

Emma DeAbreu

From: Emma DeAbreu
Sent: Friday, July 10, 2026 1:10 PM
To: mcoffey@gleafcapital.com
Cc: abrice@halff.com; bprewitt@halff.com; Ryan.Byrne@MyFWC.com
Subject: FW: Marina Rack Club, Pinellas County

Good afternoon all,

Please see the below comments from FWC.

Best,



Emma DeAbreu (she / her)
Environmental Scientist
Regulation Division | Environmental Resource Permit Bureau
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From: Telesco, David <david.telesco@MyFWC.com>
Sent: Friday, July 10, 2026 12:46 PM
To: ERP Agency Coordination <ERPAgencyCoordination@swfwmd.state.fl.us>
Cc: Emma DeAbreu <Emma.DeAbreu@swfwmd.state.fl.us>; Seckinger, Eric <Eric.Seckinger@MyFWC.com>; Byrne, Ryan <Ryan.Byrne@MyFWC.com>; Charles Calleson <charles_calleson@fws.gov>; ImperiledSpecies <ImperiledSpecies@MyFWC.com>; Goff, Jennifer <jennifer.goff@MyFWC.com>
Subject: Marina Rack Club, Pinellas County

Some people who received this message don't often get email from david.telesco@myfwc.com. [Learn why this is important](#)

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Project Name: Marina Rack Club, Pinellas County
File Number: 921286

Florida Fish and Wildlife Conservation Commission (FWC) staff have received this application to modify an existing marina including the demolition of a 23,912 sf retail building and parking areas and the construction of a 3,079 sf clubhouse, a 3,211 sf marina office and dry boat storage racks. The proposed work includes the removal of 67 dry slip racks from the existing 357 dry slips and the addition of 210 dry slips for a proposed increase of 143 dry slips and with a total of 500 dry slips. The current marina supports 89 wet slips with no proposed increase of wet slips in this permit application. The applicant currently controls 614 linear feet of shoreline. The site of the proposed project is located at 100 Pinellas Bayway South, St. Petersburg, Pinellas County. We appreciate the opportunity to review this project to determine if it is likely to have any adverse impacts on wildlife and their habitats.

FWC staff acknowledge the RAI response received on 6/12/2026 with additional information on slip usage. As stated in the previous RAI submitted on 12/19/2025, when reviewing projects in counties without a Manatee Protection Plan, a starting guideline of 1 slip to 100 feet of shoreline ratio is applied to minimize impacts to manatees. Projects that propose to exceed the 1:100 threshold need to describe how it was determined that the higher density will not be likely to adversely affect manatees and what conservation measures would be employed to reduce risks.

Manatee distribution aerial surveys conducted between 2008-2010 documented 882 manatees across 47 flights within a five-mile radius of the project location (an average of 19 manatees per survey flight). Between January 1974 and December 2023, 129 manatees have died from watercraft injuries in Pinellas County waters, 27 of which were within five miles of the project location (21% of the county total). Both manatee presence and watercraft related injuries indicate this is a high use area for manatees.

The facility at the project location currently has 416 slips (89 wet slips and 357 dry slips) resulting in a 59:100 slip to shoreline ratio. The proposed increase of 173 slips for a total of 589 slips would result in an 84:100 slip to shoreline ratio. Based on the justifications submitted in the previous RAIs, vessel usage of the area, and documented manatee use of the area, FWC staff cannot favorably recommend an increase in slips at this location.

FWC staff are available to meet to discuss any questions or concerns. Please copy Ryan Byrne (Ryan.Byrne@MyFWC.com) on future correspondence or email me when new information is posted on your website.

Sincerely,

Dave Telesco



David Telesco

Section Leader

Imperiled Species Management Section

Florida Fish and Wildlife Conservation Commission

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