

The Florida Coastal and Ocean Coalition

Caribbean Conservation Corporation & Sea Turtle Survival League •
Reef Relief • Gulf Restoration Network • Natural Resources Defense Council •
The Surfrider Foundation • The Ocean Conservancy • Environmental Defense

February 18, 2008

Mr. Phil Coram, P.E., Deputy Director
Division of Water Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, Mail Station 3500
Tallahassee, Florida 32399-2400

Re: Comments on Proposed Ocean Outfall Legislation

Dear Mr. Coram,

The Florida Coastal & Ocean Coalition offers the following comments in support of the draft legislation for closure of ocean outfalls along the southeast Florida coast. The Coalition is a group of environmental, civic, business and outdoor organizations working together to help sustain Florida's environmental and economic future. The Coalition Steering Committee alone represents hundreds of thousands of Floridians who believe in a clean and healthy coastal and ocean environment. Over 160 businesses and environmental organizations, representing fishing, boating, diving, swimming, surfing, paddling and nature viewing, have joined together to support the Coalition's shared voice and vision for a healthy and sustainable coastal and ocean future for Florida.

We are encouraged by Governor Crist's support for the Florida Department of Environmental Protection's (Department) legislation to eliminate the wasteful and harmful practice of discharging million of gallons of poorly treated domestic wastewater off Florida's shores everyday. This antiquated idea of "ocean outfall" is a remnant of a time long ago, when water was cheap and plentiful and the oceans were viewed as an inexhaustible dumping ground for pollutants.

In our opinion, the legislation as drafted will make substantial improvements for Florida's coastal and ocean ecosystems. The removal of "ocean outfall" as a construction option for future sewage or industrial waste disposal systems in the State puts Florida on a path of responsible stewardship for our ocean related resources. The capping of existing discharge capacity in southeast Florida is a bold statement that expansion of this disposal process is contrary to the public good. The creation of specific requirements to achieve advanced wastewater treatment and a beneficial commodity of reuse water is visionary leadership for the world class cities of South Florida.

We find the Department's timelines, reporting requirements and incentives to prioritize financial assistance for these actions to be reasonable, responsible and effective. In our view, the objective of reaching full advanced wastewater treatment by 2018, thus

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providing a viable reuse commodity and elimination of poor water quality discharges into our oceans, is of the utmost importance. We believe firm adherence to the 10 year goal will be the catalyst that propels the South Florida metropolitan area to embrace the benefits of reuse water, protect their potable water supply and reach the 2025 goal of complete ocean outfall closure other than for emergency purposes.

Our sole recommendation for change in the legislation is eliminating the word "potentially" in Section 2 (403.086) (9) relating to the finding by the legislature that "...discharge of domestic wastewater through ocean outfalls ... compromises the coastal environment and the quality of life and local economies that depend on those resources". It is unquestionable that discharge of these pollutants at these volumes over time is having negative effects on the marine environment, whether fully documented or not. Nothing defines Florida more than the ocean. The opportunity should not be lost to make a strong statement of our commitment to its preservation.

We congratulate the Department on the draft language and the substantive effort to bring about closure of the ocean outfalls in the State's most populous region. We also appreciate the time and cost it will take for local governments to make this conversion to reuse. We strongly believe, however, that once this investment is made in treatment and reuse, this once waste-product will be a vital commodity for the future growth and economic vitality of the community, as well as a safe guard to our coastal and marine environment.

We have no doubt that every gallon of wastewater treated to advanced standards for reuse in the community will save a gallon of Biscayne Aquifer water for drinking and other public purposes. The water savings will not only benefit future public and environmental interests, but help reduce the amount of salt water intrusion into the aquifer as a result of increased drawdown, thus safeguarding our water supply for future generations.

We commit to working with the Department and these local governments in moving this legislation forward.

Thank you for the opportunity to provide these comments.

Sincerely,

Gary Appelson – Caribbean Conservation Corp.
Sarah Chasis, J.D. – Natural Resources Defense Council
Ericka D'Avanzo – Surfrider Foundation
Paul G. Johnson – Reef Relief
Gerald Karnas. – Environmental Defense
Joe Murphy – Gulf Restoration Network
David White, J.D. – The Ocean Conservancy

cc: Governor Charlie Crist
Senate Environmental Preservation and Conservation Committee
House Committee on Environmental Protection
Secretary Mike Sole
Distribution