

## Horst, Rachel

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**From:** CEER@brevardfl.gov  
**Sent:** Saturday, January 31, 2026 3:35 PM  
**To:** Horst, Rachel  
**Subject:** A new CEER Recommendation has been submitted as ID #2026056

### Recommendation # 2026056

Dear CEER Administrator,

Speak Up Brevard Recommendation ID #2026056 has been submitted. Please login to the CEER Application to start the recommendation evaluation workflow.

#### Contact Information:

<b>Group/Organization</b>	WAVESaction
<b>Name</b>	Sandra Sullivan
<b>Address</b>	165 Dorset Lane, South Patrick Shores FL 32937
<b>Phone</b>	(954) 224-8624
<b>Email</b>	s2sully@gmail.com
<b>Alternate Email</b>	s2sully@gmail.com

#### Recommendation Information:

<b>Recommendation ID</b>	2026056
<b>Recommendation Title</b>	Moratorium on Glyphosate
<b>Areas Affected</b>	Several depts
<b>Department Affected</b>	
<b>Current problem</b>	<p>The problem is the economic impact to Brevard on the loss of seagrass in the Lagoon. In 2024, Brevard stopped spraying glyphosate where it drains to the lagoon following my 2023 Speak up Brevard submission and the scientific evidence on this issue. This moratorium should be formalized and studied scientifically since following this stopping spraying seagrass recovery in 2025 is encouraging from this change. HB981 (Nov 2010) is what killed the seagrass in the lagoon. The seagrass looked as good as 1943 aerials in 2010. The sewage didn't change. The muck didn't change. The septic didn't change. What changed in 2011 was spraying herbicides. This SJRWMD timeline shows you the impact. <a href="https://www.facebook.com/groups/wavesaction/posts/4127612310902622/">https://www.facebook.com/groups/wavesaction/posts/4127612310902622/</a></p>
<b>Recommendation</b>	<p>The recommendation is for a Moratorium for 2 years on the spraying of glyphosate or herbicide in any area near the IRL or that drains to the IRL to evaluate the impact. Unfortunately, currently Florida Statute 487.051(2) preempts cities and counties from enacting any regulations restricting the use of pesticides including herbicide. This recommendation will save the county billions in restoration to the lagoon :)</p>



BOARD OF COUNTY COMMISSIONERS

**TO:** Jim Liesenfelt, County Manager

**THRU:** Tad Calkins, Assistant County Manager

**FROM:** Virginia Barker, Director, Natural Resources Management Dept.

**SUBJ:** Citizen Efficiency and Effectiveness Recommendation (CEER) # 2026056

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CEER # 2026056, titled Moratorium on Glyphosate, was received by the County from Sandra Sullivan.

**Citizen Statement:**

The problem is the economic impact to Brevard on the loss of seagrass in the Lagoon. In 2024, Brevard stopped spraying glyphosate where it drains to the lagoon following my 2023 Speak up Brevard submission and the scientific evidence on this issue. This moratorium should be formalized and studied scientifically since following this stopping spraying seagrass recovery in 2025 is encouraging from this change. HB981 (Nov 2010) is what killed the seagrass in the lagoon. The seagrass looked as good as 1943 aerials in 2010. The sewage didn't change. The muck didn't change. The septic didn't change. What changed in 2011 was spraying herbicides. This SJRWMD timeline shows you the impact.

**Citizen Recommendation:**

The recommendation is for a Moratorium for 2 years on the spraying of glyphosate or herbicide in any area near the IRL or that drains to the IRL to evaluate the impact. Unfortunately, currently Florida Statute 487.051(2) preempts cities and counties from enacting any regulations restricting the use of pesticides including herbicide.

**Staff Analysis:**

According to Dr. Chuck Jacoby, Sr Environmental Scientist at St Johns River Water Management District, who presented to the Save Our Indian River Lagoon (SOIRL) Citizen Oversight Committee (COC) in March 2022, it would take 6.2 million pounds of glyphosate to reach the lowest recommended dose for killing plants (0.01 pounds per gallon) in the Banana River Lagoon. That would equate to 18% of all glyphosate used in the United States over the past 30 years. The Indian River and Mosquito Lagoon would require even more glyphosate to cause an impact to seagrass. That portion of Dr.

