MINUTES
PIRATE HARBOR WATERWAY
MUNICIPAL SERVICE BENEFIT UNIT (MSBU)

ADVISORY BOARD REGULAR MEETING
WEDNESDAY, JULY 8, 2026

2:05 p.m. – 3:26 p.m.
Punta Gorda Library
401 Shreve St, Punta Gorda, Florida

Members Present:	John Schwind, Chair Robert DiMuzio, Vice Chair Phillip Smallwood David Vigne
Members Absent:	None
County Staff:	Erica Hayes, Community Liaison
Guests:	Sign in sheet attached

Call to Order / Roll Call:
The meeting was called to order at 2:05 p.m. A roll call was taken, and a quorum was established.

Changes to the Agenda / Motion to Approve Changes:
None

Citizen Input on Agenda Items (3 Minute Limit):
None

Approval of the Minutes:
The April 15, 2026, minutes were unanimously approved as written.

Unfinished Business:
a. Interior Dredge Project: Staff reported that the Pirate Harbor dredging project remains on hold pending issuance of the U.S. Army Corps of Engineers permit. A recent request for a status update was submitted to the Army Corps, but no response had been received as of the meeting. Staff also advised that the County is pursuing a Countywide blanket dredging permit, which may be approved before the individual Army Corps permit. Once either permit is issued, the project will be immediately advertised for competitive bids. Staff further noted that the Alligator Creek dredging project has already received its permit and is currently waiting for Pirate Harbor so the projects can move forward together. Staff provided an overview of the anticipated bidding process, explaining that once the necessary permit is received, the dredging project will be advertised to qualified contractors. Interested contractors can register with Charlotte County Purchasing and submit a bid. The solicitation is expected to remain open for approximately 30 to 60 days, after which proposals will be evaluated based on contractor qualifications, and relevant dredging experience. Staff also noted that contractors are generally required to provide performance bonds to ensure completion of the project. Board members requested to be notified when the project is officially advertised for bid. Staff also discussed the Countywide blanket dredging permit,

explaining that it will encompass previously surveyed and County-maintained waterways and is anticipated to remain valid for approximately 20 years. Once in place, the blanket permit is expected to significantly reduce project timelines by eliminating the need to obtain individual Army Corps permits for future dredging projects within the covered waterways. However, waterways that have not previously been surveyed or maintained by the County would still require separate permitting. A Board member requested copies of the blanket permit application documents.

b. Sea Grass Mitigation Monitoring: Staff provided an update on the seagrass mitigation project following recent discussions between County Engineering staff and the permitting agencies. Staff reported that while the agencies continue to maintain that the existing buffer zones cannot currently be credited toward the required mitigation, they indicated the permit could potentially be amended to include the buffer zones. Although such an amendment would likely involve additional costs, staff believes it may ultimately be more cost-effective than continuing to dispute the current permit requirements. Staff also advised that a site visit with agency representatives has been scheduled later this month, after which Engineering staff plans to attend the next Advisory Board meeting to present a comprehensive update on the findings and discuss potential next steps. The Board engaged in an extensive discussion regarding the seagrass mitigation project, focusing on communication between County staff, Engineering, regulatory agencies, and Advisory Board members. Board members questioned whether permit negotiations had been fully pursued and discussed the potential use of buffer zones as compensatory mitigation, the interpretation of permitting requirements, and the possibility of additional long-term monitoring costs. Members also highlighted the environmental improvements that have already resulted from the project and discussed future communications with the Board of County Commissioners. Several Board members expressed concerns regarding transparency throughout the permitting process, delays in receiving responses to Board inquiries, and the potential for continued expenditures associated with mitigation monitoring. Staff explained that, based on legal guidance, documents and supporting materials should generally be presented during publicly noticed meetings rather than distributed outside of meetings in order to avoid potential Sunshine Law concerns.

New Business:

- Financial Reports: Staff presented the proposed FY2027 budget, noting that it remains preliminary and will undergo several additional review stages before receiving final approval. The Board discussed proposed reimbursement line items, aquatic vegetation budget allocations, continued funding for seagrass monitoring, and requested additional clarification regarding historical mitigation-related expenditures. Board members specifically requested detailed documentation for FY2025 and FY2026 expenditures, including invoices, vendor payments, and supporting information identifying the budget authority for proposed future expenditures. Staff agreed to coordinate with Fiscal Services to obtain and provide the requested financial documentation. Staff also reviewed the County's long-range budget planning process and discussed potential increases to the annual assessment beginning in FY2028. The preliminary recommendation is to increase the annual assessment from the current rate of

approximately $335 per parcel to approximately $500 per parcel in order to adequately fund future exterior dredging projects. Staff explained the statutory limitations on assessment increases, including the maximum assessment that may be adopted without additional public procedures, and reviewed the County's requirements for long-term capital planning and assessment scheduling. The Board also discussed discontinuing annual surveys in favor of conducting surveys only when necessary, allowing available funding to be prioritized toward future dredging projects.

Citizen Input on MSTU items (3 Minute Limit): None.

Advisory Board Open Discussion:

- Board members discussed ongoing navigational safety concerns related to the spacing of channel markers between Marker 4A and Marker 8, noting that the large distance between markers makes nighttime navigation difficult and increases the risk of vessels leaving the channel. Members referenced previous boat strikes involving navigation markers and discussed potential solutions, including relocating existing markers or installing an additional marker to improve channel visibility. Staff explained that relocating markers would require additional permitting, while the installation of new markers would require coordination with Traffic Signs and Markings (TSM), the U.S. Coast Guard, and potentially the Marine Advisory Committee (MAC). Staff agreed to contact Traffic Signs and Markings to discuss the Board's concerns, evaluate possible improvements, and investigate whether funding opportunities may be available through the Marine Advisory Committee.
- Staff also reminded Board members that reappointment applications for both the Waterway Advisory Board and the Street & Drainage Advisory Board will be distributed prior to the next meeting. Members were encouraged to complete and return their applications before the upcoming application deadline to ensure continued eligibility for appointment.

Schedule Meetings / Items for Next Agenda:
Future meetings are tentatively scheduled at 2:00 p.m. at the Punta Gorda Charlotte Library as follows:

- Wednesday, October 28, 2026

The meeting adjourned at 3:26 p.m.

