

Subject: PBSD Joint Peer Review

From: mlmassocaicp@aol.com

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Dear PBSD Board Members,

I am writing on behalf of the Mangrove Action Group to commend the position of the PBSD Board at its August meeting against proceeding with Collier County's Coast Zone Management Department in a joint peer review of the PBS&J study, "Clam Bay System Data Collection and Analysis."

In December 2009, I wrote to the PBSD Board calling for just such a peer review. It was and continues to be our belief that the findings presented in the PBS&J report are 1) not backed by adequate data, 2) are biased against the Pelican Bay community and its historical stewardship of Clam Bay, and 3) are politically motivated to solve the water problems of the larger region at the expense of the Clam Bay estuarine preserve.

In December, we argued for a vigorous, unbiased assessment of the PBS&J report with respect to the underlying data and analysis, as well as the conclusions and recommendations. A peer review had been contemplated in the County's own design for the PBS&J contract. However, the scope has been ill-defined and subject to continual redefinition from when it was presented well over a year ago to the Pelican Bay Foundation Board in April 2009.

When the PBSD Board sought to simplify and focus the peer review at a meeting called for that purpose this past spring, the CZM responded with numerous additional modifications, essentially seeking to curtail the scope of the review to the water quality findings and to postpone a review of the circulation study data. The CZM Manager has also indicated at meetings of the Coastal Advisory Committee that there is no rush to complete the peer review. In fact, the modeling effort that was to incorporate the circulation data in question has already been approved to proceed and is underway. This belies any sincere interest on the part of the CZM to undertake serious review of the adequacy of the data.

The PBSD was right to decline to continue with the joint peer review process under such compromised circumstances. However, we urge the Board to consider going forward with its own independent peer review to ensure that the interests of the Pelican Bay community in protecting the Clam Bay ecosystem are adequately addressed.

Sincerely,

Mary McLean Johnson

President
Mangrove Action Group