



Friends of St. Sebastian River

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Officers

August 12, 2019

Tim Glover
President

To: City of Sebastian, Planning and Zoning

Buzz Herrmann
Vice President

Re.: Grave Brothers Company, Request for Annexation, June 2019

Bill Brennan
Treasurer

The Friends of St. Sebastian River understands the Graves Brothers Company has requested voluntary annexation of approximately 1118 acres, located on CR 510 and adjacent to the City of Sebastian. We are familiar with this property and anticipated that it would be developed at some future date, with the demise of the local citrus agricultural industry.

Mark Bondy
Secretary

Directors

The mission of the Friends organization is to help maintain the health and beauty of the St. Sebastian River, a magnificent and beautiful natural resource in our “backyard.” The St. Sebastian River is one of the largest tributaries to the Indian River Lagoon and, specifically, the Indian River-Malabar to Vero Beach Aquatic Preserve. “Aquatic Preserves are state-owned sovereign submerged lands in areas which have exceptional biological, aesthetic, and scientific value..., which have been set aside for the benefit of future generations.” (Florida Geographic Data Portal)

Tom Bauer

Diana Bolton

Lee Ann Kluepfel

Robin & Archie Laird

All of Florida’s Aquatic Preserves are also considered an Outstanding Florida Water, as well, “worthy of special protection because of its natural attributes.” As such, the Department of Environmental Protection (DEP) is required by Florida law, “... to afford the highest protection to Outstanding Florida Waters.... No degradation of water quality, other than that allowed in subsections 62-4.242(2) and (3), F.A.C., is to be permitted in Outstanding Florida Waters.” (F.A.C. 62-302.700)

Bob Stephen

Bruce Sabol

Bruce Zingman

Founding Member

Therefore, any increase in human activity, and especially an intensive development project, that not only is within the St. Sebastian River watershed, but immediately adjacent to the South Prong of the River, is cause for concern. We believe that the City of Sebastian has a responsibility, in consideration of annexing and future development of the Graves Brothers property, to intensively scrutinize this proposal.

Frank DeJoia
1924-2017

Directors Emeriti

Many of our local waters continue to be considered as “impaired” due to impacts directly attributable to human activity, for which taxpayers have been spending millions of dollars to try and correct. Brevard County residents pay a self-imposed tax, to a fund earmarked for water quality improvement projects. Our immediate area has not suffered from the worst of these impacts due to less development than some of the surrounding areas and significant flushing provided by the Sebastian Inlet. Portions of the St. Sebastian River continue to be designated as “impaired,” though,

Lynn Stieglitz

Frank Wegel

The mission of the Friends of St. Sebastian River is to help maintain and improve the health and beauty of the St. Sebastian River and its watershed.

and many long-time residents lament that fishing is not what it historically was. Some have told of sandy bottoms in our river and plate-size oysters they used to harvest from our local estuary that no longer exist.

In addition, the St. Sebastian River, and specifically the South Prong, provide critical habitat for some rare and endemic fish species. These species have been recorded, and research published, by Dr. Grant Gilmore, formerly of Harbor Branch Oceanographic Institute.

Lessons have been learned over the years about the negative effects of past development practices and changes made in an attempt to prevent those effects from future development. The City of Sebastian Land Development Code includes provisions to avoid adverse impact to coastal resources. We believe the City must be prepared to thoroughly scrutinize any proposed future development as part of an annexation, and, in fact, require extraordinary compliance for developments impacting our local water resources, especially in consideration of the interconnection of the St. Sebastian River with, and “impaired” quality of, the Indian River Lagoon.

“Development along the coastal shoreline or within an area extending into the jurisdictional tidal waters of the city shall avoid adverse impacts of development on benthonic communities within tidal waters, including seagrass beds and other live bottom communities as well as adverse impacts on the coastal marsh and other coastal non-tidal wetland habitats.” (City of Sebastian, LDR 54-3-11.4(c))

“Since these areas are sensitive to increased turbidity and other forms of pollution, water run-off and introduction of nutrients, these forms of pollution shall be regulated through effective water quality management criteria.” (City of Sebastian, LDR 54-3-11.4)

City staff indicated that future development of the Graves Brothers property would be reviewed under the City’s Planned Unit Development process. “The (PUD-R) district provisions establish a voluntary management framework for negotiating innovative development concepts, which protect natural features....” (City of Sebastian, LDR 54-2-5.11(a)) We request the City take full advantage of this provision, to negotiate innovative and extraordinary protection our local water resources deserve and the public expects. Doing so avoids decades of efforts to correct past mistakes made in the interest of a quick profit at the expense of our local resources and taxpayers of the community.

In consideration of these unique aspects and degradation of our local waterways, we request that the City require the following aspects of the future development of the Graves Brothers property, if the annexation is approved.

- 1) Connection to a wastewater treatment system, i.e., no onsite septic systems.
- 2) Stormwater treatment facilities – a 50% increase in design standard for the 25-year storm event, due to impacts of the St. Sebastian River draining to an Outstanding Florida Water. City of Sebastian LDR 54-3-11.4, Coastal resource impact analysis states, “In order to protect the water quality of the aquatic preserve, no new point source pollution shall be permitted to discharge into the lagoon or into ditches or canals flowing into these [sic] lagoon.” In the proposed development of the Graves Brothers property, stormwater impacts will be changed from the current percolation/recharge, to stormwater retention areas with potential for recharge, and overflow beyond the design standard, with discharge to canals, the St. Sebastian River and ultimately the aquatic preserve/lagoon, through outfalls, i.e. “new point sources.” “The stormwater management system shall handle all stormwater that flows

into, through and from the project without creating adverse impacts on other lands served by the stormwater management system or by receiving water relative to flooding, erosion hazards, or water quality and quantity.” (City of Sebastian LDR 54-3-12.10(a)(19))

- 3) Stormwater treatment facility littoral and upland buffer zones planted with native vegetation for stabilization and filtration purposes.
- 4) Increased protection of the St. Sebastian River South Prong slough. This area is adjacent to and immediately south of the Stough Property, acquired by Indian River County for the purpose of protecting the headwaters of the South Prong, and extension of the St. Sebastian River Greenway. This area should be protected by larger conservation areas/setbacks, lower density development, less road infrastructure including no bridging of the South Prong. Consideration should also be given to conservation easements over, or direct acquisition of parcels 31383600000700000001.0, 31383600000700000002.0, 31383600000100000007.0 and 31383600000100000010.0. “Regardless of permitting by federal or state permitting agencies, the city shall reserve the right to determine the appropriate land use and density/intensity.” (City of Sebastian, LDR 54-3-11.1(e) - Administration of wetland development restrictions)
- 5) Use of pervious pavement or pavers in commercial zones, with consideration of stormwater credits for use of pervious paving/pavers by homeowners in residential areas.
- 6) Use of reuse water for all irrigation and/or use of rainwater cisterns. No irrigation allowed in littoral and buffer zones of water bodies.
- 7) Landscaping requirements – incentivize reduction of grass/sod; incentivize use of ground covers and native vegetation.
- 8) Maximize open/green space by use of clustering and density transfers similar to “new town” development.

Sincerely,

/s/ Tim Glover

Tim Glover, President

Friends of St. Sebastian River