



07/03/2025

To:

Miami Dade County Department of Environmental Resources
Coastal Resources Section
dermMPP@miamidade.gov

Re: Comments on the Manatee Protection Plan revision

Dear Commissioners and Miami Dade County DERM Staff,

I appreciate the opportunity to provide public input on the proposed revisions to the Miami-Dade County Manatee Protection Plan (MPP). While I support the County's commitment to manatee protection, I have serious concerns regarding the direction and content of the proposed updates.

Notably, the current draft does not reference any new scientific data, environmental studies, or measurable outcomes that demonstrate the effectiveness of the existing MPP, nor does it provide clear justification for the proposed changes. It also lacks any analysis of the plan's performance over the past 30 years in protecting manatees. Instead, the plan continues to rely solely on restricting waterfront business activities—particularly slip limitations—as the primary tool for manatee protection. This approach has led to constrained marine business growth, job losses, and the loss of funding opportunities that could be used for more targeted protections. The absence of updated evidence-based reasoning undermines the credibility and enforceability of the revised plan.

Below, I respectfully submit the following recommendations for your consideration in the interest of creating a more balanced, data-driven, and equitable MPP for our community.

1. Vessel Traffic and Manatee Mortality Data

Since 2020, vessel traffic on the Miami River has increased significantly due to recreational boating, sightseeing, restaurant access, and residential dockage. Marinas are operating at full capacity and vessel registrations continue to rise. However, Florida Fish and Wildlife Conservation Commission (FWC) data show no corresponding increase in manatee mortality or vessel-strike incidents over the past five years.

The Miami River is a no-wake/slow-speed zone and contains minimal seagrass habitat. Its deep-water profile, along with the speed restrictions, likely mitigates the risk to manatees. Given this,

the MPP should allocate funding to enhance law enforcement efforts in these zones, raise fines for violations, and introduce escalating sanctions for repeat offenders.

Additionally, I urge the County to consider increasing the permitted slip count—similar to the approach taken by Broward County, whose updated MPP added 4,392 slips and was approved by FWC—while still prioritizing responsible environmental stewardship.

2. Preservation of Existing Marine Facility Designation

The proposed change to redefine “existing marine facilities” as those active within the past five years is concerning. Many properties with valid environmental approvals and historical marine operations would be disqualified under this revision—despite maintaining their marine zoning and permit compliance if they did not operate within the last 5 years.

I urge the County to retain the current definition: marine facilities that have been in use and possessed all required environmental approvals since October 28, 1984. The five-year threshold is arbitrary, lacks scientific support, and risks undermining long-standing marine industrial property.

3. Support for Marine Industrial Uses and MOP Permit Holders

Marine industrial properties along the Miami River provide vital services and local employment. Yet under the current MPP, they bear a disproportionate burden in manatee protection—facing growth restrictions, slip limitations, and heightened scrutiny, while contributing significantly to compliance and oversight.

This approach has stifled economic development and contributed to a surge in illegal and unregulated slip usage, which remains unenforceable by DERM. The MPP should allow commercial growth in slip allocations for Marine Operating Permit (MOP) holders and recognize these entities as active partners in conservation rather than barriers to it.

4. Slip Transfer Provisions

The revised MPP should explicitly permit for the transfer of slips between properties along the Miami River, regardless of direction. Numerous commercial slips have been lost due to rezoning from commercial to residential, especially in the eastern and middle river areas. Enabling reallocation of these commercial slips to the western river corridor where industrial zoned land remains would support a healthy commercial boating infrastructure without increasing net vessel density or environmental risk.

5. Dry Storage Expansion

Miami-Dade County faces a significant shortage in dry vessel storage, as evidenced by all six County-operated boat ramps regularly reaching capacity by 9:00 a.m. on weekends. Proposed dry stack storage facilities on the Miami River have been denied under the existing MPP, despite limited environmental impact and low frequency of vessel launch.

The revised MPP should increase flexibility for dry storage facilities, especially on the western Miami River where feasible locations remain. Dry slips should not count toward in-water slip totals on MOP permits due to their infrequent and controlled usage.

6. Equitable Slip Allocation Standards

Under the current MPP, residential properties rezoned from other uses are automatically eligible for one slip per 100 feet of shoreline, even without a history of marine activity. In contrast, commercial properties are held to more restrictive, historical-use standards and are often denied similar allocations.

This disparity promotes residential development at the expense of the marine economy. I urge the County to adopt a universal slip allocation standard of one slip per 100 feet of shoreline, regardless of zoning, to ensure equitable treatment.

7. Appoint a Manatee Protection Plan Liaison

The County should appoint a dedicated liaison or establish a stakeholder advisory committee to serve as a communication bridge between regulatory agencies and local maritime community. This liaison or body should be tasked with meeting regularly with affected parties—including business owners, marina operators, recreational users, and environmental advocates—to:

Discuss marine-related concerns, provide input on proposed MPP changes, advise on effective strategies for manatee protection and recommend improvements for boating safety and enforcement funding.

Creating a formal stakeholder engagement process will help ensure that future updates to the MPP are informed by real-world experience, data, and local priorities. It will also foster greater transparency, collaboration, and compliance.

Conclusion

I respectfully request that the County revise the MPP to reflect up-to-date scientific data, balance environmental and economic needs, and support legitimate marine businesses as collaborators in conservation. With thoughtful changes, we can protect manatees while fostering a thriving, regulated waterfront economy.

Thank you for your attention and consideration.

Sincerely,



Jason Lopez
Ocean Marine Management, Inc.
JasonFL@oceanmarinemanagement.com