

Environmental Management Criteria

11.17.20 Working Group Notes

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Notes

The purpose of criteria working group meetings are to go over the specific criteria in detail with the goal of identifying questions to take back to the international organization; identifying criteria which need to further strengthening; identifying areas for improvement; and identifying areas which may be problematic to implement. To facilitate note taking on these goals we will look at each criterion and assess:

- a. No change
- b. Yes this specific change
- c. Yes need more discussion/question to international org
- d. Add criteria, is this a guideline or imperative criteria?

Criterion 12. The local authority/beach operator should establish a beach management committee.

A- No change

Criterion 13. The local authority/beach operator must comply with all laws and/or regulations affecting the location and operation of the beach.

C- Yes, this criterion uses “local building requirements” but does not clarify what this means. It is suggested language be used to indicate that buildings are as up to date as possible.

Criterion 14. Sensitive areas must be managed.

B- Sensitive areas should be included as a part of the management plan in the application. Sensitive wildlife should be broken out as their own criterion because they do not stay in one area but use the whole beach and are diverse across the country. A representative from NWF will help write up a specific criterion for the management of wildlife. It should include a sentence on the feeding of wildlife as bad practice.

Criterion 15. The beach must be clean.

B- expand cigarette butts to plastic pieces and Styrofoam as well.

Criterion 16. Algal vegetation or natural debris must be left on the beach.

C- The criterion does not do a good job at defining “nuisance”. In order to clarify that nuisance is not just unsightly, it is recommended that nuisance be better defined and an effort to educate the public and staff be implemented.

Criterion 17. Waste disposal bins/containers must be available at the beach in adequate numbers and they must be regularly maintained.

A - No Change

Criterion 18. Facilities for the separation of recyclable waste materials must be available at the beach.

A – No Change

Criterion 19. An adequate number of toilet or restroom facilities must be provided.

B- Use “sanitizer” as a general term.

C- need to clarify use of port-a-toilets as acceptable restroom facilities.

Criterion 20. The toilet or restroom facilities must be kept clean.

A- No Change

Criterion 21. The toilet or restroom facilities must have controlled sewage disposal.

A- No Change

Criterion 22. There must be no unauthorised camping or driving and no dumping on the beach

C- The criterion does not explain what types of driving are unauthorized. We need to define this for communities.

Criterion 23. Access to the beach by dogs and other domestic animals must be strictly controlled.

A- No change, domestic animals should not be allowed on the beach.

Criterion 24. All buildings and beach equipment must be properly maintained.

A- No change

Criterion 25. Marine and freshwater sensitive habitats (such as coral reefs or sea grass beds) in the vicinity of the beach must be monitored.

B- Bolster the emphasis on the consultant to monitor and maintain or increase the quality of the habitat.

Criterion 26. A sustainable means of transportation should be promoted in the beach area.

A- No Change

Next Steps

Notes will be sent out via email and made available on the Blue Flag in the US website. Written comments on the above notes will be accepted through November 20.

National Operator staff will have proposed criteria changes by December 4. If necessary, another meeting will be held for review and acceptance of the criteria by the working group at a time convenient to most stakeholders.



Applying Blue Flag Criteria in the United States

The Surfrider Foundation offers these recommendations and poses the below questions to help establish a Blue Flag program in the US that will challenge beach operators to achieve high standards in providing and ensuring safe water quality, environmental management, environmental education and public safety.

In many ways the international Blue Flag criteria will do this as is. However, in some instances as described below, more robust criteria are needed to elevate beach management to meet or exceed the beach management standards that are already routinely achieved in US coastal states. The Blue Flag Canada draft beach criteria were reviewed for reference and example of how to implement the international criteria in North America.

Water Quality Monitoring & Public Notification Criteria

The International Criteria requires beaches to be tested monthly for E. coli and enterococcus, and results to be posted at the beach within one month. **These minimum requirements would be a step backwards for public health protection at most US beaches.** Instead, we recommend that Blue Flag beaches should follow these criteria and protocols to be most valuable locally:

- Beaches should be tested as frequently as Tier 1 beaches are tested locally, or at least weekly – whichever is greater. Weekly testing in most states is typical of the most popular Tier 1 beaches, however in some regions, like the Great Lakes, beaches are sampled 2-3x/week. Blue Flag beaches should meet this standard of excellence and not be viewed as ‘less than’ typical.
- Meet EPA approved and state implemented Beach Action Values when those local water quality standards are lower than Blue Flag International WQ criteria. For instance, coastal states use a range of Beach Action Values to issue swim advisories such as enterococcus counts of 60, 70, 104, 130 (all in cfu/100ml), and beaches should be judged according to state relevant criteria where those local criteria are below the international criteria of 100 cfu/100 ml. See state specific criteria for all US coastal states [here](#).
- Testing beaches for both E. coli and enterococcus. There certainly is no harm in this but in the US there is no standard for E. coli in marine waters, only enterococcus. In freshwaters there is a

standard for both E. coli and enterococcus that are used. Surfrider would be most concerned that fecal indicator bacteria levels that correspond to the state approved water quality criteria and implemented Beach Action Value are measured.

