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Steve Jenkins



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Michelle Tappouni

Michelle Tappouni – Chairman
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Bobby L. Baker, P.E., Tony C. Bellamy, P.E.
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Mobeen Rathore, M.D., Lucinda Sonnenberg, Ph.D.

September 30, 2016

The Honorable Lori Boyer, President
Jacksonville City Council
117 W. Duval Street, 4th Floor
Jacksonville, FL 32202

Re: City of Jacksonville Resolution 2016-536

Dear Council President Boyer:

The City of Jacksonville has a long-standing focus on environmental issues impacting the quality of life of its residents. The Jacksonville Environmental Protection Board ("JEPB"), established in 1965, acts as the local hearing platform for all environmental matters that occur within Duval County. It is in that capacity that we offer support and request that the City Council approve Resolution 2016-536, introduced by Councilman Love.

The JEPB discussed and voted to support Resolution 2016-536 during our September 26, 2016 Board meeting. We share several concerns regarding changes to Florida's Surface Water Quality Standards including the opportunity for public participation and comment prior to the approval by the Florida Environmental Regulation Commission ("Commission"). Specifically, in May 2016 the FDEP announced that it was planning to take the proposed rules to the Commission in early Fall 2016 for consideration. However, on June 30, 2016, FDEP announced that the proposed rules would be fast-tracked and sent to the Commission on July 26, 2016 instead of the original timeline provided in May. This expedited date greatly reduced the public's ability to have input and we assert that a more appropriate time frame and notice for public input should have been provided. In addition, the Commission did not have full membership and was not represented by appointees from local government and the environmental community. The absence of these members further limited input from key stakeholders who would be directly impacted by any decisions made.

While we are not currently taking a position on the actual standards being modified, we strongly support the requests you have made of EPA to review the methodology used in the process the Commission undertook to approve the change in water quality standards and to allow more public comment.

If we can be of any assistance, please feel free to contact us.

Sincerely,


Michelle M. Tappouni, Chair
Jacksonville Environmental Protection Board

cc: Jacksonville City Council
Environmental Protection Board
Ali Korman-Shelton, Mayor's Office
Kimberly Scott, Interim Director of Neighborhoods
Melissa Long, Chief, Environmental Quality Division