
MEMORANDUM

TO: COLLIER BOARD OF COUNTY COMMISSIONERS
FROM: ENVIRONMENTAL ADVISORY COUNCIL
SUBJECT: EAC COMMENTS ON WATERSHED MANAGEMENT PLANS
DATE: 9/8/2010
CC: MAC HATCHER, PBS&J, CONSERVANCY OF SW FLORIDA, COLLIER COUNTY PLANNING COMMISSION

As described in the Collier County Comprehensive Plan, Watershed Management Plans (WMPs) are to serve as a watershed management tool to guide future development – they are to “protect the County’s estuarine and wetland systems.” They are to help identify areas where state standards are not currently met and to develop strategies to help meet them in the future. They are also to identify water management strategies appropriate to each drainage basin that can be used to guide development, land use changes, and mitigation within that basin.

The initial efforts focused on model development to include quality as well as quantity are necessary and are providing valuable insights into the County’s water resources. One of the major conclusions to be drawn from this relates to how and where samples are taken to assess water quality. This effort showed that since it has been expeditious to sample water from canals and ditches near roadways, this is where the bulk of sampling has been occurring. This explains how even large expanses of natural land can be determined to be impaired if they have conveyance waterways running through them that collected polluted runoff from other anthropogenically impacted areas. Because it is important to address pollutant hot spots and identify pollution sources, the County should continue to ensure that future samples are taken in the most appropriate places. We recommend a re-evaluation of the WMPs every five years to incorporate new data, new water control structures, and revised climatic data, etc. as that becomes available as well.

The effort by the County’s consultants should be focused on identifying Best Management Practices (BMPs) to help meet state water quality standards and not on trying to dispute or change current state water quality standards. Existing water quality regulations take into account natural sources of “pollutants” in the setting of the appropriate Total Maximum Daily Load (TMDL) pollutant reduction target once a waterbody has been found impaired. However, there are rarely no anthropogenic pollutant sources present – the only instance where federal regulation would allow a waterbody to exceed state water quality standards – i.e., be impaired - without being considered out of compliance. In such instances, the County would then need to supply the scientific support to the state for a deviation (Site Specific Alternative Criteria or Designated Use Change).

Since some Collier County waterbodies have not met state standards and are not pursuing such deviations presently, these WMPs should focus on compliance. Steps should be taken, where exceedences are identified to exist, to control anthropogenic sources. There are significant possibilities that even control locations, such as the upper Gordon River are subject to anthropogenic effects from adjoining properties. It is also expected that in the WMPs, BMPs would be recommended for reducing the introduction of nutrients and contaminants/pesticides into surface waters. This would have a benefit on water quality for surface water discharge and recharge. Where TMDLs are being developed, these WMPs should be designed to complement the Basin Management Action Plans (BMAPs) that will be developed to meet such TMDLs.

Additionally, WMPs should concentrate on areas such as required groundwater recharge areas, wetlands, water flow patterns, and current and future water requirements. There should be a recommendation that wetland mitigation, when required, should occur within that same drainage area. They should also indicate mitigation locations and activities that would be potentially most advantageous for each drainage area as well as where development should not be allowed so as to conserve natural flow ways and recharge areas. They might also indicate infrastructure changes that could be included in future County planning.

In the analysis performed to date, agricultural lands were assigned a resource value score of “zero.” This is inappropriate since these areas serve as recharge areas as well as habitat for a number of wildlife species. This needs to be re-evaluated, with the score elevated commensurately to those outlined in the Landscape Suitability Index (LSI), before these reports can be accepted.

It is hoped that the future efforts of the contractor will be focused on the water planning aspects of these WMPs rather than on the water quality aspects. Only if this happens will the resulting WMPs be useful for future planning. Plans should also be made to present each of the draft WMPs to the public within that drainage area for their education and to obtain their comments.