

October 19, 2010

Members of the Florida Delegation
United States Senate & United States House of Representatives
Washington, D.C.

RE: Florida Nutrient Criteria

Dear Senators and Representatives:

Thank you for standing up for Florida and recognizing the threat of the costly, unprecedented numeric nutrient criteria rule that the Environmental Protection Agency is set to impose on the State of Florida. We are grateful for the 30-day extension to allow EPA to review additional comments prior to finalizing the rule. However, we still believe the EPA must subject its proposed criteria to a scientific review by its Science Advisory Board (SAB) and to an independent economic analysis, as requested in early August by a bipartisan coalition of the Florida Congressional Delegation. We are again asking for your assistance in requesting these reviews of the EPA's proposed rule in its entirety before it is finalized. The consequences of not getting this right could be devastating to the state.

The EPA already has delayed finalization of criteria for Florida's canals, coastal waters and estuaries until August 2012 to allow the SAB to conduct a peer review of the EPA's data and methodologies for deriving criteria for these waters. We believe that the same level of analysis is needed for EPA's proposed rules for rivers, lakes and streams, specifically including a review of the scientific validity of EPA's proposed criteria for these fresh waters. We need your assistance in requesting that sufficient time be allotted so that the review can be done correctly. It is notable that EPA delayed finalization of its estuarine and marine waters rule by 10 months to allow for an SAB review of the data and methodologies that will support those standards. EPA's announced 30-day delay for finalizing its freshwater criteria is simply an inadequate amount of time to conduct the necessary thorough scientific and economic reviews.

The proposed rules will affect all of Florida's citizens, local governments and vital sectors of our economy. It is imperative that, before any rule is imposed, we ensure that all aspects of the EPA's rulemaking are based on sound scientific rationale. We must also make certain that the costs associated with these new standards will not place undue burdens on Florida's businesses and families.

Again, thank you for your consistent support on this issue of vital concern to us. We look forward to continuing our work with you to make sure that the critical scientific and economic reviews are completed before the rule is finalized.

Sincerely,

Terry Baker, General Manager
PCS Phosphate – White Springs
Bevin Beaudet, P.E., Director
Palm Beach County Water Utilities
Barney Bishop, President & CEO
Associated Industries of Florida
Rick Bitner, President
Farm Credit of Northwest Florida
Ben Bolusky, CEO
Florida Nursery, Growers & Landscape
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Douglas C. Bournique, Executive VP
Indian River Citrus League
Tim Brock, President
Florida Pest Management Association
Charles H. Carden, Chair
Florida Section AWWA
Barbara Carlton, Executive Director
Peace River Valley Citrus Growers Assn.
Ed Chambers, President
United Food and Commercial Workers
International Union – UFCW Local 1625
William L. Dever, Jr., President
Florida Gulf Coast Building &
Construction Trades Council
Jeff Doran, Executive Vice President
Florida Forestry Association
Mercer Fearington, Jr., Executive Director
Florida Pulp and Paper Association
Alfonso Fanjul, Chairman, CEO
Florida Crystals Corporation
John C. Fowke, President
Florida Home Builders Association
Kristen Gunter, Executive Director
Florida Citrus Processors Association
Jim Handley Executive Vice President
Florida Cattlemen's Association
Ron Hamel, Executive Vice President
Gulf Citrus Growers Association
Martha Harbin, Executive Director
Florida Beverage Association

Mary Hartney, President
Florida Fertilizer & Agrichemical
Association
John L. Hoblick, President
Florida Farm Bureau Federation
Ray Hodge, President
Florida Water Quality Coalition, Inc.
Chris Holley, Executive Director
Florida Association of Counties
Reginald Holt, President
Farm Credit of Central Florida
Bill Hunter, President
Association of Florida Community
Developers
Jimmy Knight, President
Farm Credit of Southwest Florida
Chuck Littlejohn, Executive Director
Florida Land Council
Lauren McCarthy, Executive Director
Florida Recycling Partnership
Don Rice, President
Farm Credit of South Florida
Dale Rossman, Chairman
Floridians for Industry, Jobs, and Growth
Daryl Sargent, President
Florida Poultry Federation
Mike Sittig, Executive Director
Florida League of Cities
Michael W. Sparks, Executive Vice
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Kurt Spitzer, Executive Director
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Paul Steinbrecher, PE, President
Florida Water Environment Association
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Nancy Stephens, Executive Director
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Michael J. Stuart, President
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Charles Thompson, President
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George H. Wedgworth, CEO
Sugar Cane Growers Cooperative of FL
Ford B. West, President
The Fertilizer Institute
Gary Williams, Executive Director
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Bill Willingham, Executive V.P. & General
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Mark Wilson, President & CEO
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Joel Wolf, President
South Florida Aquatic Plant
Management Society, Inc.
Joe Wright, President
Southeast Milk Inc.