Submitted by Erica Hayes
Public Works Department

Chair Signature

10-28-26
Date

AGENDA
PIRATE HARBOR WATERWAY
MUNICIPAL SERVICE BENEFIT UNIT (MSBU)

ADVISORY BOARD REGULAR MEETING
WEDNESDAY, JULY 8, 2026

2:00 p.m. Punta Gorda Library
401 Shreve Street, Punta Gorda, Florida

BOARD MEMBERS: John Schwind, Chair
Robert DiMuzio, Vice-Chair
Phillip Smallwood
David Vigne

COUNTY STAFF: Erica Hayes, Community Liaison

PURPOSE: Regular Meeting

1. Call to Order / Roll Call
2. Changes to the Agenda / Motion to Approve Changes
3. Citizen Input on Agenda Items (3-Minute Limit)
4. Approval of Minutes: April 15, 2026
5. Unfinished Business
    a. Interior Dredge Project
    b. Sea Grass Mitigation Monitoring
6. Citizen Input on Agenda Items (3-Minute Limit)
7. New Business
    a. Financial Reports
    b. FY27 Proposed Budget
    c. Future Projects
8. Advisory Board Open Discussion
9. Citizen Input on MSBU Items (3-Minute Limit)
10. Meeting Schedule / Items for Next Agenda
11. Motion to Adjourn

A review of the Pirate Harbor Entrance Channel Dredging Seagrass Monitoring Report

By

John Schwind

Member, Pirate Harbor Waterway MSBU Advisory Board

August 17, 2025

Please note the statements made herein represent the opinions of one Charlotte County, Florida citizen, and may differ from official positions of either The Pirate Harbor Waterway MSBU or the Charlotte County Board of County Commissioners.

Introduction

Ostensibly, the results of the Pirate Harbor Seagrass Mitigation project are described within the Pirate Harbor Entrance Channel Dredging Seagrass Monitoring Report, Fifth Annual Survey of Mitigation, Control, and Impact Sites, January 22, 2025, in sufficient detail to ascertain whether the project could be deemed successful. Given the importance of this project to the local citizens who funded it, and given the extraordinary environmental and meteorological circumstances that have influenced the project, an argument can be made that its success need be evaluated in a more particular manner.

Any evaluation of this project's success should acknowledge:

1) Project success should be judged on both the renewed ability for the environment to support seagrass growth, and the seagrass growth realized to date.
2) Seagrass growth success should be judged on the entirety of the Permit Area including the buffer zones.
3) Mitigation area selection and its treatment thereafter has negatively influenced the way results are interpreted.
4) Ambient water quality and environmental conditions limit the possible range of success for this project.
5) Other similar projects in Charlotte County are not judged as strictly as this one.

The ultimate measure of success for any mitigation project meant to offset impacts is whether the net change to the environment is zero or positive. This review shows that in the case of the Pirate Harbor Outer Channel Dredging Seagrass Mitigation Plan, the net results are positive. Florida law supports, and does not prohibit, use of a whole project analysis to determine success.

Issue

Should the Pirate Harbor Waterway MSBU and/ or the Charlotte County Board of County Commissioners be released from further obligations to monitor or mitigate seagrass pursuant to U.S Army Corps of Engineers Department of Army Permit SAJ-2006-01964, and Florida Department of Environmental Protection Pirate Harbor Navigation Channel Dredge Environmental Resource Permit State Owned Lands Authorization Permit No. 0128695-008-EI?

Did the Pirate Harbor Outer Channel Dredging Seagrass Mitigation Plan fulfill its purpose?

Rule

The rules which surround the dredging project, and drive the seagrass mitigation plan, are inspired by, or originate in, federal laws not all specifically noted herein. Florida's statutes have adequately translated federal requirements to allow reliance upon them in most cases. This list of rules is not intended to be exhaustive or definitive but rather informative for considering the question at hand.

Federal Regulations

1) 40 CFR Part 230 Section 404(b)(1) Guidelines..., Subpart J Compensatory Mitigation for Loss of Aquatic Resources, 230.93 (h) Preservation. (1) "Preservation may be used to provide compensatory mitigation ..." and (2) "Where preservation is used to provide compensatory mitigation ... the preservation shall be done in conjunction with aquatic resource restoration ... activities."
   (2)(i) Buffers. "... If buffers are required by the district engineer as part of the compensatory mitigation project, compensatory mitigation credit will be provided for those buffers."
2) Federal Register 73 FR 19687 The preamble to the 2008 Compensatory Mitigation of Losses of Aquatic Resources states at page 19625: While enhancement (and elsewhere rehabilitation and preservation) does not result in a gain in aquatic resource area for purposes of "no net loss" of wetlands, this does not mean that it cannot be used to compensate for a loss in resource area at the impact site.

State Statutes

1) Title XXVIII Chapter 373 section 4131 Environmental Resource Program. Authorizes implementation of the statewide ERP rules.
2) Title XXVIII Chapter 373 section 414 (b) "the department, in deciding to grant or deny a permit, must consider measures proposed by or acceptable to the applicant to mitigate adverse effects that may be caused by the regulated activity. Such measures may include, but are not limited to, onsite mitigation ...". And "... It is the responsibility of the applicant to choose the form of mitigation." And: "The mitigation must offset the adverse effects caused by the regulated activity."

3) 373.414(b) 3 F.S. "If the applicant is unable to meet water quality standards because existing ambient water quality does not meet standards, the governing board or the department must consider mitigation measures proposed by or acceptable to the applicant that cause net improvement of the water quality ...".

State Regulations

1) Florida Administrative Code 62-330. Establishes types of activities that require permits and those that don't, and other aspects of the permit program. It also provides for general permits, which are pre-issued for specified activities that have been determined by rule to have minimal individual and cumulative impact.
2) Chapter 62-330.401 F.A.C. Policy and Purpose. (1) "General Permits authorize activities that, if conducted consistent with the permit requirements, will cause minimal individual and cumulative adverse impacts to the water resources of the Agencies. Mitigation is neither necessary nor required to offset those impacts except when provided for in the General Permit."
3) FAC 62-330.411 General Permit for Public Navigation Channel and Canal Infrastructure by the West Coast Inland Navigation District within Charlotte County. (3)(d) "Seagrasses ... within dredged areas shall be relocated to viable recipient sites, using scientifically accepted methods, to the maximum practicable extent."
4) FAC 62-345 Uniform Mitigation Assessment Method. Required for use in assessing environmental impact and mitigation, including preservation, enhancement, restoration, and creation of wetlands.
5) FAC 62-302.530(47)(b) Nutrients. "In no case shall nutrient concentrations of a body of water be altered so as to cause an imbalance in natural populations of aquatic flora or fauna."
6) FAC 62-302.531(1) "The narrative water quality criteria for nutrients in paragraphs 62-302.530(47)(a) and (b) FAC apply to all Class I, II, and III waters."

