



May 10, 2015

Department of Environmental Protection  
Re: Joint Coastal Permit (File No. 0333315-001-JC)  
Via email to [chiu.cheng@dep.state.fl.us](mailto:chiu.cheng@dep.state.fl.us)

Dear Mr. Cheng,

We are again writing to you on behalf of the Siesta Key Association of Sarasota, Inc . We have 66 years of civic and environmental advocacy on behalf of the Siesta Key residents of unincorporated Sarasota County. We ask your consideration of these comments and questions regarding the most recent Joint Coastal Permit Application (**File No. 0333315-001-JC**) filed by the City of Sarasota and the Army Corps of Engineers.

These questions and concerns we believe should be considered within your permitting decision process. We represent more than 3000 citizens who have reason to believe they may be adversely impacted by the proposed project in its current form.

Our concerns and objections include the following:

1. The proposed dredging plan of Big Pass (D2-C-B) is to dredge (Attachment 5, Project Description, page 3) 300,000 cubic yards of sand from the existing channel ("Area B") just offshore of the north end of Siesta Key and up to 985,000 cubic years of sand from the "ephemeral channel" ("Cut C") down the middle of Big Pass shoal. This will remove a significant amount of sand that is currently the primary source of the natural renourishment of mid-Siesta Key beach (Siesta Key Beach Access 3 to the public beach). Not only have these areas never been dredged before but there is no modeling presented in the permit application to demonstrate a finding of '*no significant impact*' to our beach, recently rated the #1 beach in the US. The natural beach is a significant public asset, serving the public for recreation and provides a source of tourism related economic benefit for Sarasota County and Florida. Thus, modeling should be expanded to show the impact for 5 years of the proposed dredging of the Siesta Key mid-beach (between Siesta Key Access 3 and the Siesta Key County Park public beach). Further, *there is no plan to monitor the actual impact on Siesta Key of the proposed dredging*, should it be approved. Thus, item 33a of your 4/15/2015 RAI#1 should be expanded to included the monitoring of this Siesta Key mid beach area. This would include updated assessment of species of concern, the relevant food source impact and mitigation of these impacts.

2. The permit application requests a 15-year permit (proposing to pre-approve not only the initial dredging but also additional dredging to permit planned future nourishments of Lido every five years). This first time dredge plan should instead be viewed as an “experiment” and additional dredging of this area should not be ‘pre-approved’ but instead await proof (based on actual data after this initial dredging) that the current and supplemental requested models are correct and the impacts are not significant. An additional request related to this issue of ‘real time’ evaluation, is that any borrow site included for consideration not receive approved, dedicated State of Florida DEP ‘borrow site’ status during such a period of evaluation. The borrow sites as requested, should receive a temporary limited use designation. We foresee risk of future disputes and potential environmental risk without a special status exemption prohibiting access while in such an evaluation period.
  
3. The application modeling (see **Attach No. 38-3 - USACE Study Of Big Sarasota Pass Mining Alternatives**, page 110, 2/20/2015) demonstrates that within 6 months of the dredging “there will be **significant accretion** in Cut C and the main navigation channel” (emphasis added). **Figure 115, page 111**, *ibid* predicts that a fill in of Cut C by 3 meters (about 9 feet) and a fill in of the existing pass (Area B) by 1 meter (about 3 feet) in just 6 months after dredging. No modeling is disclosed for longer periods up to the proposed five years between dredging but should be performed to properly assess the impact the proposed permit. This is a significant loss of a Sarasota Big Pass navigation channel with no proposed mitigation, e.g., a commitment to future dredging. Thus, this proposal with *significant impact is unacceptable or at minimum, requires mitigation design*.

Thank you in advance for your response. Kindly respond to these concerns prior to the permit review process being completed.

Respectfully, on behalf of the Board of Directors,

Catherine E. Luckner, Environmental Committee Chair  
Vice President

Michael T. Shay, President  
The Siesta Key Association of Sarasota, Inc.