

LAKE JESUP BMAP: REQUIREMENTS AND PROJECT COMMITMENTS

DRAFT – August 2008

This paper expresses how each Lake Jesup BMAP allocation entity can meet their reduction obligations through project commitments in the first iteration of the BMAP. The text describes the meaning of project commitments for the three primary categories of BMAP projects: 1) completed/funded local projects, 2) planned local projects, and 3) cooperative Interagency Strategy Projects. "Interagency Projects" refers to the five projects identified in the Lake Jesup Interagency Restoration Strategy (SJRWMD, DEP, & FWC; January 2008).

Reduction Requirements

- Allocation entities are ultimately responsible for the full 8.9 MT total phosphorus reduction identified in the TMDL (7.4 MT from stormwater; 1.5 MT from septic tanks).
- The project list will describe the implementation timetable for each project. This timetable may exceed the implementation horizon for the first BMAP iteration (approximately five years). As the BMAP is updated, the project list and schedule will be refined to reflect current feasibility, cost, and load reduction needs.

Allocations

- One allocation and load reduction requirement will be assigned per entity. Each entity will be responsible for a portion of the 7.4 MT stormwater reduction, calculated on a load-weighted basis using the updated surface runoff loading values. The 1.5 MT septic tank reduction will be allocated among local governments, on a load-weighted basis using septic tank loading values. DOT, agriculture, the Turnpike Authority, the Expressway Authority, and Sanford's Site 10 stormwater required reductions will not include a septic tank component.

Projects and Commitments

- Entities can meet their allocation obligation through a combination of local projects (stormwater or wastewater, as appropriate) and/or shared participation in Interagency projects.
- All projects and their associated load reductions and the implementation timeline will be clearly identified by entity (or entities for shared projects) in the BMAP. Projects applicable to MS4 permits will be identified as such. The implementation horizon for projects may extend beyond the approximate 5-year time horizon of the first iteration of the BMAP.
- For all projects, credits will be calculated using the Department's methodology for approved project types. Further, only reductions achieved over and above regulatory requirements will be eligible for credit toward individual allocations.
- Lake Jesup BMAP Project Types
 - Local Completed/Funded Projects: Allocation entities have completed a number of projects since termination of the TMDL period of record. Provided that they meet project sufficiency requirements, projects that have been completed or have formal funding commitments in place (e.g. identified in a local government CIP) will be fully credited in the BMAP. Entities will be fully responsible for implementing these projects on the schedule identified in the BMAP, as outlined in 403.067(7) F.S.
 - Local Planned Projects: Entities for whom completed/funded projects are insufficient to meet their required reductions have been asked to identify additional projects. These include local projects that are planned, but have not yet received formal funding commitments from the entity. Entities are expected to pursue these projects

in good faith, which includes proposing a schedule that provides reasonable time to secure funding. With a schedule in place, these projects will be credited in the BMAP and entities will be fully responsible for implementing these projects within the scheduled timeframe, similar to the completed/funded projects.

- Interagency Projects: Entities may commit to participate in the Interagency Strategy projects to achieve a portion of their required reduction. As these projects are regional and targeted at areas of high nutrient concentrations, they are expected to be very cost-effective in terms of cost per pound phosphorus removed. Based on current estimates and assuming full feasibility, there is sufficient capacity in the regional projects to meet the load reductions required in the BMAP. Thus, entities that cannot meet their reductions with local efforts will list the remainder of their responsibility in the Interagency Project category. As the feasibility of the Interagency Projects is determined by SJRWMD and the projects begin to move forward, BMAP allocation entities will meet to clarify the details of their commitments to each project. Regardless of the feasibility of the Interagency Projects, allocation entities retain the flexibility to change their level of commitment and meet their required reductions through local projects, as described below.

Interagency Strategy Details

- SJRWMD is committed to moving forward with studying the feasibility of the Interagency projects in detail. This information is critical to the long-term viability of these projects as an option for meeting BMAP reduction requirements.
- Preliminary cost numbers for the Interagency projects are provided in the Strategy to allow entities to evaluate their cost effectiveness, relative to local projects. These costs were based on the best information currently available and are subject to change as the feasibility studies are completed and the projects mature.
- As the Interagency Strategy feasibility studies are completed, the Working Group will come back together to further negotiate the details of entity commitments. If an Interagency project is determined by SJRWMD, DEP, or FWC to be infeasible due to physical, technical, or other limitations, the entities relying upon that project to meet their BMAP obligation will have 12 months to provide alternative projects and a schedule to meet that portion of their required reduction.