

December 6, 2010

U.S. Environmental Protection Agency (MC-1400R)
Attn: Stephanie Sanzone
Designated Federal Officer - Science Advisory Board Staff Office
1200 Pennsylvania Ave, NW
Washington, DC 20460

RE: Methods and Approaches for deriving Numeric Nutrient Criteria for Nitrogen/Phosphorus Pollution in Florida's Estuaries, Coastal Waters, and Southern Inland Flowing Waters.

Dear Ms. Sanzone,

Thank you for the continued coordination on the methods to develop Numeric Nutrient Criteria (NNC) for the State of Florida. Pinellas County is committed to working with EPA and the Florida Department of Environmental Protection (FDEP) to develop technically sound water quality standards that will protect our surface waters.

Tampa Bay efforts in Water Quality

The Tampa Bay community realized years ago that specific criteria were needed and led the charge to develop standards to protect water quality and seagrass health. The positive changes seen in Tampa Bay since the 1970s are due to the adaptive management strategies by the state and local stakeholders to restore and preserve the Bay. Those actions include:

- Compliance with the Grizzle-Figg Act
- Improved stormwater regulations
- Stakeholder nutrient reduction projects and programs
- Strong local policies like the Fertilizer Ordinance, which alone is estimated to remove 84 tons of nitrogen from the bay.

EPA's guidance document states that the most comprehensive and scientifically defensible approach to developing numeric nutrient criteria is to relate nutrients to a measured biological response. Based on the extensive scientific record, the existing standards put in place for Tampa Bay have achieved full aquatic life protection, as shown through the restoration of seagrass habitat.

Current management actions have maintained Total Nitrogen (TN) and Total Phosphorus (TP) loads at levels that allow Tampa Bay to meet its Designated Uses. Existing TN and TP loads are appropriate and scientifically-defensible estuarine NNC and meet the requirements for Downstream Protective Values for the Tampa Bay watershed. Additionally, Tampa Bay's scientific determination of appropriate nutrient loads to support healthy seagrass beds and encourage seagrass expansion has been peer-reviewed through publication of scientific journal articles and reviewed and accepted by FDEP. All supporting documentation for the Tampa Bay Reasonable Assurance Plan can be found on the Tampa Bay Estuary Program's technical website here: <http://tbepotech.org/>

Boca Ciega Bay

Years ago draft water quality targets were proposed for Boca Ciega Bay, but due to limited water quality data to support those targets, they were not formally adopted. Since that time an extensive water quality monitoring program has been employed along with continued benthic and seagrass monitoring efforts. These data sources are currently being used to update the initial proposal for water quality targets in Boca Ciega Bay (See Attachment A).

Clearwater Harbor- St Joseph Sound Comprehensive Conservation & Management Plan

Pinellas County, together with the EPA, the Southwest Florida Water Management District, and the Cities of Clearwater, Dunedin, Largo, and Tarpon Springs, is developing a Comprehensive Conservation and Management Plan (CCMP) for Clearwater Harbor and St. Joseph Sound (See attachment A). This project includes the identification of critical resources within the study area and the development of data analysis plans to establish quantitative management goals and targets for the proper stewardship of the estuarine areas and the contributing watershed. The project also includes an extensive water quality evaluation to model watershed loadings, to estimate residence times within the estuary, and the development of water quality targets. The latter effort is consistent with methods proposed within the EPA Methods and Approaches technical guidance document. This task is moving forward quickly and draft targets will be under review in December 2010.

Pinellas County is requesting that EPA support the Tampa Bay Reasonable Assurance Plan and the work being completed for Boca Ciega Bay, Clearwater Harbor, and St. Joseph Sound as NNC for these waters. The area specific targets for these estuaries link water quality to the response of the aquatic system based on a thorough understanding of the resource. The effort to develop these targets as a community demonstrates our commitment to water quality and ecological improvements. Furthermore, we have proven our willingness to employ adaptive management strategies as part of the process. As a cohesive stakeholder group we have achieved the desired goals and will continue those efforts.

