



April 6, 2016

Sara C. Davis
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Division of Environmental Assessment and Restoration
Florida Department of Environmental Protection
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Delivered by electronic mail.

Ms. Davis:

Please consider the following comments on the 2015 Progress Report for the Caloosahatchee Estuary Basin Management Action Plan.

The primary concern with the 2015 Progress Report and with the program in general is that many of the entities assigned TN load reductions are not making realistic progress toward those requirements.

Incremental progress for three of the load reduction entities, Fort Myers, Cape Coral and Lee County is summarized in the table below. At the average annual rate of load reduction these three entities will not achieve compliance for many decades and would not be reasonable assurance for FDEP that TMDL or BMAP compliance will be attained. The lack of real progress emphasized here is of further concern since the original load reduction targets were based on 2005 land use. Considering the lack of reasonable progress during the first three years of the BMAP for at least the three entities listed, and the rapid growth that has occurred in the Estuary Basin since 2005, it is possible that no net progress has occurred toward reducing TN concentrations.

The additional graphics you added to the report with respect to my email comments made on March 22, 2016 are helpful but the rate of TN load reduction must be calculated from those figures and additional information in the report. As such the lack of incremental progress as outlined here is not explicitly stated in the Progress Report.

Please consider additional summary information such as average annual TN load reduction per entity since the BMAP inception.

With respect to the Caloosahatchee Estuary BMAP program in general, please consider updating the loading estimates with 2012 land use maps available from the SFWMD. We would also recommend a

comprehensive water quality analysis as we have before that would help gauge real progress. Presenting water quality from several stations in the basin for limited durations does not achieve an accurate picture of the overall water quality conditions and trends in the basin. These same or similar suggestions were part of a document submitted to FDEP on August 19, 2015 and titled *Southwest Florida Stakeholder's Comments on the Lee County 2013-2014 MS4 Annual Report and its Nexus to the Caloosahatchee Estuary TMDL and BMAP*. As such we hope they will be given serious consideration.

Sincerely,



John Cassani, Chairman
Southwest Florida Watershed Council



John R. Paul III, President
Caloosahatchee River Citizens Association

Total nitrogen load reduction progress for Caloosahatchee BMAP Entities (Unincorporated Lee County, Fort Myers, Cape Coral).

BMAP Entity	2013	2014	2015	Avg. TN load Reduction lbs./yr	Remaining BMAP Load reduction requirement (lbs.)
Unincorp. Lee Co.	45,708	45,927	45,927	73	94,926
Fort Myers	20,258	21,533	21,533	425	19,391
Cape Coral	47,484	48,162	49,437	651	53,977