



4052 Old Plantation Loop
Tallahassee, Florida 32311

December 5, 2022

Mr. John Carmichael, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Dr, Suite 201
North Charleston, South Carolina 29405

Dear Mr. Carmichael:

Thank you for the opportunity to comment on the recent report from the Habitat Advisory Panel (AP). We value both your and the Council's time and efforts to manage healthy marine fisheries.

Resiliency Florida is a not-for-profit based in Florida for the advancement of sound policies regarding all aspects of resilience communities. These include issues associated with sea-level rise, flooding, extreme weather, energy, and more. As such, it is with great interest that we contact you about the above-mentioned report.

In many cases, the recommendations of the panel appear to be consistent with the existing permitting requirements, however, there are portions that we would request be more thoroughly vetted by the Council Habitat Committee and then the full Council as the policy making body. For example, much of the language used by the AP is absolute while based on inference. We believe that while scientific inference is of value, it can also be fraught with opinion and bias.

There have been studies of beach renourishment and coastal engineering projects that have found the impacts are temporary in nature. The AP document makes no reference to the temporary nature of these impacts. The AP also makes recommendations which are based on assumptions while mentioning that more scientific study is required. We would suggest that additional requirements for these types of projects should not be pursued until further analysis has been completed.

As mentioned in the document, endangered and threatened species impacts are currently considered during the permitting process for these activities. Suggesting that mitigation of impacts to non-threatened species should be undertaken is a departure from many existing permitting practices. Also, a cumulative impact analysis being performed for every project site may be impracticable. Additionally, questions remain as to who would bear the cost burden of such studies and modeling.

Lastly, many beach renourishment and coastal engineering projects are not only performed to protect human health and safety but to restore estuarine habitats that have been lost to storm damage and other impacts. There is no mention of the potential consequences or the added costs to these much-needed projects.

As mentioned, the work of both the Council and the AP is vitally important. We request that the Council refer the AP report to the Council Habitat Committee for further review and refinement prior to final approval. We are also willing to assist the Council, if requested, to further this important work.

Sincerely,

A handwritten signature in black ink, appearing to read "David Rathke", with a long, sweeping underline.

David Rathke, Executive Director
Resiliency Florida