Respectfully,

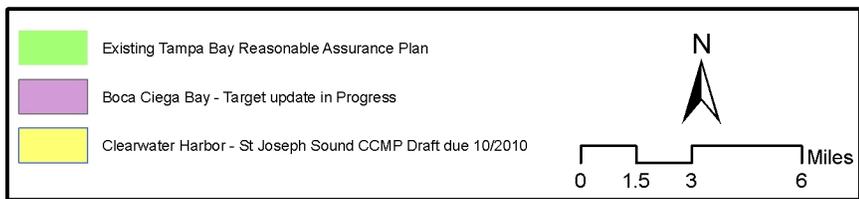
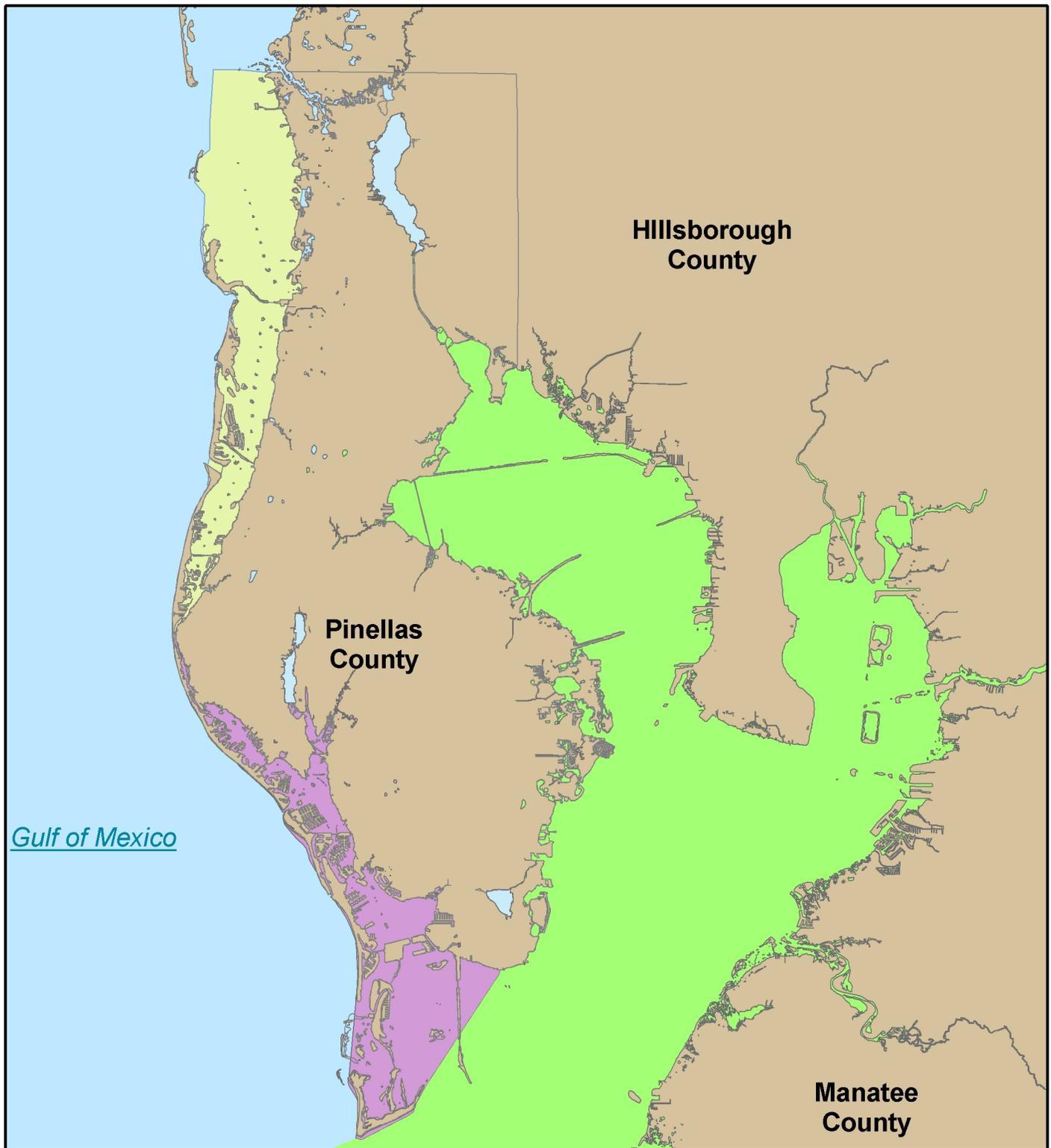
Kelli Hammer Levy
Division Director
Watershed Management Division

Cc:

Andrew Squires, Director, Environmental Sciences, Pinellas County Public Works
David McCrea, Pinellas County Assistant County Attorney

Encl: Attachment A

Attachment A Status of Pinellas County Estuarine Nutrient Targets



RA_CCMP map.mxd Created by MW - 12/6/2010