

CWG Review 1: Spring 2015

Tier 1 Information:

1. Management Action

S-102 Develop and integrate more effective quality control procedures in the regulatory framework and triggers within permits for corrective action during coastal development projects to insure protection of marine habitat and species.

2. Intended Result (Output/Outcome)

What is the end product/result of this management action?

- What this means is that a project should be subject to quality control procedures that are feasible, measurable, timely, unbiased, realistic, and capable of providing feedback leading to remedial action. In essence, a good QC procedure will ensure project mission attainment and achievement of contract goals. Design flaws and implementation problems can then be detected quickly and the project modified or re-directed as needed. Once a project's QC program is defined, performance data should be collected by a qualified third party and reported to all stakeholders. Issues such as excessive silting, unexpected collateral damage due to blasting, and careless dumping of spoil will then be quickly identified and then mitigated. A proper QC program will sample progress periodically, compare results to specifications, and report any deviations. Corrective action, or project modification, can then take place in a timely manner.
- Quality control within the, regulatory framework that ensures enforceability of permit conditions and having clearly defined triggers which allow for rapid adjustment of projects such as ceasing operation
- Quality control can include legal review of permits to ensure independent agency approved biological contractors or agency on-site monitoring Integrate clear and actionable triggers for corrective action in permits when
- Make sure there is a mechanism for rapid response and ceasing operations/ cease and desist.
- Make a blanket goal/objective of the project that is to prevent harm to the resources, because there will always be issues that you can't foresee.

3. Duration of Activity

Is this a discrete action or a recurring activity? Explain.

- An effective QC program should be designed to accompany each and every coastal project impacting coral reefs. This policy must be on-going into the foreseeable future.

4. Justification

What issue or problem will this management action address? Explain.

- Recent history, and both current and proposed projects, show a lack of effective compliance monitoring and corrective action. Triggers are agreed-upon, placed into permits, but lack a QC process to sample work performed, assess the degree to which specifications are met, and detect anomalies and unexpected consequences as they occur. Without QC procedures in place, substantial environmental damage can occur, detected only after project completion. Mitigation is compromised.

5. Potential Pros

What are the potential advantages associated with this management action?

- Good QC procedures can detect project problems early and can avoid or minimize impacts to resources before damage occurs or becomes extensive through rapid response and corrective action. Design of a QC process can also warn of project defects.

6. Potential Cons

What are the potential disadvantages associated with this management action?

- QC procedures are a watchdog function which acts to insure that project design specifications and outcomes are in fact met. This inevitably creates a natural friction between contractors and clients, the latter typically government entities. Conflict over project goal attainment may be substantial, but is usually in the public interest while reducing a project's profitability for the contractor.
- Logistical issues and if the contractor is required to do more then cost will increase
- Additional triggers for adapting project work or ceasing work will increase cost (but may actually reduce cost because they will not need to do mitigation on the back if no impact in)
- Contract modifications may be necessary through adaptive management and contract modifications can be complicated.

7. Location

County/Countries: Miami-Dade, Broward, Palm Beach, Martin, Other?

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- Entire SEFCRI region and adjacent areas

Relevant Habitats: Coral reef, seagrass, watershed, etc.?

- Every project should incorporate these, specifically to reef and reef associated resources

Specific Location: City, site name, coordinates, etc.?

- All

8. Extent

Area, number, etc.

- All

9. Is this action spatial in nature?

- No

Tier 2 Information:

WHY?

1. Strategic Goals & Objectives to be Achieved

Refer to the [SEFCRI Coral Reef Management Goals and Objectives Reference Guide](#).

- Develop and integrate more effective quality control procedures and triggers for corrective action in a timely manner for coastal development projects to insure new standards for protecting marine habitat and species included in the SEFCRI region.

2. Current Status

Is this activity currently underway, or are there planned actions related to this recommendation in southeast Florida? If so, what are they, and what is their status.

- There is a need for more stringent, valid QC procedures capable of insuring that project goals and objectives are met without undue damage and unintended consequences.

3. Intended Benefits (Outcomes)

What potential environmental benefits or positive impacts might this management action have?

- Effective practices will make it more likely that planned environmental improvements will be achieved and damage and losses minimized.

What potential social/economic benefits or positive impacts might this management action have?

- Effective practices that lead to improved reef health and less unavoidable damage will thereby benefit tourism, improve fishing and water sports, and allow intelligent port development. Economic growth will be enhanced.

What is the likely duration of these benefits - short term or long-lasting? Explain.

- There are no simple and fast solutions to complex problems, and reef protection is one of the world's more complex challenges. Excellent quality assurance practices must be long term to preserve our marine environments.

4. Indirect Costs (Outcomes)

What potential negative environmental impacts might this action have?

- Quality assurance is designed to improve all aspects of life on the planet. Consequently, if quality is properly defined and not corrupted, no negative impacts will occur.

What potential negative social/economic impacts might this action have?

- Quality assurance improves the quality of human life, and seeks to reduce waste, improve economic performance, and maximize technological performance. Doing things right the first time is the cheapest strategy since resources are thereby conserved

What is the likely duration of these negative impacts - short term or long-lasting? Explain.

- No negative impacts are anticipated. Special interests will always seek to reduce quality if that results in personal or corporate enrichment.

5. Risk

What is the threat of adverse environmental, social, or economic effects arising from not implementing this action?

- The consequences of poor quality control include uncontrolled damage, waste of resources, legal and political conflict, and environmental degradation. Corporations, especially those controlled by foreign powers, tend to water-down quality control procedures in a drive for improved profitability and improved market share, as the BP disaster in the Gulf of Mexico amply demonstrated. Strong regulation, which is a type of quality control, is proven effective in protecting the environment.
- Projects will continue to impact the reefs with no rapid response.

