

12/10/01 submitted by
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200882

Gainesville City Commission Meeting
December 10, 2001
Comments Re: Preservation of the City's Wetlands
by Francine Robinson

In order for the City of Gainesville to comply with state law regarding its Comprehensive Plan, the City must base its conclusions on standards, findings, data and other supporting components which must be included in the Plan. This requirement can be found in the Florida Administrative Code 9J5-005 (2) (a). Yet, thus far, the record demonstrates that the Nielsen wetlands policy has not been substantiated by the objective information required by the Florida Administrative Code.

It is especially significant that the wetlands of Alachua County are highly concentrated in the City of Gainesville. Outside of the city the wetlands are more scattered as drier areas are encountered. Within the boundaries of the City of Gainesville, according to City figures, there are some 3,370 acres of existing, natural wetlands. 289 of these wetlands are one acre or more in size. Does the City have figures for the number of wetlands smaller than one acre? Does the City have figures for the total acreage of wetlands that have been destroyed within the City of Gainesville since 1975? Does the City have figures to indicate which of the undeveloped lands contain wetlands? Which of the developed lands? Restoration of injured wetlands has not been addressed as yet.

Statements have been made here alleging that the city's smaller wetlands do not function, function poorly or are contaminated, but these statements are unsupported.

Further, the City's proposal does not match the County's higher standard which protects all wetlands, no matter how small. Created wetlands are not an option in the County's wetlands policy although the Nielsen policy provides that as a choice. This, notwithstanding the July 2001 publication by the National Academy of Sciences stating that created wetlands cannot substitute for natural wetlands.

This has not been addressed although the City's own Data and Analysis Report (DAR) emphasizes the importance of retaining small wetlands. No analysis has been provided assessing the consequences of past destruction and loss of wetlands nor has the City provided any ratios regarding wetland acreage and the amount of water discharged into our aquifer. The Data and Analysis Report of the City makes clear that the water filtered through our city wetlands flows into our city's wellfields.

Citizens of Gainesville have not been given any reasons why City Commissioners should adopt the Nielsen proposal that will allow destruction of our wetlands on a scale not seen under our current Comprehensive Plan. The current Plan language of "no net loss of function onsite" has inhibited wide-scale destruction but the Nielsen policy will open the way for wholesale wetlands elimination. Yet City Commissioners have not demonstrated the hydrologic rationale for permitting wetland destruction in the City but "mitigating" offsite, even as far as out in the county.

The City has not addressed the potential, cumulative impact of the destruction of existing wetlands on our clean drinking water and on our stormwater management. Neither short nor long-term consequences have been discussed. We are asked to

accept the Nielsen wetlands policy without the required substantive information.

How can we legally or rationally vote to transmit to Tallahassee an element lacking in the substantive data required by law?

We also need to have the Nielsen policy contrasted with our current policy to determine what we gain or lose by substituting the Nielsen policy for our current policy; or indeed, with an alternate policy. What are the specific numbers, volumes, ratios, etc. of wetlands loss in relation to replenishing our aquifer? Which wetland areas would be affected by the Nielsen policy? Which would not? Restoration of injured wetlands has not yet been addressed.

The City has not addressed the future of those wetlands that have previously been protected under the current Comprehensive Plan but will be subject to destruction under the Nielsen "mitigation" policies. Wetlands on already developed properties could be destroyed because the so-called "mitigation" policy will no longer require onsite "mitigation". The developer can destroy city wetlands and "mitigate" out in the county. The result will be a net loss to Gainesville and our citizens because our drinking water and stormwater management depend on the city wetlands.

The Nielsen wetlands policy has not yet brought forward solid data to indicate how it will better protect the wetlands, the drinking water resources and the health and welfare of Gainesville's citizens. The most logical path would be to preserve the natural wetlands both in the city and the county.