



City of Naples

STREETS & STORMWATER DEPARTMENT

NATURAL RESOURCES DIVISION

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November 22, 2019

Ms. Kaitlyn Sutton
Florida Department of Environmental Protection
2600 Blair Stone Rd MS# 6511
Tallahassee, FL 32399

Ms. Sutton:

Please find below comments from the City of Naples (Collier County) regarding the 2019 Triennial Review of Florida's Water Quality Standards:

Naples Bay (3278R4):

- This estuary, bounded by Gordon Pass to the south and the US41 bridge to the north, is currently classified as a Class II waterbody (Shellfish propagation/harvesting). Whereas this estuary historically had shellfish harvesting as a compatible use, it is now highly urbanized, the watershed is greatly altered and increased (it now also receives drainage from a large urban/semi-urban upland watershed), and it has no shellfish harvest areas. Since Naples Bay has experienced an 80% loss in oyster beds due to urbanization impacts since the 1950s, with a busy federally-maintained navigation channel, it is anticipated that oyster harvesting will not be a compatible use into the future and any restoration efforts that are conducted will not have harvesting as an ultimate goal. In addition, the Gordon River (Marine Segment, 3278R5), bounded by the US41 bridge to the south and the Golden Gate Canal/Gordon River Extension (3278K) to the north, is a Class III waterbody and is contiguous to Naples Bay. Therefore, the City recommends reclassifying Naples Bay from a Class II to a Class III (Fish Consumption; Recreation, Propagation and Maintenance of a Healthy, Well-Balanced Population of Fish and Wildlife) waterbody as it is more representative of the current and anticipated future use of the waterbody.

Moorings Bay (3278Q2):

- This bay, bounded by Banyan Blvd. to the south and Seagate Dr. to the north, is currently categorized as a Class II waterbody (Shellfish propagation or Harvesting). Whereas this bay historically had shellfish harvesting as a compatible use when it was a mangrove wetland with tidal creeks, it is now highly urbanized with armored shorelines, numerous stormwater pipes discharging into the waterbody, and has no shellfish harvest areas or oyster reefs remaining. The Class III (Fish Consumption; Recreation, Propagation and Maintenance of a Healthy, Well-Balanced Population of Fish and Wildlife) designation is more representative of the current and anticipated future use for this waterbody, therefore it is the recommendation of the City to reclassify Moorings Bay from a Class II to a Class III waterbody.
- The map boundary for this waterbody should encompass surface waters bounded to the north by Seagate Dr. and Banyan Blvd. to the south. The current boundaries as shown by DEP in the new Class II mapping effort has the southern boundary ending at the Mooring Line Dr. bridge and excludes the remainder of the waterway to the south of that bridge.

Sincerely,



Katie Laakkonen

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