



Orange Audubon Society

(A Chapter of National and Florida Audubon Societies)

PO Box 941142, Maitland, FL 32794-1142

www.orangeaudubonfl.org

July 4, 2014

Mr. Kraig McLane
Intergovernmental Coordinator, SJRWMD
4049 Reid Street
Palatka, FL 32177

Dear Mr. McLane:

Cc: Nancy Christman, Intergovernmental Coordinator, SJRWMD

Re: comments (in red) regarding the Harris Chain of Lakes Restoration Council Goals

Objective 1 – Control nutrient and sediment inputs

- a. Continued long-term support for the Lake County Water Authority (LCWA) Nutrient Removal Facility (NuRF) for treating non-flood discharges from Lake Apopka to the lakes downstream. **Assuming the NuRF is properly run, we support their use of alum to tie up phosphorus (P) to help reduce P-loading to downstream water bodies. Since the LCWA was responsible for the construction of this facility, they should continue to bear the expense of running it.**
- b. Minimize direct releases from Harris Bayou into Lake Griffin with the construction of by-pass infrastructure.
No comment
- c. Continued long-term support for agricultural, urban, and other categories of structural and non-structural best management practices (BMPs) as part of the total maximum daily load (TMDL) program, which the key implementation strategy under the Upper Ocklawaha Basin Management Action Plan (BMAP).
We support the implementation and *monitoring* of BMPs to reduce further degradation and help restore the Upper Ocklawaha Basin.

Objective 2 – Continue to improve aquatic habitat and water quality

- a. Directly connect marshlands within the North Shore Restoration Area (NSRA) to Lake Apopka in those areas where the St. Johns Water Management District (SJRWMD) is not subject to land/water use restrictions as part of the agreement with the U.S. Fish and Wildlife Service. **Directly connecting Lake Apopka to the former muck farm properties with their residual pesticides and high phosphorus loads would have two very negative effects. First, phosphorus from the NSRA could move directly into the current lake area without being treated with alum as is now the case. Secondly, the flooding of the NSRA would eliminate aquatic habitat for shorebirds and wading birds, both resident and migratory. Currently, the NSRA is an American Bird Conservancy designated Globally Important Birding Area. This area holds the crown of being where the highest ever inland North American Christmas Bird Count occurred in over 110 years of counts (174 species were confirmed in 24 hours). Both of these impacts would adversely affect the efforts of the Lake Apopka Ecotourism Development Council, thereby negatively affecting the potential to rejuvenate the local economies around the NSRA, which was decimated**

Orange Audubon Society, Inc. is a Florida not-for-profit organization recognized as tax exempt under Section 501(c)(3) of the Internal Revenue Code. Your donation is tax deductible to the fullest extent allowed by law.

A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE WITHIN FLORIDA 1-800-435-7352. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL OR RECOMMENDATION BY THE STATE. REGISTRATION NO. CH2330

by the muck farm buyouts. Furthermore, this **multifaceted** (i.e., not just sport fishing) ecotourism effort by governments, non-governmental organizations and businesses—designed to stimulate the economies of Lake and Orange counties, Apopka, Howey-in-the-Hills, Mount Dora, Oakland, Ocoee, Montverde and Winter Garden—would be negatively affected. With ~30,000 acres of open water, Lake Apopka does not need to be expanded at the expense of a multitude of other ecotourism and nature education activities. We strongly oppose Objective 2a.

- b. Support a pilot program to allow hydrilla to grow naturally in selected areas of Lake Apopka in an attempt to stabilize lake bottom sediments, improve water clarity, and provide important fisheries habitat. Hydrilla would be controlled to prevent encroachment into areas of the lake with public access and navigation opportunities, private docks, and habitat supporting the crappie fishery.

The idea of allowing hydrilla, a Florida Exotic Pest Plant Council Category I invasive weed, to spread (not grow “NATURALLY”) in Lake Apopka is irresponsible. First, due to naturally occurring increases in eelgrass and other aquatic plant populations and the planting of tens of thousands of additional native submergent plants by the SJRWMD, the Florida Fish & Wildlife Conservation Commission and others, the fisheries habitat in Lake Apopka is already improving. Second, as noted by aquatic weed experts, “low coverages associated with positive impacts to fisheries are usually not sustainable because hydrilla can rapidly expand to detrimental levels” (SJRWMD SPECIAL PUBLICATION SJ2010-SP3). In addition, low hydrilla coverage may not improve water clarity but may displace native submerged aquatic vegetation. Further, “The environmental and economic costs of a hydrilla infestation can be greater than the benefits”. Thus, a short term gain could become a long-term pain and expense. Adding to the inadvisability of allowing the hydrilla population to increase in Lake Apopka is the threat that this aquatic weed will continue to develop resistance to the currently used herbicides as it has already done to fluridone and endothall. Trying to contain an increased hydrilla population would entail increased labor, chemical, and equipment expenses that could be used for more productive lake, wetlands, and upland restoration efforts. Additionally, greater amounts of hydrilla contaminated waters would likely lead to increased downstream and offsite contamination of other water bodies due to fragmentation and movement with water down the Apopka-Beauclair canal and on boats to downstream and other water bodies throughout Florida. We strongly object to this proposal.

Objective 3 – Capitalize on habitat and water-quality improvements

- a. Gain the support of the Florida Fish and Wildlife Conservation Commission (FWC) for designating the Harris Chain of Lakes as Trophy Bass Resource by implementing a catch-and-release only regulation for largemouth bass of 16 inches or greater in length.

We support recommendation.

- b. Improve public access to Lake Apopka, particularly in the deeper sections of the lake along the western shore.

We support the establishment of additional public access sites and hope that one in Oakland and the one used for shad harvesting can both be developed and opened to the public.

Sincerely,



Deborah Green, President
Orange Audubon Society

P.S. – Please distribute this response to all the members of the Technical Advisory Group