



The Western Coalition of Arid States
WESTCAS

May 7, 2010

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Water Docket
U.S. Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Avenue, NW.
Washington, DC 20460

Via Electronic Mail: ow-docket@epa.gov

Attention: Docket ID No. EPA-HQ-OW-2009-0596

Dear Sir or Madam:

The Western Coalition of Arid States (WESTCAS) appreciates the opportunity to comment on *Water Quality Standards for the State of Florida's Lakes and Flowing Rivers Notice of Proposed Rulemaking*, published by the Environmental Protection Agency (EPA) in the *Federal Register* on January 26, 2010 (75 *Fed. Reg.* 4174). WESTCAS is a coalition of approximately 125 water and wastewater districts, cities, towns, and professional organizations focused on water quality and water quantity issues in the States of Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, and Texas. Our mission is to work with Federal, State, and Regional water quality and quantity agencies to promote scientifically-sound laws, regulations, appropriations, and policies that protect public health and the environment in the arid West. WESTCAS member entities own and operate facilities located on or near waters of the United States, all of which are subject to water quality standards and NPDES permit requirements. WESTCAS has a direct interest in the arena of water quality standards for nutrients and approaches to ensuring that water quality standards are appropriate to waters in our areas of interest.

The members of WESTCAS concur with and endorse the comments on the cited documents submitted by the National Association of Clean Water Agencies (NACWA), dated April 28, 2010. The NACWA comments are thorough and thoughtful and fully represent the concerns that our members have with the proposed Florida nutrient criteria.

To emphasize the importance of these comments to WESTCAS members, we are particularly concerned that the approach to establishing numeric nutrient criteria in Florida would become standard practice among other

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states. The issues raised by NACWA are expected to have serious ramifications in the arid states, where the receiving streams are often effluent dominated. The presence of nutrients has got to be linked to the demonstrated impacts on the biological health of the stream on a stream-specific basis.

If there are any questions about these comments, please contact Robert Hollander, WESTCAS President, at 480-371-0015 or at rhollander@apaienv.com

Sincerely,



Robert Hollander
President

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