



July 10, 2018

Secretary Noah Valenstein
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Dr. Ann Shortelle, Executive Director
St. Johns River Water Management District
4049 Reid Street
Palatka, Florida 32177

RE: Urgent Request -Immediate Moratorium of Sewage Sludge Application within the Upper Basin of the St. Johns

Dear Secretary Valenstein and Dr. Shortelle,

In early April, St. Johns Riverkeeper and its Headwaters Advisory Council first alerted the Florida Department of Environmental Protection (FDEP) and the St. Johns River Water Management District (SJRWMD) about spiking pollution, particularly phosphorus, within the Upper Basin of the St. Johns River.

There appears to be a strong correlation of this growing threat with the increase of Class B biosolids, or sewage sludge, being permitted on adjacent lands within the Headwaters of the St. Johns River.

FDEP confirmed that **more than 70,000 tons of sewage sludge was permitted in 2016 to be disposed within the Upper Basin of the St. Johns River.** This is more than 73% of Class B biosolids permitted that year.

Now Blue Cypress Lake, once one of the most pristine lakes in the state, is covered in green algae making it dangerous for human use and threatening to wildlife.

This outbreak is highly toxic as reported by Treasure Coast Newspapers.

<https://www.tcpalm.com/story/news/local/indian-river-lagoon/health/2018/06/14/highly-toxic-blue-green-algae-bloom-reported-blue-cypress-lake/700929002/?csp=chromepush>

A sample from the bloom tested Wednesday contained the toxin microcystin at a level of 4,700 parts per billion, ORCA founder and lead scientist Edie Widder said Thursday. The World Health Organization considers microcystin levels higher than 2,000 parts per billion to be "very highly hazardous" in recreational contact.

This is much more than an environmental crisis. It is a human health crisis.

According to the Florida Fish and Wildlife Conservation Commission (FWC):

There are three main types of cyanotoxins in Florida's freshwater systems: hepatotoxins (affecting the liver), neurotoxins (affecting the nervous system), or dermatotoxins (causing topical skin irritations).

Downstream Impacts

Spiking water degradation in the Upper Basin is quite concerning. It degrades our river's water quality, threatens human health and undermines downstream investments in nutrient pollution reduction as a part of the Middle Basin- Basin Management Action Plan (BMAP) lead by the FDEP and SJRWMD.

<https://floridadep.gov/sites/default/files/harney-monroe-bmap-apr-2015.pdf>

Consider the following observations stated in 2015 by FDEP:

The Florida Department of Environmental Protection (DEP) identified the Lakes Harney and Monroe and MSJR Basin to be impaired by nutrients and low dissolved oxygen, and, in December 2009, adopted TMDLs for Total Phosphorus (TP) and Total Nitrogen (TN) for the lakes and river segments. The Smith Canal TMDL was adopted by the department in September 2009 for TP. **An important consideration for the restoration of the Lakes Harney and Monroe and MSJR Basin is that the majority of the loading to the impaired waterbodies comes from sources outside the watershed. Therefore, reductions from the upstream sources must occur before water quality standards can be met in the impaired waterbodies.**

An important consideration for the restoration of the Lakes Harney and Monroe and MSJR Basin is that the majority of the loading to the impaired waterbodies comes from sources outside the watershed. Approximately 96.4% of the total nitrogen (TN) loading and 95% of the total phosphorus (TP) loading enters the impaired waterbodies **from the Upper St. Johns River, Econlockhatchee River, and Lake Jesup Basins. Therefore, implementing projects in the watershed alone will not achieve the TMDLs; reductions from the upstream sources must occur before water quality standards can be met in the impaired WBIDs.**

Request for Immediate Moratorium

We applaud the Indian River County Commission and Senator Joe Negron for requesting urgent action.

We also appreciate the soon-to-be-created FDEP Technical Advisory Committee to address this issue.

However, based on the visible, measured and unprecedented pollution impacting Blue Cypress Lake, time is of the essence and we strongly request an immediate moratorium of sewage sludge application within the Upper Basin of the St. Johns until a full technical report can be completed that identifies how to best manage sewage sludge disposal in the State of Florida in order to protect Florida's waters, public investment and human health.

Over the next 30 days, we will be urging elected officials throughout the Upper Basin of the St. Johns River to address this issue. Please let us know if you both take this threat as seriously as we do. We sincerely request relief as soon as possible. Please contact us at 904-509-3260 or at lisa@stjohnsriverkeeper.org.

For the River,

The St. Johns Riverkeeper Headwaters Advisory Council

Vince Lamb - Merritt Island, Brevard County

Bill Zoby - Melbourne, Brevard County

Doug Sphar – St. Johns River Property Owner, Brevard County

Richard Baker – Sebastian, Indian River County

Scott Green – St. Johns River Property Owner, Osteen, Volusia County

R.T. "Bo" Platt – Melbourne, Brevard County

Lisa Rinaman – St. Johns Riverkeeper

CC:

Deputy Secretary Drew Bartlett

SJRWMD Board

