



FLORIDA SHORE & BEACH  
PRESERVATION ASSOCIATION

A League of Cities and Counties on Beach and Coastal Issues

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December 7, 2022

John Carmichael  
SAFMC  
4055 Faber Place Drive, Suite 201  
North Charleston, SC 29405

Dear Mr. Carmichael:

I am the President of the Florida Shore & Beach Preservation Association (FSBPA) and am submitting public comments on its behalf regarding the draft revised policies of the Habitat Protection & Ecosystem Advisory Panel on the effects of beach nourishment on essential fish habitat (EFH). FSBPA is a non-profit that focuses on beach on coastal issues throughout Florida. The association has been and will continue to support sound policies that protect both built and natural environments.

In reviewing the 2022 draft document and the underlying document from 2015, FSBPA has several concerns. As I was not involved in these issues in 2015, I will address the revisions as well as some existing items in the 2015 document.

**Comment: It is clear additional study is needed before additional policy decisions are made.**

Among the most notable revisions is the focus on beach nourishment rather than general coastal engineering projects. Along with this new focus, the findings conclude that beach nourishment projects constitute a real and significant threat to EFH, yet the second finding indicates the cumulative adverse effects of such projects has not been adequately assessed. Indeed, the revised draft includes "Research Needs" and lists spatial, temporal, and cumulative impact analyses as needing additional research. FSBPA agrees with the recommended research needs identified in the draft before further action is taken. Without additional studies, FSBPA requests that refinement or addition to any beach nourishment policies based on existing science be reviewed by the Habitat Protection and Ecosystem-Based Management Committee, and, ultimately, considered by the SAFMC as a whole.

**Comment: The AP should not be addressing "retreat" as a finding.**

I am unsure why the AP includes "retreat" as a finding. I could find no direct studies on the impacts of retreat on EFH. Retreating from the coastline may be a viable option on a case-by-case basis for certain upland structures and infrastructure, however, without data, the AP's use of this "finding" as a potential alternative to protect EFH is unsubstantiated.

**Comment: Florida has significant and effective permitting requirements for beach nourishment projects.**

Permitting beach nourishment projects in Florida is a lengthy and comprehensive process involving federal, state, and local governments. Each permit has multiple conditions to protect threatened and endangered species and nearshore benthic habitats, including hard bottom, and upland resources, and is temporally limited to avoid sea turtle nesting season. Water quality and turbidity monitoring are key aspects of the permitting process and violations of these standards may result in shutting down the construction process during any phase. In addition, such projects provide vital habitat for endangered sea turtles and shorebirds that an armored coastline cannot.

**Comment: Additional regulations for beach nourishment projects in Florida are not warranted at this time.**

As mentioned above, due to the comprehensive permitting process already in place in Florida, a cumulative impact study and additional requirements to mitigate for non-listed species for each beach nourishment project are unnecessary until further study and analysis is conducted. There are other significant threats to EFH that may be far more impactful that also need further evaluation including nearshore water quality degradation from upland point and nonpoint sources, which the AP has not addressed.

In sum, FSBPA thanks the SAFMC and Habitat Protection & Ecosystem Advisory Panel for the opportunity to submit public comments and for its critical work in fisheries management. FSBPA fully endorses the need for further studies as recommended in the report under research needs, however, until such studies are completed, additional policy recommendations for beach nourishment and associated large-scale coastal engineering projects cannot be justified. At a minimum, FSBPA requests the revised policy document be carefully vetted by the Habitat Protection and Ecosystem-Based Management Committee and subsequently by the full SAFMC to ensure consistency with existing science.

Sincerely,

Pepper Uchino  
President, FSBPA