



Everglades Coalition

1000 FRIENDS OF FLORIDA
ARTHUR R. MARSHALL FOUNDATION
AUDUBON OF FLORIDA
AUDUBON SOCIETY OF THE
EVERGLADES
AUDUBON OF SOUTHWEST FLORIDA
CALOOSAHATCHEE RIVER CITIZENS
ASSOCIATION/ RIVERWATCH
CLEAN WATER ACTION
CLEAN WATER NETWORK
COLLIER COUNTY AUDUBON SOCIETY
CONSERVANCY OF SOUTHWEST
FLORIDA
DEFENDERS OF WILDLIFE
DING DARLING WILDLIFE SOCIETY
EARTHJUSTICE
ENVIRONMENT FLORIDA
THE ENVIRONMENTAL COALITION
EVERGLADES COORDINATING COUNCIL
EVERGLADES FOUNDATION
EVERGLADES LAW CENTER
FLORIDA CONSERVATION ALLIANCE
FLORIDA DEFENDERS OF THE
ENVIRONMENT
FLORIDA KEYS ENVIRONMENTAL FUND
FLORIDA NATIVE PLANT SOCIETY
FLORIDA OCEANOGRAPHIC SOCIETY
FLORIDA WILDLIFE FEDERATION
FRIENDS OF THE ARTHUR R. MARSHALL
LOXAHATCHEE WILDLIFE REFUGE
FRIENDS OF THE EVERGLADES
HENDRY GLADES AUDUBON SOCIETY
IZAAK WALTON LEAGUE FLORIDA
DIVISION
IZAAK WALTON LEAGUE FLORIDA KEYS
CHAPTER
IZAAK WALTON LEAGUE MANGROVE
CHAPTER
IZAAK WALTON LEAGUE OF AMERICA
LAST STAND
LEAGUE OF WOMEN VOTERS OF
FLORIDA
LOXAHATCHEE RIVER COALITION
MARTIN COUNTY CONSERVATION
ALLIANCE
NATIONAL AUDUBON SOCIETY
NATIONAL PARKS CONSERVATION
ASSOCIATION
NATIONAL WILDLIFE FEDERATION
NATIONAL WILDLIFE REFUGE
ASSOCIATION
NATURAL RESOURCES DEFENSE
COUNCIL
THE OCEAN CONSERVANCY
THE PEGASUS FOUNDATION
REEF RELIEF
SANIBEL-CAPTIVA CONSERVATION
FOUNDATION
SAVE IT NOW, GLADES!
SIERRA CLUB
SIERRA CLUB BROWARD GROUP
SIERRA CLUB CALUSA GROUP
SIERRA CLUB CENTRAL FLORIDA
GROUP
SIERRA CLUB FLORIDA CHAPTER
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SIERRA CLUB MIAMI GROUP
THE SNOOK AND GAMEFISH
FOUNDATION
SOUTH FLORIDA AUDUBON SOCIETY
TROPICAL AUDUBON SOCIETY
THE URBAN ENVIRONMENT LEAGUE
WORLD WILDLIFE FUND

November 19, 2012

Administrator Lisa Jackson
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Jackson:

We are writing on behalf of the various undersigned organizations with regards to numeric nutrient pollution water quality standards for fresh and marine waters in the State of Florida. Our groups are collectively dedicated to restoring Florida's exceptional water resources including America's Everglades, an iconic unique ecosystem that has been severely degraded by nutrient pollution.

We would like to express our strong support for EPA's proposed numeric nutrient criteria for Florida, as well as our opposition to the numeric nutrient standards currently proposed by the Florida Department of Environmental Protection (FDEP) and under review by the EPA. EPA's standards would prevent severe water quality degradation from nutrient pollution, while the FDEP rule actually requires impairment before any real standards or pollution containment requirements are enacted. Vital aspects of effective nutrient water quality standards, such as downstream protection values and true effective flowing waters standards for *all* Class III flowing waters (including altered/artificial, intermittent, South Florida and tidal flowing waters) are lacking in the state proposal. Without these, the state proposal would not effectively control nutrient pollution at its source or prevent the biological and water quality failures that are continuing to become more evident and widespread throughout the greater Everglades ecosystem.

We understand that the state's proposal is currently under review by EPA, and we urge that EPA to thoroughly assess this proposal of paramount importance to the public health, economy and environment of Florida and its citizens – as well as being of critical importance for restoring America's Everglades and precedent setting for regulating nutrient pollution throughout the entire nation. We strongly believe that

EPA should not approve the current state proposal, but instead ensure that it is fundamentally rectified to include sufficiently protective actual in-stream numeric nutrient standards and downstream protective values for all Class III flowing waters in Florida, as well as create criteria that are similarly stringent to EPA's proposal for all other types of waters.

Please feel free to contact any of us to discuss this further and thank you for your time and consideration in this matter.

Sincerely,



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