

Name	Comment	Date
Brock Nicholas, Baseline Property Group	“... I believe the DAB is interested in hearing ... opinion on assuming delegated authority for FDEP permitting so there’s less duplication of work....And although I’m sure this doesn’t feel like a compliment given today’s workload, the DAB was clear about this recommendation only being possible due to the strong competence and consistent professionalism we see from EPD at OC.”	10/20/21
John Miklos, Bio-Tech Consulting, Inc.	I watched the wetland ordinance presentation last week. I was unable to attend in person as I just had a surgical procedure, but I will be at any and all upcoming events, and speaking when I believe appropriate. I would like to request a meeting or call after the holidays, ... this is an extremely important issue to me. I have taken a position, and maintain it, that staff has implemented the existing rule inappropriately and inconsistently for years. I went as far as to obtain a detailed legal opinion from one of the top environmental/regulatory attorneys in the state on the topic, at my cost. Neither my constant rhetoric nor the legal opinion really got me anywhere, but I do realize that the noise I have made is, in part, why the review of the ordinance is occurring. I think it is appropriate and overdue, but I have concerns with the framing of the topic thus far. First, the county comparisons. Leon and Alachua are different worlds compared to Orange County, not only from a wetland and geography perspective, but from development demand and growth. I struggle with the basis used to select these counties and think more appropriate ones exist, or even cities. That ship has likely sailed, but I believe it is something to consider. Second, the wetland tour. I may be wrong be it sounds like you went to TM Econ Mitigation Bank and that’s it. By no means does that give you the whole picture. It is paramount to see wetlands that are in the line of development and to see what happens to small wetlands that staff forces applicants to leave in the middle of developments. The notion that all wetlands are inherently valuable is simply wrong. A few years ago I took Commissioner Bonilla on a tour of wetlands that were associated with proposed developments and wetlands that had been required to remain in existing developments. It changed her outlook on things, to a degree at least, and since then she has been amenable to permitting some impacts on projects. What you saw at TM should be the goal... large, intact, mosaics of uplands and wetlands preserved and managed, not one acre marshes in the middle of a subdivision. Another point that is in the mix here is what an overreaching wetland program does for the county. The simple answer is, not much. I can show you several significant projects where the County was unwilling to work with the applicants on impacts that lead to the projects being annexed into the adjacent municipality, which lead to the same project or in one case, a more impactful project occurring. The net result is lost tax revenue, and less overall wetland protection within the County. In any event, I am asking for a discussion with one or both of you. I am not really interested in meeting with staff, as I will be doing that in the future. My goal is to just get some things on your radar that will not be presented to you in the course of this process. Thank you.	12/21/22
Maria Bolton-Joubert	Good day, Mayor Demings and Orange County Commissioners, Was planning to attend this morning (Tues) to speak during public comment, but my child is sick and I can't be present since he won't be in school and I need to stay with him. My comments are pertaining to wetlands protections. We need to do more. Protecting and preserving all types of wetlands allows for flood mitigation, as well as, for aquifer recharge. We need all forms of wetlands. All classes. What we do here in Orange County impacts the St Johns River, and even our threatened Manatee populations that live in that River. There's an expression, "People Protect What They Love", by Jacques Cousteau. We need to get to know nature more and protect all aspects of it.	1/24/23

	<p>There's a few groups on Facebook with wildlife photographers -- amateurs and professionals -- who frequent and love the Lake Apopka Wildlife Drive and the Orlando Wetlands Park (just to name a few) for the wildlife and wild spaces/scenery.</p> <p>They post some beautiful pictures. Was just messaging in the Orlando Wetlands Park group with a woman from Michigan tonight. Tourists are coming here for wildlife. For photo opps. Spending their money here because of nature. We need to remind some folks that we are so much more than the theme park corridor. Some already know!</p> <p>Let's focus on highlighting Wild Florida more. More elevated ADA boardwalks and accessible wildlife drives in all your Districts that can help bring folks in and remind them where we live and what we need to protect. (And this can help mitigate any future flooding events like what we had this Fall.)</p> <p>Looking forward to the info with the study in the afternoon tomorrow.</p> <p>Thank you for caring and for your time today.</p>	
<p>Don Kendzior, Noah's Notes, Inc.</p>	<p>I've encountered the following issues several times and believe they should be included in the wetlands conservation ordinance review.</p> <p>First, there appears to be no clear statements or guidelines for HOA's or homeowners regarding landscape maintenance on properties adjoining conservation wetlands. I've been asked multiple times by various HOA's where it is permissible to conduct mowing/clearing along the conservation line. This has been especially apparent in the case of the berms surrounding stormwater retention ponds adjoining conservation wetlands. When we researched this we received vague and differing statements from staff. Some said to the top of the berm, others the bottom of the backside of the berm, and others not within 10 feet of the wetlands line, etc.</p> <p>Second, what enforcement exists for property owners or HOA's who encroach on conservation wetlands areas? I personally have seen several instances where homeowners or HOA's have extended property lines into designated conservation wetland areas.</p>	<p>01/25/23</p>
