



THE COUNTY OF ESCAMBIA  
PENSACOLA, FLORIDA

NEIGHBORHOOD AND ENVIRONMENTAL  
SERVICES DEPARTMENT

Marine Resources  
Mosquito Control  
Environmental Quality  
Community Redevelopment Agency  
Soil and Water Conservation District  
Neighborhood Enterprise Foundation, Inc.

KEITH WILKINS  
Director

July 5, 2007

Mr. Clif Payne  
Department of the Army  
Jacksonville District Corps of Engineers  
Pensacola Regulatory Office  
41 North Jefferson St, Suite 104  
Pensacola, FL 32501-5794

RE: Renewal of LAARS Permit 199402365 IP-CP

Dear Mr. Payne:

Please accept this partial response to your 21 May 2007 request for additional information. As you indicated, responses to items 1-5 are required for the application to be considered complete and noticing the project for public comment. MRD will continue to develop responses to the remaining items, and will submit responses to those items under separate cover.

For your convenience and ease of understanding my responses, I have included each of your questions as originally numbered below:

1. The quality of the file copy of the drawings associated with the LAARS East is degraded due to duplication. To ensure adequate information is provided for public comment, please provide updated plan view and cross sectional drawings utilizing sheets 1-6 of 8 of the existing permit drawings as a guide. Please include a copy of most recent NOAA chart with the corners and boundaries of the LAARS East depicted. Please include the lat/long coordinates for the all corners in decimal minute format to the 3<sup>rd</sup> decimal place. Please ensure the chart number and date of print are clearly depicted.

Response to 1. Please find the enclosed charts, drawings and diagrams.

2. Considering the county's request for LAARS East to be utilized exclusively for public deployments, what changes if any are proposed for the authorized reef materials listed in special condition 1 of the existing permit?

Response to 2.

Existing LAARS permit special conditions 1:

1. The materials to be deployed on the Large Area Artificial Reef Sites (LAARS) shall be cleaned and free of pollutants and toxins and composed of: non-productive oil platforms thoroughly clean in accordance with US Coast Guard and US Environmental Protection Agency (EPA) standards, surplus military equipment (1/4 inch or greater in thickness thoroughly clean in accordance with US Coast Guard and US Environmental Protection Agency (EPA) standards, steel hull vessels ballasted and thoroughly clean in accordance with US Coast Guard and US Environmental Protection Agency (EPA) standards, natural limestone boulders weighing a minimum of 150 pounds each, clean concrete rubble weighing a minimum of 150 pounds each, clean concrete prefabricated reef materials or modules weighing a minimum of 150 pounds each, clean and structurally stabilized steel/aluminum/metal alloy boxes or structures (1/8 inch or greater in thickness) weighing 150 pounds or more.

No reef material shall be allowed to trap marine life, and must be configured, cut or shaped, so as to not function as a fish trap. All materials/structures must be configured and constructed to be stable, durable, and provide habitat. No material whatsoever may be deployed within one-quarter mile of the boundaries of the Large Area Artificial Reef Sites (LAARS). No other materials are authorized by this permit. Materials expressly prohibited include cars and trucks and any parts thereof, white goods (i.e. appliances), shopping carts, bread trays, 55 gal drums, storage or fuel tanks, loose metal materials, plastics, fiberglass, materials that upon inspection by FWCC staff or designated agent are found to be potentially unstable or lack acceptable habitat qualities

LAARS East will be used by Escambia County Marine Resources Division (MRD) to deploy artificial reef materials for use by the public. Although most artificial reefs deployed by MRD exceed the minimum standards listed in special condition 1, several departures from the criteria have been requested. These special requests have been made to allow MRD the opportunity to increase our understanding of artificial reef materials' effectiveness in providing stable, durable, long-term marine life habitat. Other considerations include: unique materials of opportunity; habitat complexity; and financial factors.

For example, during construction of the PENHALL reef, MRD requested permission to deploy a small quantity of concrete rubble of weights less than the 150lb minimum. Although the total quantity of small pieces was less than 5% of the total reef, the increased habitat complexity may have been the cause of an increased biodiversity and abundance of small fishes. Subsequently, MRD has deployed three pairs of reefs (half of which have increased habitat complexity) to monitor and determine potential of significant reef 'improvements'.

