



## **EPA Water Quality Standards Comment Letter Template**

The following template includes recommended information to be included in each paragraph. **It is not a cut and paste document.** Comments have more impact if completed on individual farm letterhead and signed by a principal for the operation. Please remember that all comments must be received on or before **March 29, 2010.**

The letter below is addressed as if it will be hand delivered by courier. Standard mail delivery (via a separate address) and e-mail delivery are available as options. Please see the *Comment Submittal Guidelines* section if other delivery methods are used.

Via Federal Express

EPA Docket Center  
EPA West Room 3334  
1301 Constitution Avenue, NW.  
Washington, DC 20004  
Attention: Docket ID No. EPA-HQ-OW-2009-0596

**RE: Comments to Docket ID No. EPA-HQ-OW-  
2009-0596**

Dear Sir or Madam:

### **Introductory Section**

< Introductory paragraph that includes basic information on the location and history of your farming operation, the crops grown, seasonality of production, and how your operation benefits the local community and economy (providing stable jobs).>

<General discussion and description of potential impacts to your farm, economic impacts, general management changes that would be required, and discussion of general implementation issues (i.e. loss of land for treatment structures, cost of implementing expensive technologies).>

< Acknowledge your understanding of the importance of having clean surface water. Discuss how you have taken a proactive approach dealing with water impairment. Discuss your history of BMP implementation to curb surface water degradation and how effective you believe the program to be.>

## **Grower/Stakeholder Comments**

*Address these comments as appropriate for your specific situation (farm location, size, crop, etc.). To maximize effectiveness, it is imperative to be as specific to your own operation as possible. The Grower/Stakeholder Comment section can be used as a guide when formulating your individual responses. Please feel free to add any other additional comments that you deem appropriate. The aforementioned comment topics are as follows:*

- **Economic Impact**
  - What are the expected economic repercussions if this ruling is adopted?
  - How will this ruling affect your operation and the local economy?
- **Current Best Management Practices (BMPs)**
  - Elaborate on what your operation has done to reduce surface water impairment?
- **The Proposed EPA Nutrient Ruling Criteria is too Generalized**
  - Discuss how you believe the proposed criteria do not consider the uniqueness of Florida's water bodies and that many pristine, healthy springs and streams would be considered impaired.
  - Mention your support for the FDEP's TMDL and BMAP programs.
  - Inquire what will happen to the FDEP overseen NPDES program and all the current permits and permit holders.
- **Responsibility for Impaired Waters Entering the State**
  - Mention your opposition to Florida being subjugated to cleaning and maintaining out-of-state rivers and streams.
- **Flood Control Within Southern Florida**
  - Question how the EPA will plan to regulate drainage and alleviate flooding currently provided by southern Florida's canal systems.

## **EPA's Request for Comments**

*You have the option to address any of the EPA's specific, technical comment requests. If you choose to do so, please indicate the section of the proposed ruling to which your comment applies.*

## **Conclusions**

<Reiterate how Florida's growers and the agriculture community understand the need and share the desire to protect the quality of our state's lakes, rivers and streams, and how they would like to continue to have a proactive role in the process. The grower should reinforce the potential impacts of the proposed changes and thank the Agency for the opportunity to provide comments. It always helps to express the desire to work with the agency to seek solutions to the problems identified or in the development of data to refine the specific efforts that are needed.>

Sincerely yours,

Principal, XYZ Farms, Inc.

cc: Mr. Daniel A. Botts, FFVA  
Mr. Kerry B. Kates, P.E., FFVA

If you have questions, please contact the Environmental and Pest Management Division for further information at (321) 214-5200.