

FW: Comments on new guidelines

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To: Sutton, Kaitlyn <Kaitlyn.Sutton@dep.state.fl.us>

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Here are some comments on the coral reef turbidity criterion implementation document. Although these aren't formal public comments at this point, please create a file for the comments.

Daryll

From: Lirman, Diego <dlirman@rsmas.miami.edu>

Sent: Wednesday, November 18, 2020 6:23 PM

To: Joyner, Daryll <Daryll.Joyner@dep.state.fl.us>

Subject: Comments on new guidelines

I looked at the DEP sediment documents and on first read it makes a lot more sense using natural variability and confidence intervals than some high threshold level.

It also makes each project unique and tailored to the coral community found at the particular site. Flip side of that is that if you have a site that is already impaired due to sedimentation, you will be allowed to have higher levels during construction which may be closer to some threshold level beyond which the corals can't survive (corals on the edge type of scenario)

Concerns with this approach are the data used to set the confidence intervals. In theory, you would need a long record of a lot of point surveys to get at background levels. Allowing for these levels to be set based on a limited number of samples is risky as you can easily (being very cynical here) game the baseline to be what you want it.

I think a system in which the data required to establish the baseline and confidence intervals could be scaled to the magnitude and duration of the project. They do mention that projects that will go on for a while will be required some seasonal data collection but that is very vague. If you require large sample sizes and long-term data to establish a robust baseline, then the guidelines should help over the flat 29 NTU threshold.

There are comparable approaches to set up nutrient benchmarks and baselines that should be reviewed for an established method on how to set baselines for sediments.

Regards

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