

February 26, 2010

From: Richard Royal, Member HCOLRC

To: Harris Chain of Lakes Restoration Council and Technical Advisory Group
Legislative Delegation and Water Management Governing Board

RE: Lake Apopka

Supporters of the current projects at Lake Apopka continue to claim success and to be fair some incremental improvements can be quantified after two plus decades (1) of restoration work. Put in the context, however, of hundreds of lost jobs, lost property taxes, lost local economic contributions, and hundreds of millions of dollars in expenditures of public funds, has it been efficient? After 20 years, progress should be obvious, not elusive and vague.

Some facts are not even debatable.

1. Lake Apopka has not been restored to a bass fishing destination. (Supporters of the WMD takeover in the 1990s claimed that revenue from recreation would replace the economic contribution of farms within a few years)
2. There is not a noticeable gain in vegetation or water quality.

Has anything of consequence really been accomplished by this very expensive experiment?

Sometimes even extensively thought out experiments fail to perform as intended. That is where we have been and still are at Lake Apopka. Is the solution more of the same? Another 20 or 40 years of marginal improvements explained by data presented on graphs selectively scaled because the changes cannot be seen by looking at the lake? The promise was to return Lake Apopka into a sport-fishing destination. The reality has become gizzard shad netting and decades of managed wetlands. The key words being *managed wetlands*. Aren't there wetland species that can be planted and then survive natural fluctuations in water levels without being *managed*?

It is time to put this great experiment on hold and try something different, something cost effective, that will provide observable and meaningful change in a reasonable amount of time.

1. Stop all discharges from the North Shore into Lake Apopka. Recall this was the reason ownership had to transfer from taxpayers to tax spenders. Twelve years after the Zellwood Drainage District farms changed title, pumping nutrients and sediments into the lake with accumulated rainwater and seepage continues. We are told that is mandated by the memorandum of understanding between USFW and the SJRWMD. A memorandum void of understanding would be more accurate.

Conclusions “agreed to” by SJRWMD and USFW were questioned and/or disputed by other environmental agencies, by university researchers, by years of birds on flooded fields when OCP materials were in use without mortality, and even by the consulting firm hired by the WMD to investigate the cause of the bird deaths. (2) This agreement between these two agencies has led to continued pumping, no storage of water on thousands of acres supposedly bought for just that purpose, soil remediation centered on \$2500 per acre plowing of land that had been plowed by previous owners for decades (not quite as deep but plowed none the less), and the agency charged with mismanagement being required to take more public money and purchase thousands more acres of wildlife habitat to manage, as a penalty.(3)

Political comedy writers would be hard pressed to pen a better spoof of government in action.

The Zellwood Drainage District operated a system of canals, dikes, and culverts from the 1940s to 1998 capable of moving water from field to field, flooding some areas and keeping water off of others. At least from the time soil testing identified “problem areas” this infrastructure could have been utilized to avoid or minimize discharges into Lake Apopka. Permitting municipalities to withdraw water from the North Shore would have further reduced the need to pump back into the lake. There is not a good excuse for continuing this practice of loading nutrients and sediments into Lake Apopka when viable alternatives are already in place. If water managers can’t figure out how to utilize that system to avoid pumping into the lake and explain that to USFW, then they should consult with one of the former owners or managing engineer to do it for them.

2. Shouldn’t the current economic situation and state budget demand cost effective alternatives be used instead of going on and on with inefficient, management intensive projects?

Lake Apopka has one outlet through a long canal with a controlled flow structure making it a good location to move to an **already proven** change in aquatic weed management strategies. (4)

Lake Apopka needs vegetation, Lake Apopka needs fish habitat, Lake Apopka needs improved water clarity to allow native vegetation to establish.

Not spraying hydrilla in Lake Apopka, (*saving money*) can provide the improvement of water quality and restoration of bass fishing, that two decades of expensive and intensive management, have not. It is past the time to change strategy at Lake Apopka. At least to temporarily halt current activities and give a natural low management solution an opportunity to work. What can be lost by a two-year delay in a 50-year program that has shown minimal benefits?

I propose that our council pursue this course of action by asking our technical advisory group to report back the feasibility and success probability of this strategy. If spending less public money can achieve the declared objectives of restoring sport fishing, water clarity, and vegetation cover in Lake Apopka faster, we need to demand that it happens.

Tax dollars being thrown at this problem can be better used elsewhere or be left in the pockets of taxpayers.

(1) Farm closings and restoration projects started in the late 1980s ten plus years before the final purchases and closings in 1998.

(2) See attached abstracts from Exponent

(3) Mantanzas Refuge purchase spelled out in agreement

(4) See attached March 2009 Meeting Minutes with presentation on Orange Lake and Rodman Reservoir.