

**PGA Village Property Owners Association, Inc.  
2140 NW Reserve Park Trace  
Port St. Lucie, FL 34986**

February 18, 2019

The Hon. Ron DeSantis  
Executive Office of the Governor  
400 So. Monroe Street  
Tallahassee, FL 32399

Re: Use and Application of Bio-solids in Florida

Dear Governor DeSantis:

I am writing to you on behalf of the PGA Village Property Owners Association, Inc., which represents more than 5,000 residents in St. Lucie County, where a large out-of-state landowner is attempting to construct a bio-solids composting facility to process human waste for application on agricultural land within the St. Lucie County Watershed.

Our residents and members are appreciative of your remarkably successful efforts to improve the governance of the South Florida Water Management District (SFWMD) which is charged with regulating and ensuring water quality for 8.1 million Floridians, including those who live in PGA Village communities. We also are encouraged by your environmental policies and proposals that recognize serious threats to our waterways.

It is our hope that your leadership will result in careful review and ecologically responsible action on an application filed with the SFWMD by Sunbreak Farms, LLC to modify Environmental Resource Permit No. 56-00111-S for a bio-solids composting facility on the applicant's St. Lucie County property which extends into Indian River County as well.

Bio-solids composting and land application can produce significant adverse impacts to public resources, residents, and businesses in the vicinity of facilities which process domestic wastewater residuals, also known as "sewage sludge". Even after removal of deadly pathogens and other disease-causing and pathogen-spreading organisms, bio-solids pose a risk to water supplies, food crops, and residents. Nutrient pollution is a major threat to Florida's water quality as it fuels toxic algae blooms and Red Tide, and bio-solids composting is known to add large quantities of nutrients to surrounding waters and groundwater. These nutrients can pollute aquifers and permanently damage precious water supplies.

The application submitted by Sunbreak Farms fatally fails to address these critical threats to the environment and to public health and safety.

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The applicant's disregard for mitigating these known threats is demonstrated by proposing to capture admittedly dangerous composting runoff in a reservoir that is unlined and inadequately buffered or bermed, allowing seepage through the buffer. If permitted, the reservoir will fail to protect offsite properties from the effects of waste- and pathogen-laden runoff.

The location of the proposed project near the C-25 Canal presents a threat to the fragile and already damaged Indian River Lagoon, since the C-25 outfall flows into the C-24 and the C-23 Canals and eventually into the Lagoon.

Recent disclosures of the fouling of water in formerly pristine Blue Cypress Lake raise substantial concerns that must be addressed by regulatory agencies such as SFWMD when reviewing projects that allow composting and land application of bio-solids. The St. Johns Water Management District and the Ocean Research and Conservation Association (ORCA) both concluded that toxic algae in Blue Cypress Lake was tied to application of bio-solids on neighboring lands.

Scientists from state and national agencies and organizations have warned of inadequate or non-existent regulation of bio-solids. We understand that regulation of bio-solids is part of your environmental agenda and is of grave concern to many members of the Florida Legislature.

We urge thorough and careful vetting of the Sunbreak Farms project as well as other proposals which involve processing and land application of bio-solids. PGA Village Property Owners Association has engaged experts who have prepared reports and delivered presentations on the dangers of unrestricted use of bio-solids, and we would be pleased to provide any assistance you may find helpful in addressing this serious environmental and public safety concern. In this regard, your staff may contact our attorney, Virginia P. Sherlock, of Littman, Sherlock & Heims, P.A., P.O. Box 1197, Stuart, FL 34995, Tel: 772-287-0200, who can transmit any further information you request.

Thank you for your interest and your continued diligence in working to protect residents of St. Lucie County and all of Florida from environmental threats such as those posed by under-regulated processing and application of bio-solids.

We are hopeful that a reorganized and more responsible South Florida Water Management District will reflect your administration's goals and commitment to public health and safety by denying the Sunbreak Farms bio-solids processing permit.

Sincerely,

*Stephen Navaretta /rps*

President, PGA Village Property Owners Association, Inc.

Cc: The Hon. U.S. Rep. Brian Mast  
The Hon. State Rep. Delores Hogan Johnson, District 84