State Guidelines, Incorporated by Reference (thus becoming regulation)

1) FAC 62-330.010(4) Applicant's Handbook Volume I. At 2.0 Definitions and Terms (a)

85. ""Permit Area" means the area where works occur as part of an activity requiring a permit under Part IV of Chapter 373, F.S. and any mitigation, buffer, and preservation areas ..."

10.3 "... the programmatic and project permitting goal of no net loss of wetland and other surface waters functions."

10.3.1 "... Areas proposed to be preserved to prevent secondary or cumulative impacts ... may also be considered part of a mitigation plan if those areas also serve to offset adverse impacts."

10.3.1.4 "In instances where an applicant is unable to meet water quality standards because existing ambient water quality does not meet standards and the activity will contribute to this existing condition, mitigation for water quality impacts can consist of

water quality enhancement. In these cases, the applicant must implement mitigation measures that will cause net improvement of water quality in the receiving waters."

10.3.3.1 "Applicants shall provide reasonable assurance that proposed mitigation will: (a) Offset adverse impacts due to regulated activities; and (b) Achieve mitigation success by providing viable and sustainable ecological and hydrological functions."

Project Specific Permits

1) U.S. Army Corps of Engineers Department of the Army Permit No. SAJ-2006-01964 (SP-ACM)

The USACE permit does not itself innumerate success criteria, but instead does so by incorporating (and referring to) Attachment 6, which is the Pirate Harbor Outer Channel Dredging Seagrass Mitigation Plan.

The USACE permit issued for the project thus states (indirectly) that the mitigation plan will be deemed successful when all of the following criteria are met:

- The mitigation Site shall achieve percent aerial coverage of seagrass equal to 80 percent of the Control Site;
- The mitigation Site meets the subsidence criteria; and
- Mitigation Site has achieved viable, sustainable ecological and hydrological functions defined as the unassisted persistence of the required acreage of seagrass coverage for a two-year period.

Special condition 19 states: If the Corps evaluation determines that the restoration has not been successful, the Permittee may provide statistical reports other than those required by the Specific Conditions of this permit (made at the Permittee's expense) to show that the success criteria has been met.

Special Condition 19 also states: "Based on technical information supplied by Corps personnel and other sources, this program (additional mitigation and monitoring) can be required by the Corps even if the monitoring reports indicate the criteria are or are not being met." Said 'technical information' is not provided nor further elaborated upon.

Special Condition 20 says, in part, "however, the Permittee, Successors, and subsequent Transferees remain perpetually responsible to ensure that the mitigation area(s) remain in a condition appropriate to offset the authorized impacts ..."

2) Florida Department of Environmental Protection Pirate Harbor Navigation Channel Dredge Environmental Resource Permit State Owned Lands Authorization No. 0128695-008-EI January 17, 2018

Specific Conditions – Mitigation #22 page 8 of 15, Permit No. 0128695-008-EI states "In order to mitigate for 0.19 acres of seagrass impacts, the Permittee shall restore 0.33 acre of boat grounding blow outs (Mitigation Areas) located within seagrass beds in

Charlotte Harbor in accordance with the attached Pirate Harbor Seagrass Mitigation Plan and the following actions and schedule, and Specific Conditions 23-27...".

Analysis

The question of whether the Pirate Harbor Waterway MSBU and or the Charlotte County Board of County Commissioners (CCBCC) (referred to hereafter as The County) should be released from further obligation for seagrass mitigation and monitoring can be analyzed at several levels.

1) Project Judged in its Entirety

Florida statutes and regulation make clear that the project can and should be judged as a whole. At the broadest level, Florida Statute 373.414(b) makes simple the determination of project success. The statute says the mitigation must offset the adverse effects of the regulated activity. Chapter 62-330.010(4) 10.3 clarifies "... the programmatic and project permitting goal of no net loss of wetland and other surface waters functions" is the ultimate target. Inasmuch as thousands of pages are dedicated to ways this can be done, none override this prime statement of goal. It would follow then that a project which has both "offset the adverse effects of the regulated activity" and achieves "no net loss of ... other surface waters functions" has succeeded. The regulated activity for this project is described in the USACE and Florida DEP permits and is that which takes place within the Permit Area. The Applicant's Handbook states: ""Permit Area" means the area where works occur as part of an activity requiring a permit under Part IV of Chapter 373, F.S. and any mitigation, buffer, and preservation areas ...". The Permit Area includes, by definition, the buffer zones in this project. Subsequent regulations may describe approaches to certain circumstances, but do not relieve or divert the Permittee from the overarching goal – offsetting adverse effects. The permits describe circumstances which have the potential for impacts, including primary dredging, buffer zone management, and mitigation and control site operations. The Permittee is at risk for, and must mitigate any impacts of, work in these areas.

The Pirate Harbor Outer Channel Dredging Seagrass Mitigation Plan describes within it multiple ways that project impacts will be offset, and these are not limited to what eventually became the specifically identified Mitigation Site North (MSN) and Mitigation Site South (MSS). Impacts were minimized by the way the project was implemented, limiting dredging depth in some areas and realigning the channel were practices that reduced possible impacts. Multiple mitigation sites were considered both for seagrass growth and for subsidence mitigation (habitat restoration) which has made an area that was not functional as a seagrass bed now able to function. Buffer zones were delineated and preserved, at risk to the Permittee, per the DEP Final Permit Impact Site Monitoring Plan. Preservation efforts included placing seagrass marker buoys and information signs to advise boaters to avoid seagrass in the buffer zone. The County also placed seagrass

education signs at Ponce De Leon Park, created a public education program on the County's TV channel, worked on additional awareness through Sea Grant, posted seagrass signs around the mitigation areas, and had Marine Patrol and Florida Fish and Wildlife patrol the permit area.

The dredging project itself serves as a preservation of sorts, as the newly dredged and clearly marked channel helps boaters (who generally prefer not to run aground) stay within its confines and out of the seagrass areas. It is noteworthy that had the Permittee not properly preserved the buffer zones, the Permittee would have been at risk for additional project costs. It seems fitting that if the Permittee assumes such risks, the Permittee would also realize the benefits of increasing the extent of the seagrass growth (as it has) within the buffer zones. The 5-year weighted average increase in seagrass coverage in the buffer zone (0.21 ac) is greater than the total amount of project impact (0.19 acre).

