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William M. Davis
Bureau Director

August 9, 2007

David L. Moore
Executive Director
Southwest Florida Water Management District
2379 Broad Street
Brooksville, FL 34604-6899

RE: Lake Seminole Reasonable Assurance Plan

Dear Mr. Moore:

Pinellas County recently applied for Reasonable Assurance (RA) through the State and Federal Total Maximum Daily Load (TMDL) program. The RA plan is based on the Lake Seminole Watershed Management Plan (LSWMP) which was cooperatively funded by Pinellas County, the Southwest Florida Water Management District (SWFWMD), and the Cities of Largo and Seminole. However, there are differences within the two documents that are explained here.

The LSWMP calls for a series of structural and nonstructural projects that are largely in progress or scheduled within the next several years. Furthermore, the LSWMP outlines the anticipated improvements to water quality through project implementation. The LSWMP Trophic State Index (TSI) goal of 65 was estimated based on best available knowledge and modeling efforts for the lake after all proposed projects were complete. The LSWMP target TSI of 65 was based on the calculation by Huber et al. which takes into account Secchi data. The State's analysis using the Impaired Waters Rule (IWR) does not include Secchi data therefore the resultant TSI within the RA document is a goal of 60. Based on the two calculations, a Huber et al. TSI of 65 is equal to an IWR TSI of 60.

The second noted difference between the two documents is proposed Total Nitrogen (TN) and Total Phosphorous (TP) targets for Lake Seminole. The LSWMP did not adopt any in-lake water TN or TP targets; however, the RA plan proposes targets of 0.9 mg/L TN and 0.055 mg/L TP. These proposed nutrient targets approximate to a TSI of 60 following the IWR methodology or a TSI of 65 following the Huber et al. method. The use of in-lake TN and TP targets will better allow the County to monitor the impacts of the multiple improvement projects on water quality.

PLEASE ADDRESS REPLY TO:
512 S. Ft. Harrison Avenue
Clearwater, Florida 33756
Phone: (727) 464-4761
FAX: (727) 464-3174
SUNCOM: 570-4761
SUNCOMFAX: 570-3174
Website: www.pinellascounty.org



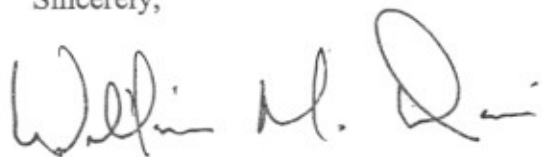
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The above mentioned differences between the RA plan and the LSWMP do not change lake restoration goals, agreements, or operation and maintenance requirements. These differences allow for consistency between the State's IWR methodology and the LSWMP and will allow for more directed monitoring of water quality. If you have any questions concerning the Lake Seminole RA plan, please contact Kelli Hammer Levy at (727) 464-4425 or klevy@pinellascounty.org.

Sincerely,

A handwritten signature in black ink, appearing to read "William M. Davis". The signature is fluid and cursive, with a large initial "W" and "D".

William M. Davis, Director
Department of Environmental Management