November 21, 2025

Ms. Mariana Kendall
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000
Submitted via email to mariana.kendall@floridadep.gov

Re: Surfrider Foundation Comment on the Proposed General Permit for the Installation, Construction, and Maintenance of Living Shorelines

Dear Ms. Kendall,

On behalf of the Surfrider Foundation, please accept these comments regarding the Florida Department of Environmental Protection's ("FDEP") Proposed General Permit for the Installation, Construction, and Maintenance of Living Shorelines ("Proposed Living Shorelines Permit").

The Surfrider Foundation is an environmental nonprofit organization dedicated to the protection and enjoyment of our ocean, waves, and beaches for all people through a grassroots network. Working towards this mission, our twelve Florida volunteer-led chapters stretch from Jacksonville Beach to the Florida Keys to the panhandle. Surfrider chapter members care deeply about our coasts and work to protect them through education, advocacy, and stewardship.

We appreciate the opportunity to provide comments on the Proposed Living Shorelines Permit. Ensuring our coasts and communities are resilient while also safeguarding natural resources, healthy beaches, and public access are among Surfrider's primary goals in the state. We commend FDEP's efforts to ensure healthy and thriving Florida coasts and recognize the challenges presented by extreme weather events, sea level projections, and flooding. The following comment highlights Surfrider's recommendations for FDEP to consider when reviewing the Proposed Living Shorelines Permit.

I. The Proposed Living Shorelines Permit Provides a Critical Regulatory Pathway for Increased Living Shorelines Implementation in Florida.

We strongly support FDEP's efforts to create a clear, accessible general permit for living shorelines. The proposed permit maintains a focus on native vegetation and natural materials, recognizing that nature-based solutions are essential to sustaining healthy

coastal environments and mitigating erosion. The Proposed Living Shorelines Permit will provide property owners with an important method for bolstering resilience while also providing significant ecological benefits.

II. Maintaining a Constrained List of Authorized Materials, Focused on Natural Materials, Facilitates Effective and Responsible Living Shorelines Implementation.

Surfrider encourages FDEP to preserve the current list of permissible materials for marsh sills. The Proposed Living Shorelines Permit appropriately requires the use of predominantly natural materials.[1] We urge FDEP not to add additional categories of materials, especially those with uncertain environmental performance in coastal systems. FDEP may consider including definitions for the authorized materials in the permit or applicant handbook for greater clarity and guidance. Maintaining a narrow and clearly defined material list helps ensure projects deliver intended ecological benefits while minimizing unintended impacts. We particularly commend the prohibition of plastic materials in marsh sills,[2] which reinforces ecological integrity and reduces the addition of pollutants into coastal environments.

III. Maintaining and Clarifying Requirement for Native Vegetation Facilitates Effective and Responsible Living Shorelines Implementation.

We support the focus on native vegetation in the Proposed Living Shorelines Permit, exemplified through the requirements for acceptable plantings and the removal of invasive and exotic species to the extent practicable.[3] To avoid confusion in interpretation and implementation, we recommend also adding "native" before "wetland vegetation obtained from commercially or nursery grown stock."[4] Explicit indication that both emergent plants and wetland vegetation must be native will help ensure consistent ecological outcomes and prevent use of non-native vegetation that could compromise shoreline ecosystems.

IV. Simple Permittee Monitoring Would Provide Important Information for Program Review and Improvement.

To strengthen statewide understanding of living shoreline performance and adaptive management techniques, Surfrider encourages FDEP to incorporate a simple monitoring requirement into the general permit. For example, requiring permittees to provide a brief

[1] *See* Proposed Living Shorelines Permit, 62-330.604(2)(d)(1.-3.).
[2] Proposed Living Shorelines Permit, 62-330.604(2)(d)(3.).
[3] Proposed Living Shorelines Permit, 62-330.604(2)(b) & (4)(a).
[4] *See* Proposed Living Shorelines Permit, 62-330.604(2)(b).

monitoring report at the conclusion of years one and two following project completion. This brief report could consist of the permit number, representative photos of the site, and a brief statement (1-2 paragraphs) about the status of the living shoreline.[5] Coupled with the documentation required to receive the general permit,[6] these reports would provide a more comprehensive picture of implementation.

This simple and non-burdensome approach would provide valuable statewide data on shoreline condition, project success, and effective placement and techniques. Such information would help FDEP evaluate and improve the general permit and applicant handbook over time without imposing significant additional burden on applicants.

V. Dynamic, Long-Term Resilience Action in Florida Will Require Sustained Regulatory Guidance and Support for Nature-Based Solutions and Green Infrastructure.

To support effective use of the Proposed Living Shorelines Permit, FDEP may consider developing resources and materials that provide guidance on suitable locations, ecological design principles, and habitat-type recommendations. Materials may include maps of suitable shoreline typologies, wave energy zones, native plant options, and other design recommendations for different coastal settings. This technical assistance can help ensure property owners and Floridians have access to scientifically-grounded and site-specific guidance, which in turn can increase informed and effective adoption of living shorelines.

As FDEP continues to focus on bolstering Florida's resilience capacity, we encourage prioritization of methods like mangrove restoration and plantings, dune and wetlands restoration, and other natural approaches and green infrastructure. Guidelines, regulatory support and pathways, and education efforts for these important resilience options are critical for Floridians and communities seeking to pursue these methods.[7]

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[5] Virginia requires similar monitoring after the installation of a living shoreline. *Living Shoreline Group 2 General Permit for Certain Living Shoreline Treatments*, 4VAC 20-1330-40(M.), available here: https://www.mrc.virginia.gov/Regulations/MRC_Scanned_Regs/Habitat/fr1330_11-01-17.pdf.

[6] Proposed Living Shorelines Permit, 62-330.604(3) (requiring color photos, .

[7] *See* Carlie Dario, Cali Curley, Katharine J. Mach, *Shaping Coastal Nature-Based Solutions: Perceptions and Policy Priorities of Living Shorelines*, Nature-Based Solutions 1, https://www.sciencedirect.com/science/article/pii/S2772411524000703 (examining policy barriers and supports for living shorelines in Florida).

Conclusion

Surfrider Foundation applauds FDEP for the committed efforts to advance nature-based coastal resilience. Living shorelines are essential tools for protecting Florida's coasts. We appreciate FDEP's thoughtful approach in this Proposed Living Shorelines Permit and the intent to provide a viable and effective resilience option for property owners. We encourage the incorporation of the recommendations above to further strengthen ecological outcomes and the successful utilization of the general permit. Thank you for your consideration of the public interests represented by the Surfrider Foundation.

Sincerely,

Katie Bauman

Katie Bauman
Florida Policy Manager
Surfrider Foundation