The Applicant's Handbook notes that "Areas proposed to be preserved to prevent secondary or cumulative impacts ... may also be considered part of a mitigation plan if those areas also serve to offset adverse impacts". In this project, the two 50 foot wide x 2300 foot long buffer zones (north and south, 5.28 acres total) alongside the primary dredge area are considered per DEP Permit Special Condition 27 as just the type of secondary potential impact areas invoked in 62-330.010(4) at 10.3.1, and have in fact served to offset adverse impacts as proven by the 0.21 acre (5-year weighted average) increase in seagrass coverage grown within them. The multi-year viable and sustained ecological and hydrological functional improvements in the buffer zones demonstrate success per the first and third criteria noted in the permits.

At a minimum, there appears to be no statute, regulation, guidance, or permit condition that prohibits consideration of overall project offsets when evaluating project success. Nor is there language that requires adherence solely to the narrowest view (that only success in the so-named 'mitigation area' qualifies) when assessing success. Ignoring offsets and sustained ecological and hydrological function just because they occurred in addition to similar conditions found in the mitigation areas, instead of solely within them, is at odds with at least the intent, if not the letter, of Florida law.

2) Relative Importance of Dredging Impacts/ Comparison to Similar Projects

At another level, a comparison can be made to the involvement of government in similar projects to discern how severely the Pirate Harbor project should be scrutinized. For comparison's sake, consider the General Permit described at FAC 62-330.411, the General Permit for Public Navigation Channel and Canal Infrastructure by the West Coast Inland Navigation District within Charlotte County. In this case, it has been determined that the periodic dredging of channels with similarities to the Pirate Harbor channel apparently has such insignificant environmental impact as to be governable under a general permit rather

than an individual permit (as was imposed upon Pirate Harbor). Under 62-330.401(1) FAC "mitigation is neither necessary nor required to offset those impacts" for general permit-covered projects. The totality of effort required for seagrass impacts under this General Permit is "Seagrasses ... within dredged areas shall be relocated to viable recipient sites, using scientifically accepted methods, to the maximum practicable extent." This suggests that at the present status of the Pirate Harbor project, that is, where project impacts have been mitigated through entirely successful subsidence mitigation, documented increase in seagrass acreage, and sustained ecological and hydrological function enhancement, significant success has been achieved beyond what is required for other dredge projects.

A statement made on the UMAM assessment form for the Impact Site declares "The Percentage of seagrass lost to dredging (0.19 ac) is miniscule compared to the area of seagrass in the area". At a minimum, such a statement suggests there is room to evaluate success criteria more liberally given that this project's miniscule impacts could be equated with the underlying reasons that general permits do not require mitigation of impacts at all.

3) Arbitrary and Capricious Imposition of Perpetual Responsibility

USACE Permit Number SAJ-2006-01964 Special Condition 20 says, in part, "however, the Permittee, Successors, and subsequent Transferees remain perpetually responsible to ensure that the mitigation area(s) remain in a condition appropriate to offset the authorized impacts in accordance with General Condition 2 of this permit." Note there is also language in Special Condition 19 which seems peculiarly capricious; specifically, "Based on technical information supplied by Corps personnel and other sources, this program (additional mitigation and monitoring) can be required by the Corps even if the monitoring reports indicate the criteria ***are or are not*** being met"(emphasis added). Said 'technical information' is not provided nor further elaborated upon. While it may be conceivable that certain legal or regulatory information may empower the Corps with such limitless control, it is unclear what type of technical information would so empower the Corps. Nor is it apparent why the Corps would require the Permittee to go through the time and monetary expense of producing a mitigation plan and fully executing it if the Corps intends to arbitrarily discard it and enforce perpetual responsibility regardless of project outcome. Assuming the last sentence found at Special Condition 19 ("Permittee may provide statistical reports ... to show that the success criteria has been met") is more sincere than the aforementioned statements, the Corps now has within this Review, including its 'statistical report', technical information that supports a written acknowledgement from the Corps declaring project success.

4) Broad Environmental Relationships to the Project

Another level at which the question can be addressed is that of the overall health of- and conditions within- the 'recipient water' i.e. Charlotte Harbor. It is well documented that water quality in Charlotte Harbor is largely to blame for the reduction in seagrass growth.

FAC 62-302.530(47)(b) states: "In no case shall nutrient concentrations of a body of water be altered so as to cause an imbalance in natural populations of aquatic flora or fauna." Extensive mats of drift algae blocked sunlight and effectively smothered seagrass, particularly on the east side of Charlotte Harbor, stemming from just such a nutrient alteration. The mitigation monitoring period was marked by multiple extraordinary natural environmental impacts in the form of repeated influxes of drift algae and recent hurricanes.

Florida law states at 373.414(b) : "If the applicant is unable to meet water quality standards because existing ambient water quality does not meet standards, the governing board or the department must consider mitigation measures proposed by or acceptable to the applicant that cause net improvement of the water quality ...". The fact that the control sites in this project demonstrated significant reduction in seagrass prevalence makes clear that the ambient water quality is more the issue than the effort of the mitigation project. Florida recognizes that it is unreasonable to expect an applicant/ Permittee to outperform mother nature. In doing so it offers The County other ways to offset project impacts, and those ways must be proposed by or acceptable to The County. In this case The County may assert that other ways include consideration of the buffer zones as adequate demonstration of net improvement of the waterway. The County may also assert other environmental projects, such as mangrove island restoration or oyster reef creation as methods to achieve net improvement of the waterway.

5) The Influence of Inconsistent Application of Methodologies

It is worth analyzing whether the criteria so narrowly insisted upon as the sole measure of success have been validly derived for this project. In addition to the highly altered ambient conditions into which this project was introduced, the mitigation project design itself may also have been altered in ways which make success harder to achieve, or at least harder to perceive. Historic mitigation schemes were often built upon a notion of integer multiples of impact equating to offset targets. The two-for-one ratio sometimes seen in this project's apparent impact/mitigation numbers (0.19 acres impact/ 0.38 acres mitigation) seem coincidental. The Uniform Mitigation Assessment Method, 62-345 FAC, was adopted to replace this simplistic and often invalid offset-ratio approach. Application of the UMAM in this case may not have been uniform enough to assure legitimate mitigation project design. In fact, the actual UMAM forms produced for this project calculate a mitigation area of 0.33 acres. Yet elsewhere in the permits, for example USACE Permit No. SAJ-2006-01964 Special Condition 17, Compensatory Mitigation, the mitigation acreage is written as 0.38 acres (exactly twice the impact acreage). This unsupported departure from the legally mandated use of UMAM is also seen in the DEP permit, in the second paragraph of the project description: "To offset unavoidable impacts that will occur from these authorized activities, the permittee shall restore 0.38 acres of seagrass habitat in Charlotte Harbor ...". Even the Mitigation Plan itself appears to have been influenced by the arbitrary two-for-one assumption, as it states on page 5 "CEC identified a 0.19 acre supplemental mitigation site contiguous with Site B (figure 3) to provide ... the required 0.38 acre of mitigation".

