

SCCF Comments on the EPA's Proposed Numeric Nutrient Criteria
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SCCF sent the following in an e-mail to the U.S. Environmental Protection Agency as public comment for the EPA's establishment of Numeric Nutrient Criteria on April 26, 2010. The EPA is currently establishing numeric criteria to set the benchmark requirements for "clean" freshwater in Florida's rivers, streams and lakes.

This letter is written on behalf of the Sanibel Captiva Conservation Foundation (SCCF) and our 3,000 members in support of the U.S. EPA's Water Quality Standards for the State of Florida's Lakes and Flowing Waters, a/k/a numeric nutrient criteria. SCCF is a 501(c)(3) not-for-profit organization in our fifth decade of preservation dedicated to the conservation of coastal habitats and aquatic resources on Sanibel and Captiva islands and in the surrounding watershed.

SCCF has been involved in water quality issues in Southwest Florida for decades. We have actively supported grass roots effort to establish and press for Outstanding Florida Water status for several local tributaries and supported the Aquatic Preserve designation for our coastal waters. These state designations are reserved for water bodies with "natural attributes worthy of special protection."

Our backyard has the distinction of encompassing the very first Aquatic Preserve -- Estero Bay -- designated in 1966. That designation was hard fought by a diverse group of residents who wanted to protect the outstanding natural diversity and health of a very special marine environment. Sadly, today, each of these specially designated waters now suffers nutrient impairment which has significantly reduced the water clarity and quality, biological abundance and health of these ecosystems. This degradation has happened in the past 30 years while we have had narrative water quality regulations in place. Clearly the status quo is not sustainable. We must commit to numeric standards for water quality pollutants.

Economic growth, prosperity, public health and quality of life are directly tied to reliable supplies of clean water. The health of our inland waters is the lifeblood of this state, fundamental to the economy of our communities by supporting the precious freshwater we need for our growing population and for the diversity of productive estuary and coastal waters. The cleaner the headwaters, the healthier the downstream waters, the greater the economic vitality of a community and our state.

In 2004-2006 the Caloosahatchee experienced devastating blooms of toxic blue green algae that turned the river green and the coastal beaches red with algae. Your power point presentation used photos of these conditions taken by members of our "river spotter" team. The Health Department posted signs warning people to stay away from the water and shut down the regional Olga water treatment plant that serves over 40,000

homes. These conditions earned the Caloosahatchee the dubious distinction of being chosen American Rivers Seventh Most Endangered River in the U.S. Those conditions caused Lee County a \$40 million dollar loss in our economy.

Tourism is the largest industry in Florida, contributing \$53 billion annually. Wildlife-related recreation constitutes a significant portion of that total, with fishing, hunting and wildlife viewing generating \$7.2 billion annually. Investing in the health of our state is an investment in our economy. We needed numeric nutrient criteria decades ago.

Many water quality problems are regional in nature with contamination delivered to surface and ground waters from fertilizer and regional stormwater runoff, wastewater treatment plants and septic leachate. This points to the need for regional or statewide controls but our local communities have taken extraordinary steps to work on local sources of pollutions, working to do what we can in our own watersheds. In collaboration with the Mayor of Sanibel and the Southwest Florida Regional Planning Council, our staff worked with technical and policy stakeholders to develop and pass regional regulations on fertilizer, stormwater, septic and wastewater systems in our six county area.

Specific Comments on the EPA Rule

SCCF supports the development of scientifically grounded standards that incorporate and reflect the ecological diversity of Florida's waters. The variability of Florida's landscape and water bodies requires regionally customized approaches to the selection and application of water quality standards. We are concerned that the USGS SPARROW model is not suitable for this purpose and encourage the continued coordination between the EPA and state DEP to use site specific existing and historical data to set numeric targets for water bodies.

The EPA rule uses an eco-region approach for grouping water bodies as opposed to a site specific approach. In our region this approach splits the watershed of our major regional river, the Caloosahatchee. For south Florida in particular this approach is not reflective of the unique attributes of water influences. Instead we would recommend establishing smaller regions that might group smaller, more similar tributaries together as distinct from major regional rivers and canals.

Proposed nutrient criteria for streams should be applied to the south Florida region, not just the canals as currently proposed. There are numerous natural freshwater streams and rivers in south Florida including the Caloosahatchee, Orange River, Hickeys Creek, and Telegraph Creek among many others, that are freshwater above their tidal interface. These waters should be included in stream criteria instead of canal standards.

We support the decision to take more time to establish the Downstream Protective Values (DPV) until the Estuary and Coastal Rulemaking effort is conducted in 2011.

We appreciate the opportunity to comment in support of protection of our water resources which are fundamental to our public and economic health and quality of life. The cost of not going forward with standards is far too great.

We strongly urge adoption of strong numeric nutrient standards to protect the public's most precious and fundamental resource: our water.