In our attempts to maximize artificial reef deployment, reef quantity must be balanced with reef quality. We recognize the futility of expending scarce funding on reefs likely to be destroyed by tropical storms. Although we request no changes to special condition 1, MRD will continue to work closely with Army Corps of Engineers, stakeholders, and other regulatory agencies to examine, on a case-by-case basis, materials of opportunity that may become available for reefing.

3. The existing permit includes 12 special conditions. From text in the county's request for permit modification, it would appear the county desires to modify in whole or in part condition 5 regarding pre-deployment notification submittals for each deployment. Please clarify if modifications are proposed for any of the remaining permit conditions.

Response to 3. The successful implementation and streamlined permitting of multiple deployments of I10 bridge rubble indicate such 'multi-deployment' authorizations (requested modification to condition 5) are feasible.

Special condition 10 does not apply to the proposed deployments in LAARS East, therefore can be eliminated. All other special conditions remain unchanged; no modifications are proposed.

4. Clearly define the purpose and proposed future use of LAARS East. Will sanctuary/refugia reefs be deployed within LAARS East or would they be diverged to LAARS West where less chance might exist of discovery due to vessel transit?

Response to 4. The purpose of LAARS is for deployment of artificial reef materials in accordance with Escambia County Artificial Reef Plan (Attached). The following Escambia County Artificial Reef Plan goals apply:

1) enhance the (primarily sand) seafloor of the marine and estuarine waters of, and adjacent to, Escambia County by the placement of stable and durable artificial reef materials for the purpose of creating habitat for reef-associated species of fishes and invertebrates; 2) increase regional abundance of marine life species; 3) reduce negative impacts to natural reefs; 4) provide fishing and diving opportunities for the residents and tourists of Escambia County; 5) increase fishing and diving success, and artificial reef-user satisfaction; 6) reduce conflicts between artificial reef users and user groups.

To the extent required by LAARS Permit, and as necessary to effectively plan and manage Escambia County's Artificial Reef Program, MRD deploys and monitors artificial reefs. Under the principles of 'Adaptive Management', innovative reef materials and designs may be deployed and monitored. When innovative reef materials and designs are contemplated, principles of risk management are also considered. MRD draws upon extensive experience with artificial reef construction and monitoring. MRD's excellent working relationships with artificial reef colleagues, regulatory and permitting agencies provide vast and varied artificial reef knowledge and experience to effective decision-making.

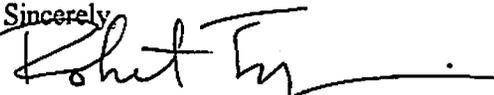
Sanctuary/refugia reefs have been deployed within LAARS East. Although no specific plans exist to deploy additional sanctuary/refugia reefs, MRD would collaborate with stakeholders, colleagues, regulatory and permitting agencies (especially Army Corps of Engineers) to determine the likelihood of success.

5. Will the county continue to use the deployment setbacks stated in the present permit?

Response to 5. Yes.

Please contact me if you need additional documentation, or if I can assist with any additional information to expedite your review.

Sincerely

A handwritten signature in black ink, appearing to read "Robert Turpin", with a long horizontal flourish extending to the right.

Robert Turpin, manager  
Marine Resources Division

Enclosures

30 39' 20' 10' 87° 50' 35'

**EXPLANATION**

100kHz  
79,600 Microseconds  
ORS: (Not individual station)

daily  
daily  
daily  
daily

**THIS CHART**  
50-X 7980-Y

as published by the National  
or others should not be used  
which shown have been adjusted  
mined overland signal propa-  
it been verified by comparison  
it has been made to meet the  
trans established by the U.S.  
cautioned not to rely solely on

