



Orange Audubon Society

(A Chapter of National and Florida Audubon Societies)

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www.orangeaudubonfl.org

January 24, 2023

County Mayor Jerry Demings
Commissioner Nicole Wilson
Commissioner Christine Moore
Commissioner Mayra Uribe
Commissioner Maribel Gomez Cordero
Commissioner Emily Bonilla
Commissioner Michael Scott

To the Orange County Board of County Commissioners:

I am writing on behalf of Orange Audubon Society (OAS) and its 2000 member-households prior to the second Work Session on the County's State of the Wetlands Study. Having reviewed the December 13th Wetland Regulatory Framework Study Work Session, I thank you—Mayor, commissioners and staff—for taking a thorough look during ordinance development and for considering public input.

Florida has lost the most acreage of wetlands of any state since 1845, over 9 million acres, according to the U.S. Fish and Wildlife Service. And Orange County being one of the fastest growing counties (with a nearly 25% population increase in the past 10 years, according to the 2020 census) will have experienced significant wetland loss.

Orange Audubon Society has made as one of its major efforts the support of the St. Johns River Water Management District in public access to the Lake Apopka North Shore for wildlife viewing. Incidentally, the preservation of wetlands that were once part of Lake Apopka cannot be counted under Orange County's efforts, although part of the North Shore is in Orange County. The Lake Apopka North Shore Restoration Area is a state tax-payer funded effort to restore a lake. I mention the North Shore now because of the astounding enthusiasm by local residents and visitors (who bring in ecotourism dollars) for seeing the wildlife of those wetlands. And although that 20,000-acre Restoration Area is large and supports tremendous wildlife diversity, even the smallest wetlands in urban areas have importance for wildlife. And a retention pond does not have the same value to wildlife as a natural wetland.

A point of concern to you—Mayor, commissioners and staff—is how parts of Orange County experienced flooding from the 2022 hurricanes. A suggestion from the consultants working for developers is to remove floodplain review from the Conservation Area Impact permit (CAI) process. Allowing new development in floodplains will continue to exacerbate flooding problems for existing residents.

The scope of today's workshop is very valuable (and we will be following online although we are unable to attend):

- comparison of the historic inventory and condition of the County's wetland resources with present day conditions,
- estimation of cumulative wetland impacts and assessment of ecosystem services associated with loss of wetland function,
- evaluation and spatial assessment of wetlands over time, including -1989 (coinciding with adoption of wetland ordinance) and every 10 years thereafter, and

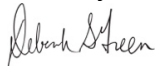
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- estimation of the secondary effects of wetland loss through modeling of conceptual development scenarios; analysis of conventional development versus Low Impact Development/green infrastructure approaches to assess differences (or similarities) in impacts to threatened and endangered species, aquifer recharge, flood control, and water quality.

We hope that Orange County Environmental Protection Division staff soon put specific proposals to change the Orange County Wetlands Ordinance into writing so we can comment further. Thank you very much for considering survival of wildlife as you work through this ordinance revision.

Sincerely,



Deborah Green

Orange Audubon Society President and Conservation Committee Member
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