

## Revise Lake Okeechobee Operations

The Lake Okeechobee System Operating Manual (LOSOM), currently being developed, should bring greater emphasis to environmental resource needs, public health risk from harmful algal blooms (HABs) and greater overall balance between competing users.

## Establish State-Wide Standards for Cyanotoxins (Blue-Green Algae)

Florida Department of Environmental Protection (FDEP) should adopt the 2016 draft EPA guidelines for microcystin and cylindrospermopsin as new water quality standards. Florida Department of Health (FDOH) should adopt the same guidelines for establishing statewide swim advisories no later than June 2021.

## Develop Red Tide Brevetoxin Standards

Florida Fish and Wildlife Conservation Commission (FWC) and the HAB (Red Tide) Task Force need to establish, and the legislature should adopt, a consistent statewide policy for on-site public health risk notification on red tide no later than June of 2021. There is considerable peer reviewed research in existence to establish such a policy without deferring to new research that could take decades.

## Increase Fecal Indicator Bacteria (FIB) Monitoring

Florida Department of Health (FDOH) should establish priority monitoring locations for fecal indicator bacteria (FIB) at waterbodies throughout the state in addition to the coastal beaches. Waterbodies with existing verified impairment for FIB should be posted at public access points with cautionary signage similar to what is done in some counties for cyanobacteria. "No Swimming" signs should not be a proxy for signage that is specific to health risk for FIB.

## Basin Management Action Plans (BMAPs) Need Greater Assurance for Timely Compliance

FDEP Basin Management Action Plans for the Northern Everglades and Estuaries (Caloosahatchee, Lake Okeechobee and St. Lucie) that were revised and adopted prior to the 2020 legislative session should be modified to include the provisions of the 2020 Clean Waterways Act during the 2021 legislative session. Waiting another five years, as part of the existing planning cycle to modify the northern estuaries BMAPs is unacceptable considering the growing rate of water quality impairment throughout Florida.

## Adopt Mandatory and Verifiable Agricultural Best Management Practices

Agricultural Best Management Practices (BMPs) are ineffective at protecting state waters from nutrient and other types of pollutants. The 2020 Clean Waterways Act provision in SB 712 relating to Agricultural Best Management Practices lack enforcement and compliance certainty.

## Do Not Change Federal Authority Over Wetland Permitting

FDEP should not assume Clean Water Act section 404 wetland permitting in Florida, which is currently under the Army Corps of Engineers' authority. No fiscal analysis has been done to determine the state's ability to adopt this new permitting authority without impacting the prioritization and implementation of other state water quality programs such as Total Maximum Daily Loads (TMDL) which has a large backlog of waterbodies already impaired awaiting implementation.

## Ensure Water Quality Treatment for the C43 Reservoir That Will Meet Effluent Limitations

An onsite or in-reservoir water quality component for the C43 Reservoir needs to come online prior to the scheduled operation of the reservoir in 2022. FDEP should conduct the required operational water quality certification of the C43 Reservoir no later than January 2022.

## Improve State-wide Stormwater Treatment Criteria

FDEP should adopt revised and effective statewide stormwater treatment criteria for permitting new development that discharge to waters of the state. The 2020 Clean Waterways Act compels this goal but the specifics were left to advisory groups. Furthermore, criteria and necessary funding to retrofit existing systems that contribute to the increased rate of impairment should be identified and adopted no later than 2022.

## Expedite CERP Funding

Increased federal funding for completion of Greater Everglades restoration projects should occur as early in the budget planning process as possible and no later than passage of the 2020 Water Resources and Development Act.



## OUR MISSION

To Protect and Restore the Caloosahatchee River from Lake Okeechobee to the Coastal Waters.

