

POSITION PAPER  
FRIENDS OF LAKE APOPKA  
After review of  
HARRIS CHAIN LAKES RESTORATION COUNCIL  
2011 Report to the Florida Legislature

The Friends of Lake Apopka (FOLA) group was founded in 1991 as a Citizens Advocacy group with the goal of initiating and supporting the restoration of the lake. The group was successful in attracting the attention of local legislators and involving many residents of central Florida who had been frustrated and angered by the long-term massive pollution of this once great fishing lake. FOLA played a major role in the initiation and passage of the 1996 Lake Apopka Restoration Act.

The trigger that finally stimulated this group to action was a proposal to dump concrete debris in the lake and the decision by the St. Johns River Water Management District (SJRWMD) to allow ten more years of operation of farms with little attention to nutrient reduction.

Since Lake Apopka is the headwaters of the Oklawaha Basin, we are acutely aware of the negative effects downstream. We feel strongly that all decisions and opinions considered by FOLA should be science based and, where possible, peer reviewed. While we realize some adaptive management decisions may be necessary because of the unprecedented magnitude of this project, final decisions should be made after review by competent scientists.

The formation of the Harris Chain Lakes Restoration Council (Council), established in 2001 by the legislature, was welcomed by FOLA as they joined other groups including the SJRWMD, Lake County Water Authority (LCWA) and

the Putnam County Environmental Council, all dedicated to working together on the restoration of the entire basin in a cost effective, science-driven and timely basis.

In recent years the Council has apparently forgotten this cooperative action plan and pursued support for local projects, some lacking a scientific basis and, at the same time, becoming critical of the restoration process in Lake Apopka, and seeking re-allocation of funds.

The results brought about by these activities have created friction and caused other groups to spend time and money responding. In 2008, 2009, 2010 and now 2011, FOLA has spent a lot of time researching the Council's proposals and opinions and SJRWMD project management has been under serious attack each year. A review of the Council annual reports to the legislature and the position papers from FOLA will indicate many of the issues are repeated each year. The most serious issues are those that request reallocation of funds and call for abandonment of projects that are already underway in Lake Apopka. The following list describes the position of FOLA in response to the latest Council report to the legislature.

1. NORTH SHORE RESTORATION AREA (NSRA) CONNECTION :

FOLA has concerns about proposals to re-connect the NSRA directly to the lake. During the years of farming, the former marshes experienced major soil oxidation, creating deeper pits where shallow marshes previously existed. Flooding at this time will restore deep water impoundments rather than marshes. Inundating the 20,000 acres may also lower lake levels during droughts.

One of the major projects planned for NSRA is an 18-mile trail along the dike road crossing from Magnolia Park west to Clay Island. This would greatly expand our recreational, educational and ecotourism programs. Breaching the dikes could negatively affect these projects.

## HYDRILLA MANAGEMENT:

FOLA strongly disagrees with any decision regarding hydrilla management other than complete eradication. We have research and experience with attempts to control growths of any magnitude: their resistance to herbicides, rapid growth, reproduction, and costs to treat are well known facts. The 1 million dollar hydrilla control fund requested by Council for control would not cover a single treatment of the lake. The determination to decide on the feasibility of this project by "counting stakeholders" is not a scientific process. Lake Apopka now has rapidly expanding growths of native eel grass (*Valisneria americana*) which could be threatened by competition from the invasive exotic hydrilla.

## LAKE BEAUCLAIR DREDGING :

FOLA supports the continued dredging of the portion of Lake Beauclair at the end of the Apopka-Beauclair Canal and the deposition of dredge material in two of the deeper cells (f and g) within the NSRA. FOLA has protested against any use of the spoils on sod fields because of the toxicity of the sediments.

## 2. LAKE APOPKA DREDGING:

FOLA has always supported any project involving the dredging of Lake Apopka sediments but only if the following conditions are met and guaranteed: (a) the project is cost effective, (b) there is scientific proof that no toxins will be returned to the lake or transported to off-site areas and (c) on site disposal of dredge materials and/or dewatering do not create contamination problems elsewhere, or attract foraging birds.

(Funding requested: \$1,250,000.00 from FWC Lake Restoration Trust Fund)

3. WATER LEVEL MANAGEMENT:

Conflicting needs for water level changes will probably always be a problem on this chain of lakes. FOLA feels the highest priority should always favor taxpayer funded restoration projects, especially in the headwaters, until successful progress has been attained. FOLA encourages SJRWMD to continue investigation of all possibilities to raise the average water level in Lake Apopka.

