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December 9, 2010

Carol Wehle
Executive Director
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL
Via Email: cwehle@sfwmd.gov

Subject: Lake Okeechobee Protection Plan 2011 Update Recommendations

Dear Ms. Wehle:

Attached is Audubon's letter making detailed recommendations on the draft revision of the Lake Okeechobee Protection Plan.

On October 21, 2010, I wrote to you with our preliminary recommendations, upon which we based our comments on the draft issued by South Florida Water Management District on November 9th.

Having reviewed the draft LOPP changes prepared by your staff, our concern is heightened that the serious problems of Lake Okeechobee, and the downstream estuaries and Everglades will not be resolved by this plan.

The table below, which is taken from page 54 of the Draft LOPP reveals the gravity of the situation. You can see from this table that the phosphorus nutrient imports to the Okeechobee watersheds remain at 6,088 tons. While there is an apparent reduction from previous years of phosphorus loading for row crops and sugarcane, which account for most of the difference, the report text suggests that the reasons for this change may be temporal and related to reduced production in row crops for economic reasons, and a different measurement system accounting for phosphorus in sugarcane. Most notably, the largest land use category in the table listed (improved pasture at 714,245 acres) showed a 15% increase in phosphorus loading. The report text attributes this to inputs accounted for due to sewage residual land spreading. We have repeatedly communicated with both the South Florida Water Management District and the Department of Environmental Protection regarding the significance of sewage residuals (biosolids) in the Okeechobee basin. We continue to be concerned that DEP and SFWMD are not

moving aggressively enough to enforce the 2007 legislation intended to eliminate biosolids as a source of phosphorus loading in the Okeechobee Basin.

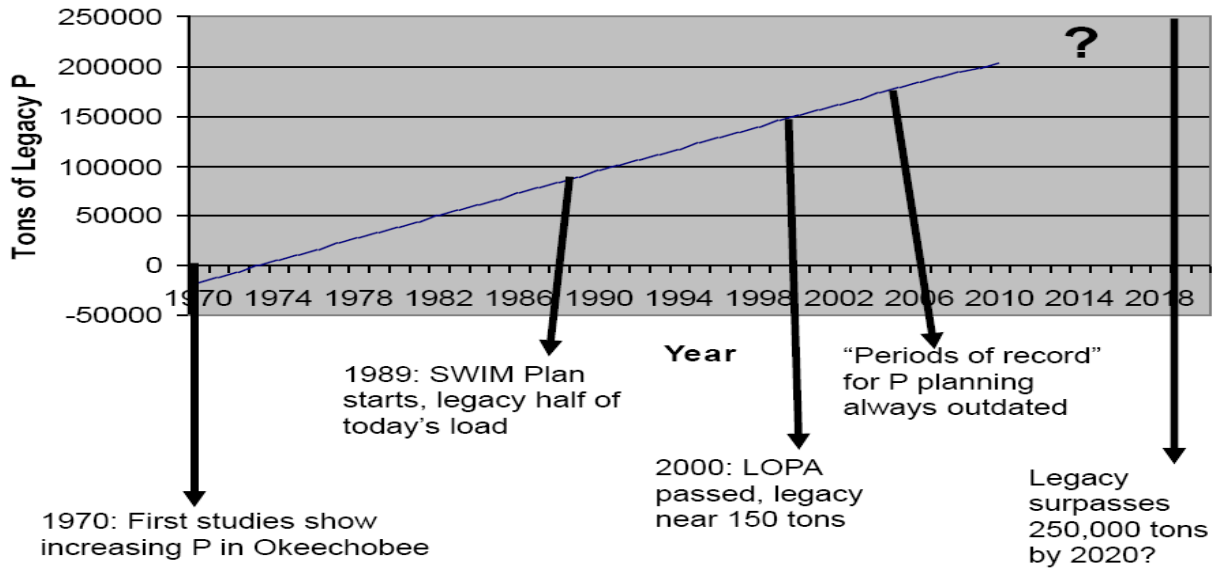
Table 4-2. Comparison of phosphorus (P) budget analyses.

