

Stormwater 2020 Comments

September 30, 2020

Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, FL 32399

Dear Sir/Madam:

The Brevard Indian River Lagoon Coalition, a non-profit formed to support the protection and restoration of the Indian River Lagoon, has signed on with the 1000 Friends of Florida on their comment letter. We strongly support the specific recommendations provided in that letter. We have a few additional comments that we want to offer.

In 2016, Brevard County taxpayers approved a half-cent sales tax to restore and protect the Indian River Lagoon. More than \$100 Million has been spent on muck removal, extracting pollutants that mostly entered the Lagoon from stormwater. Other portions of this revenue are being used to construct baffle boxes and retention ponds with bacterially activated media. After three years and more than \$140 Million spent, little evidence suggests that the Indian River Lagoon health is improving. The continuing inflow of pollutants may be preventing the waterway from achieving health. We understand that three years may not be enough time to recognize improvements and that is certainly our experience.

The current stormwater regulations for real estate development have not been updated by Brevard County in **more than 25 years**. Since that time, the Indian River Lagoon has experienced large algae blooms, massive fish kills, enormous loss of seagrasses and unusual mortality of marine mammals and other wildlife. Nature is telling us that our waters cannot remain healthy unless we stop flushing our nutrient pollutants and other chemicals.

We encourage the Florida DEP to propose stringent new stormwater regulations that will serve as a meaningful base level, but allow local governments to add stronger ones. Monitoring and regulation is essential; it is clear that self-certification does not result in sufficient progress. With major portions of the Indian River Lagoon and the St Johns River in Brevard County listed as impaired water bodies, we support the "net-improvement" requirements to include at least the 10% requirement used in Alachua County. Please use this opportunity to provide substantial new protection for our estuaries, rivers, lakes and streams. Florida should be recognized as the "Clean Water State" - not the state that is being frequently ravaged by hazardous toxins .

Respectfully,

Vince Lamb
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