



# Audubon OF FLORIDA

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February 10, 2011

Members of the Governing Board  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, Florida 3340

Dear Governing Board Members:

This February, you will decide whether or not to approve the Lake Okeechobee Protection Plan 2011 update (2011 LOPP update) and send it to the Florida Legislature for approval.

The draft 2011 LOPP update does not provide a path to achieve compliance with the Lake Okeechobee TMDL, nor does it do enough to elaborate on specific approaches, funding and timelines to solve Lake Okeechobee's nutrient problems.

I support Audubon of Florida's recommendations for improving the 2011 LOPP update. Several critical recommendations are as follows:

The 2011 LOPP update should include recommended levels of funding and timelines for implementation, monitoring and enforcement of Best Management Practices.

Given clear evidence that phosphorus loading to Lake Okeechobee has not improved, the 2011 LOPP update should include a proposal for evaluating and revise the current BMPs.

The 2011 LOPP update should include proposals to evaluate and implement Edge of Farm treatment wherever it can be effective.

The elimination of biosolid use in the Lake Okeechobee Watershed should be encouraged. Class AA biosolids should be restricted to use only where site specific soil tests and plant tissue tests indicate the need for the nutrients found in their application under the BMP rule.

Dispersed Water Management projects are a cost effective approach to water storage and merit a funding plan and timeline that provides increased funding in future years.

The Lakeside Ranch Stormwater Treatment Area Phase I is nearing completion. Pre-treatment of these waters with a chemical precipitation process, or other treatment designed to reduce the phosphorus could substantially increase the project's effectiveness. Phase II should be postponed allowing funds to be reallocated to expedite Dispersed Water Management (DWM) projects that provide nutrient removal on a pay for performance basis.

Sincerely,

450 Signatories, attached