<p>Chuck O'Neal</p>	<p>On behalf of Speak Up Wekiva, Inc., Section 704.1 of the Orange County Charter sets the policy for wetlands and other water bodies within the jurisdiction of Orange County. In short, that policy in regards to wetlands is "no wetlands destruction." Any deviation from that policy is a violation of the Orange County Charter. Florida has lost over a third of its wetlands to development. With the population of Orange County increasing, we need more wetlands rather than less.</p>	<p>2/23/23</p>
	<p>Friends of Lake Apopka (FOLA) applauds the Orange County Environmental Protection Department for their work updating the Wetland Conservation Areas Ordinance. Last year, the U.S. Fish and Wildlife service estimated that Florida has lost over 9 million acres of wetlands (over half) since 1845. These wetlands are not only vital by creating water filtering and recharge, but they also provide valuable habitat for our wildlife. FOLA hopes that more attention and protection can be applied to protect our remaining wetland conservation areas. Many of our concerns have been incorporated into the NGO summary of the "Wetland Regulatory Framework" Study.</p> <p>Our positions and comments to some of the ordinance topics are listed below:</p> <ul style="list-style-type: none"> • Increase wetland buffer to a minimum of 50 ft. and at least 100 ft. for sensitive or rare Communities • We would like improved identification and education on the location of wetland boundaries and ensure that local agencies know who is responsible for protecting those boundaries • We would like improved enforcement and follow-up of wetland violations 	<p>3/22/23</p>

	<ul style="list-style-type: none"> • Don't eliminate floodplain analyses if it allows permitting staff to estimate impacts to wetlands • Don't allow for urban in-fill, those smaller wetlands provide valuable wildlife habitat and help beautify our communities • Only eliminate the wetlands classification system if it improves protection of wetlands • Please work with proper agencies to improve upland buffers • All landscape firms and employees should abide by the principles found in Florida's GIBMP manual 	
Lori Bradford	I've been reviewing the wetland ordinance presentations and noticed there are areas of special protection noted yet nothing specific regarding the wetlands that protect the Butler Chain, an OFW. Years ago we were given a map of vulnerable wetland areas. I noticed on google earth that a few were already negatively impacted with connections to the Chain. This is concerning because we have areas where reclaimed water has been a huge problem and these wetlands are necessary to help filter these high nutrient levels before entering the lakes as well as other significant functions. Will there be an opportunity for MSTU boards like the BCLAB to make recommendations for protection regarding these special areas that need protection?	4/26/23
David Bottomley	Special Protection Areas - Since the St Johns Protection Area is in the Florida Wildlife Corridor, enable this Protection Area as it will be working with the Econlockhatchee Protection Zone as part for wildlife migration both on the ground and in the air.	6/12/23
David Bottomley	The Econlockhatchee and proposed St Johns Environment zone fallen the Florida Wildlife Corridor (https://floridawildlifecorridor.org/maps/) and covered but the Florida Wildlife Corridor Act (https://www.flsenate.gov/Session/Bill/2021/976/BillText/er/HTML) Also the existing wetlands, stormwater ponds are in these Environmental Zones and should be converted, as practicle to wetlands for at least environmental and wildlife reasons . Studies have been down in that it is economical as well (2013) (https://drive.google.com/file/d/15WyMnSK7ues7yrd94JLfU7fCWdx0TvB_/view?usp=drive_link) Sincerely, David Bottomley Orlando	6/12/23
Craig Mazer	Wetlands are a critical component of our environment and the natural experiences we deserve as Florida and Orange County residents. Please give them as much protection as possible as our future, our ecology, and our state depends on it. Thank you!	6/13/23
Christopher J Lewis	As a retired Environmental Scientist, with an MS in Environmental Hydrogeology (Cal State LA 2010) I believe that Wetlands are crucial to our entire planet, as are estuaries !	6/13/23
Maria Bolton-Joubert	Good day. Thanks for doing this. We need to protect our wetlands because of Hurricane Ian. And the potential for more Hurricane Ians. Mass flooding events. Needing the water to flow to the wetlands to then allow for mitigation of flooding. To allow for aquifer recharge. For habitat. For endemic plants. Wildlife. And I do worry about karst landforms and the potential for sinkholes. Thank you for listening to the public and the constituents. Thank you.	6/13/23
Rawlin Julius	Protect them now or we'll all pay later!	6/14/23
Lisa	We are involved with the Lake Davis Community Garden which is located in the eastern border of the urban wetlands. Hurricane Ian flooded it, and left much of the area contaminated for months. I was so thankful for these wetlands for taking so much of the hurricane runoff from our neighborhood even though it messed up our garden.	6/14/23

	We absolutely love walking around and seeing how many different land and water animals we can find, as well as all the native plants. It's nice to know they have a safe habitat.	
