

10 July 2008

Governing Board
St. Johns River Water Management District
4049 Reid Street
Palatka, FL 32177

RE: Petition for variance from Rule 40C-4.302(1) (c), FAC and subsection 112.2.5(c), applicant's handbook, pursuant to sections 373.414 and 403.201, F.S.

Oslo Road Boat Ramp Improvements

SJRWMD File #4-061-114751-1

Dear Governing Board:

I am writing you as a concerned research scientist intimately familiar with the Oslo Road Boat Ramp Improvement project.

I do believe that this boat ramp needs to be repaired and made safe and utilitarian to small boats that typically use the ramp at this time. It is obvious that the present use is compatible with regional aquatic preserves and the aquatic organisms that depend on vital habitats at this location within the Indian River Lagoon.

The seagrass meadows that occur at this location are the largest and among the most productive in Indian River County. Large spawning aggregations of spotted seatrout have been documented in this section of the Lagoon. Spotted seatrout are the primary fishery species utilizing seagrass habitats adjacent to the Oslo boat ramp.

Seagrass habitats also support the most biologically diverse aquatic fauna in the Indian River Lagoon, when compared to open bottom of mangrove wetland ecosystems. They are also very sensitive to water pollution, dredging, prop scarring and decreases in water clarity.

If the intention of the requested variance is to increase the number and size of boating activity at the Oslo boat ramp, then it has great potential to deleteriously impact seagrass habitat and the creatures that depend on seagrass such as the spotted seatrout and manatee.

The proposed fishing pier will not be an effective fishing structure due to the shallow nature of the Lagoon at the Oslo ramp site. It will negatively impact seagrass where it will be constructed.

The proposed mitigation for this deleterious seagrass impact is inadequate and inappropriate. Two primary reasons for this are that: (1) the mangrove impoundment at Oslo road already has a breached dike with tidal access to the Indian River Lagoon through the breach and another culvert presently in place; (2) seagrass habitat supports a different aquatic fauna than the mangrove impoundment.

Mitigating seagrass with mangrove impoundment improvements would be analogous to putting artificial purple martin houses out to mitigate for destroying bald eagle nesting sites. Local

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mangrove systems support a maximum of 90 fish species, several of which do not utilize other Lagoon habitats, while seagrass supports over 260 local species, thus representing the most diverse fish habitat in the Indian River Lagoon.

I note that the variance request states on page 3, item 6, next to last line, that the work will provide for “passive recreational opportunities”. Would increased power boat traffic in the State of Florida Aquatic Reserve adjacent to a principle spotted seatrout spawning site and manatee foraging ground qualify as a passive recreational opportunity, or as a disruptive influence, degrading natural resource productivity that the truly passive recreational public would otherwise enjoy?

Page 4, first line: How does a pier and larger boat ramp recognize “the need for manatee and seagrass protection”? How will “prop wash be reduced”?

Page 4, item 7. How will the increased boat traffic, or boat size with ramp improvements minimize negative impacts on shellfish? There is considerable scientific work that demonstrates the opposite influence, negative impacts on shellfish due to increased boat traffic.

Page 4, item 8. Who has demonstrated that water quality is deteriorating at the Oslo boat ramp as a consequence of present minimal small boat traffic? If ramp improvements increase boat size and boat traffic, it is highly likely that water quality will decline.

The present site has considerable wildlife and fishery use and value in its present state. There are alternative sites for boat ramp improvements and new ramp construction that will not impact vital state and local aquatic resources.

Based on these observations and comments I urge the SJRWMD Governing Board to deny this variance request.

Sincerely,

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