

From: [Tiffany L Busby](#)
To: [Espy, Julie](#); [Cathleen Foerster](#)
Subject: FW: Comments re Water Quality and Loading Targets
Date: Friday, February 23, 2018 4:27:16 PM

[See below.](#)

From: Katie Tripp [mailto:ktripp@savethemanatee.org]
Sent: Friday, February 23, 2018 3:34 PM
To: Tony Janicki <tjanicki@janickienviromental.com>
Cc: 'Tiffany L Busby' <tlbusby@wildwoodconsulting.net>; Judy Grim <JGrim@volusia.org>; Brett Cunningham <bcunningham@jonesedmunds.com>; Katie Tripp <ktripp@savethemanatee.org>
Subject: Re: Comments re Water Quality and Loading Targets

Hi Tony,

Thank you for your reply.

My biggest concern is that the targets are being set at a level that will not allow the system to stabilize. The message I am hearing most recently from seagrass scientists is that there was a long period of declining health that preceded the major blooms which caught everyone's attention. Maybe the % light target should have been higher, they should have been looking at % cover, not extent of bed, etc. Unless we roll loading back to a level that preceded the period of destabilization that was taking place without anyone realizing it was happening, I don't believe the lagoon will have the level of health that the stakeholders hope to achieve. I wonder if you all would consider an incremental process that achieves your proposed targets within 10 years, and EPA's targets within 15-20 years. From a public policy perspective, if this initial commitment/investment is billed as "the answer" but falls short, I'm not sure there will be enough support to ask for "more" from the local governments 10+ years down the road.

Best,

Katie

Katie Tripp, Ph.D.
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From: Tony Janicki <tjanicki@janickienviromental.com>
Sent: Friday, February 9, 2018 9:03:30 AM
To: Katie Tripp
Cc: 'Tiffany L Busby'; Judy Grim; Brett Cunningham
Subject: RE: Comments re Water Quality and Loading Targets

[Katie](#)

I hope this finds you well and sorry for the time it has taken to get back to you as it's been a busy few weeks.

I'd also like to affirm that a Reasonable Assurance Plan is one of a number of potential regulatory required responses to address a water quality impairment in a water body. As such, it is necessary to follow specific methods defined by the regulatory agencies, in this case FDEP and EPA. It is not intended to address all issues that may exist in a system. I know there has been concern regarding the proposed targets but I wanted to let you know that Mosquito Lagoon remains impaired when applying those proposed targets, thereby assuring that the need for nutrient loading reductions remain. I offer the following in response to your comments. Please let me know if you have any questions.

The water quality criteria are a regulatory requirement, also known as Numeric Nutrient Criteria, are specifically set as water column value. The water column concentrations are a direct result of the integration of the different loadings to the system and a measure of the available nutrients in the system. The proposed water quality targets were derived using the same procedures used by the FDEP to set current criteria.

The water clarity, dissolved oxygen, and chlorophyll *a* parameters provide the “legs” of the three-legged stool analysis proposed by the EPA Science Advisory Board and required by both EPA and FDEP when setting estuarine criteria (USEPA 2012, FDEP 2014). These parameters were chosen as they are sensitive to nutrients and necessary for balanced populations of flora and fauna. “The transparency and DO targets were designed to directly protect aquatic flora and fauna, while the Chl *a* target was designed to protect human recreation use as well, by preventing anthropogenic algal blooms (EPA 2012).” The “three-legged stool” analysis for this project followed the same procedure used by FDEP when setting the current criteria for Mosquito Lagoon and many other estuarine systems.

As you state in your comment letter, Ms. Morris was presenting on the Indian River Lagoon as a whole and not directly with regard to Mosquito Lagoon. As you may recall from the September 26th, 2017 Mosquito Lagoon RAP meeting in Edgewater by Chuck Jacoby and Lori Morris where they presented their data on seagrasses specifically in Mosquito Lagoon and pointed out that there are distinct differences between what has occurred in Indian River Lagoon proper (North IRL, Central IRL and Banana River Lagoon) where profound losses occurred when compared to Mosquito Lagoon which remained relatively stable through 2015.

The water quality and seagrass data meet the criteria to set criteria up to the bloom period after 2010. The updated criteria will not result in the lagoon as not being listed as impaired as the water quality during bloom period exceeds both the current and proposed criteria. Load reductions will still be required that will benefit the lagoon.

From: Katie Tripp [<mailto:ktripp@savethemanatee.org>]

Sent: Tuesday, December 05, 2017 10:13 AM

To: Tony Janicki

Cc: Tiffany L Busby; Katie Tripp

Subject: Comments re Water Quality and Loading Targets

Please see attached. Thank you.

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