



Board of County Commissioners

June 16, 2026

Florida Department of Environmental Protection
Division of State Lands
Attention: Kevin Mears, PLS
3900 Commonwealth Blvd.
Tallahassee, FL 32399
Kevin.Mears@FloridaDEP.gov

RE: Opposition to the petition for rescission of the Erosion Control Line in Belleair Shore, FL

Dear Mr. Mears,

I am writing regarding the petition to rescind or modify the Sand Key Phase IV Erosion Control Line (ECL). After reviewing the operational, administrative, and coastal management implications—and after receiving a legal review from the County Attorney's Office—it is evident that altering the existing ECL would introduce significant risks for both the State of Florida and Pinellas County.

This concern is heightened by the fact that Pinellas County and the U.S. Army Corps of Engineers are finally aligned on project guidance and next steps. Any disruption to the ECL would undermine this progress and could place the federal project at risk.

The Sand Key Phase IV ECL, established in 1997, spans nearly three miles from Clearwater to Belleair Shore. The beach seaward of the ECL is public land and serves as a vital construction corridor for the Sand Key nourishment project. This area is essential for moving pipeline and heavy equipment between Belleair Beach and Indian Rocks Beach. Losing access to approximately one mile of this corridor would disrupt construction sequencing, increase project costs, and jeopardize the timely delivery of nourishment activities.

Any modification to the ECL would reduce the area of publicly accessible beaches and raise concerns with regulatory agencies responsible for ensuring that public trust lands remain available for public use. Maintaining the current ECL avoids unnecessary conflict with long-standing access expectations and regulatory frameworks.

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The Sand Key project is intentionally designed to "top load" the northern beaches, recognizing that sand naturally migrates southward. Belleair Shore benefits from this sediment transport pattern, as sand placed to the north moves through the system and contributes to the stability of its shoreline over time.

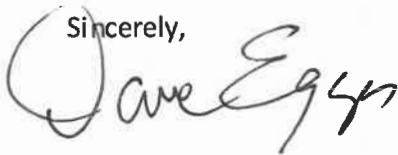
The County Attorney's Office has completed a review of the petition and the governing statutory framework. Their analysis indicates that the petition does not meet the requirements necessary to support rescission or modification of the ECL. While I defer to their formal legal conclusions, their findings reinforce the substantial operational and administrative concerns outlined above.

Given the operational importance of the existing ECL, the public access implications, the coastal management considerations, and the significant administrative and financial risks, I urge the State to decline the petition to modify or rescind the Sand Key Phase IV Erosion Control Line.

Remaining silent on this matter could be interpreted as consent or a lack of concern, neither of which reflects the County's position. Protecting the integrity of this project is essential to safeguarding our coastline, our residents, and our long term- coastal resilience strategy.

Thank you for your careful consideration of this issue.

Sincerely,



ATTEST: KEN BURKE, CLERK

By: 

