The following provides further detail regarding my verbal comments as well as additional thoughts on pages **C3-107** and **C3-108** of the First External Review Draft.

C3-107 line26: Table 3-23. The target for Tampa bay may be better expressed as follows:

Target: "Maintain Total Nitrogen load at 1992-1994 levels. ", there are also annual average chlorophyll targets established by bay segment.

This is both a Plan, and a Federally Recognized TMDL.

Lines 29-37:

This does not seem to convey well the point that regional differences may be large, reductions of less than or more than the 'average' may be required to restore estuarine health.

C3-108 lines 4-12:

The discussion about Chesapeake Bay may be better balanced by noting the personal communication with Robin Dennis, NOAA National Air Lab, cited by Howarth (2008; paper previously provided): "Recent model estimates suggest that total nitrogen deposition onto the watersheds of Chesapeake Bay may have been underestimated by 40% due to lack of consideration of the deposition of these gases [dry deposition]."

C3-108 lines 14-25:

Regarding the Long Island Sound DO criteria, and stated lack of ability to meet this – it should be noted that there are other approaches that can currently be used to address such issues, e.g., alternative criteria (Site Specific Alternative Criteria), or extended timeline for achieving goals, sometimes on the order of 20 years or more.

Overall, these pages present a very 'doom & gloom' perspective of estuarine/coastal health and our ability to meet under existing regulatory/societal structures. Although I certainly understand the source of this conclusion, I believe it would better serve this report and its intent to identify some more positive outcomes. The following language was provided by the Tampa Bay Estuary Program (Holly Greening, personal communication):

"Recovery of seagrass coverage in Tampa Bay, Florida to levels observed in 1950 (15,400 ha) is a long-term goal adopted by local, state, federal and private partners in the Tampa Bay Estuary Program. Nitrogen controls initiated in 1980 and continuing through present (from wastewater treatment facilities, stormwater treatment, fertilizer manufacturers, and power plants) resulted in a 60% TN load reduction compared to the mid-1970's. As a

result, annual water clarity and chlorophyll targets are being met, and seagrass coverage in 2006 was the highest recorded since 1950 (but still 5500 ha lower than 1950 coverage)."

Citations for any of these details can be found at: www.tbep.org , or I would be glad to provided specific details as desired.

An additional, unique effort along these lines that may deserve mention is the Gulf of Mexico Alliance's Nutrient Reduction Priority Information Team whose aim is to develop nutrient criteria management tools to reduce nutrient pollution to Gulf of Mexico coastal waters, and work to ensure that Gulf Coast rebuilding efforts incorporate innovative practices and technologies to reduce the potential for nutrient pollution to coastal ecosystems.

Below is from http://gulfofmexicoalliance.org/welcome.html. Again, I can provide more detailed specifics if desired.

"The Gulf of Mexico Alliance is a partnership, initiated in 2004 by the states of Alabama, Florida, Louisiana, Mississippi, and Texas, intent on significantly increasing regional collaboration to enhance the ecological and economic health of the Gulf of Mexico. Representatives from thirteen federal agencies convened to form the Gulf of Mexico Regional Partnership Federal Workgroup to provide support to the Gulf of Mexico Alliance in addressing priority coastal and ocean issues facing the Gulf of Mexico region. The Federal Workgroup provides the venue for collaboration and integration of federal efforts to address regional issues identified by the Gulf of Mexico Alliance."

Than you for the opportunity to comment, and please excuse the hasty compilation of this, as I desired to get it back to you for use in revising the first draft if desired. I remain interested and available if further input/details are desired.

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