4. AQUATIC HABITAT RESTORATION:

FOLA understands the values of created artificial habitats and fish attractors but questions the real need in Lake Apopka. Large stands of bulrush, cattails, pickerelweed, water lilies, southern naiad, coon-tail, chara and eelgrass are already established around the perimeter of the lake and this should provide sufficient habitat. A review of proposed funds for creating these habitats (below) appears to be over-estimated. If any attractors are added, FOLA objects to the idea of using concrete rubble. A natural attractor such as brush is sufficient. If funds are made available, the construction should be contracted to local sources, not to the University of Florida.

(Funding: Actually two sets of figures are used in the draft report: \$250,000.00 for three years (Total \$750,000.00) OR \$595,000.00 for the first year, \$390,000.00 for the second year and \$305,000.00 for the third year (Total \$1,290,000.00).

5. SPORT FISH STOCKING:

The Council report does not differentiate between fish stocked as fingerlings by FWC or those stocked as adults by relocation from existing lakes done by UF. All the research studied by FOLA indicates that the best way to restore an ecosystem is to essentially start restoration of the lower end of the food chain before introducing top predators.

In Lake Apopka, the shad harvest is aimed at removal of the larger adults, reducing reproduction, leaving populations of smaller fish and introduction of sunshine bass fingerlings in an attempt to eventually reach a predator-prey balance.

Based on this (and what is taught in freshman ecology courses), FOLA continues to encourage ecosystem restoration through stocking with farm-raised fingerlings, and to discontinue the funding of relocating adult wild fish. The funding requested to continue this introduction of adult fish could be spent much better on projects aimed at ecologic restoration.

In light of the increasing attention to cost-effective restoration, FOLA hereby requests an accounting of funds spent per fish to date, to help gauge whether the practice is cost-effective. FOLA also agrees with the FWC rule requiring that all largemouth bass stocking programs in this area be limited to genetically confirmed, Florida Largemouth Bass, (Micropterus salmoides floridanus) and continues to encourage stocking with sterile Sunshine Bass.

(Funding requested: \$150,000.00 for one year)

6. NUTRIENT REDUCTION FACILITY: (NuRF)

FOLA initially protested the construction of the NuRF system because of the proposed location. We are well aware of the value served by alum treatment. We opposed NuRF because the complex was to be built on a very sensitive and important tract in the NSRA, the only parcel that had never been tilled and the only possibility to restore a tract to a wet prairie habitat. It was purchased with funding designated for sensitive lands and offered to LCWA for NuRF by SJRWMD at no cost. We also felt the NuRF complex would be far more effective further downstream where it could deal with nutrient loading occurring north of the Rt. 48 bridge on the A-B Canal.

While FOLA's focus is primarily on environmental impacts, we pointed out several major potential problems: (a) the dams must be closed at times to facilitate water level management, making the NuRF temporarily inoperable, (b) the steady decline in Phosphorus compounds in Lake Apopka will eventually make the NuRF unnecessary, (c) the total operating costs are unpredictable and perhaps unsustainable, (d) without a dedicated disposal site for accumulated floc there could be a future contamination problem. We were assured that LCWA would be able to address these issues.

The rise in cost of alum and costs of equipment repair now leaves the project in a financially vulnerable condition. The Council has recommended that the legislature now assume that cost to rescue a local project with state tax payer monies. While FOLA again recognizes the potential value of NuRF, we are reluctant to support expenditures of state taxpayer dollars when this was a local project initiated by a Lake County organization.

(Recommended Funding: \$1,500,000.00/year for alum and \$65,000.00 for polymers. Staff expenses, electricity and maintenance are not included. Lake County voters should decide whether they are being over taxed for water problems.)

#### 7. CANAL DREDGING:

In previous years Council has requested funding for dredging dead-end canals connected to lakes in the chain. FOLA has protested this funding for several reasons: (a) the detrimental effects of adjoining dead-end canals on water quality in lakes are well documented, (b) access to these canals is for the private use of the homeowners who live there, and (c) these funds can better be spent on lake restoration projects. FOLA recommends the formation of a MSTU or similar taxing formula to assist the homeowners in financing the cost of cleaning these canals.

In spite of our objection, Council was able to obtain a legislative appropriation and millions of dollars for dredging the private canals primarily in Lake Griffin. FOLA calls for a review of these expenditures that will indicate the total amount spent, the location of canals treated and the number of taxpayers affected by these projects.

The Friends of Lake Apopka feel strongly about the outstanding credentials of the scientists with whom we have consulted, particularly the staff at St. Johns River Water Management District. They have been faced with the task of restoring an ecosystem that is unprecedented in size and contamination. We agree with their decisions to focus primarily on nutrient reduction projects and the current data indicates slow, but steady success.

We have seen yearly attacks by the Council with many of their opinions and critiques that are not science based, and some of their financial requests that appear self serving and aimed at criticism of current projects in Lake Apopka. We feel the best way to enhance the long-term restoration of the entire chain of lakes is to work together in supporting science-based projects and educating interested citizen advocacy groups.