

Sutton, Kaitlyn

From: Weaver, Kenneth
Sent: Monday, December 2, 2019 1:38 PM
To: ODonnell, Kevin; WatkinsRhonda; Joyner, Daryll; Sutton, Kaitlyn
Cc: Tyler, David; Espy, Julie
Subject: RE: When you have time

Rhonda,

Thank you for your comment/suggestion. It is not too late to be considered. We will add it to the public comments.



Ken Weaver

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From: ODonnell, Kevin <Kevin.ODonnell@dep.state.fl.us>
Sent: Monday, December 02, 2019 1:35 PM
To: WatkinsRhonda <Rhonda.Watkins@colliercountyfl.gov>; Joyner, Daryll <Daryll.Joyner@dep.state.fl.us>; Weaver, Kenneth <Kenneth.Weaver@dep.state.fl.us>; Sutton, Kaitlyn <Kaitlyn.Sutton@dep.state.fl.us>
Cc: Tyler, David <David.Tyler@dep.state.fl.us>; Espy, Julie <Julie.Espy@dep.state.fl.us>
Subject: RE: When you have time

Rhonda,

Thanks for the feedback and I your logic does make sense. The comment period officially ended on Nov. 22nd, but there may be some flexibility for including this as a comment. It sounds like what you are proposing is applying the standard for IWR purposes if there is an "existing use".

Daryll/Ken,

Any thoughts on Rhonda's question below?

Thanks,
Kevin

From: WatkinsRhonda <Rhonda.Watkins@colliercountyfl.gov>
Sent: Monday, December 02, 2019 11:36 AM
To: ODonnell, Kevin <Kevin.ODonnell@dep.state.fl.us>
Cc: Tyler, David <David.Tyler@dep.state.fl.us>
Subject: RE: When you have time

Thanks Kevin,

It just wasn't clear during the meeting which criterion this "single station failure" was being applied to. Several of us thought it was for one of the nutrients. So no worries.

Is too late for public comment? I was just thinking if changing Class II water classification to Class III marine is too difficult, maybe you could change how the fecal coliform criteria are applied. Would it be possible to only apply fecal coliform criteria to those stations that are in active shellfish harvesting areas? For example, Naples Bay and Cocohatchee don't have any active shellfish harvesting, nor will they ever. Neither one of those waterbodies are impaired for Enterococcus using the newer standard, but they are both impaired for fecal. This "selective" application of the standard would be similar to applying NNC to only certain stations that are within an ENR. I hope I'm making sense.

From: ODonnell, Kevin <Kevin.ODonnell@dep.state.fl.us>
Sent: Monday, December 2, 2019 11:19 AM
To: WatkinsRhonda <Rhonda.Watkins@colliercountyfl.gov>
Cc: Tyler, David <David.Tyler@dep.state.fl.us>
Subject: RE: When you have time

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Hi Rhonda,

Sorry for not following up with you on your question regarding the floral assessments. The screen shot below shows the section in the NNC Implementation document where the assessment on a station level is being implemented. The reason we chose to go this route is due because some WBIDs will have several stations with floral data and we needed to have a way to make a conclusive decision, as best we can. We thought this was most protective as well.

Let me know if you have any additional questions on this.

<http://publicfiles.dep.state.fl.us/DEAR/DEARweb/Standards/Triennial%20Review%202019/November%202019%20Workshops%20Technical%20Documentation/Draft%20Revised%20NNC%20Implementation%20Document.pdf>

10.1 303(d) Assessment of the Floral Metrics of the Numeric Nutrient Standard for Streams

For IWR assessment purposes, implementation of the floral evaluation component of the NNC is based on the **waterbody identification (WBID)** assessment unit. Assessments for a WBID will be based on floral results from all representative sites, defined as unique stations, within a WBID. The Department will evaluate the floral results at each station to make a station assessment following the procedures described in Sections 6.3 through 6.8. If any station fails to attain the floral evidentiary thresholds based on conclusive results, the WBID will be assessed as failing the expectation for the floral evidentiary thresholds, regardless of whether or not the failing station results are the most recent floral results available in the WBID. If the WBID assessment is determined to be inconclusive, the WBID will be prioritized for additional data collection.

Thanks,
Kevin

From: ODonnell, Kevin <Kevin.ODonnell@dep.state.fl.us>
Sent: Wednesday, November 06, 2019 4:18 PM
To: WatkinsRhonda <Rhonda.Watkins@colliercountyfl.gov>
Subject: Re: When you have time

Hi Rhonda,

Great to see you too! Sorry we didn't have more time to chat. So you did hear correctly that part about the floral (rps or lvs) failure at a station resulting in an impairment. This is in the draft NNC Implementation Document under the section that covers implementation in the IWR. I dont recall where exactly though of hand.

I'll call you next week when I am back. I'm off on this Friday (whew)!

Thanks,
Kevin

Thanks, Kevin

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From: WatkinsRhonda <Rhonda.Watkins@colliercountyfl.gov>
Sent: Wednesday, November 6, 2019 1:40:10 PM
To: ODonnell, Kevin <Kevin.ODonnell@dep.state.fl.us>
Subject: When you have time

Hey Kevin,

Good to see you yesterday! Hey, I know you weren't the one that presented the NNC stuff, but I know you will be implementing it. I have a question about something that was said during the meeting about not taking the WBID average from all stations, but allowing a single site to impair a WBID. Not sure if I heard that correctly and I cant seem to find it in any of the documents.

I know you're out doing more public meetings, so when you get back to Tally, give me a call.

Rhonda

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