Ultimately the mitigation project restored more acreage (0.394 acre at mitigation sites and 5.28 acre buffer zone) than either the UMAM calculated 0.33 or the arbitrary 0.38 acre (or the more properly derived 0.20 acre calculated below). If a proper UMAM assessment had been completed, and adhered to, the amount and location of mitigation could have differed enough to achieve an even better outcome for the project.

Further inconsistencies influence the assessment of this project's success. For example, within the UMAM assessment that was prepared, 'current' (pre-construction) values assigned to both the Impact Site and the Mitigation Site were identical, despite that the impact site clearly has higher function as evidenced by the presence of seagrass (seagrass is absent at the mitigation site). Similarly, despite largely equal narrative notes describing the advantages of side slope seagrass growth, as seen on the Impact Site "Location and Landscape" and "Community Structure" boxes on the Impact Site form, such notes apparently support a high value for Location and Landscape but a zero value for Community Structure. If the explanatory notes have any truth to them, the value for Community Structure should be more like 3, i.e. something less than "Minimal Level of support of wetland/surface water functions", and not zero "Condition is insufficient to provide wetland/ surface water functions". Finally, the post-project function values assigned to the mitigation site seem unreasonable. For example, despite that mother nature herself seems unable to sustain better than a value of 7 for the impact and mitigation sites pre-project, the mitigation project is supposedly going to produce function values as high as 9 – nearly the optimal value. It is possible that had realistic values been applied to this assessment, it may have calculated a smaller requisite size for the mitigation area. An example is provided below:

> Ignoring the several internal inconsistencies between the impact and mitigation site UMAM assessments and instead adjusting just one factor on the impact site form to be consistent with its own narrative, i.e. changing the score for the post-dredging Community Structure functions at the impact site from a zero to a 3, reduces the required acreage for mitigation to 0.20 acres. See Appendix 1 for example revised UMAM forms.
>
> <u>Impact Site UMAN Calculation</u>
>
> Sum of individual Impact Current scores / 30 = current (pre-construction) score
>
> 7 + 7 + 7 = 21 / 30 = 0.7
>
> Sum of individual Impact 'with' scores / 30 = with (post-construction) score
>
> 6 + 7 + 3 = 16 / 30 = 0.533
>
> [With – Current] = Delta for Impact site
>
> 0.533 – 0.700 = 0.167

For Impact assessment areas:

delta x acres = Functional Loss (FL)

0.167 x 0.19 = 0.0317

Mitigation Site UMAM Calculation

Sum of individual Mitigation Current scores / 30 = current (pre-construction) score

7 + 8 + 2 = 17 / 30 = 0.567

Sum of individual Mitigation Site 'with' scores / 30 = with (post-construction) score

9 + 8 + 8 = 16 / 30 = 0.833

[With – Current] = Delta for Mitigation site

0.833 – 0.567 = 0.266

For Mitigation assessment areas:

delta / (t-factor x risk) = Relative Functional Gain (RFG)

0.266 / (1.14 x 1.5) = 0.156

Mitigation needed to offset impacts when not using a bank

To determine the acres of mitigation needed to offset impacts when not using a bank or a regional offsite mitigation area as mitigation, divide the functional loss (FL) by relative functional gain (RFG).

Example FL / RFG = **Acres of Mitigation**

0.0317 / 0.156 = **0.20 acre**

This amount of seagrass coverage increase was achieved within the buffer zone alone. Had the project proceeded with a UMAM-driven mitigation acreage of only 0.20 acres, it is possible that mitigation site selection would have resulted not in two sites but rather just one, either an area immediately adjacent to the dredge itself, or in the better of the two mitigation areas- that surrounding MSN.

6) The Project Judged Narrowly, Alternate Statistical Report

Conclusions in the Monitoring Report seem to focus primarily on whether there has been sufficient progress in offsetting impacts in the mitigation areas to meet success criteria. At

first look it appears this is not the case, because there is more than one mitigation site, and because each site performed differently on two of three criteria. While the seagrass coverage increased in the buffer zone, it decreased in the other mitigation sites and their respective control sites. However, if the results found in MSN and MSS are combined, as they should be per permit language, and buffer zones are included, a statistical argument can be made that all the criteria (seagrass coverage at least 80% of that in the control sites, subsidence mitigated, sustained ecological and hydrological function) have been met.

The applicant has the right per Special Condition 19 of the USACE Permit to provide an alternate evaluation of success: "if the Corps evaluation determines that the restoration has not been successful, the Permittee may provide statistical reports other than those required by the Specific Conditions of this permit (made at the Permittee's expense) to show that the success criteria has been met". It should be noted that no regulatory support was found to validate the choice of 80% as a target for seagrass success. For the purposes of this analysis 80% can be used, but it would be worthwhile to know the origins of- and rationale for- this key number.

6.1 Mitigation Site Seagrass vs Control Site

A statistical argument can be made that the first criterion has been met. See below:

> To evaluate what the permit calls 'the mitigation area', two sites must be combined. Converting percent coverage to acreage makes it easier to combine two of the mitigation areas. Using data from the Pirate Harbor Entrance Channel Dredging Fifth Annual Seagrass Monitoring Report:
>
> Percent Aerial Coverage of MSN at year 5 was 0.8%. Multiplied by its size (0.09 acre) we get the total area of seagrass coverage 0.8% X 0.09 acre = 0.0007 acres of seagrass. The absence of seagrass in MSS at year 5 means the total acreage of seagrass in the combined mitigation areas in year 5 was 0.0007 acre.
>
> Percent Aerial Coverage of the MSN control site at year 5 was 0.2%. Multiplied by the size of the control site (0.12 acre) we get the total area of seagrass coverage 0.2% X 0.12 acre = 0.0002 acre. For the MSS control site 0.6% X 0.12 acre = 0.0007 acre of seagrass. Combining the control sites gives 0.0007+0.0002 = 0.0009 acre of seagrass. Eighty percent of 0.0009 acre equals 0.0007 acre, which is the same as the acreage of seagrass grown in the two combined mitigation sites. The first success criteria can thus be viewed as met.

