

Submitted  
12/10/01  
Bonnie O'Brien  
#000882

**Gainesville City Commission Meeting  
December 10, 2001  
Bonnie O'Brien**

**My friends ask me – why do you sit there for over 9 hours just to talk for three minutes? My answer is always the same – because I think protecting the wetlands is so important.**

**Since credentials seem to be in question – my degree is in biology. For 27 years I have worked in scientific research labs. I can read scientific papers, analyze data and reach decisions based on scientific evidence. I have authored papers in peer reviewed journals. Three of my family members are scientists. I live in the world of science.**

**According to the city's own data and analysis, the importance of this city's wetlands to aquifer recharge and flood protection is based on fact. The proposed wetland policy for the comprehensive plan offers little protection for the city's natural wetlands. The policy is full of loopholes and, that by using the comprehensive plan policies, anything is possible.**

**This comp plan language clearly contains language that will assure the destruction of the natural wetlands. This plan allows artificially created wetlands as a substitute for natural wetlands. In the comp plan, Policy 1.1.1, b2 starts out by saying that creation of new wetlands as a form of mitigation is least desirable. The wording then goes on to say that wetlands can be created as mitigation with requirements, restrictions etc. No land development code will ever solve the problem of attempting to create wetlands without the loss of wetlands. This is because a wetland cannot be created that will function as a substitute for a natural wetland. The language in the city comp plan to include creation of wetlands as a substitute for natural wetlands is bad science.**

**The National Academy of Science published a report in July 2001 stating that created wetlands are no match for the original and that loss of wetlands throughout the United States over the past 20 years is attributed to this bad policy. I have not seen any recently published papers in peer reviewed journals that refute the findings of the National Academy of Sciences.**

**Even local experts will agree that created wetlands are not a substitute for natural wetlands. Wetlands in this area have taken hundreds of thousands of years to create.**

**There are people who say they can create artificial wetlands. These are not functional wetlands. Attempting to make wetlands someplace else in the city or county to substitute for destroyed natural wetlands that filter drinking water into our city's wellfields is bad science. There is no evidence to substantiate the theory that this form of mitigation works. There is overwhelming evidence from the nation's top scientists and over 20 years of data that says that this policy only results in the loss of wetlands.**

**The definition of mitigation from the State of Florida doesn't mention creation as a part of mitigation, only restoration, enhancement and preservation. Nielsen's wetland policy actually proposes lower standards than the county wetlands policy. Created wetlands are not even ~~an option~~ <sup>possible</sup> under the new Alachua County Comprehensive Plan.**

**Certainly the city needs to be even more protective of our natural wetlands since our wetlands help recharge the city wellfields and provide drinking water for our citizens. I don't know how we can have a comprehensive plan that is based on bad science with no evidence that it works....only evidence that it doesn't.**

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**I would like to thank the commissioners and the staff for having this workshop. I would also like to thank the staff for being helpful in providing materials and information concerning the comprehensive plan.**

**The information I will be talking about is in the Data and Analysis report of the Conservation Plan. This report was written by various staff members using scientific data and analysis provided by experts in the field, the SJWM, and other agencies. This report provides information and principles upon which the comprehensive plan is based. The recently proposed wetland policy by the city commission does not reflect the city's own data and analysis.**

**On page 14 of the Data and Analysis report it clearly states that the wetlands in the city are (this is a quote) "an important component of the ecology of the urban area."**

**Map #4 from the data and analysis report map series is called Environmentally Significant Land and Resources. This map clearly shows that the recharge rate to the Florida Aquifer from the area within the City of Gainesville is more than 12 inches per year. This, according to the city's own data, equals one half million gallons a day of recharge per square mile within the city. The city of Gainesville is identified in the data and analysis report as a major natural ground water recharge area.**

**Map #3 shows that most of Gainesville is in the Perforated zone which allows water access to the Florida Aquifer. Some of our citizen advisors would like us to believe that our wetlands sit on a bed of clay so they cannot function. This is not true according to the city's own data and analysis. On page 23 it is stated that (this is a quote) "single component beds (that is-pure clay) are uncommon" end quote.**

**The importance of preserving and protecting our wetlands at the site where they naturally occur has become even more important to this community. From the city's own data and analysis report Page 30....(this is a quote) " The predominate direction of groundwater flow under the city now appears to be toward the northeast and the wellfield's expanding cone of depression." End**

**quote. This clearly indicates that our Murphree wellfield water is recharged by the aquifer under our city which flows into the city wells as water is pumped out.**

**The data and analysis report makes it clear that our drinking water source comes from the recharge capabilities within our city. It would be folly to imagine that we can afford the destruction of the natural wetlands within the city and relocate the wetlands somewhere in the county. This action can only have a negative impact on our drinking water source. It is clearly imperative that we preserve our city's natural wetlands at their natural site.**

**There is a lot of useful and interesting information in this data and analysis report. However, this report was written well before the land mark study on wetlands was published by the National Academy of Sciences in July of this year. The study was based on over 10 years of research and data collection from throughout the entire country. This study concludes that functional wetlands cannot be created. It underscores that there is no substitute for preserving natural wetlands. Most importantly, the science does not exist to support claims of people who say they can create functioning wetlands with no negative impact at the site where they naturally occurred. Destruction of a wetland and attempting to mitigate more wetlands, can only result in the loss of irreplaceable wetland acreage.**

**We can not afford to make the mistake of experimenting with this city's wetlands that provide us with clean drinking water. To make this mistake is clearly not in the interest of the health, safety or welfare of the citizens you were elected to represent.**