

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"> <li>• Increase wetland buffer to a minimum of 50 ft. and at least 100 ft. for sensitive or rare Communities</li> <li>• 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</li> </ul>	<p>3/22/23</p>

	<ul style="list-style-type: none"> <li>• We would like improved enforcement and follow-up of wetland violations</li> <li>• Don't eliminate floodplain analyses if it allows permitting staff to estimate impacts to wetlands</li> <li>• Don't allow for urban in-fill, those smaller wetlands provide valuable wildlife habitat and help beautify our communities</li> <li>• Only eliminate the wetlands classification system if it improves protection of wetlands</li> <li>• Please work with proper agencies to improve upland buffers</li> <li>• All landscape firms and employees should abide by the principles found in Florida's GIBMP manual</li> </ul>	
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 ( <a href="https://floridawildlifecorridor.org/maps/">https://floridawildlifecorridor.org/maps/</a> ) and covered but the Florida Wildlife Corridor Act ( <a href="https://www.flsenate.gov/Session/Bill/2021/976/BillText/er/HTML">https://www.flsenate.gov/Session/Bill/2021/976/BillText/er/HTML</a> ) Also the existing wetlands, stormwater ponds are in these Environmental Zones and should be converted, as practice to wetlands for at least environmental and wildlife reasons . Studies have been down in that it is economical as well (2013) ( <a href="https://drive.google.com/file/d/15WyMnSK7ues7yrd94JLfU7fCWdx0TvB/_view?usp=drive_link">https://drive.google.com/file/d/15WyMnSK7ues7yrd94JLfU7fCWdx0TvB/_view?usp=drive_link</a> ) 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 floodinng 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	6/14/23

	wetlands for taking so much of the hurricane runoff from our neighborhood even though it messed up our garden. 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 habitants 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, Noah's Notes, Inc.	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"> <li>• <b>15-363 REMOVES MENTION OF CLASSIFICATION SYSTEM:</b> 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.</li> <li>• <b>15-386: REVIEW STANDARDS:</b> EPD will be issuing Noticed General Permits or Standard Permits. Please clarify the public noticing process for the tiered review analysis and approval.</li> <li>• <b>15-382 UPLAND BUFFERS:</b> 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.</li> </ul>	9/26/23
John Miklos, Bio-Tech Consulting, Inc.	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>	
Jim Serrano	<p>This letter is regarding the Wetlands Protection Ordinance discussion between the Mayor and the Commissioners on September 26, 2023. I am a resident of the Orlando area since 1988 and a homeowner since 2000. I am a proud supporter and defender of all things that help to protect our native landscapes and waterways. It is common knowledge that in even these divisive political times, Floridians are in consensus that our sensitive undeveloped lands need more protection. Our rules around these protections need crucial updates that follow the science on these pressing issues. Our wetlands, the surrounding uplands and the ecosystems they create are in critical need of more stringent protection. Whether the goal is biodiversity, flood mitigation, containing urban sprawl and saving natural Florida from development, we need to act now. Orange County has some of the most unique native habitats in the world and they are under pressure. Thankfully, we have had a history of protecting our environment and we must bolster our sustainable practices as we move forward under the guidance of our Vision 2050 Plan. I strongly urge you to take proactive action to protect and support our wetlands AND uplands, as they are one cohesive ecosystem. Once gone, they are gone forever.</p>	9/27/23
Jessica Stage Gehr	<p>I am a 20 year resident of Orange county and own a lakefront home off of Dean and University. Our lake is home to so much wildlife including a pair of Bald Eagles. We have a small buffer area between our lake and Dean roas, but I have seen a bobcat in our yard. In this time of overdevelopment it is so important to protect the nature in Florida that makes our state unique.</p> <p>I am writing to draw your attention to the crucial discussion held between the Mayor and the Commissioners on September 26 regarding the Wetlands Protection Ordinance. The dwindling wetlands within our county urgently need more stringent protections.</p> <p>Buffer zones around wetlands are fundamental as they provide a vital line of defense against pollution and urban encroachment, ensuring that these fragile ecosystems remain undisturbed. Additionally, by preserving the rich habitats found within our wetlands, we uphold biodiversity, a crucial aspect that significantly contributes to the overall health and balance of our local ecosystem.</p> <p>Moreover, wetlands play a pivotal role in flood mitigation by acting as natural sponges, absorbing and storing excess</p>	9/27/23

