



To: Honorable Board of County Commissioners

July 11, 2016

Alan Maio, Chair
Paul Caraguilo
Christine Robinson
Charles Hines
Carolyn Mason

RE: Board Action in support of an *Environmental Impact Statement (EIS)* for the proposed Lido Key Hurricane and Storm damage Reduction Project, Sarasota County, Florida

Dear Commissioners:

Siesta Key Association (SKA) is requesting your communication by official Resolution, be sent to the City of Sarasota and the US Army Corps of Engineers (USACE) asking for withdrawal of the draft *Finding of No Significant Impact* (FONSI) in the Environmental Assessment (**EA**) of the Lido Beach Project. There is sufficient information now to conclude the draft EA should change and conclude instead an Environmental Impact Statement (**EIS**) is required. The **EIS** would formally update and document the principal design and provide analyses of alternative designs. An **EIS** is essential given the significance of this project to the shorelines of Lido and Siesta Key, potential impacts to Big Sarasota Pass and Ted Sperling County Park.

During the March 23, 2016 BCC review of the Atkins Report, many questions went unanswered as the models used by USACE were not considered 'best practices' for this project. The answers could be obtained through an alternative model, described by Atkins, well known in similar Coastal erosion circumstances. If you recall, the modeling used by USACE was not designed for tidal inlets such as Sarasota Big Pass. The environmental descriptions in the EA, upon which impacts were to be assessed, were also significantly out of date. Additionally, USACE arbitrarily dismissed reasonable alternatives to the sand source and groin design.

As this project design continues to cycle within the **EA** and FDEP permit process, our coastal community is not being afforded the protections of **NEPA**. Based on the data thus far, it's indefensible to reach a FONSI and an **EIS** is necessary. An **EIS** would evaluate and rank alternatives such as the following:

- Remove the existing rock groin north of the eroded beach which threatens condos. This groin has been acknowledged as a model of how groins impact the down drift beaches on Lido Key. This is without debate since the USACE used the down-drift erosion caused by the existing groin to model their predicted erosion from the proposed new rock groins. The **EIS** should study whether removing this groin can reduce or eliminate elements of the proposed project.
- Utilize an alternative design of permeable adjustable groins (PAGs) as used by the City of Longboat Key in its two most recent (FDEP approved) beach refurbishment projects. Within the initial RAI response, the USACE stated to FDEP this type of groin was not considered as it was not proved technology. However, it's noted the Longboat Key project received FDEP approval



for this in 2007. This alternative design was arbitrarily ignored. This arbitrary exclusion should provide a legal challenge to the draft FONSI.

- Study a smaller project focused on protecting the most eroded portion of the Lido Key beach rather than the significant expansion of beach currently proposed.
- Disclose and cost rank alternative sand sources (including trucked sand) previously deemed not (economically) 'feasible'. Document these alternative costs compared to full cost of dredging Sarasota Big Pass, including the environmental mitigation costs. Cost should be compared using the most recent reduction in proposed sand volume.
- Restore protections for Ted Sperling Park. Costs and permits for this were eliminated by USACE through modeling that indicated it might not be needed. While the modeling may be correct, the design of the third groin, including all required permits (FDEP and Sarasota County lease) should be included as part of an Adaptive Management Plan with funds dedicated should it be needed¹.

Finally, we request your written communication to FDEP recommending an Adaptive Management Plan (described above) as part of any Permit. SKA was recently informed by FDEP that a permit could be issued without a complete Biological Opinion. Recent FDEP Permits for other local projects were not granted without the Biological Opinion being complete. For this project, a Permit should not be granted without a completed Biological Opinion.

Siesta Key Association Board of Directors voted to submit this request June 28, 2016. We have consistently worked toward a 'no harm' solution on this issue. While our request may seem atypical, many corporations and government entities *begin* with an **EIS** to more efficiently address complex issues and achieve the best outcomes.

We greatly appreciate your consideration of our request.

Respectfully submitted on behalf of the Board of Directors,

Catherine Luckner	Robert Stein
2d Vice President	Vice President
Siesta Key Association of Sarasota, Inc.	

Cc: Tom Harmer
Matt Osterhoudt, Carolyn Brown
Laird Wreford

¹ Col Mopps, who presented the Atkins Report, was previously the USACE Project Manager for the Stump Pass project. USACE provided an Adaptive Management Plan for that project. Sarasota County deserves nothing less and should never be left in a precarious position.