6.2 Sediment Subsidence

According to the monitoring report, noted at 4.1.3, subsidence criteria were met in their entirety. Approximately 0.394 acre of seagrass habitat was restored. If and when water quality in the vicinity of the mitigation sites improves, the sites are prepared to support seagrass growth and viable, sustainable ecological and hydrological functions.

6.3 Viable, Sustainable Ecological and Hydrological Functions

Adherence to the narrow definition of viable, sustainable ecological and hydrological functions described in the success criteria obscures the fact that sustainable functions have been achieved in multiple areas within the permit area. Federal compensatory mitigation regulations make a distinction between aquatic resource function and aquatic resource area. The third success criterion in this permit simplistically equates these. It could be argued that the work performed at the mitigation sites was both re-establishment and rehabilitation. If the first criterion measures gain in aquatic area, then the third criterion measures gain of aquatic function. Subsidence has been mitigated in 0.394 acre of MSN and MSS. The habitat is restored and capable of sustaining seagrass in an area nearly twice the revised mitigation area target (0.20ac) - if only the ambient water quality could support it. If hydrological function is restored through seafloor elevation (whereas ecological function is more closely tied to seagrass growth) and such function was restored on 197% of the (revised) required acreage, how is this success enumerated if acres of seagrass is the only metric for sustainable function?

The absence of specific language in the third success criterion on when within the five-year monitoring period the two years of sustained improvement must be logged opens it up to interpretation. Under one interpretation it can be said that the mitigation site did reach this level of success. MSS demonstrated two successive years of improvement in 2022 and 2023 - percent aerial coverage increasing five-fold in the composite. The control site saw only a three-fold increase in coverage during this period, so the mitigation site exceeded control site performance. Combining the mitigation sites (and control sites) reveals that while combined the sites still showed two years of seagrass improvement, the percent change in the mitigation sites (31%) was less than the control sites (126%). Unfortunately, some broad environmental condition, possibly hurricanes Helene and Milton, abruptly curtailed seagrass growth – or more appropriately - destroyed existing seagrass in both mitigation and control sites.

Assigning value to the seagrass grown in the buffer zone can supply ample evidence of overall project success. Federal regulations recognize that preservation, like that done in the buffer zone, is worthy of credit in compensatory mitigation. In fact, if the buffer zone (understood to be a 50-foot zone on each of the north and the south sides of the 2300-foot-long primary dredge site) were considered a mitigation site itself, at 5.28 acres in size, the project could be considered to have offset at least 16 times the necessary mitigation acreage. This is because the percentage of seagrass coverage in the buffer zone at year five

was 22%, (1.16 acres out of a total area of 5.28 acres). This is 138% of the highest percent aerial coverage of either control site at any time, and over 3600% of the highest percent aerial coverage of either control site at year five. The Pirate Harbor Entrance Channel Dredging Fifth Annual Seagrass Monitoring Report states: "Reviewing the seagrass within the buffer zone, the five-year weighted average was 1.18 acres, a net increase of 0.21 acre." This amount of additional seagrass in the buffer zone represents over 20% increase in the amount of seagrass in the buffer zone and slightly exceeds the original impact acreage and the revised mitigation target. It should be noted that the buffer zone was monitored for five years despite the permits' allowance to cease such monitoring after three years. For this reason, again the buffer zone meets the requirements to be considered valid mitigation areas and one upon which project success can be judged. There has been no evidence of subsidence in the buffer zones. Viable and sustainable ecological and hydrological function has been demonstrated by the unassisted persistence of (more than) the required acreage of seagrass coverage for (more than) a two-year period. Seagrass coverage increased each of the first three years of the monitoring period. Increases were set back but never below the pre-construction or time-zero amount and then increased in the last two years of the project.

6.4 Relative Value of the Success Criteria

It is unclear exactly what relative value has been assigned to each of the three success criteria. In the absence of specific language, it seems implicit that each criterion may have equal weight, i.e. 33%. Because the Permittee is afforded the opportunity to provide an alternate analysis, such an exercise is offered herein using simple estimates for these values to illustrate a point.

For this hypothetical construct, it can be asserted that if value were assigned to each of the three success criteria, the highest value would be placed upon sustained successful management of subsidence, because that 'sets the table' for long term success more so than does any one instance of seagrass appearance. While the end goal seems to be primarily represented as seagrass growth, attempting to push such into an environment unable to accept it, such as the nutrient-impaired waters of Charlotte Harbor, is a limited view of success. If seagrass were to briefly flourish against all odds even at less-than-ideal depths, it would be a short-lived occurrence; whereas elevating the seafloor to be within the optimal depth for seagrass growth in Charlotte Harbor ensures that when water quality improves, the environment will be prepared to accept and support seagrass.

Thus, for this hypothetical construct, a relative importance of 20% shall be assigned to the first criterion – short term seagrass growth, 50% to subsidence management, and 30% to the last point, to allow a way to statistically evaluate the project's success. The fact that seagrass growth in the mitigation sites was 80% of that observed in the control sites would contribute 20% towards total success under our hypothetical construct. Successful subsidence management of more acreage than was required adds 50% bringing the project

to 70% success. Note that the third 'success criterion' is more a representation of the success of the first two criteria over time than a separate criterion and thus is assigned a value that, when combined with either of the first two, would give a valid perspective on the state of the project viewed over time for either criterion. While functions have been improved after elevating the seafloor, and early glimpses of seagrass growth improvement were observed in the combined mitigation sites, the nearly wholesale elimination of seagrasses by storm events or other extraordinary conditions means the third criterion gets only 10% (of 30% available in this construct) value. Under this simplistic construct, the project would be deemed 80% successful (similar to the unsupported target of 80% utilized in the first criterion).

The hypothetical construct described above did not include values for the buffer zone achievements. If value were assigned, it could be 100%, because all success criteria were realized in the buffer zone. Or, to the point of this exercise, it could be at least a percentage (eg 20%) that would make up the difference between perceived mitigation site restoration shortcomings and the target, consistent with 40 CFR 230.93 (h)(2). Whether viewed as re-establishment (0.21 acres added) or preservation (5.28 acres preserved), the buffer zone results supply 'credits' to adequately offset project impacts.