- Results should be posted at the beach as soon as they are available, generally the very next day after samples are collected. Additionally, any advisories issued by local/state health authorities to protect public health should also be posted at the beach, including but not limited to swim advisories, rain and brown water advisories, and harmful algal bloom advisories.
- Samples should be collected in accordance with the protocols required by state beach water quality monitoring programs and health authorities. That could vary somewhat from the 30 cm recommended by International Blue Flag, for instance to 6 inches/15 cm below the surface. Harmful Algal Bloom events, including red tides and cyanobacteria blooms, should be included in the types of abnormal weather or extreme events that would cause a beach to take down its Blue Flag temporarily, as is required by Blue Flag Canada.
- Discarding or discounting of test results should be limited to better defined extreme events. International criteria allows discounting of results for 'extreme weather events' or for follow up testing of short-term events, which could be caused by wet weather/runoff conditions, community water infrastructure failures, etc... I think as written the criteria are not specific enough on when discounting or discarding of samples would be allowed. Extreme weather events such as hurricanes or tropical storms that would cause truly severe and atypical bacteria levels to be measured, seem to be reasonable to discount as long as a beach stays within the 15% allowance, however discounting the results of follow-up testing for smaller short term events that could occur at some locations with only moderate levels of rain seems to defeat the purpose of testing in the first place.

Other beach assessment and management considerations

No sewage discharge. It is clear that a beach cannot have permitted or allowed discharges of untreated sewage into its waters, but how will beaches that are in communities that experience frequent sewage infrastructure failures and spills be handled? For instance, most of S. Florida is plagued by sewage failures and overages, especially during the wet season.

Beach bathrooms. Connection to sewer should be required where available. Regular maintenance/pumping records should be kept where bathrooms are serviced by septic systems. No cesspools allowed.

No driving on the beach. No unauthorized driving leaves a lot of wiggle room. Recommend Blue Flag Canada language instead. No driving permitted except emergency and work vehicles.

Domestic animals. Also recommend Blue Flag Canada language for more specificity.

Beach cleaning. We do not recommend allowing beaches to use mechanical beach sieving. If cigarette butts are an issue, we'd recommend a no smoking on the beach policy instead. Blue Flag Canada has good language regarding beach cleaning and requiring seaweed to be left on the beach, except when contributing to unsafe or unsanitary conditions.

Free access to public. How will public access be considered for beaches that require local town, city or other municipality residence for parking? Would a beach need to offer non-resident paid parking at or below \$30/day?

Litter & plastic reduction. We are very supportive of criteria to have plentiful and well maintained garbage and recycling bins, as well as potable water to reduce the need of plastic water bottles for beach goers.

Environmental education and information. Surfrider is very supportive of these criteria to better inform beach goers of how to protect natural environments at the beach and to reduce their impact. We'd recommend ways to reduce single-use plastics as a training or education category for both beach goers, food service providers and tourist operators using the beach. In regards to the presence of stranded or hurt marine life, we suggest signage that clearly mentions the local marine mammal rescue agency ([see here](#) for list by state/region).

Monitoring of renourishment projects. Beach renourishment is a necessity in current areas, yet it's important for beach managers to adequately document and mitigate potential adverse impacts to marine life and beach ecology more broadly. Surfrider recommends new criteria or expanding criterion 25 to require pre/during/post nourishment monitoring of physical parameters (e.g. beach morphology) and ecological parameters (e.g. abundance and diversity of marine/coastal wildlife and vegetation).

Appendix B: California State Coastal Conservancy Comments

- Criterion 2. Environmental education activities must be offered and promoted to beach users.
 - Highlight disadvantaged communities or communities of color who have been historically kept out of coastal areas
 - Highlight environmental justice in the "environmental issues" bin
- Criterion 4. Information relating to local eco-systems, environmental elements and cultural sites must be displayed.
 - Include climate change, and more specifically sea level rise
 - It might even be better to have a separate criterion surrounding sea level rise and nature-based adaptation being prioritized over hard infrastructure (e.g. seawalls) that will accelerate beach losses.
- Criterion 6. A code of conduct that reflects appropriate laws and/or regulations governing the use of the beach and surrounding areas must be displayed.
 - I would include a phrase about how this code of conduct should not perpetuate the exclusion of communities of color
- Criterion 15. The beach must be clean.
 - This is a good criterion, but I would urge some additional information about how these cleaning efforts should be done by hand or carefully if machinery is used. Beach grooming has decimated critical beach habitats across Southern California. There is some discussion about algae and plants being important, but no mention of mechanical grooming.
 - Removal of invasive species would be good here under the vegetation removal component. If you are recommending removing native vegetation, I would pose it as "trimming" rather than full removal.
- Criterion 25. Marine and freshwater sensitive habitats (such as coral reefs or sea grass beds) in the vicinity of the beach must be monitored.
 - Provide more example ecosystems. Adjacent wetlands?