



*Florida Department of
Environmental Protection*

Everglades West Coast BMAP Public Meeting

October 25, 2012

South Florida Water Management District

2301 McGregor Boulevard, Ft. Myers, Florida 33901



Agenda

- Introductions and Introductory Comments
- Review of Draft BMAP Process
- Major Comments on Draft BMAP Document
- BMAP Next Steps
- Questions



October 25, 2012



Stakeholder Involvement

- Kickoff Meeting - July 2009
- Technical Meetings (5)
 - September 2009
 - February 2010
 - September 2010
 - March 2011
 - December 2011
- One-on-One Meetings and NPDES MS4 Discussions





BMAP Draft Process and Schedule

- Draft BMAP to stakeholders for review –
August 15, 2012
- Comments on Draft BMAP due to FDEP –
September 17, 2012
- Policy briefing on Draft BMAP –
August 31, 2012
- Public meeting on Final Draft BMAP –
October 25, 2012





BMAP Draft Process and Schedule

- Letters of commitment due for inclusion in BMAP package to FDEP Secretary

November 26, 2012

- Brief FDEP Secretary on BMAP and obtain Secretarial approval
- Notify interested parties and place FAW notice
- End of challenge period (21-days after notice)
- BMAP adopted and enforceable (if there are no challenges)



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Basin Management Action Plan (BMAP) Introduction



Total Maximum Daily Loads

- Both Hendry Creek and Imperial River impaired for Dissolved Oxygen at the time of TMDL
- TMDL defined Total Nitrogen as the cause



TMDLs

Hendry Creek

Freshwater Segment

- TN Target = 0.74 mg/l
- Load Reduction = 32%

Marine Segment

- TN Target = 0.6 mg/l
- Load Reduction = 44%

Imperial River

Freshwater Segment

- TN Target = 0.74 mg/l
- Load Reduction = 24.87%

No definition of loading sources, differentiating WWTP, stormwater and agricultural sources.





Adjustment of TMDL in BMAP

- For purposes of initial allocation, loading assigned to stakeholders based on land uses
- Allocation based on relative amount of developed (non-natural) loading

Hendry Creek

- Lee County
- Catalina
- FDOT
- Agriculture

Imperial River

- Lee County
- Bonita Springs
- FDOT
- Agriculture





Basin Management Action Plan [403.067(7)]

- Document a phased approach to achieve adopted TMDL
- Itemize initial set of TN load reduction activities and projects
- Identify needs for additional study and monitoring
- Allow for participation of stakeholder, partners and interested parties





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BMAP Document



BMAP Outline

- Executive Summary
- Chapter 1 – Context, Purpose and Scope
- **Hendry Creek/Imperial River**
- Chapter 2/8 – Basin Setting
- Chapter 3/9 – Pollutant Sources and Anticipated Outcomes
- Chapter 4/10 – Detailed Allocations
- Chapter 5/11 – Management Actions
- Chapter 6/12 – Assessing Progress and Making Changes
- Chapter 7/13 – Commitment to Plan Implementation



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Anticipated Outcomes

- Improved water quality trends in Hendry Creek and Imperial River
- Decreased loading of TN
- Increased coordination
- Additional data on the Benefits of TN reducing projects
- Additional data to improve the DO TMDL in next phase





Potential Load Reduction From Projects

Hendry Creek

- Estimated Stormwater Loading Reduction Required = 10,147 lb/yr (Urban load only)
- Estimated TN Load Reduction by 9 Projects and Activities = 6,665 lb/yr (~66%)

Imperial River

- Estimated Stormwater Loading Reduction Required = 11,554 lb/yr (Urban load only)
- Estimated TN Load Reduction by 17 Projects and Activities = 5,212 lb/yr (~45%)

Note that loading reduction required does not include agricultural loads for this comparison.





Assumptions and Considerations

- Load reduction credits for projects completed or planned since January 2000
- 2004 Florida Land Use and Cover Classification System (FLUCCS) data were used to represent “existing” conditions
- The loading from septic tanks (failing or otherwise) was not included
- The need to revisit the DO TMDLs is recognized by FDEP in the BMAP





Regulatory Nature of BMAP

- A BMAP is developed collaboratively with stakeholders [§403.067(7)]
- Point Sources: WWTF and MS4 Permits
- Nonpoint Sources: BMAP Itself Enforceable
- Agriculture: BMPs and monitoring required
- BMAP adopted by Secretarial Order





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Major Comments on Draft BMAP Document



Change in WBID Boundaries

- FDEP acknowledged in the BMAP the change in WBID boundaries done recently as well as change to marine for Hendry Creek –
[Description and details of change in appendix](#)
- Effects of change will be addressed in next phase
- Note: TMDL had higher reduction for marine segment; however, FDEP used lower reduction due to issues in the TMDL





Potential Change in DO Standard

- FDEP's TMDL is based on the current DO Standard
- Should the DO Standard be changed, the TMDL and BMAP will be modified accordingly



Septic Tank Credit

- FDEP recognizes that failed septic tanks may discharge TN load to Hendry Creek and Imperial River.
- Magnitude and impact are unknown at the present.
- With additional modeling and information, value of septic tank remediation will be re-evaluated.



Controls on New Development

- All of the existing loading was considered in BMAP
- As a result, growth must not increase the TN load:
 - Post-development load = Existing development load; or
 - Increase in development load matched with decrease





Credits for Low Impact Development

- Low Impact Development (LID) practices are encouraged, not required.
- As more information gained on LID TN reduction, value of LID credits will be re-evaluated.



Consideration of All Sources

- FDEP recognizes that the TMDL did not fully address all potential sources of TN
- The focus of the BMAP is on the stormwater sources; other sources will be included in the reconsideration of the TMDL in the next phase



CDD's and HOA's

- Discussed during the development of the BMAP as well as with NPDES Section at FDEP
- BMAP prepared based on current MS4 co-permittees – if and when this is changed, the BMAP will be modified accordingly.





“Ranchettes” – Whose are They?

- “Ranchettes” are small properties with an agricultural tax exemption but are not bona fide commercial agricultural operations.
- Not under FDACS responsibility
- Clarification of responsibility needs to be worked out in next BMAP cycle



Groundwater Monitoring

- A brief description of the Groundwater Monitoring Study has been added to the text.



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Next Steps



Stakeholder and FDEP Staff Actions

Action	Responsible Party	Date
Public meeting on Final Draft BMAP	Public/FDEP	October 25, 2012
Letters of commitment due for inclusion in BMAP package to FDEP Secretary	Policy Makers and Technical Stakeholders	November 2012
Notify interested parties and place FAW notice	FDEP	December 2012



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