Jr MCGovern	Wetlands provide homes for a myriad of species that keep our environment balanced. With all the development of nexomes wven mpre important to keep this habitat alive	6/14/23
Natalia Arcila	We need to protect as much land as possible and especial wetlands. They play an important role in our ecosystems, and for the changing climate	6/14/23
Danila Dominguez	Thank you for working on protecting our wetlands. They are necessary to recharge the aquifer , alleviate flooding, and provide water for future generations. Wetlands are beautiful and support many plants and animals that make Florida special.	6/14/23
Lindsay Lee	Please preserve our wetlands. For our children's future.	6/14/23
Jason Cavett	Protect our wetlands!!! We pay taxes not for companies to exploit our natural resources, but for EPD to PROTECT... isn't that what the P is for? Please do your constituents right and don't bow down to the big businesses that don't care about the future of Orange County, just their bottom line.	6/14/23
James C Adamski, PG	Greetings, as a licensed professional geologist and a professor of geology at Valencia College, I strongly encourage the protection of natural lands and sustainable growth and wise land management. The increasing population growth in Florida is putting stress on our natural treasures, such as wetlands, lakes, springs, and biodiversity, and impacting our ground-water supplies, from which we get most of our drinking water. Research conducted by my students and I have demonstrated the following: 1. Water levels in the Floridan Aquifer System have declined over time, most likely because of ground-water withdrawals for consumptive uses. 2. As a result, discharge of Wekiwa, Rock, and other springs, which have their source in the Upper Floridan Aquifer, has also declined. Our studies indicate that from 2003 – 2018, the discharge of Wekiwa and Rock Springs has been below their minimum flows and levels (MFLs) 60% and 33% of the time, respectively. 3. While the average annual rainfall of central Florida has not significantly changed, our studies indicate the distribution and patterns of precipitation is changing. The amount of rain generally has increased during our summer wet season (June – September), while rainfall has declined during the dry season (Oct – May). These changes in rainfall patterns could have adverse impacts on wetlands and aquifer recharge. Protection of natural lands, such as wetlands, has benefits to water quality and biodiversity. Our natural lands also are an important component of our local economy through ecotourism. In addition, protection of natural lands can help mitigate some of the effects of climate change. I strongly encourage Orange County to adopt strong protections and sustainable growth policies for the benefit of our community and future generations. Thank you for your consideration.	6/14/23
Robin Harris	Concerned about the issues, flooding issues in Orla Vista. We need wetland preservation alongside of infrastructure justice. Many residents Stull have NOT recovered from Hurricane Ian	6/14/23
Lizbeth Fernandez	I'm a native to florida and my main concern and always has been is all the infrastructure and growth and how it effects our wetlands which in turn messes up our habitats. Do we have ongoing studies and evaluations of our wetlands periodically that show it's decline or loss of habitans and quality? Would love to see how we can work towards protecting our wetlands and considering this first before building more unaffordable housing.	6/14/23
Christopher J Lewis	Wetlands are very important resources in nature. I am a retired Environmental Scientist, and without wetlands, our environment would be severely degraded! Christopher Lewis BA, Geology, UC Santa Barbara, 1984 MS, Environmental Hydrogeology, Cal State LA, 2010 MS	6/28/23

	candidate, MS Data Science, New College of Florida, hopefully May 2025	
Anonymous	Wetlands are extremely important, they are needed to prevent flooding in communities and rural homes. Without wetlands our homes will flood in the city more frequently especially if we are hit with a major hurricane. I've seen first hand what removing or building on top of wetlands does and it isn't pretty. We need nature. We need a balance.	7/1/23
Michelle L Julius	To whom it may concern, I believe the Florida wetlands are an integral part of the ecosystem. it helps with water purification and water runoff, and not to forget the wildlife too. please help preserve this important part of Florida ecology. thank you Volunteer at the orlando wetlands-- Michelle Louise Tan	7/2/23