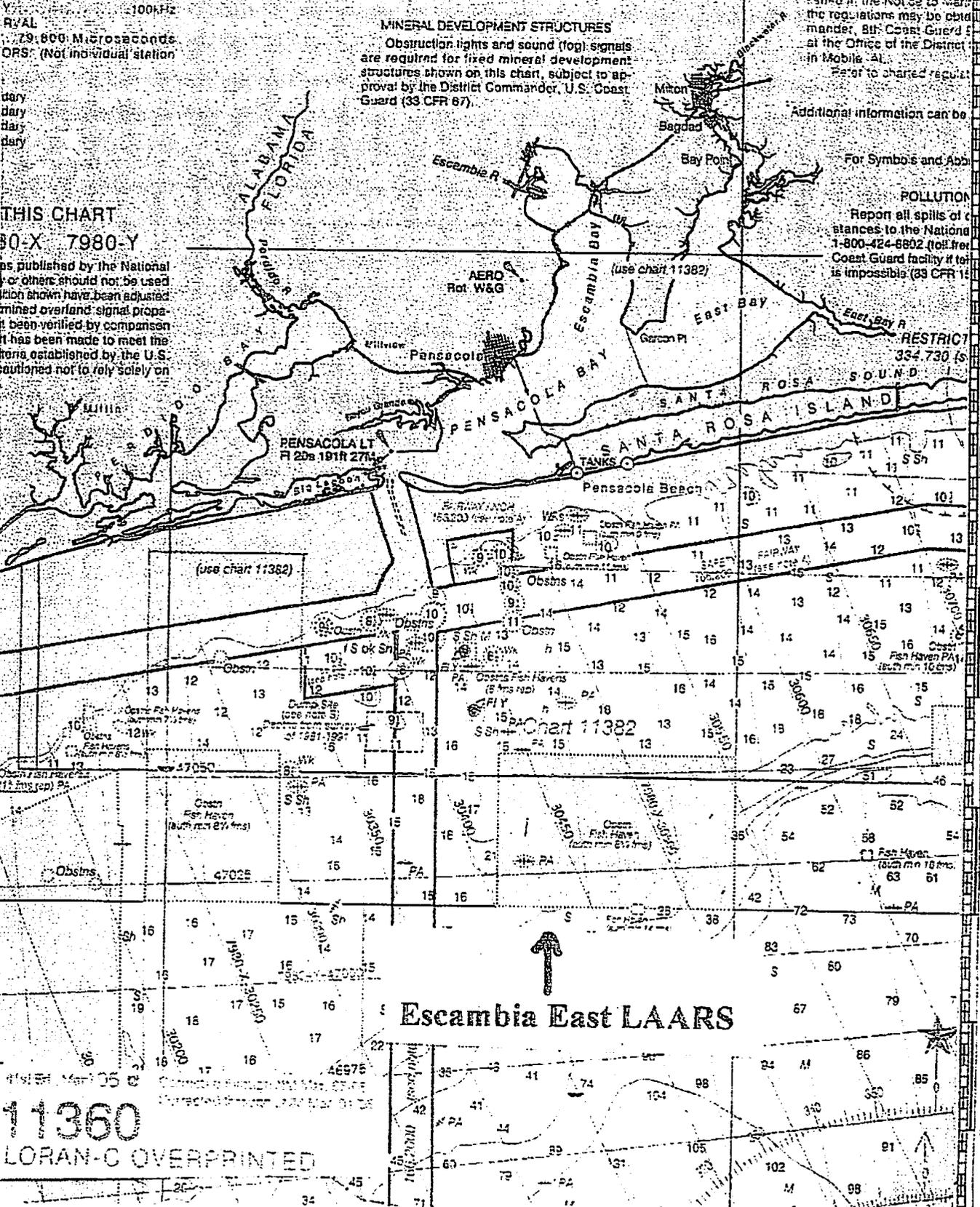
**MINERAL DEVELOPMENT STRUCTURES**  
Obstruction lights and sound (top) signals  
are required for fixed mineral development  
structures shown on this chart, subject to ap-  
proval by the District Commander, U.S. Coast  
Guard (33 CFR 67).

Navigation regulations a-  
Coast Pilot 5. Additions or  
changes in the Notice to Mar-  
the regulations may be obtain-  
at the Office of the District  
in Mobile, AL.  
Refer to charted regula-

Additional information can be  
For Symbols and Abb-

**POLLUTION**  
Report all spills of  
stances to the Nationa  
1-800-424-8802 (not free  
Coast Guard facility if tel-  
is impossible (33 CFR 15

