

Sutton, Kaitlyn

From: Mark Crosley <mcrosley@aicw.org>
Sent: Thursday, November 21, 2019 11:46 AM
To: Sutton, Kaitlyn
Cc: Janet Zimmerman; Don Donaldson; larmbruster@sustainablebeaches.com; Shelley Trulock (Shelley.F.Trulock@usace.army.mil); 'Jerry Scarborough'; Jackie Larson; Debbie Flack; Alyssa Freeman
Subject: Triennial Review of Water Quality Standards - comments

Kaitlyn:

Thank you for the opportunity to provide necessary and valuable input to the referenced process and specific language changes as suggested by the Florida Department of Environmental Protection (FDEP). On behalf of the Florida Inland Navigation District (FIND) , I would also like to take this opportunity to thank the FDEP for all of the work that you do on behalf of the State of Florida, as well as the many successful partnerships FIND has enjoyed with the FDEP over the many years of both agency's existence.

As you may know, FIND is committed to the protection of our State's valuable natural resources, while allowing for the reasonable access and enjoyment of these resources. This commitment is becoming increasingly important as our State's increasing population puts additional pressure on these resources. No one desires the degradation of our environment, especially boaters, a unique user group that can often be the environment's staunchest defender. I commend FDEP on efforts to improve water quality standards and offer the following comments/suggestions:

- 1) At the public meeting on Wednesday, November 6, 2019, the presenter noted that "the dredging industry is requesting additional criterion above the current 29 NTU background turbidity requirements". Please provide specific examples and references for this statement.
- 2) The presentation suggested a change to current monitoring standards by establishing an in situ background turbidity standard based on three (3) monitoring events over the course of two(?) tidal cycles. This is obviously a very limited sample size and those of us that have worked in the field know that turbidity can vary greatly depending upon hydrologic and other weather-related conditions. It would be far more effective to establish baseline turbidity standards in area basins based on annual sampling and an analysis of previous data as available (past projects for example?)
- 3) In concurrence with point #2 above, it is likely that episodic weather events and seasonal variations in turbidity are far more consistent and a constant factor in affecting overall water clarity than occasional, properly permitted dredging projects. In relation to this statement, has the effects of bleaching and water chemistry been considered in hardbottom mortality?
- 4) The presentation assumes that human intervention (and more specifically, dredging) is the outlying causal effect of the recent spate of hardbottom decline. This ignores water temperature and chemistry and plausibly other more significant factors. If all dredging has a direct impact to hardbottom habitat, then each and every dredging project would demonstrate some adverse effect on the benthic community. This is simply NOT the case. Numerous successful and properly permitted and constructed dredging projects have demonstrated benefits to the benthic community by removing fine sediments in the project area and increasing available areas for hardbottom recruitment. I have long been a proponent of marking and maintaining navigation channels and keeping vessels within those channel to protect resources. Limiting beneficial dredging would significantly curtail that effort.
- 5) The potential additional costs associated with the proposed changes has not been significantly calculated. I suspect that these costs would be difficult to quantify since the variables and unknowns associated with future dredging projects is improbable to predict without additional information. It would be reckless to implement the proposed changes with a proper cost/benefit analysis.

Please consider these initial comments as I request to ability to further comment as the proposed changes are considered and potentially revised.

Thank you.

Sincerely,

Mark Crosley
Executive Director

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