Don Kendzior	Is the issue of HOA's addressed in the draft? I can't seem to find it. My previous comments pertained to HOA maintenance of adjoining wetland boundaries. For example, in one location there are berms around stormwater retention ponds that separate the ponds from adjoining wetlands under conservation easement. There is no clarity as to where the HOA should stop mowing, trimming, or fertilizing the berms - at the top of the berm? at the bottom of the berm? At one point I was told that it the line was on the bottom backside of the berm. I've seen many cases of HOA's both trimming, fertilizing, and spraying herbicides on wetland boundaries.	9/21/23
Marge Holt (Sierra Club)	On behalf of the Sierra Club Central Florida Group, I am taking the opportunity to comment on the above subject draft ordinance. The Sierra Club supports the need for increased wetland protections and larger upland buffers. We believe however, that there will always be an ongoing challenge to prevent degradation of Orange County wetlands as well as development intrusion into the rural service area. Our comments are as follows: <ul style="list-style-type: none"> • 15-363 REMOVES MENTION OF CLASSIFICATION SYSTEM: Please clarify 15-383 (2) This section requires BCC approval of proposed Class I and Class II wetland Impacts within the Econlockhatchee River Protection Area. • 15-386: REVIEW STANDARDS: EPD will be issuing Noticed General Permits or Standard Permits. Please clarify the public noticing process for the tiered review analysis and approval. • 15-382 UPLAND BUFFERS: The Sierra Club supports the 100 foot buffer. The Sierra Club supports greater protection for Orange County wetlands and greater upland buffers that will enhance protection for the Shingle Creek and St. Johns River basins. The Sierra Club may be submitting more comments prior to BCC approval. Thank you for the opportunity to comment. 	9/26/23
John Miklos	We watched your presentation today and are disappointed in some of the direction that has come from the final draft. First, perpetual monitoring and maintenance... While in theory this may sound great, the ultimate cost points could very well make this type of mitigation infeasible. The only mitigation that I am aware of that requires perpetual work is limited to mitigation and conservation banks. The unintended consequence of this concept is that you can likely expect no new CEs in your county, or at least no new CEs where the County is the grantee. Additionally, holding applicants to a level of conduct that the County themselves don't necessarily meet on their own conservation lands seems to be quite an overreach. Second, the direction to mitigate within the County limits... This is a difficult endeavor in that the only mitigation bank with credits for sale in Orange County is owned by the County. This is without question a conflict of interest. I realize that it isn't a hard and fast requirement, but it is encouraged, which we take to mean that if in-County	9/26/23

	<p>mitigation is proposed, the impacts could be deemed more favorable. To that end, how can the County take a position that certain basins merit higher levels of protection, but ignore basin limits when it comes to providing mitigation?? Agencies like yours need to be concerned about the hydrologic basins, and not irrelevant political boundaries. This position promotes postage stamp mitigation, cumulative impacts to basins and could lead to reduced water quality. Those are detrimental issues all in the name of saying the mitigation occurred in County. I think you also need to consider state statute and Florida Administrative Code as it relates to a local government's mitigation requirements versus the State's, but that is another conversation. A final point on this that I likely offer to my own demise, is the idea that the County can, and apparently will, deem some proposed conservation areas as inappropriate. How can a wetland be not good enough to preserve but too good to impact??</p> <p>I would like to know which developers found the 100-foot buffer acceptable, considering it is four times the state mandated standard. We would assume all of the outreach and interaction is part of the public record. I would hope that the developers that were queried are those that are still working in the County and not those that have abandoned the County, as many have. Another note on buffers is the notion of flood mitigation. Is the County officially stating that the increased buffers are, in part, for flood control?? As always, thanks for listening, or reading. More to come I am sure.</p>	