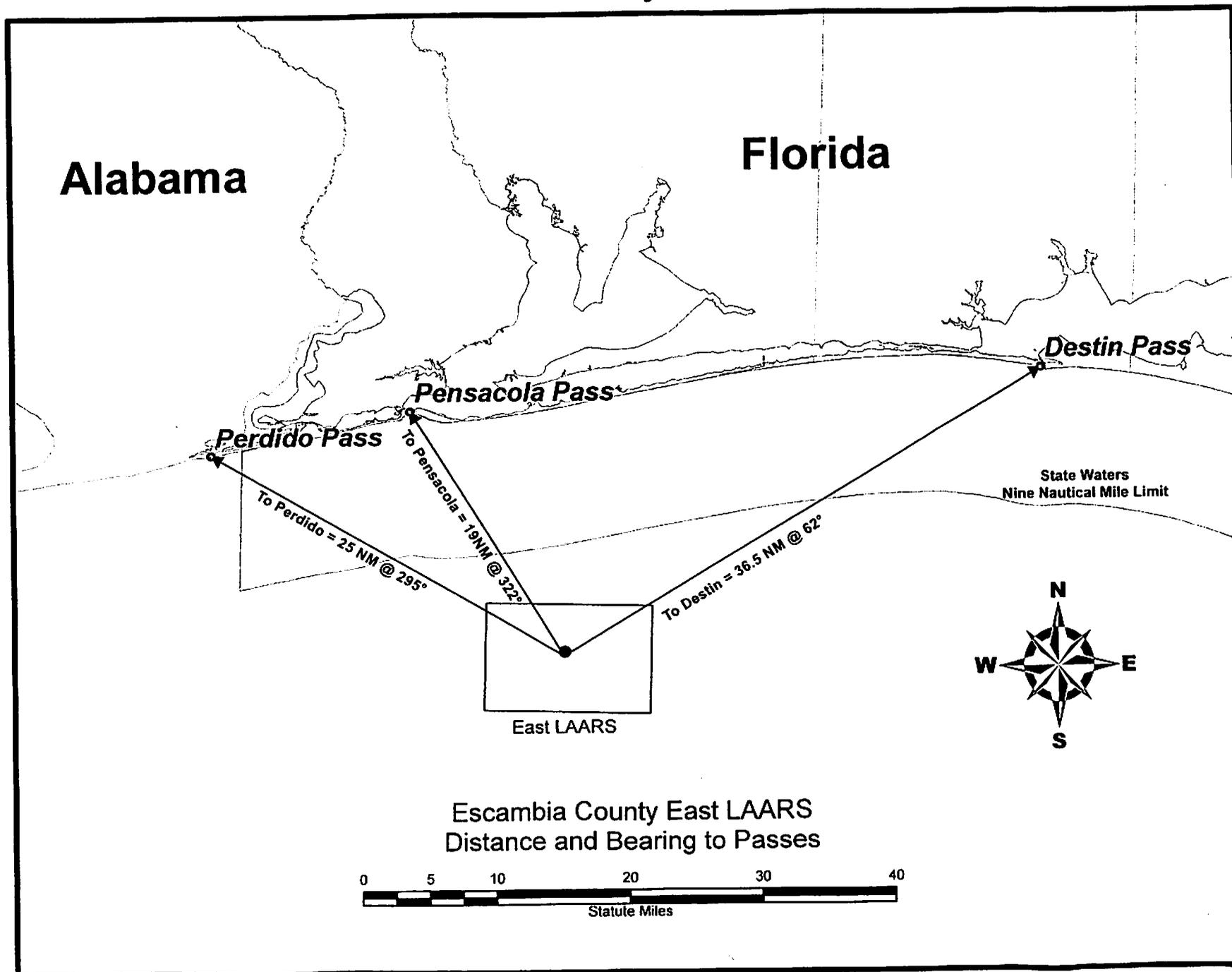
**RESTRICT**  
354,730 (s



**Escambia East LAARS**

**11360**  
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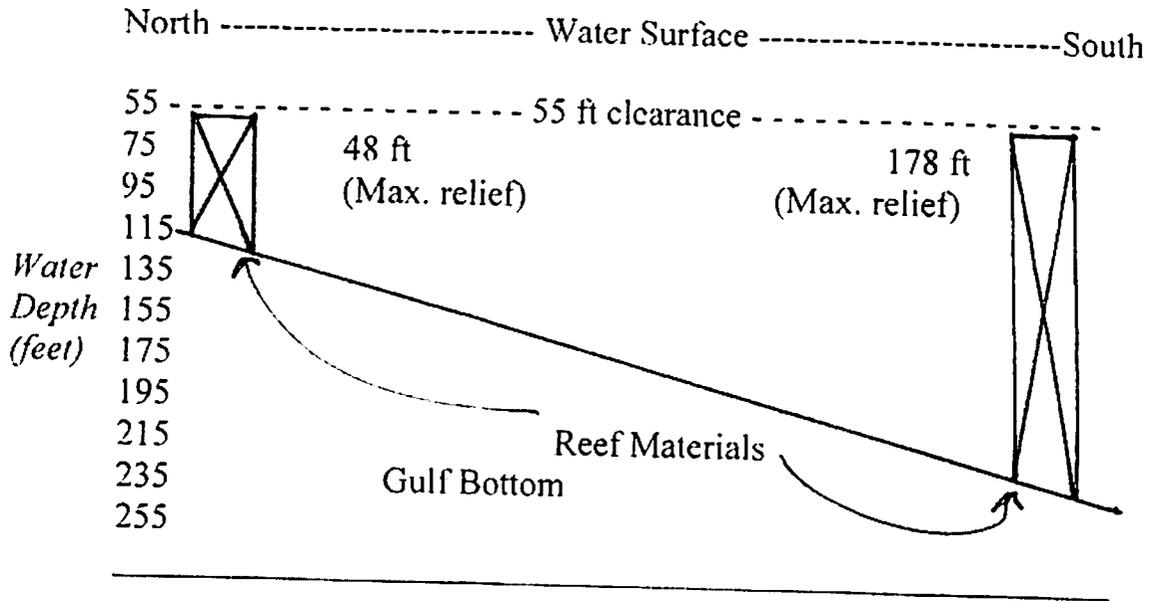
# Escambia County East LAARS



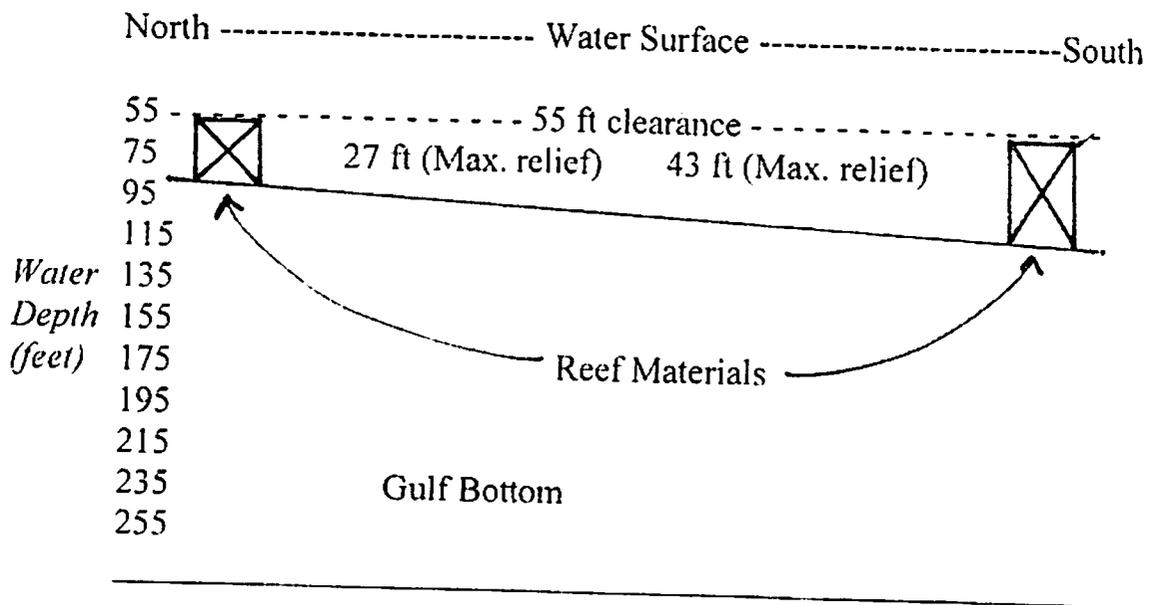
# Escambia East Large Area Artificial Reef Site (LAARS)

Cross-sectional view of proposed deployments

## Eastern Border (87° 00.000'W Longitude)



## Western Border (87° 12.500'W Longitude)



Note: graphic representation only; drawings not to scale

# Escambia East LAARS Deployments

