

COMMUNITY & ENVIRONMENTAL DEFENSE SERVICES

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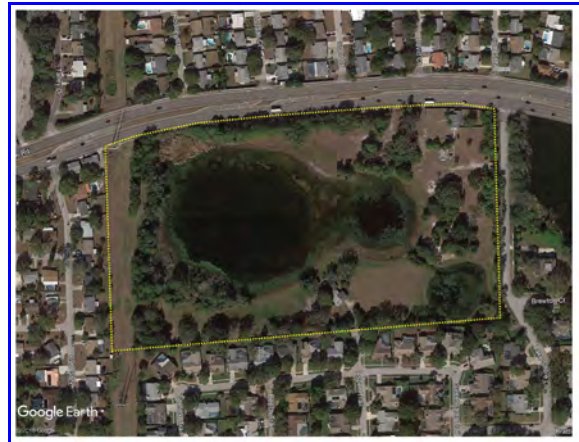
March 28, 2018

Lauren Matzke
Long Range Planning Manager
Planning and Development Department
100 South Myrtle Avenue
Clearwater, Florida 33756

RE: 3474 Aspen Trail Environmental Comments

Dear Ms. Matzke:

I am assisting the Trails of Countryside Homeowners Association with concerns regarding the 3474 Aspen Trail rezoning-annexation request. The 24.5-acre tract owned by the applicant, Mr. Benjamin Roddey, III, is shown in the 2017 aerial photo to the right. Trails of Countryside residents live in the neighborhood seen to the south of the tract.

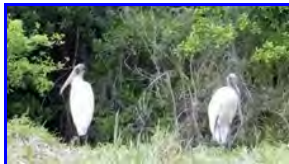


While Association members would prefer to preserve the 24.5-acre tract in the current, mostly natural state, they also respect the owners right to make use of their property. Of greatest concern is preserving the quality of the onsite stormwater management facility known locally as Aspen Trail Lake. In these comments I offer suggestions for how the owner could develop the site in a way that achieves his goals and preserve Aspen Trail Lake too. These suggestions were offered to the owner's representatives at a recent meeting. The Association is awaiting the owner's response.

Map A-11, in the City of Clearwater Comprehensive Plan, shows that the 24.5-acre tract contains a wildlife *Hot Spot* (Multiple Species Habitat). Hot Spots are described as

"Representing biological diversity, created by aggregation of predictive habitat maps for wading birds, important natural communities, and 44 focal species. It also includes known species and community locations."

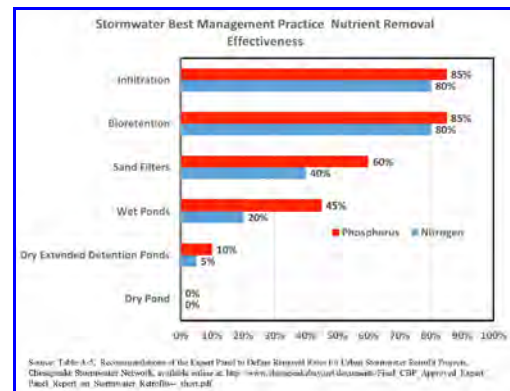
Pictured to the right is one of the Bald Eagles frequenting Aspen Trail Lake. Other wildlife observed on the site includes: gulls, many varieties of ibis, red tail hawks, chuck-wills-widow, raccoons, otters, turtles, Florida scrub jay, mourning doves, Pileated woodpeckers, red headed woodpeckers, Cardinals, Roseate Spoonbills, Moorhens, Great Egrets, and coyotes.



Pictured to the left are two of the many Wood Storks that frequent Aspen Trail Lake. This species (*Mycteria americana*) is considered threatened by the U.S. Fish & Wildlife Service and the Florida Fish & Wildlife Conservation Commission.¹

Association members are concerned that the proposed development of the site would result in the loss of much of the trees, shrubs and other habitat elements which allowed the Aspen Trail Lake tract to attain wildlife Hot Spot status. Additionally, conventional development could substantially increase stormwater pollutant loads to Aspen Trail Lake. The rise in pollutant loadings would result from an increase in the area of rooftops, streets, and other impervious surfaces draining to the Lake.

The graph to the right compares nutrient removal efficiencies for the six most common stormwater Best Management Practice (BMP) categories.² The efficiencies presented in this graph mirrors those provided in Appendix D, of the *Pinellas County Stormwater Manual*.³ The graph shows that bioretention and other infiltration practices are the most effective BMPs with regard to keeping nutrients out of downstream waters. These practices are also the most effective with regard to other stormwater pollutants and maintaining groundwater recharge.



On the next page is the USDA Web Soil Survey map for the 24.5-acre Aspen Trail Lake tract. Added to the map is the Depth to Water values from Web Soil Survey.

¹ See the Florida Fish & Wildlife Conservation Commission Wood Stork webpage at: <http://myfwc.com/wildlifehabitats/imperiled/profiles/birds/wood-stork/>

² The data presented in this graph is from Table A-5, *Recommendations of the Expert Panel to Define Removal Rates for Urban Stormwater Retrofit Projects*, Chesapeake Stormwater Network, available online at: http://www.chesapeakebay.net/documents/Final_CBP_Approved_Expert_Panel_Report_on_Stormwater_Retrofits--_short.pdf

³ The Pinellas County Stormwater Manual is available online at: http://www.pinellascounty.org/plan/stormwater_manual.htm

Soil Map—Pinellas County, Florida
(Aspen Trail Lake Soils Map)



The *Pinellas County Stormwater Manual* calls for a minimum of two feet of unsaturated soil beneath practices utilizing infiltration to achieve a high pollutant removal efficiency. Since these practices extend two- to four-feet below the soil surface, a minimum six-foot Depth to Water would be needed to accommodate highly-effective stormwater BMPs. The Web Soil Survey map shows that a Depth to Water of six-feet or more only exists in the five acres located in the northeast portion of the tract. Concentrating development in this portion of the site would allow treatment of impervious surface runoff with highly-effective BMPs. This layout would allow development of the site with far less stormwater impact to Aspen Trail Lake and make it possible to preserve the most important wildlife habitat on the tract.

The 24.5-acre tract is located in the Curlew Creek watershed. The Florida Department of Environmental Protection has determined that Curlew Creek suffers from diminished dissolved oxygen levels due to excessive nutrient inputs.⁴ Concentrating development on the best soils on the tract would not only protect Aspen Trail Lake but Curlew Creek as well from increased nutrient inputs.

In summary, concentrating development in the northeast portion of the 24.5-acre tract would allow treatment of stormwater runoff with the most effective BMPs. Rezoning the remainder of the tract Preservation would safeguard existing habitat and open the door to creating more high-quality wildlife habitat. The net result would be improvements to this wildlife Hot Spot and a reduction in pollutant loads to Aspen Trail Lake and Curlew Creek.

Of course this is but one of several possible scenarios for accommodating a reasonable degree of development on the site while preserving the environmental resources essential to maintaining the high quality of life enjoyed by Trails at Countryside Association members and other City of Clearwater residents. The Association is anxious to work with the City and Mr. Roddey to find a mutually beneficial solution. Association representatives would deeply appreciate an opportunity to meet with you to explore how the interests of all parties can be met.

Sincerely,



Richard D. Klein

cc: Mr. Paul Keleti, Trails of Countryside Homeowners Association
Mr. Benjamin Roddey, III

⁴ Dissolved Oxygen and Nutrient TMDL for Curlew Creek Tidal Segment, WBID 1538, available online at: <https://floridadep.gov/sites/default/files/curlew-tidal1538-donutr-tmdl.pdf>