Summary

Florida law supports flexibility in evaluating project success, allowing a project to be judged as a whole, particularly in circumstances where it is ambient environmental conditions that restrict mitigation project success. Elsewhere in the state, projects with so little environmental impact as this project are governed under general permits which have few or no mitigation requirements. This supports the idea that the success achieved on this project is already a net benefit, especially when compared to general-permitted projects. Successful preservation of the large buffer zones, which were by permit required to be protected from secondary impacts, supplies offsets in as high a ratio as 16 to 1, and has resulted in an additional 0.21 acre of seagrass growth – an amount essentially equal to the original impact acreage. Adjusting the UMAM assessment to be internally consistent results in a revised mitigation acreage of only 0.20 acre, an amount again nearly equal to the amount of seagrass coverage increase realized in the buffer zone. In the most literal sense, the project fully met the first two of three success criteria. Habitat restoration through subsidence management has probably made the biggest difference in the likely future for the mitigation areas. Progress towards success on the third criterion showed promise until hurricanes Helene and Milton, or some other detrimental factor, curtailed seagrass growth at control sites and mitigation sites. If no individual opportunity described above is sufficient to deem the project a success, the weight of two or more of them is enough to justify ceasing further mitigation or monitoring on this project. Ultimately, there are several ways one could conclude that the Pirate Harbor Outer Channel Dredging Seagrass Mitigation Plan did fulfill its purpose.

Conclusion

1. Florida law supports, rather than prohibits, consideration of a project as-a-whole when assessing success. This project has offset the adverse effects of the regulated activity.
2. Regulations specifically state that areas "proposed to be preserved to prevent secondary or cumulative impacts ... may also be considered part of a mitigation plan if those areas also serve to offset adverse impacts". This project's buffer zones therefore qualify to offset impacts and define success.
3. The underlying rationale for general permits applying to channel dredge operations can be applied to this project to conclude that further mitigation of the 'miniscule' impact is not warranted.
4. Broad environmental conditions surrounding the project demand reconsideration of the definition of success. Florida law and regulation allows a permittee to propose mitigation alternatives when ambient conditions impede project success. If the Permittee proposed deeming buffer zones to be mitigation sites, the project could be judged successful because of the positive developments within them.
5. When the two so-designated mitigation sites are combined and considered as one site, the seagrass coverage in them was 80% of that found in the combined control sites as of the last monitoring event, explicitly meeting success criteria.
6. Subsidence in the so-named mitigation sites has been satisfactorily controlled, with 0.394 acre of habitat restored, explicitly exceeding success criteria.
7. Viable ecological and hydrological function has been demonstrated by at least one two-year period of increasing seagrass coverage in the combined mitigation sites. Detrimental conditions (two hurricanes) ultimately suppressed this development. Five years of viable, sustainable function in the buffer zone implicitly (per conclusions #2 and #4) meets success criteria in an area over five times the required size of the mitigation area.
8. A more internally consistent application of the UMAM assessment forms would have produced a required mitigation area of only 0.20 acre. Seagrass coverage increases (0.21 ac) in the 5.28-acre buffer zone shows a successful offset amount.

Taken as a whole, and in consideration of the existing water quality and recent natural environmental impacts on Charlotte Harbor, the Pirate Harbor Seagrass Mitigation Project should be considered a success, and Pirate Harbor Waterways MSBU and the County should be released from further obligation to monitor or mitigate seagrass related to the Pirate Harbor Outer Channel Dredge Project.

Please note the statements made herein represent the opinions of one Charlotte County, Florida citizen, and may differ from official positions of either The Pirate Harbor Waterway MSBU or the Charlotte County Board of County Commissioners.

Appendix 1
Revised UMAM Assessment Forms for Impact Site and Mitigation Site

PART II – Quantification of Assessment Area (impact or mitigation)
(See Rules 62-345.500 and .600, F.A.C.)

Site/Project Name	Application Number	Assessment Area Name or Number
Pirate Harbor	08-128695-007	Channel
Impact or Mitigation	**Assessment conducted by:**	**Assessment date:**
Impact	JS	example revision 8/13/2025

Scoring Guidance	Optimal (10)	Moderate(7)	Minimal (4)	Not Present (0)
The scoring of each indicator is based on what would be suitable for the type of wetland or surface water assessed	Condition is optimal and fully supports wetland/surface water functions	Condition is less than optimal, but sufficient to maintain most wetland/surface waterfunctions	Minimal level of support of wetland/surface water functions	Condition is insufficient to provide wetland/surface water functions

.500(6)(a) Location and Landscape Support w/o pres or current: 7 with: 6	Seagrass is in the area; after dredging, there will be seagrass in the area and the dredge depth being reduced to 4 MLW will allow for seagrass to grow into the side slopes. The percentage of seagrass lost to dredging (0.19ac) is miniscule compared to the area of seagrass in the area.
.500(6)(b)Water Environment (n/a for uplands) w/o pres or current: 7 with: 7	Dredging should not have any effect on water quality.
.500(6)(c)Community structure 1. Vegetation and/or 2. Benthic Community w/o pres or current: 7 with: 0 to 3	After dredging, the side slopes will remain as suitable habitat (in terms of depth and sediment structure) so that seagrass can revegetate the side slopes. Post-construction monitoring of these areas would confirm this. NOTE:The original value (0) is shown along with the replacment value (3) used for this alternate calculation. The remaining portions of the form reflect calculations using the value of 3 for Community Score. The value of 3 is justified given the narrative statements in this and the Location and Landscape boxes, as these stements make clear that the functions are not completely eliminated, but instead would be something slightly less than "minimal level of support of wetland/ surface water functions.

Score = sum of above scores/30 (if uplands, divide by 20)	
current or w/o pres: 0.7	with: 0.533

If preservation as mitigation,
Preservation adjustment factor =
Adjusted mitigation delta =

For impact assessment areas
FL = delta x acres = 0.167x0.19=0.032

Delta = [with-current]
0.167

If mitigation
Time lag (t-factor) =
Risk factor =

For mitigation assessment areas
RFG = delta/(t-factor x risk) =

Form 62-345.300(2) [effective date 02-04-2004]
Incorporated by reference in paragraph 62-345.300(3)(b), F.A.C.

PART II – Quantification of Assessment Area (impact or mitigation)
(See Rules 62-345.500 and .600, F.A.C.)