Land Use	Previous 2002–2003 P Budget Analysis				Current P Budget Analysis			
	Area (acre)	Percent	Net P Import (mt)	Percent	Area (acre)	Percent	Net P Import (mt)	Percent
Barren Land	64,092	1.9%	—	0.0%	41,318	1.2%	—	0.0%
Citrus	250,755	7.3%	285	3.5%	245,790	7.1%	1,274	20.9%
Dairies	28,256	0.8%	504	6.2%	23,361	0.7%	470	7.7%
Improved Pastures	714,245	20.8%	1,672	20.7%	676,991	19.7%	1,916	31.5%
Other Areas	52,853	1.5%	434	5.4%	30,935	0.9%	170	2.8%
Row Crops	22,899	0.7%	1,845	22.8%	23,238	0.7%	309	5.1%
Sod	32,823	1.0%	(493)	(6.1%)	38,425	1.1%	(256)	(4.2%)
Sugarcane	399,836	11.6%	1,562	19.3%	399,213	11.6%	543	8.9%
Unimproved Pastures/ Rangeland	337,385	9.8%	2	0.0%	325,064	9.4%	(84)	(1.4%)
Upland Forests	416,214	12.1%	(14)	(0.2%)	392,200	11.4%	(36)	(0.6%)
Urban	281,633	8.2%	2,288	28.3%	410,397	11.9%	1,783	29.3%
Water Bodies	226,650	6.6%	—	0.0%	219,847	6.4%	—	0.0%
Wetlands	614,701	17.9%	—	0.0%	615,081	17.9%	—	0.0%
Total Acreage	3,442,141	100.0%	8,085	100.0%	3,441,861	100.0%	6,088	100.0%

Our concern about continued phosphorus loading in the Okeechobee watershed is also heightened by our understanding of the continuing accumulation of “legacy phosphorus” in the system. The graph below, prepared by Paul Gray of our science staff¹, shows the history and continued accumulation of legacy phosphorus which is happening regardless of the efforts that South Florida Water Management District and other agencies have undertaken.

¹ This graph used SWET’s 2007 estimate of 190,000 mt of legacy phosphorus and backdated likely legacy loads using Mock Roos import numbers, as well as SWET’s revised numbers for the past three years. The fact that the legacy load drops below zero in the 1970s shows some inaccuracies in our estimates, but does not change the general trend.

Legacy Phosphorus in Okeechobee's watershed



We believe that the continued accumulation of “legacy phosphorus” may be one of them most important indicators. The release of these “legacy phosphorus” deposits will eventually grow to outstrip annual reductions of phosphorus imports unless more decisive action is taken on a broad front, beginning with more aggressive source controls.

Audubon recognizes the challenging economic times for government budgets, however we believe that phosphorus loading and the rapid movement of surface water toward Lake Okeechobee is an issue of crisis proportions for South Florida. We commend the SFWMD for ramping up the distributed water storage effort this year, which will help slow flows toward the lake and allow increased water quality treatment, but recommend the agencies develop a clear and ambitious timeline to further ramp up to your stated goal of 450,000 acre feet.

At numerous places within the draft Lake Okeechobee Protection Plan released on November 9th, your staff has proposed to merely comment on the fact that the level of effort of the district and others on such crucial phosphorus reduction activities as Best Management Practice (BMP) implementation is being hampered or reduced by budget shortfalls. We believe it is incumbent upon the SFWMD in this plan to spell out in detail the specific budgets, actions, and policy changes that must be undertaken if the Lake Okeechobee watershed is to be rescued from eutrophic collapse.

Our attached detailed comments represent an attempt to make recommendations of the changes needed in the plan. We hope that you and the Governing Board will consider them seriously.

Sincerely,

Eric Draper

A handwritten signature in blue ink, appearing to read "Eric Draper". The signature is fluid and cursive, with the first name "Eric" and last name "Draper" clearly distinguishable.

Executive Director
Audubon of Florida