	<p>rainfall, and reducing flooding. In an era where climate change continues to exacerbate extreme weather events, having intact wetlands is a cost-effective solution to alleviate flood risks and maintain the natural water flow, proving beneficial for the community and the local government.</p> <p>Orange County residents are strongly inclined towards sustainability, and there is a growing concern regarding urban sprawl. The continual expansion of urban areas at the expense of natural landscapes contradicts the sustainable principles outlined in the Vision 2050 Plan. It's clear that once nature has been disturbed or replaced, it's an irrevocable loss that leaves our community impoverished in many ways.</p> <p>The Wetlands Protection Ordinance presents a significant step towards realizing a sustainable and environmentally resilient Orange County. I urge you to support and advocate for more robust protections for our remaining wetlands. This is not only an investment in our environment but a critical action towards a sustainable and resilient future for all residents of Orange County.</p> <p>I hope you will consider this urgent appeal and take a proactive stance in ensuring the Wetlands Protection Ordinance receives the backing it critically needs. Thank you for your time and consideration.</p>	
Katherine Winter	<p>I wish to bring to your attention the crucial dialogue on September 26 between the Mayor and the Commissioners regarding the Wetlands Protection Ordinance. The alarming decline of our county's wetlands necessitates immediate and enhanced protective measures. Establishing buffer zones is imperative to protect our wetlands from pollution and urban encroachment while conserving these habitats significantly contributes to maintaining local biodiversity. Furthermore, wetlands act as natural barriers to flooding by absorbing excess rainfall, offering a cost-effective solution amidst the rising challenges of climate change. The increasing urban sprawl in Orange County is at odds with the sustainable aspirations outlined in the Vision 2050 Plan. Disruption or replacement of natural landscapes leads to irreversible loss. The Wetlands Protection Ordinance is a progressive stride towards fostering a sustainable and ecologically resilient Orange County. I earnestly urge you to endorse and advocate for robust protections for our remaining wetlands, as it is a pivotal investment towards a sustainable and verdant future for the residents of Orange County. Your active support for the Wetlands Protection Ordinance is essential and will be highly valued. Thank you for your thoughtful consideration.</p>	9/27/23
Shauna Junco, Orange County Sustainability Advisory Board	<p>Invasive species - when this is used to move down a level of review, are there follow-up requirements to make sure they keep taking care of invasive species which tend to come back? I think he said they have to show data for 5 years then every 3 years, but I missed part of what he said so wasn't sure.</p> <p>Moving levels of review - I think he said you could only move one level of review (e.g. a Level 3 review can only move to a level 2, not a level 1), but is that true, and if so it it true in both directions? I don't see why you couldn't move from a level 1 to a level 3 if a project is implementing enough changes viewed as negative enough to weight against the project and would recommend considering that projects can move two levels if moving to a higher level of review (e.g. 1 to 3). This is all assuming I heard right that you can only move one level. I think allowing for two levels of tougher review would really prohibit negative behaviors and doubt anyone would move two levels. I agree with only allowing level 3 to move to level 2 and not ever allowing to move to level 1.</p>	10/30/23

	<p>Finally, I was wondering if I could get the remaining Public benefits that allow you to improve your score in order to move one level of review. I know affordable housing was removed but I can't remember what was left and was just curious.</p> <p>Slide 42 says "demonstrated public benefit" but I don't see what those are specifically. He presented those to us previously and said they removed affordable housing as one; I just can't remember what the rest were.</p> <p>It looks like slide 62 answers my first question - I thought I heard him say that but wasn't sure.</p> <p>My only other comment/question would be if they would consider allowing deterrents to move applicants up 2 levels of review (from level 1 to 3) but not allow for movement down 2 levels (from 3 to 1).</p>	
<p>Mike Dennis, Breedlove, Dennis &amp; Associates, Inc.</p>	<p>Based on your presentation of September 26, 2023, we understand the Orange County Environmental Protection Division (OCEPD) plans to present the updated Wetland Ordinance to the Planning and Zoning Commission/Local Planning Agency for an adoption hearing on November 16, 2023, and to the Environmental Protection Commission for adoption recommendation on December 6, 2023. We would like to request all background material used by the OCEPD to identify and support the proposed St. Johns Sensitive Areas depicted in slides 50 and 51 of your presentation.</p> <p>Orange County response: In response to your request dated, October 31, 2023, our present approach is to utilize a county term contractor to conduct a technical study to acquire the data and recommendations needed to support future new regulations for the proposed St. Johns River Special Protection Area. This data-driven approach is upon the advice of our county legal staff. The effort will take place throughout next year, and we will keep stakeholders aware of our milestones on the effort as they are achieved, including when the technical study is available for review.</p>	<p>10/31/23</p>
<p>Laura Betts, Shauna Junco, Orange County Sustainability Advisory Board</p>	<p>Q: "Section 15-365 Repeal of inconsistent ordinances or policies. All ordinances, part of ordinances, or policies or elements of adopted comprehensive plans or parts thereof in conflict herewith are repealed to the extent of the inconsistency and shall be otherwise considered to be amended to conform to the purposes and declared policies of this article." Can you confirm with the county attorney if this is legal?</p> <p>A: The County Attorney's Office states that this is standard language.</p> <p>Q: Is mapping of Special Flood Hazard Area 100-year flood-prone areas per recent FEMA maps required in the new ordinance for applicants?</p> <p>A: EPD defers review of floodplain issues to Public Works on all development applications.</p> <p>Q: The Comprehensive Plan designates Shingle Creek as a Special Protection Area. Why is it not listed as such in the draft ordinance? All of the other special areas are listed.</p> <p>A: We intend to bring the proposed Shingle Creek SPA and St. Johns River SPA as stand-alone articles next year. We don't yet have the required technical studies with recommendations needed to withstand legal challenges, particularly as related to "takings" that are anticipated with more restrictive regulations. This was covered in the presentation.</p>	<p>11/1/23</p>

