



# SAVE THE MANATEE®

*The Voice For Manatees Since*

March 23, 2023

Jason Andreotta  
Florida Department of Environmental Protection,  
Southeast District, District Director  
3301 Gun Club Rd, West Palm Beach, FL 33406

Re: Riverwatch Conservation Easement Section 11, Range 41 East (File No. 2155599 OR Book, 1655 Page 2772) and Sopotnick Duplex Parcel ID: 4511-444-0001-002

Mr. Andreotta,

It has come to our attention that the Riverwatch HOA has submitted a request through the FDEP for an Exemption of Verification permit to dredge the waters in and surrounding the sensitive mangrove habitat of the Riverwatch Conservation Easement. Save the Manatee Club opposes the issuance of a permit to dredge the Riverwatch Conservation Easement or in any way modify the existing permit to remove restrictions on vessels powered by gasoline or diesel engines. We also oppose any activities that propose to remove mangrove and other vegetation within and surrounding the Conservation Easement.

The Riverwatch POA was entered into between FDEP and Federal Deposit Insurance Corporation in 1991 to mitigate violations of the Clean Water Act and is intended to be preserved in perpetuity. According to Army Corps of Engineer (Corps) documents, the "tidal pond, flushing channel and preserved wetlands provided important function and services to the watershed and accepted them as mitigation for impacts associated with the original work." Further, the National Marine Fisheries Service acknowledges that the area is identified as Essential Fish Habitat.

The Indian River Lagoon (IRL) is considered critical manatee habitat under the Endangered Species Act. As the Riverwatch Conservation Easement is located within the IRL, it is unsurprising that residents of the Easement regularly witness manatees foraging, resting and calving within the waters of the easement. As you are likely well aware, Florida's east coast has been experiencing an unprecedented number of manatee deaths over the past two years, with an Unusual Mortality Event being declared in March of 2021. Since December 2020, over 1,000 animals have perished in the six counties surrounding the IRL, mainly due to starvation.

In 2015, the Florida Fish and Wildlife Conservation Commission estimated that the east coast manatee population was composed of 4,000 individuals. With a decrease of a number equal to nearly 25% of the estimated east coast population, it is critically important that the surviving manatees be properly protected from further habitat loss. There are also ongoing concerns from managers that manatee birth rates are diminished due to the physical stresses of long-term starvation, further threatening the already imperiled east coast manatee population. Therefore, it is critically important to protect manatee birthing areas, now more than ever.

There is no question that the Riverwatch Conservation Easement is an important manatee habitat. For this reason, Save the Manatee Club is opposed to any action that would negatively impact the sensitive habitat of the conservation easement or allow any uses within the easement not currently permitted.

Sincerely,

Tiare Fridrich, MPS  
Manatee Biologist  
Save the Manatee Club  
[tfridrich@savethemanatee.org](mailto:tfridrich@savethemanatee.org)  
407-539-0990