Site/Project Name	Application Number	Assessment Area Name or Number
Pirate Harbor	08-0128695-007	Cormorant Key
Impact or Mitigation	**Assessment conducted by:**	**Assessment date:**
Mitigation site	JS	example revision 8/13/2025

Scoring Guidance	Optimal (10)	Moderate(7)	Minimal (4)	Not Present (0)
The scoring of each indicator is based on what would be suitable for the type of wetland or surface water assessed	Condition is optimal and fully supports wetland/surface water functions	Condition is less than optimal, but sufficient to maintain most wetland/surface waterfunctions	Minimal level of support of wetland/surface water functions	Condition is insufficient to provide wetland/surface water functions

		w/o pres or current	with
.500(6)(a) Location and Landscape Support	62-345. "The value of functions provided by an assessment area to fish and wildlife are influenced by the landscape position of the assessment area and its relationship with surrounding areas ... The location of the assessment area shall be considered to the extent that fish and wildlife utilizing the area have opportunity to access other habitats necessary to fulfill their life history requirements." The current condition of the mitigation assessment area is a fragmented seagrass meadow with a history of prop scars. There are extensive areas of seagrass immediately adjacent to the assessment site. Fish and wildlife utilizing the area will have the opportunity to access the adjacent seagrass habitat. The addition of fill to the mitigation area will raise the elevation of the submerged land to one favorable for expansion of seagrass into the mitigation area. Species inhabiting the mitigation area will have full opportunity to access the adjacent seagrasses and will benefit from having access to these areas.	7	9
.500(6)(b)Water Environment (n/a for uplands)	Water quality will not be effected by proposed mitigation. The mitigation site is not large enough to change the existing water quality in Charlotte Harbor.	8	8
.500(6)(c)Community structure 1. Vegetation and/or 2. Benthic Community	Currently condition is a sandy unvegetated area with benthic infauna; with mitigation the site is expected to become a seagrass community. NOTE: All values on this sheet remain as asserted in the original assessment.	2	8

Score = sum of above scores/30 (if uplands, divide by 20)	current or w/o pres	with
	0.567	0.833

If preservation as mitigation,
Preservation adjustment factor =
Adjusted mitigation delta =

For impact assessment areas
FL = delta x acres =

Delta = [with-current]
0.266

If mitigation
Time lag (t-factor) = 1.14
Risk factor = 1.5

For mitigation assessment areas
RFG = delta/(t-factor x risk) = 0.156

Form 62-345.300(2) [effective date 02-04-2004]
Incorporated by reference in paragraph 62-345.300(3)(b), F.A.C.

Pirate Harbor Waterway MSBU

Proposed Budget

FY2027

Estimated ERU's and Cost per ERU

	Approved FY2027	Proposed FY2027	Changes FY2027
Vacant and Occupied			
Estimated ERU's	326.000	326.000	-
Cost per ERU	$ 335.00	$ 335.00	$ -
Current FY26 Rate	**$ 335.00**		
Current Maximum Rate	**$ 828.25**		

	Approved Budget FY2027	Proposed Budget FY2027	Budget Changes FY2027
Beginning Balance	$ 354,642	$ 511,026	$ 156,384
Revenues			
Assessments & Earnings			
Assessments	109,210	109,210	-
Interest	1,242	1,789	547
Less 5% Reserve - FS 129.01(2)b	(5,523)	(5,550)	(27)
Grant & Subsidy Revenue			
Loans & Borrowing			
Debt Proceeds	-	391,000	391,000
Total Revenue	$ 104,929	$ 496,449	$ 391,520
Expenditures			
Contract Services			
Engineering	-	-	-
Other Contractual Srvs	-	-	-
Contract Services; other			
Survey	30,000	30,000	-
Navigational Trimming	-	-	-
Public Works Services			
Equip Repl Charges-PubWrks	500	500	-
Operating Exp-PubWrks	16,509	16,509	-

	Approved Budget FY2027	Proposed Budget FY2027	Budget Changes FY2027
Internal Charges			
Central/Indirect Srvs	1,371	1,526	155
Purchased Services			
Admin Srvs-PubWrks	-	-	-
Reimb-Aquatic Weed Chrgs	23,219	23,219	-
Advertising-Legal	-	-	-
Collection Fee-Tax Collector	2,185	2,185	-
Materials and Supplies			
Capital Outlay			
Imprv-Other Than Bldgs	-	-	-
Debt Services			
Principal	78,200	78,200	-
Interest	12,730	15,610	2,880
Other Debt Service Costs	-	-	-
Project Costs			
Pirate Harbor Dredging FY23			
Engineering	-	84,620	84,620
Dredging	-	375,000	375,000
Labor	-	9,827	9,827
Total Expenditures	164,714	637,196	472,482
Reserves (Ending Fund Balance)	$ 294,857	$ 370,279	$ 75,422
Reserve %	*64.2%*	*36.8%*	

Version Date 6/2/2026

Budget Report

Activity Description: All

Pirate Harbor Waterway Unit

Budget Year: 2027

	Budget Details						
Activity Description	**Work Quantity**	**Unit of Measure**	**Labor Cost**	**Materials Cost**	**Equipment Cost**	**Contractor Cost**	**Total**
MSBU Administrative Work	120	HOURS	$9,476.40		$499.20		$9,975.60
Project Management	75	LABOR	$7,031.75				$7,031.75
Pirate Harbor Waterway Unit Total			**$16,508.15**		**$499.20**		**$17,007.35**

Capital Maintenance Schedule
Public Works - MSBU/TU Dredging
2027

Costs (in thousands)

Project Title	2027	2028	2029	2030	2031	2032	TOTAL
Alligator Creek - Entrance Channel	2,353	54	37	19	9	-	2,473
Don Pedro/Knight/Palm Island Re-nourishment	244	-	-	-	-	-	244
Don Pedro/Knight Island Renourishment FY27	10,305	1,167	1,056	929	807	679	14,943
Gulf Cove WW Dredging	1,747	-	-	-	-	-	1,747
Harbour Heights WW Maintenance Dredging	-	1,418	-	-	-	-	1,418
Manasota Key Beach Nourishment FY20	197	-	-	-	-	-	197
Manasota Key Beach Nourishment FY27	10,120	1,272	1,164	1,035	915	790	15,296
Manchester Waterway Maintenance Dredging	845	-	-	-	-	-	845
Northwest Port Charlotte Exterior Dredging	1,290	-	-	-	-	-	1,290
Pirate Harbor Maintenance Dredging FY23	485	13	10	7	3	1	518
South Gulf Cove WW Maintenance Dredging	1,817	-	-	-	-	-	1,817
Stump Pass Maintenance Dredging FY25	120	45	-	-	-	-	165
Stump Pass Maintenance Dredging FY29	-	95	4,436	47	48	39	4,665
TOTAL	29,523	4,064	6,703	2,037	1,783	1,508	45,618

CHARLOTTE COUNTY
FLORIDA

Pirate Harbor Waterway
Municipal Service Benefit Unit

Advisory Board Meeting Attendance
Wednesday, ~~June~~ JUN 8, 2026
Location: 401 Shreve Street, Punta Gorda, Florida
Punta Gorda Library

INFORMATION SUPPLIED ON THIS FORM BECOMES PUBLIC RECORD

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