



CITY OF
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November 22, 2019

Kaitlyn Sutton
Florida Department of Environmental Protection
2600 Blair Stone Road, Mail Station 6511
Tallahassee, FL 32399-2400

Re: Proposed Rule Changes to 62-302.530(70), F.A.C. - Florida's Water Quality Standards

Dear Ms. Sutton:

This letter is provided as public comment to the proposed changes to 62-302.530(70), F.A.C. regarding turbidity. The added rule subsection (70)(b) "*Turbidity shall not be increased above background conditions within the Southeast Florida Coral Reef Ecosystem Conservation Area, Biscayne Bay National Park, Biscayne Bay Aquatic Preserve, Florida Keys National Marine Sanctuary excluding canals, and Dry Tortugas National Park, as shown on the map titled "Florida Reef Tract", July 2019 ...*" will increase project costs and duration of construction, may not take accurate account of wave-induced natural (background) turbidity, and imposes overly restrictive criteria on projects that are not in proximity of hardbottom and coral resources.

The proposed rule change is too broad and will adversely impact construction costs of projects that are not in proximity of hardbottom and coral resources. These project costs are cost-shared by the Florida Department of Environmental Protection (Department) and the local government.

The rule change should be specifically written for projects that can directly impact the resources generally within 1,000 feet of hardbottom and coral resources (rather than a broad geographic area), while providing the additional protection to the critical coral and hardbottom resources.

I appreciate you taking the time to allow comments and feedback.

Should you have any questions or concerns, please contact me at 561-416-3397.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jennifer Bistyga", is written over a horizontal line.

Jennifer Bistyga
Coastal Program Manager
City of Boca Raton

cc: Lisa Armbruster (Sustainable Beaches, LLC)
Jackie Larson (Florida Shore and Beach Preservation Association)