



COASTAL PROTECTION ENGINEERING
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November 14, 2019

Kaitlyn Sutton
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station 6511
Tallahassee, FL 32399-2400

Re: FDEP Triennial Review of Florida's Water Quality Standards, Draft Implementation the Turbidity Criterion for the Protection of Coral Reef and Hardbottom Communities (September 2019)

Dear Ms. Sutton:

These questions and comments are respectfully submitted to you in response to the Florida Department of Environmental Protection (FDEP) Triennial Review of Florida's Water Quality Standards Workshop, presented by the Division of Environmental Assessment & Restoration (DEAR) on November 4, 2019. Specifically, these comments refer to the "Draft Implementation the Turbidity Criterion for the Protection of Coral Reef and Hardbottom Communities" (FDEP, September 2019)

Question No. 1. How does FDEP define projects "where coral reef or hardbottom communities are present"? Page 9 says the presence or absence will be based on site-specific evaluation, which must be "based on benthic surveys within the area affected by the project or construction area." Please provide specific criteria to define whether these communities are present (e.g. location relative to fill area, ETOF, borrow area, mixing zone, etc.) that would require additional turbidity monitoring measures.

Question No. 2. If hardbottom located in the project area has been mitigated through construction of artificial reefs, will additional turbidity criteria still apply?

Question No. 3. How will the turbidity criterion for coral "affect the boundaries (size) of turbidity mixing zones", as stated on p. 8?

Question No. 4. What is the difference between "reference stations" (p. 7) and "baseline stations" (pp. 9-10), or are they the same thing?

Question No. 5. How is the location of pre project baseline stations (or "least disturbed reference stations")? determined? The proposed guidelines state that the stations shall be established in portions of the project area "where there are minimal man-induced alterations" (p. 9), but it would seem to make more sense if the pre-project (baseline) samples were collected in the same area where



compliance samples may be collected during construction in order to capture the site-specific variability in the actual project area.

Question No. 6. If FDEP requires baseline stations be established “no more than three months before the beginning of the project” (p. 9), and the baseline data will be used to develop permit-required turbidity limits, will the baseline data be a Notice to Proceed Item and the turbidity limits established by FDEP in an administrative permit modification? It is not reasonable to delay issuance of project permits until within three months of construction. Projects are put out for bid more than three months before construction, and the permits, including allowable turbidity limits, are included in the bid package.

Question No. 7. Will these new turbidity criteria replace any mid-construction sediment monitoring currently required for projects with coral/hardbottom present to avoid duplication of data and to reduce monitoring costs?

Suggested Correction No. 1. On p. 2, third paragraph, this sentence is missing a word after “significant”: “Consideration of historical presence of coral is of critical importance because the FRT has experienced significant due to bleaching event and disease.” Please correct this in the next version of the document.

Suggested Correction No. 2. On p. 4, Figure 2 shows in green “South West Florida Coral Reefs”. Based on the definitions in this document of “coral reef” and “hardbottom community” (p. 3), it seems this category should be renamed “South West Florida Hardbottom Communities”.

In addition to our questions above that will help us understand the intended implementation of the proposed protocol, we would like to express our overall concern that these new requirements are too cumbersome and will significantly increase the cost and duration of beach nourishment projects. We appreciate the FDEP providing these workshops and hope you will consider the implications of the proposed added requirements to Florida’s beach nourishment program, and the coastal communities who need them.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Floyd", with a long, sweeping horizontal line extending to the right.

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