

**WRAC Issues Committee  
Comments on the  
Long-term Plan**

*August 11, 2003*

## **Comments Received**

- **Audubon of Florida**
- **Arthur R. Marshall Foundation and Florida Environmental Institute**
- **Florida Fish and Wildlife Conservation Commission**
- **Broward County Department of Planning and Environmental Protection**

# Audubon of Florida 1 of 3

## 1. Peer and public review

- Extensive review of March 2003 Plan has been completed
- *Annual review of future revisions (add to Plan)*

## 2. Consistency with Settlement Agreement

- Plan is consistent with and adds to the phosphorus control program
- *Will clarify Plan consistent with amended EFA*

## 3. Consistency with State and Federal mandates

- Intent is for the Plan to be consistent

## 4. Minimal effect on schedule and budget of CERP projects

- Plan has positive effect on schedule
  - Recommends acceleration of some CERP projects
  - Completed technical analyses that are available to CERP
- Intent is for Plan to have no effect on Federal cost share of CERP projects
  - *Will clarify Plan consistent with amended EFA*

## **Audubon of Florida** 2 of 3

- 5. Analysis of alternatives for compliance with criterion**
  - Plan calls for continuous improvement of water quality until criterion is achieved
  - *Plan will be revised to add additional PSTA projects*
- 6. Compliance with water quality standards**
  - Plan is designed to achieve compliance
- 7. Planning Objective**
  - *Plan will be revised to be consistent with amended EFA*

## **Audubon of Florida** 3 of 3

- 8. Utilize adaptive implementation**
  - Plan calls for continuous improvement of water quality until criterion is achieved
- 9. Enhanced BMPs**
  - Plan contains \$3.3 million for enhanced BMPs
  - *Investigating additional resources to be added to Plan*
- 10. Enhanced STAs**
  - *Plan will be revised to increase PSTA acreage*
  - Additional enhancements and expansion, if needed will be part of Post-2006 projects
- 11. Contingency Plan needed**
  - Post-2006 projects are the contingency plan

## **Arthur R. Marshall Foundation & Florida Environmental Institute**

- 1. Concur with Audubon comments**
- 2. Implement trees as BMPs**
  - District applauds efforts of ARM Foundation in planting trees
  - Trees have greatest value as habitat diversity, not P removal
- 3. Show input-output of existing STAs**
  - STA performance included in annual consolidated reports
  - Plan focuses on enhanced performance
- 4. Consider cost effectiveness**
  - Agree; this factor was evaluated in basin studies
- 5. Add list of acronyms**
  - Agree; *will add list of acronyms*
- 6. Mention CERP goals and objectives**
  - Agree; *will revise Plan introduction*

# Florida Fish & Wildlife Cons. Comm.

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- Issue 1 – Insufficient detail on current and future research objectives, particularly related to CERP
  - Plan includes numerous research projects and >\$30 million, including interactions with CERP projects
  - Plan includes developing models to predict impact of STA discharges on Everglades
  - *Plan will be revised to include more PSTA projects*
  - Studies indicates that trees have lower long-term TP removal performance

# Florida Fish & Wildlife Cons. Comm.

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- **Issue 2 – No clear statement of how Plan will achieve water quality goals other than monitoring and modeling**
  - **Plan includes extensive STA structural modifications by Dec. 2006 including levees, structures, & vegetation conversion**
  - **Plan includes enhanced source controls, STA operations and maintenance, including additional STA site managers and aggressive vegetation management program.**
  - ***Plan will be revised to achieve the criterion in the EPA***
  - **A Post-2006 set of projects will be defined if the Pre-2006 do not achieve the objective**
  - **District staff implementing Plan are working closely with CERP staff to ensure goals of both are met. Studies performed in support of the Plan have been (and future ones will be) provided to the CERP PDTs for consideration during alternative development and evaluation phase.**



# Florida Fish & Wildlife Cons. Comm.

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- Issue 3 – Adherence to the P-criterion adopted by ERC
  - *The Plan will be revised according to direction provided in the amended Everglades Forever Act to indicate a planning goal and objective of achieving the phosphorus criterion in the Everglades Protection Area*
- Issue 4 – Administrative Procedures
  - *Plan will be revised to include the process for revising the Plan*
  - Information on TOC can be provided
  - Awaiting guidance from Governing Board concerning role of WRAC

## **Broward County Department of Planning and Environmental Protection** 1 of 4

- **Plan relies on CERP to achieve water quality standards, yet CERP schedules are uncertain**
  - **Legislature directs Plan to be integrated with CERP to avoid unnecessary and duplicative costs**
  - **CERP projects are authorized and progressing**
- **Source controls need to be integrated with CERP and STA enhancement**
  - **Plan recommends source controls in every basin**
  - **Specifics will be worked out with basin stakeholders**

## **Broward County Department of Planning and Environmental Protection** 2 of 4

- **Clear goals and milestones should be established**
  - **Progress of Everglades Stormwater Program is documented in annual Everglades Consolidated Report**
- **Plan lacks commitment to meet water quality standards by 2006**
  - **Disagree – the Plan contains the most scientifically defensible projects for implementation by 2006, including enhanced source controls, and integration with CERP projects**
  - **Additional scientific investigations for Post-2006 if needed**

## **Broward County Department of Planning and Environmental Protection** 3 of 4

- 1. Raise priority of source controls in Pre-2006 Strategy**
  - *Plan will be reviewed/revised as appropriate*
- 2. Broward County working group could be created**
  - **Excellent idea! District can provide technical assistance**
- 3. Develop comprehensive pollution prevention plan**
  - **Excellent recommendation for working group**

## **Broward County Department of Planning and Environmental Protection** 4 of 4

- 4. Assist local water districts improve water quality**
  - District has cooperative agreements with all local districts, including water quality requirements
- 5. Consider rulemaking and regulatory programs when needed**
  - Agree; see above
- 6. Provide funding for local pollution prevention**
  - Plan contains over \$950,000 for Broward County pollution prevention programs
- 7. Projected expenditures for C-11W basin should be re-evaluated**
  - Plan provides over \$750,000 for C-11W Basin activities
  - Broward County working group could integrate funding from local agencies

## **Other Major Revisions**

- ***Will remove objectionable terms***
  - **Maximum extent practicable**
  - **Earliest practicable date**
- ***Will add Implementation Schedule section to clarify project schedules***
- **Draft revised Plan available September**
  - **September 25: STA Design Review Staff mtg**
- **Plan to go to Governing Board in November as part of long-term permit application**

# **Future Revisions Proposed Process**

- **Quarterly communications meeting**
  - **STA Design Review meeting**
- **February: annual public meeting**
- **March: District to submit proposed revisions to DEP**
- **May: DEP approval of revisions**
- **September: Everglades Consolidated Report peer-review and workshop**
- **September: Governing Board approves budget**