

March 1, 2012

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Florida Numeric Nutrient Criteria

Dear Administrator Jackson,

The undersigned organizations are all partners and stakeholders committed to addressing nutrient loadings in our nation's waters. We understand the importance of clean water for both our businesses and the communities in which those that work in our industries reside. We are writing you today to urge you to approve the Florida Department of Environmental Protection's (FDEP) Numeric Nutrient Criteria (NNC) rule for Florida and withdraw the rule entitled "*Water Quality Standards for the State of Florida's Lakes and Flowing Waters*" promulgated by your agency in December 2010.

The FDEP NNC rule was **unanimously** approved by the Florida Environmental Regulation Commission (ERC), the Florida Legislature and signed by Governor Rick Scott.

Florida is recognized as a national leader in implementing a sophisticated suite of water quality and technology-based nutrient management programs to protect its water bodies. In fact, FDEP has spent more than \$20 million during the last decade to collect and analyze data related to the concentrations and impacts of nutrients in Florida's water bodies. By utilizing this data and analysis, FDEP has worked tirelessly over the past year to develop scientifically defensible water quality standards. While there will be significant costs associated with these standards, we believe they are technically achievable standards that our members and other stakeholders will be able to meet while working in partnership with the state.

EPA has acknowledged that states must take the lead in addressing nutrients. After all, it is the states that are best suited to deal with issues related to their unique landscapes and climates. As stated in the March 16, 2010, memo entitled "*Working in Partnership with States to Address Phosphorus and Nitrogen Pollution through Use of a Framework for State Nutrient Reductions*," Acting EPA Assistant Administrator Nancy Stoner said, "States need room to innovate and respond to local water quality needs, so a one-size-fits-all solution to nitrogen and phosphorus pollution is neither desirable nor necessary." We wholly agree, and accordingly, we respectfully request that you approve FDEP's NNC rule in its entirety.

Thank you for your time and attention to this important matter.

Sincerely,

Agribusiness Association of Iowa
Agribusiness Council of Indiana
Agricultural Retailers Association
Agrium U.S., Inc.
Alabama Agribusiness Council
American Farm Bureau Federation
American Forest & Paper Association
Associated Builders and Contractors, Inc.
CF Industries
CropLife America
Florida Fertilizer & Agrichemical
Association
Florida Sugar Cane League
Georgia Agribusiness Council
Illinois Fertilizer and Chemical Association
Indiana Plant Food and Agricultural
Chemicals Association
International Raw Materials Ltd.
J.R. Simplot Company
Michigan Agri-Business Association
Mid America Croplife Association
Minnesota Crop Production Retailers
Missouri Agribusiness Association
Montana Agricultural Business Association
National Alliance of Forest Owners
National Association of Manufacturers
National Association of State Departments of
Agriculture

National Cattlemen's Beef Association
National Chicken Council
National Corn Growers Association
National Council of Farmer Cooperatives
National Milk Producers Federation
National Turkey Federation
Nebraska Agri-Business Association
New York State Agribusiness
Ohio AgriBusiness Association
PotashCorp
South Dakota Agri-Business Association
Southern Crop Production Association
The Fertilizer Institute
U.S. Cattlemen's Association
U.S. Chamber of Commerce
United Egg Producers
Virginia Agribusiness Council
Virginia Grain Producers Association
Virginia Poultry Federation
Western Plant Health Association
Wisconsin Crop Production Association
Wyoming Ag-Business Association
Wyoming Farm Bureau Federation

cc: President Barack Obama
Florida Congressional Delegation
Governor Rick Scott
Florida Attorney General Pam Bondi
Florida Commissioner of Agriculture Adam Putnam
Herschel Vinyard, Secretary of the Florida Department of Environmental Protection
Tom Vilsack, Secretary of the U.S. Department of Agriculture