



Ms. Kaitlyn Sutton  
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November 22, 2019

Re: *DRAFT Implementation of the Turbidity Criterion for the Protection of Coral Reef Resources, Cyanotoxin Criteria/Advisory Thresholds, and Numeric Nutrient Criteria*

Dear Ms. Sutton:

Thank you for the opportunity to comment on this *DRAFT Implementation of the Turbidity Criteria for the Protection of Coral Reef Resources, the Cyanotoxin Criteria/Advisory Thresholds, and the Numeric Nutrient Criteria*. We commend the Department for their recognition that the current turbidity limits are not protective of sensitive marine environments and we applaud this effort to adopt a science-based standard to protect Florida's precious and imperiled coral reef ecosystem, along with the effort to adopt a quantitative cyanotoxin standard to protect human health and quality of life in the state of Florida. We also appreciate the Department's willingness to add additional public workshops throughout the state. Providing a public forum for comments is essential to capturing public input in the decision-making process.

We are generally supportive of the proposed draft turbidity criterion and are strongly supportive of advisories issued for cyanobacteria in Florida's recreational waters. However, we would like to raise several suggestions and some concerns regarding the Draft Implementation:

## **Turbidity Criteria**

### **I. Calculation of Background Turbidity Levels**

While the newly proposed turbidity standards are a significant improvement in protection for coral reefs based on best available science, we are concerned about the calculation of background turbidity levels. The critical component in the success of this implementation is ensuring that the calculation of "background" turbidity levels is accurate, relevant, and properly applied.

One of our primary concerns is that "background" calculations may be skewed such that the apparent difference between compliance and background samples are no longer protective of coral reefs. We are not entirely clear from the draft standards how these background levels will