

Watershed Council

Southwest Florida Watershed Council, Inc.
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November 5, 2010

Ms. Beth Alvi
Department of Environmental Protection
Watershed Planning and Coordination Section
2600 Blair Stone Road, MS 3565
Tallahassee, Florida 32399-2400

Dear Ms. Alvi:

Members of the Southwest Florida Watershed Council (SWFWC) have participated in the ongoing Tidal Caloosahatchee BMAP Technical meetings. As such, we would like to take this opportunity to address some issues and to clarify some of the findings presented at the September 21, 2010 meeting in Ft. Myers.

An overall concern in the load identification and allocation process is the concept of background loading identified from natural land uses. In the examples presented, the background loading (NPS) represents 62.6% of the total TN load to the estuary from the tidal basin and the source was identified as natural land uses. The proportion of TN loading attributed to natural land uses in such a highly urbanized watershed is surprising. Please provide the natural land use types (e.g. FLUCCS codes or other land use designation types) that were referenced at the BMAP meeting that account for the majority of the TN loading. A map of these areas would also be helpful. Please also indicate what stormwater runoff and nitrogen runoff coefficients were used to calculate the TN load from natural land uses in the tidal basin.

We are also concerned that the allocation process will make inadequate progress towards meeting the tidal basin TMDL. The information presented at the meeting indicates that the first five year BMAP load reduction target for the eight entities listed is only 136,861 lbs. of nitrogen which is only a small fraction the 1,374,568 lbs. of nitrogen targeted for the tidal basin reduction under the TMDL.

We appreciated your consideration and await your response.

Sincerely,



James Evans, Chairman

Southwest Florida Watershed Council

C.c.: Mr. Nick Charnas
Mr. Scott McClelland

The mission of the Southwest Florida Watershed Council is to protect, conserve, manage and/or restore the land and water resources of the Caloosahatchee and Big Cypress Watersheds. Through increased awareness, participation and cooperation among all stakeholders in consensus building, planning and decision making, we are working to meet the economic, natural and cultural needs for this and succeeding generations.