



October 10, 2017

Erin Rasnake, Program Administrator
Division of Environmental Assessment and Restoration
Florida Department of Environmental Protection
2600 Blair Stone Road MS3555
Tallahassee, FL 32399-2400

Dear Ms. Rasnake:

The Charlotte Harbor National Estuary Program (CHNEP) is submitting the following comments for the Florida Department of Environmental Protection's (FDEP) consideration with regards to impaired Outstanding Florida Waters (OFWs) within the CHNEP service area. We appreciate FDEP's solicitation of public input and offer these suggestions in support of your efforts to restore water quality.

The CHNEP Comprehensive Conservation and Management Plan states that a priority action for the Program is to "Encourage the application of flexible, goal-oriented approaches in reasonable assurance plans, basin management action plans (BMAPs),...and nutrient reduction plans." Additionally, another priority action is to "reduce non-point source pollutants", which BMAPs do. As such, assisting in the assessment or impaired waters, as well as the development of pollutant limits and clean-up plans to remediate them, is central to CHNEP's purpose.

On July 13th, 22 experts and technical advisors including Julie Espy and yourself from FDEP, came together for a special CHNEP Technical Advisory Committee. The attendees spent four hours reviewing and discussing the 88 impaired OFW WBIDs (Waterbody IDs) in the CHNEP study area - 46% of them impaired for Bacteria and 27% for Nutrients. Because recent changes to the Bacteria standard could potentially affect some WBIDs' status, the consensus was to not focus on them for this commenting.

When assessing the Nutrient and Nutrient-related impairments, the group came up with four priorities in our region, for increased prioritization for pollutant limit and clean-up plan development. Additionally, because some of these impaired OFW WBIDs are contiguous and share the same impairment parameter, it was agreed that it would be appropriate to group those – hopefully increasing expediency and efficiency of pollutant limit and clean-up plan development.

These recommendations were then subsequently vetted and supported by the full CHNEP Technical Advisory Committee, Citizens Advisory Committee, Management Committee and Policy Committee.

The five regional priority impaired OFW estuaries that the CHNEP Management Conference identified were:

Matlacha Pass

2065F – Matlacha Pass [Nutrients (Total Nitrogen)]

Lemon Bay

1983A – Upper Lemon Bay [Nutrients (Chlorophyll-a)]

1983A – Upper Lemon Bay [Nutrients (Total Nitrogen)]

1983A1 - North Lemon Bay [Nutrients (Chlorophyll-a)]

1983A1 – Lemon Bay (North Segment) [Nutrients (Total Nitrogen)]

2039 – Forked Creek [Nutrients (Chlorophyll-a)]

Dona Bay

2002 – Dona Bay [Nutrients (Chlorophyll-a)]

2002 – Dona Bay [Nutrients (Total Nitrogen)]

Roberts Bay

2018A -- Roberts Bay [Nutrients (Total Nitrogen)]


Blackburn Bay

1968F – Blackburn Bay [Nutrients (Total Nitrogen)]

We respectfully request FDEP consider raising TMDL development prioritization for these five estuaries to high priority. This would enable more timely restoration to occur in areas important to the regional stakeholders.

Thank you for your consideration in this matter. Please do not hesitate to contact me at (941) 575-3392 to discuss further.

Sincerely,



Jennifer Hecker
Executive Director