recently. We believe this Peer Review will contribute significantly to the FDEP permitting process.

We ask you consider delay within the RAI process such that the Sarasota County Independent Peer Review is complete and available for all stakeholders consideration.

Groin Design and Sand source

We reviewed the ACOE alternatives for sand placement and the groin structure design. Of concern is the lack of alternatives should coastal erosion and sand depletion occur at a rate not falling within the anticipated renourishment schedule. We didn't find consideration of a permeable adjustable groin (PAGs) design. While such a design has not been ruled out by the ACOE, there is no reference to such a design being considered.

The State of Florida, within its goals for natural resource protection, has stated concerns regarding decreasing sand sources for coastal renourishment projects. Any design for coastal protection which is flexible, adjustable and designed to facilitate natural sand accretion would likely be preferred.

We further have questions regarding the groin field and whether the design has adverse impact on the southern end of Lido Key. We note this is a natural dune system and the ACOE design predicts coastal erosion of that area subsequent to groin placement. The additional *possible* third groin is also not a PAG design which would allow for natural accretion on the down drift beach. This plan may not be consistent with Rule 62B-441.005(5) of the Florida Administrative Code. This stipulates that structures such as groins that interfere with natural alongshore movement of sediments shall not be allowed unless a net positive benefit to the coastal system can be reasonably expected to occur.

While there are other considerations, we feel these, in particular, warrant your attention and input from other significant stakeholders. We greatly appreciate your assistance.

On behalf of the Board of Directors,

Catherine Luckner, Chair of Environmental Committee
Vice President

Michael T. Shay
President

Cc: Board of Directors, The Siesta Key Association of Sarasota, Inc.