



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 27 1992

Dr. Raymond Loehr
Chairman, Science Advisory Board
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

OFFICE OF
WATER

Dear Ray:

I would like to thank the Science Advisory Board's Marine Monitoring Task Group for its November 1991 report, EPA-SAB-EPEC-92-005, on the monitoring guidance developed for the Environmental Protection Agency's National Estuary Program (NEP). Effective environmental monitoring must be an integral part of the Agency's program review and evaluation process. Data gathered from estuary monitoring will be used to assess the effectiveness of actions taken pursuant to NEP's Comprehensive Conservation and Management Plans. Estuary monitoring data will also be used to redirect and refocus NEP management plans. It is, therefore, essential that estuary monitoring programs be conducted in a scientifically and technically sound manner. The Science Advisory Board (SAB) report on the NEP monitoring guidance identified a number of important technical and policy issues that we are currently working to address.

The EPA's Office of Wetlands, Oceans, and Watersheds has published an interim final edition of the NEP monitoring guidance document that addresses many of the issues raised during the SAB review. A final edition of the guidance document is currently being prepared. The final document will incorporate new material in response to all comments in the Task Group's final report.

In response to specific SAB recommendations in the final report, the NEP monitoring guidance is being revised to address the following issues.

- o We are identifying the kinds of differences among estuaries; in physical environment, institutional structure, and State commitment of resources that may require unique approaches to the development of monitoring plans. The guidance will be revised to describe how these approaches differ from those presently included in the case studies.
- o The Marine Monitoring Task Group noted that centralized data storage should not be a requirement for each estuary program, and that EPA should encourage the use of existing systems that maximize access to data interpreters and

promote data intercomparisons. The NEP data management policy does not dictate the use of any single data management system. We do, however, identify a set of requirements for all NEP data management systems. These requirements will be reviewed to ensure that access to the data is maximized, and that data intercomparisons are promoted. We will continue to require that all new data collected using NEP funds are submitted to EPA in a format to be archived in the Ocean Data Evaluation System.

- o The discussion of data analysis in the guidance document is being expanded to include mechanisms of integrating data analysis, hypothesis testing, and redirection of the monitoring program.
- o The Marine Monitoring Task Group recommended that the guidance document include more discussion on the relationship and interdependence of the monitoring and characterization phases of the NEP. The Office of Wetlands, Oceans, and Watersheds has recently completed draft guidance on NEP characterization studies. The characterization guidance focuses on the relationship between monitoring and characterization. The final monitoring guidance will incorporate relevant portions of the characterization guidance.
- o As proposed by the Task Group, the final monitoring guidance document will recommend peer reviews of NEP characterization studies.
- o The Task Group stated that the guidance should encourage coordinated planning among groups interested in the monitoring, research, and modelling activities within the estuary. Planning of studies and other activities supporting the development of NEP Comprehensive Conservation and Management Plans is undertaken by Management Conference Committees during an annual workplan development process. This process is described in the EPA Guidance Document, Saving Bays and Estuaries, a Primer for Establishing and Managing Estuary Projects. The monitoring guidance document will, however, be revised to ensure that coordinated planning of monitoring and research is emphasized.
- o Part of the Task Group review focused on the relationship between monitoring implemented under the NEP and that being undertaken in estuaries under the EPA's Environmental Monitoring and Assessment program (EMAP). The Task Group noted that economy in local and national interests might be well served by integrating or combining these programs. It should be recognized that EMAP and NEP monitoring program objectives differ in some respects. The EMAP Near Coastal Program has been designed to provide a regional view of ecosystem health on the basis of stratified random sampling.

NEP monitoring programs are designed to provide data describing changes in basinwide ambient conditions resulting from management actions.

However, I agree that the two programs should work together more closely. We will explore ways to improve our coordination and effectiveness. Meanwhile, the EPA Office of Wetlands, Oceans, and Watersheds has already begun to integrate and combine NEP and EMAP monitoring activities. The EMAP Near Coastal Program staff has been meeting with NEP Management Conferences to determine how the EMAP survey design, indicators, and monitoring methods can be used to assess management plan effectiveness. We will continue to work toward integration of the EMAP and NEP monitoring programs.

I would again like to thank the Science Advisory Board for reviewing the NEP monitoring guidance. We will provide members of the Marine Monitoring Task group with copies of the final guidance when it is completed.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Bill", written in dark ink.

William K. Reilly