6. Relevant Supporting Data

What existing science supports this recommendation? (Provide citations)

- Ample proof of the effectiveness of good quality control exists in the manufacturing, service, and construction industries where end products are highly visible and citizens are affected personally. In the marine environment, underwater activity is not readily visible, relatively few informed citizens are involved, merchant shipping and cruise lines are largely foreign-owned, and special interests pursue their own narrow objectives: quality control is therefore not a high priority.

7. Information Gaps

What uncertainties or information gaps still exist?

- Not relevant

WHEN?

8. Anticipated Timeframe for Implementation

How long will this recommendation take to implement?

- 0-2 years

9. Linkage to Other Proposed Management Actions

Is this activity linked to other proposed management recommendations?

- Yes

If so, which ones, and how are they linked? (e.g., is this activity a necessary step for other management actions to be completed?)

- Quality assurance is, or should be, a part of all reef-related projects since quality is defined as the degree to which design goals and objectives are met.

Does this activity conflict with other existing or proposed management actions?

- no

WHO?

10. Lead Agency or Organization for Implementation

What agency or organization currently has/would have authority? Refer to the [Agencies and Actions Reference Guide](#).

- All organization performing or controlling projects should design and implement effective QC procedures.

11. Other Agencies or Organizations

Are there any other agencies or organizations that may also support implementation? Explain.

- All and every contracting organizations should implement sound, effective, and unbiased QC procedures.

12. Key Stakeholders

Identify those stakeholders most greatly impacted by this management action, including those from whom you might expect a high level of support or opposition. Explain.

- Effective quality assurance programs are of particular interest to taxpayers and their representatives, since poor quality wastes resources, which are always in short supply, and compromises successful goal attainment. Every section of society can be expected to support quality assurance programs but for those who stand to profit in some way from poor quality and incomplete goal attainment. For example, Port Miami has nothing to gain, and business to lose, in the improvement of Port Everglades, a nearby competitor. Theoretically, at the State level, Miami-Dade representatives might lobby for budget cuts to projects at Broward's Port Everglades, cuts which might reduce QC activities and thus hamper project goal attainment and create errors and under-performance.

HOW?

13. Feasibility

Is there appropriate political will to support this? Explain.

- Most likely not because of the perceived increase of project cost.

What are the potential technical challenges to implementing this action? Has it been done elsewhere?

Agency staff time to actually be on site, don't have enough capacity in either staff or resources.

14. Legislative Considerations

Does the recommendation conflict with or actively support existing local, state, or federal laws or regulations? Explain.

None

15. Permitting Requirements

Will any permits be required to implement this action? Explain.

No

16. Estimated Direct Costs

Approximately how much will this action likely cost? (Consider one-time direct costs, annual costs, and staff time, including enforcement.)

- >\$250,000. Minimum of 2 new DEP staff for permit compliance.

Will costs associated with this activity be one-time or recurring?

- Cost is recurring because it's permanent staff and need a vessel/gas/SCUBA and field equipment

If recurring, approximately how long will staff time and annual costs be necessary to implement the management action?

Cost is recurring because it's permanent staff and need a vessel/gas/SCUBA and field equipment

17. Enforcement

Does this require enforcement effort?

- NO

18. Potential Funding Sources

Identify potential funding organizations/grant opportunities, etc.

- Legislative budget request

19. Measurable Outcomes/Success Criteria/Milestones

How will the success of this recommendation be measured? How will you know when the intended result is achieved?

- Increased compliance with specific conditions
- Reduced impacts to resources

SEFCRI/TAC Targeted Questions:

1. **TAC** - Is the recommendation likely to achieve the intended result? Explain.

Tier 1 – #2 (Intended Result - Output/Outcome)

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2. **TAC** - Is the recommendation sufficient to address the identified issue or problem? Explain.

Tier 1 – #4 (Justification)

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3. **TAC** - Is the recommendation technically achievable from a science or management perspective? Explain.

Tier 2 – #8 (Anticipated Timeframe for Implementation) and Tier 2 - #13 (Feasibility)

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4. **SEFCRI Team, PPT & Other Advisors** - Has this been done (by SEFCRI, other agencies or organizations in the SEFCRI region)? Explain.

Tier 2 – #2 (Current Status)

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5. **SEFCRI Team, PPT & Other Advisors** - Is this recommendation a research or monitoring project? (Recommendations should be turn-dirt management actions, not the step you take before a management action). Explain.

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6. **SEFCRI Team, PPT & Other Advisors** - If either of the following applies to this management action, provide feedback on which information submitted by the Community Working Groups may be more appropriate, or if entries should be merged. Explain.

- There are different viewpoints for an individual management action (i.e. two working group members provided separate information, as indicated by a '/' marking between them).

- b. Information submitted for this and other draft management actions is sufficiently similar that they might be considered the same.

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7. **SEFCRI Team, PPT & Other Advisors** - Non-agency Question: Is the recommendation technically achievable from your stakeholder perspective? If not, do you have suggestions that would allow this to become technically achievable from your stakeholder perspective? Explain.

Tier 1 - #5 (Potential Pros), Tier 1 - #6 (Potential Cons), Tier 2 - #3 (Intended Benefits), Tier 2 - #4 (Indirect Costs) and Tier 2 - #12 (Key Stakeholders)

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8. **SEFCRI Team, PPT & Other Advisors** - Agency Question: Is the recommendation technically achievable from a management perspective? If not, do you have suggestions that would allow this to become technically achievable from your agency's management perspective? Explain.

Tier 2 – #10 (Lead Agency or Organization for Implementation) and Tier 2 - #11 (Other Agencies or Organizations)

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