Jacoby's presentation can be found at <https://www.youtube.com/watch?v=QwjmV188nII&t=4600s>.

According to the U.S. State Department, glyphosate has an effective life expectancy of 7-10 weeks in water due to microbial degradation. Thus, based on Dr Jacoby's calculations, glyphosate levels wouldn't accumulate to concentrations in the lagoon capable of killing seagrass.

To further support this, Dr. Austin Fox reported to the SOIRL COC in July 2023 that controlled experiments on seagrass showed no changes in seagrass at glyphosate concentrations that were 1,000 times what is found in the Indian River Lagoon. That portion of Dr. Fox's presentation can be found at <https://www.youtube.com/live/2MUcbtsK93w?t=2467s>.

Florida Statute 487.051(2) states, "Except as provided in chapters 373, 376, 388, 403, and 482, or as otherwise provided by law, no agency, commission, department, county, municipality, or other political subdivision of the state may adopt laws, regulations, rules, or policies pertaining to pesticides, including their registration, packaging, labeling, distribution, sale, or use, except that local jurisdictions may adopt or enforce an ordinance pertaining to pesticides if that ordinance is in the area of occupational license taxes, building and zoning regulations, disposal or spillage of pesticides within a water well zone, or pesticide safety regulations relating to containment at the storage site.

Therefore, Brevard County cannot impose a moratorium on herbicide use; however, it has chosen to regulate itself to reduce glyphosate use. The SOIRL program has provided funding to Brevard County, Melbourne Tillman Water Control District and municipalities to implement vegetation harvesting programs. Brevard County Natural Resources has switched almost all of its control of invasive aquatic weeds in over 400 acres of stormwater ponds and wetlands from herbicides to vegetation harvesting. The county has looked into the 6 alternative herbicides permitted for emergent and floating vegetation, many of which have other concerns to human and wildlife health. Raleigh Berry, Senior Environmental Scientist with Brevard County Natural Resources Management Department, covered some of this during the July 2023 COC meeting, viewable at <https://www.youtube.com/live/2MUcbtsK93w?t=6158s>. While plants continue to build up resistance to herbicides, glyphosate performs relatively consistently.

Brevard County Public Works stopped using glyphosate in ditches within a half-mile of the lagoon more than 5 years ago. At the same time, Natural Resources and Mosquito Control reduced their use of glyphosate county-wide to about 5-10 gallons/year, which is used only for sites posing human health or safety concerns with no feasible alternative for weed control. Municipalities in Brevard have also been reducing their use of glyphosate. A multi-jurisdictional discussion of lessons learned from experience

using alternatives to glyphosate was conducted during the July 2023 COC meeting to help inform future management decisions by all local jurisdictions.

Mosquito Control employs an integrated mosquito management program which utilizes various habitat management (impounded wetland management), biological control (native fish hatchery/ stocking) and cultural control (public education) techniques to protect public health, but US Environmental Protection Agency (EPA)-approved pesticides ultimately are necessary to support the public health mission, and invasive aquatic vegetation control is one of those important tools. Local mosquitoes are known to utilize the shelter of aquatic vegetation during their immature (i.e., larval and pupal) life stages; and invasive aquatic plant species have the capacity to provide significant mosquito breeding habitat when given the opportunity to clog waterways and grow out of control. Glyphosate is known to be effective at controlling such aquatic vegetation, so completely removing it from the rotation could negatively impact public health due to potential increases in mosquitoes and associated disease risk. Nevertheless, Mosquito Control has taken steps to reduce glyphosate usage, particularly in areas adjacent to the Lagoon.

Alternative herbicide products and methods are limited. Invasive aquatic vegetation and associated mosquitoes have become more difficult to manage when glyphosate usage has been reduced. Alternative products have not been more cost-effective thus far.

**Staff Recommended Action:**

It is recommended that the Board of County Commissioners reject CEER #2026056 because it does not enhance the effectiveness or efficiency of County government required by Home Rule Charter.