

FOS Comments: 2023 5-Year Review of the St. Lucie River and Estuary Basin Management Action Plan

The graphs presented by DEP during the 5-year review meeting (Figures 1 and 2) clearly depict that the 10-year TMDL milestones for TN or TP will not be met. This is concerning as we face increasing development, population growth, and subsequent nutrient inputs into the watershed. The recommendation to extend the deadline **5 years to meet the TMDL** without a specific project plan for reductions does not satisfy the intent of implementing a BMAP to reach the established TMDLs.

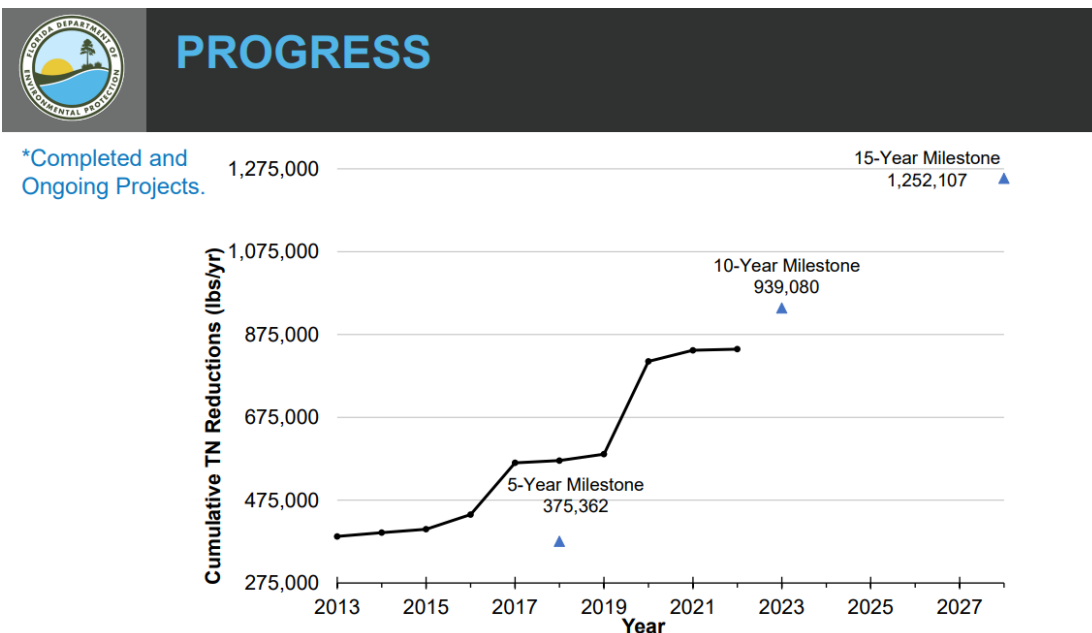


Figure 1

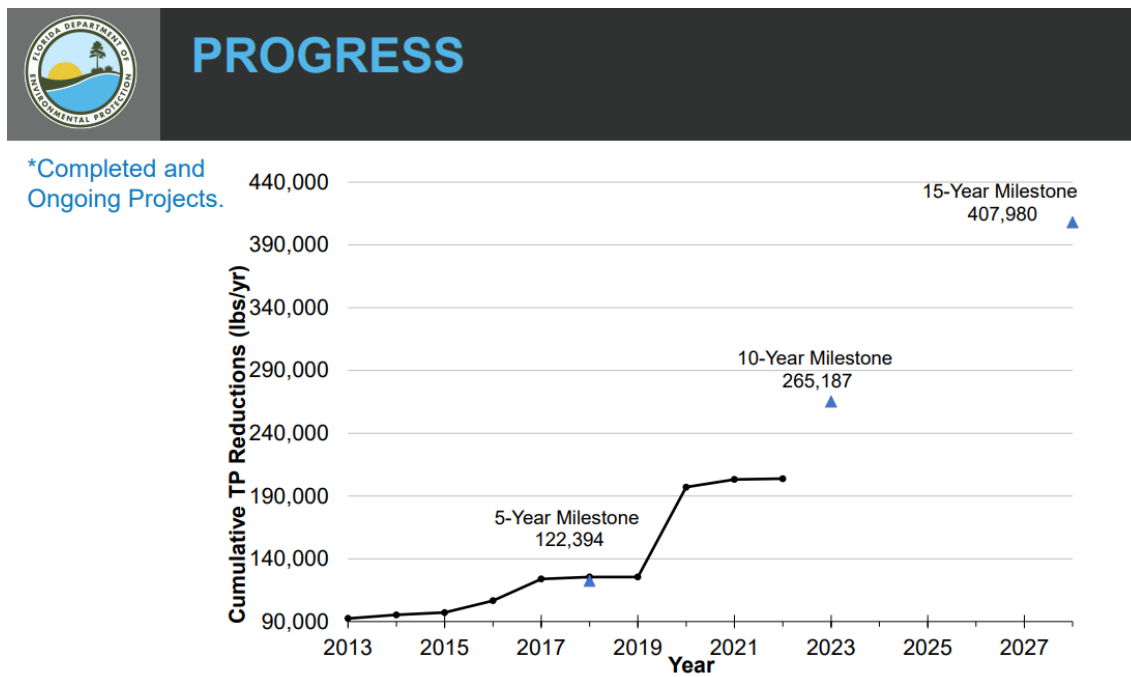


Figure 2

The status of TN and TP reduction by stakeholder projects (Figures 3 and 4) shows a drastic need for nutrient reduction by Agriculture, however, the recommendations presented by DEP do not mention any remedy to reach the required reductions to meet the TMDL. According to DEP staff, the discrepancy between Agriculture and other stakeholders is so large that, **“Agriculture was shown separately since the scale of reductions needed are larger than the other stakeholders.** When it is included on the same graph, it is difficult to see the reductions achieved by the other stakeholders.”. This provides evidence of current BMPs failing to meet the necessary reductions to meet the TMDLs for TN and TP. This must be addressed by FDACs as a Coordinating Agency.

