



The CITY OF DAYTONA BEACH

— "THE WORLD'S MOST FAMOUS BEACH" —

February 24, 2016

Office of the Mayor

The Honorable Jason P. Davis, Chairman
Volusia County Council
123 West Indiana Avenue
DeLand, FL 32720

RE: Volusia County Wetlands Regulations

Dear Chairman Davis:

The City of Daytona Beach has reviewed the *proposed Wetland Ordinance*, dated December 10, 2015, affecting Chapter 50 of the Volusia County Code of Ordinances, and attended a public meeting by the Environmental Management Division concerning the same. The City recommends that Volusia County eliminate its wetland regulations, just as the City did in 2015, updating our Code to defer to the St. Johns River Water Management District (SJRWMD).

The City currently applies State law to wetlands as administered by the St. Johns River Water Management District. The City is confident in the expertise of the district to effectively manage wetlands in the northeast and east-central Florida region and the ability of the district to work cooperatively with the City.

The City objects to enforcing stricter regulations on those seeking to develop within its jurisdiction, especially during a time when development is just beginning to resurge. The most stringent review level would be placed on areas which are critical to the City in terms of redevelopment efforts. Portions of three CRA's (Community Redevelopment Areas) are located within a Priority review area, as well as a portion of the E-Zone (Entertainment Zone). Other areas that would fall into a Priority review would be the City's 600 acres on W. International Speedway Blvd and the 200 acre site for the proposed RIB project, both located in unincorporated Volusia County, and both previously not identified as map A (Priority). The City's planned regional recreational trails, located along the Halifax River, would be subject as well.

The Findings listed in Sec. 50-202 of the proposed ordinance, subsections (a) through (j), are general facts about the significance of wetlands and wildlife, which are similar to concerns of the district. This section does not provide evidence of any current issues with the district's management or provide compelling argument for increased parameters.

An additional layer of regulation placed upon developers and property owners can delay and detour vital economic development away from the Volusia area, a result impacting both the County and the City. The City requests that the County Council suspend efforts to create excessive and redundant regulations within the cities, and instead let the St. Johns River Water Management District oversee wetland permitting and impacts consistently throughout the region, enabling them to place greater value on those wetlands which are contiguous.

Sincerely,

Derrick Henry
Mayor