	<p>Q: Why aren't Florida-friendly and native plant species historical and archeological resource assessments included in the wetland ordinance when they are listed in the Comprehensive Plan's criteria?</p> <p>A: These more restrictive types of regulations are typically applied in the SPAs, not the entirety of the county.</p>	
Lynette Brown, BDA, Inc.	<p>I just reviewed the October EPC meeting video and have a question.</p> <p>You mentioned developers being able to amenitize the upland buffer by using it for trails – but the definition of upland buffer does not appear to allow for passive recreational activities such as a trail. Do you plan on clarifying this in the Ordinance?</p> <p>Also, I had questions about the SIA. The language mentions evaluating the effect of impacts within 100' or greater depending on the activity and wetland community. Can you provide examples of when the “or greater” would be used?</p> <p>How does the SIA incorporate quality of the existing upland buffer? If the existing buffer is a maintained lawn, active pasture, or an area dominated by N/E – would the quantification of the secondary impact be reduced?</p> <p>Could the SIA ever be negligible (for example the area is currently a mowed lawn, but they are going to stop mowing and restore 15' of upland along the wetland)?</p> <p>It appears artificial ditches cut through uplands will not be used for a “Hydrologic connection”, but the Ordinance does not appear to address a reduced buffer requirement on these upland cut ditches. Does that mean all upland cut drainage ditches filled within larger projects (don't qualify for the NGP) will be assessed as an impact?</p> <p>If a ditch or wetland is impacted in its entirety, will a 100' buffer impact also be assessed?</p>	11/13/23
Susan Thome-Barrett, Conservation Chair, Orange Audubon Society	<p>I will unfortunately not be able to attend the presentation of the final draft of the Wetland Conservation Ordinance to the Planning and Zoning Commission this Thursday so I am writing to express support for Orange County's new Wetlands Ordinance and the new Wetland buffers established within the ordinance.</p> <p>Orange County Staff has done its homework in updating both its Ordinance and the need to further protect our diminishing Wetlands. Our Wetlands are responsible not only for maintaining the integrity of our water supply but also serving a role in flood control and nature preservation. With rapid rates of development and growing needs for our water, it is critical to help preserve our wetlands as best we can.</p> <p>I hope Orange County will stand firm for 100 foot buffers. Please know the 1,000+ member households of Orange Audubon Society also support this revised Wetland Ordinance.</p>	11/14/23
Marjorie Holt Chair/Conservation Chair	<p>I am submitting comments on behalf of the Sierra Club Central Florida Group in support of the draft Wetlands Conservation Ordinance.</p> <p>Orange County EPD has provided a transparent process for the Ordinance update and has readily available data to the public.</p> <p>The new required analysis will evaluate all wetlands consistently and provides greater scrutiny for small wetlands as the current Ordinance is deficient in avoidance and minimization standards.</p>	11/16/23

While the Standard Permit Application levels 1,2, and 3 provide clarity and review consistence for County staff and applicants, the Sierra Club is concerned that the public notification process for the Standard Permit Application for small wetland impacts. Stakeholder notification appears to be non-existent for staff issued permits.

We would like clarification of public the notification process.

As we understand, creating and codifying the Shingle Creek and St. Johns River Special Protection Areas will move forward at a later time.

The Sierra Club fully supports greater protection for these riverine basins and we look forward to working with the County during the process.

Upland buffers of 100-ft or greater buffer/setback is very important to sustaining water quality/quantity and wildlife habitats. Additionally, the draft Ordinance clarifies a preference for in-county mitigation.

The Sierra Club respectfully requests that the LPA find the draft Wetland Ordinance consistent with the Orange County Comprehensive Plan.

Please submit these comments to the public record. Thank you.