APPENDIX 1
Public and Peer Review Panel Comments

Appendix 1-3
Authors Responses to Comments

Appendix 1-3k
Author's Response to Comments on Chapter 11

Chapter 11: Everglades Stormwater Program

Responses to Public and Peer Review Panel Comments

By Sharon Trost

Peer Review Panel Comments (by Goro Uehara) and Authors' Responses

Comment: There are seven steps in the development of the basin-specific feasibility studies and engineering designs. These steps are outlined on page 22 of Chapter 1, and progress towards their completion is provided on pages 7 to 12 in chapter 11. It is not clear from the content of these pages whether the program will complete the feasibility studies and designs by December 31, 2003. It might be useful in the next report to include a time chart showing where each step resides with respect to the December 31, 2003 completion date.

Response: The schedule for completion of basin-specific feasibility study milestones is currently being revised. A time chart indicating completion dates will be included in next year's Everglades Consolidated Report.

Comment: One wonders why the section on the Everglades Agricultural Area (EAA) is included in this chapter given that the EAA is not part of the non-ECP and the material has already been covered in chapter 5.

Response: Chapter 5 is mainly addressing BMP research in the EAA. The EAA Best Management Program has been incorporated into the Everglades Stormwater Program (ESP). For this reason a summary of the program is included in Chapter 11.

Comment: A basin by basin update of activities along with a summary of findings is provided. The report concludes that water discharging into the Everglades Protection Area (EPA) from the non-ECP basins is generally acceptable with the exception of P concentrations discharging from 3 of the 8 basins. This comes as a surprise because in the basin by basin descriptions, only one basin is cited for discharging water with high P concentrations. But in the end, the high P concentrations from the three basins are confirmed by data in the appendices.

Response: The Summary of Findings does indicate that phosphorus levels are generally acceptable in all but three basins. In addition, Table 11-1 and data in the appendices support that phosphorus levels are acceptable in all but three basins. The basin by basin section of the chapter only updates activities associated with the ESP and is not intended to summarize basin water quality.

Comment: The water quality monitoring data for all 8 non-ECP basins show remarkably few excursions except for total phosphorus and dissolved oxygen. In reviewing the data, one gets the feeling that too much effort has been expended in measuring dissolved oxygen, and more work needs to be directed toward establishing site specific alternative criteria (SSAC) for dissolved oxygen.

Response: Chapter 4 does indeed address dissolved oxygen and the activities and process that District and the DEP are implementing to establish appropriate state criteria or SSAC, which reflect conditions applicable to Everglades wetland systems.

Comment: It is not likely that attainment of the end-of-pipe default value of 10ppb will be economically feasible given the high P concentration of water draining into the Everglades Protection Area from agricultural and urban areas. Also the connection between phosphorus enrichment, biodilution of mercury and wildlife population may come into play in determining the optimum P concentration in the Everglades

Response: These comments are addressed in detail in other chapters of this report. Namely in Chapter 4, which addresses the determination of the phosphorus threshold concentration and in Chapter 8, which addresses advanced treatment technologies.

Comment: The Everglade Stormwater Program's effort to measure both flow volume and phosphorus concentration indicates that it considers phosphorus load rather than phosphorus concentration to be the critical water quality parameter.

Response: The ESP focuses on both phosphorus concentrations and loads. A phosphorus load reduction is mandated in the Everglades Forever Act (EFA). Rule 40E-63, Florida Administrative Code, addresses implementation of BMPs in the Everglades Agricultural Area (EAA) and the 25% phosphorus load reduction requirement over historical EAA load inputs.

Comment: Since sulfate-sulfur is involved in production of methyl-mercury, the ESP should follow the sulfur and mercury projects to determine whether discharge waters need to be monitored for sulfur.

Response: The ESP will monitor the results of the mercury research program (Chapter 7) to assess whether the water quality monitoring activities of the ESP will need to be modified. Currently, sulfate-sulfur is monitored at 33 ESP structures in accordance with FDEP permit number 06,502590709.