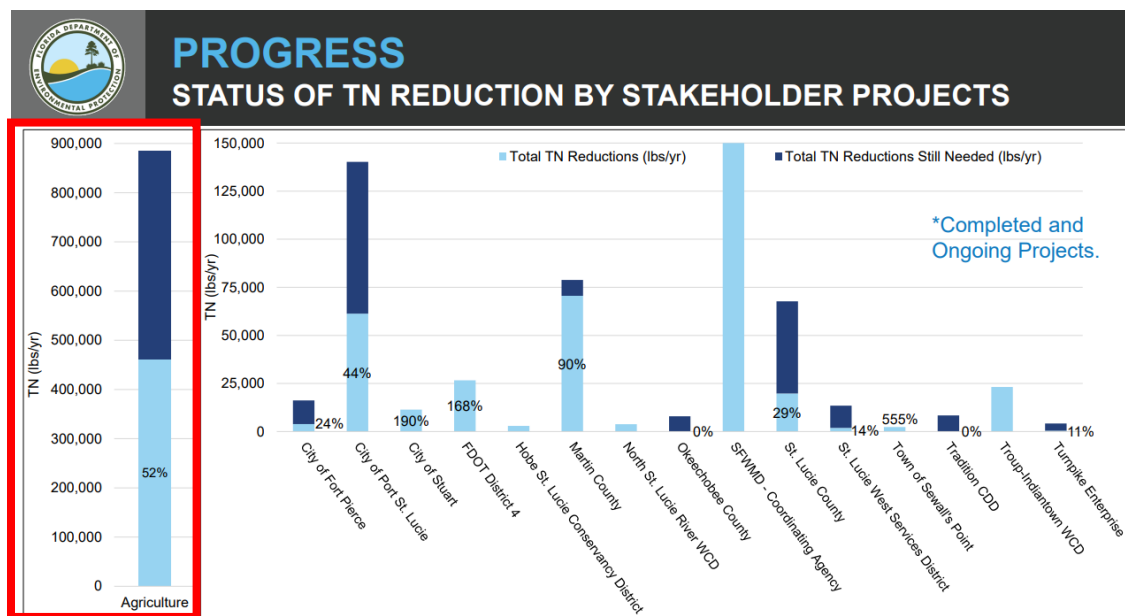


Figure 3

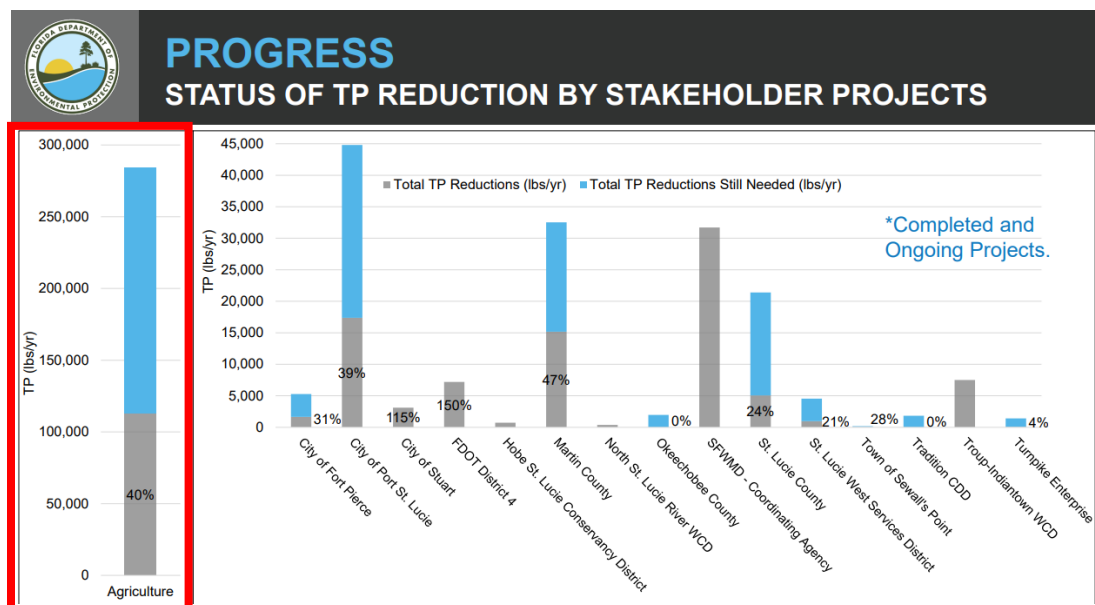


Figure 4

Finally, we recognize the interconnectivity of our waters and the need to reduce upstream nutrient loading as well as bring regional projects online to achieve improved water quality and meet the established TMDLs. The concerns we address above for the St. Lucie River and Watershed BMAP are not isolated to this watershed and we ask that they be addressed in all Florida BMAPs to address our impaired waterbodies.