

## **The Florida Coastal and Ocean Coalition**

Caribbean Conservation Corporation & Sea Turtle Survival League •  
Environmental Defense • National Wildlife Federation • Natural Resources  
Defense Council • Reef Relief • Surfrider Foundation • The Ocean Conservancy

July 30, 2007

Ms. Roxanne Dow  
Environmental Specialist III  
Florida Department of Environmental Protection (FDEP)  
3900 Commonwealth Blvd., Mail Station 300  
Tallahassee, Florida 32399-3000

Re: Comments on Draft Strategic Beach Management Plan

Dear Ms. Dow,

The Florida Coastal & Ocean Coalition would like to offer the following comments regarding the 2007 Draft Strategic Beach Management Plan ("Plan"). The Coalition is a group of environmental, civic, business and outdoor organizations working together to sustain Florida's environmental and economic future. The Coalition Steering Committee alone represents over 100,000 Floridians and that number is growing everyday; over 160 businesses and environmental organizations have joined together to support the Coalition's shared voice on the critical issues facing our coastal communities.

We fully appreciate the depth and scope of the Plan, the commitment of resources and the work of staff, and the engineering efforts outlined to restore and protect Florida's sandy beaches. However, we also believe the underlying strategy, relying solely on repetitive beach re-nourishment and existing inlet bypassing plans, is not the best long term sustainable approach to ensuring protection of our beach and dune systems. This binary approach repeated over past decades is unnecessarily limited. It does not adequately consider policy, regulatory and free market strategies as long-term solutions to the problem of critically eroding beaches. These tools should supplement the current Plan.

As stated in the Plan, "The Strategic Beach Management Plan is a dynamic management tool for use by state, local and federal government officials. It is intended to be updated annually as specific strategies are implemented, new resources and opportunities are identified, and proposed strategies are developed by FDEP and federal or local government sponsors." Furthermore, "proposed strategies developed by FDEP and local government sponsors in the future are still eligible for state funding assistance even if absent from the current SBMP." This language clearly contemplates a broader range of strategies.

In the 2000 Strategic Beach Management Plan, 39% of the state's sandy beaches were designated as critically eroded. In the 2007 Plan, almost 46% of the sandy beaches are

## **The Florida Coastal and Ocean Coalition**

Caribbean Conservation Corporation & Sea Turtle Survival League •  
Environmental Defense • National Wildlife Federation • Natural Resources  
Defense Council • Reef Relief • Surfrider Foundation • The Ocean Conservancy

critically eroded. Almost half of the State's beaches need perpetual maintenance at great public expense in order to maintain their economic, recreational, natural resource, and upland protection values. This constitutes an enormous drain on limited tax revenues, especially in the current political climate of state and local government tax cutbacks. These are clear warning signs that alternative management techniques are necessary if Florida is to successfully meet the challenges our future holds.

To that end, increased resources should be devoted toward aggressive inlet management for sand bypassing. If inlets cause in excess of 50% of coastal erosion, as many coastal engineers assert, then inlet management, utilizing best management practices and state of the art bypassing technologies, should be the state's highest Beach Management priority. We propose that the state highlight one or two inlets per year for targeted efforts at maximizing sand bypass to the fullest extent possible, partnering with the respective agencies managing each inlet and exploring all policy and regulatory tools available with them to reach full implementation.

Governor Charlie Crist has recognized that Florida needs to face issues head on; adapt and change direction when necessary to ensure our well being and quality of life. In his State of the State Address and Keynote Address at the Climate Summit, Governor Crist highlighted in no uncertain terms that Climate Change is one of the most critical issues we must address. Yet there is not one word about climate change in the Plan. There is no consideration of "adaptive strategies" that could or should be explored to address climate change and its impacts to the beach and dune system. Recognition of the impacts we can expect on our beaches from climate change, and development of policies to deter armoring as those impacts onset, should be a key component of the Plan.

In that light, there is no consideration in the Plan of policies or strategies to reduce development pressures on highly erosive beaches. This must be addressed. To solve the problem of repetitive, expensive dredging and a future where beaches have been replaced by sea walls, this fundamental issue cannot be ignored. Strategic policies to address the situation in 2015, 2030 and beyond should include, but not be limited to:

- Limitations on Citizens Insurance coverage seaward of the 30 year erosion projection line;
- Targeted coastal land acquisition programs;
- Easements and dune protection setbacks;
- Innovative redevelopment policies that would encourage more landward siting of structures that are rebuilt after storm events;
- Full public disclosure of erosion rates;
- Transfer of development rights; and

## **The Florida Coastal and Ocean Coalition**

Caribbean Conservation Corporation & Sea Turtle Survival League •  
Environmental Defense • National Wildlife Federation • Natural Resources  
Defense Council • Reef Relief • Surfrider Foundation • The Ocean Conservancy

- Support for creative and restrictive comprehensive planning amendments, and other possible initiatives.

Finally, our beaches are clearly some of the most valuable natural resources to Floridians. These areas have extremely high recreational and aesthetic value. A resilient defense of the public's ability to access these areas should be central to any Beach Management Plan; particularly those areas where significant public money has been invested. The practice of creating restrictions or closures of beach access between the termination and renewal of beach project contracts should be abolished. Where public access has been defined by the investiture of public funds in beach maintenance, that access should be maintained in perpetuity; clearly the life of the coastal area has been permanently altered by the public's investment.

FDEP is charged with the development and management of a comprehensive plan for the future of Florida's beaches and dunes. We believe FDEP has the tools and authority to objectively evaluate and launch a broader range of strategies to create a more sustainable beach and dune system that reduces coastal erosion, minimizes re-nourishment cycles, protects public access and reduces the need for sea walls and armoring. We look forward to being a partner with FDEP in creating a more sustainable coastal and ocean future for all Floridians.

Thank you for the opportunity to provide these comments.

Sincerely,

Gary Appelson – Caribbean Conservation Corp.  
Sarah Chasis, J.D. – Natural Resources Defense Council  
Ericka D'Avanzo – Surfrider Foundation  
Michelle Duval, Ph.D. – Environmental Defense  
Paul Johnson – Reef Relief  
David White, J.D. – The Ocean Conservancy

cc: Col. Paul Grosskruger, Commander ACOE Jacksonville District  
Col. Byron Jorns, Commander ACOE Mobile District  
Bill Nelson, U.S. Senator  
Mel Martinez, U.S. Senator  
Ken Haddad, Secretary Florida Fish and Wildlife Conservation Commission