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May 17, 2002

Mr. Pat Fricano
Department of Environmental Protection
2600 Blair Stone Rd., MS 3565
Tallahassee, FL 32399-2400

RE: Draft Charlotte Harbor Basin Status Report

Dear Mr. Fricano;

As requested by the Florida Department of Environmental Protection, staff of the Charlotte Harbor National Estuary Program has reviewed the draft Charlotte Harbor Basin Status Report. Because the NEP has responded to the previous version of the report, the comments below reference only overarching issues with the Status Report and do not address editorial or content issues. The following summarizes the Charlotte Harbor NEP comments:

- The State of Florida should consider additional contaminants as causing impairment of uses in the Charlotte Harbor system and include this information in the 303(d) list and resulting TMDLs. We understand that the Department will develop limits for contaminants determined to cause impairment through the 303(d) listing process; however, the current 303(d) list is inadequate. We understand that the State of Florida is developing a revision to the 303(d) listing which is due Fall 2002. We strongly urge that the State work with the U.S. Environmental Protection Agency to consider information beyond the 1998 Florida 303(d) list and current Florida water quality standards in developing the upcoming revision. For instance, it is well known that fecal coliform and total coliform are poor indicators of anthropogenic pollution. We urge that the Department work with the U.S. EPA and effect changes towards the utilization of *Enterococci* and *E. Coli*.
- The State of Florida should include all water quality data with a State or Federally approved Quality Assurance Plan in the determination of impairments. The State has used only those data held within STORET in 2001 for this report and the development of the Planning List. We urge the State accept more recent data from the US Geological Survey; Southwest and South Florida Water Management Districts; Lee, Charlotte and Sarasota Counties; the Florida Fish and Wildlife Conservation Commission-Florida Marine Research Institute; Charlotte Harbor Estuaries Volunteer Water Quality Monitoring Network; City of Punta Gorda and the Peace River/Manasota Regional Water Supply Authority at a minimum.

We appreciate the opportunity to participate in the review of the Charlotte Harbor Basin Status Report. If you have any questions, please contact Catherine A. Corbett at the Charlotte Harbor National Estuary Program office at (941) 995-1777.

Sincerely,

Lisa B. Beever

Lisa B. Beever, PhD, AICP
Director
LBB/CAC/cac

CC: Craig Hesterlee, U.S. Environmental Protection Agency-Region 4
Kim Pierce, U.S. Environmental Protection Agency-Region 4

Charlotte Harbor National Estuary Program

