

Dear Editor

Mr. Orth (Executive Director, St. Johns Riverkeeper) and I have some things in common. We both spend our working hours advocating a goal of clean water in our rivers and lakes.

We differ on our approaches. I don't spend my days cruising the river in a boat. My days are spent with pipefitters, welders, masons, electricians, and computer programmers building some of the most far-reaching improvements to our water-quality infrastructure that Florida has witnessed in over three decades. Most of the men and women I work with would rather be on a boat enjoying the river, but the work they are doing is creating real reductions in nutrient pollution while putting groceries on their family dinner tables and helping them pay their taxes.

I don't do lunch with attorneys between motions in lawsuits. I go to the Mom and Pop restaurants where Pop is flipping burgers and fretting about increasing food costs to his business, and where Mom is serving coffee to small family farmers who lament the increasing costs of maintaining crop yields and delivering Florida-grown food products to the restaurant for Pop to cook.

We're not being cheap in our efforts to clean nutrients from Florida's waters. Contrary to Mr. Orth's claims that "short-sighted politicians, utilities, and businesses that continue to fight against much needed protections" we have unleashed a \$700 million, five-year capital improvement plan in Northeast Florida to clean up the Lower St. Johns River. Team Florida is basing their clean-up plans on Florida's Total Maximum Daily Load (TMDL) program. Some of Florida's brightest scientists and water quality experts developed this plan. This plan has been peer-reviewed by other smart scientists and water quality experts, who agree that the plan will work when the construction is finished.

We would have completed work on River cleanup two years earlier, had it not been for capricious and arbitrary lawsuits filed by environmental lobbyists. In the past, these lawsuits resulted in backroom settlement deals between unelected EPA bureaucrats and the environmental lobbyists. In 2008, this tactic did not work and Team Florida was finally able to issue permits to allow the work to begin. However, during the period of time that the TMDL plan was hung up in the legal system, over 20,300,000 pounds of excess total nitrogen was discharged into the St. Johns River that would have otherwise been cleaned up under the TMDL program.

Whether he cares to admit it or not, some of that excess pollution is caused by Mr. Orth whenever he flushes his toilet and every time rain falls on the parking lot at the Riverkeeper's office on University Blvd in Jacksonville. Team Florida is cleaning up Mr. Orth's pollution and it is more costly than EPA or Mr. Orth believe it to be.

It is widely believed that EPA is underestimating costs. Mr. Orth seems to say that those of us who disagree with EPA are using "scare tactics". In EPA's analysis, the cost of converting existing wastewater treatment plants to meet the TMDL is \$1.74 per treated gallon per day. Most utility owners, engineers, and contractors find that estimate unbelievable. The Town of Orange Park will spend \$10 million to treat 2.5 million gallons of wastewater per day (\$4 per treated gallon per day), which is arguably the most cost-effective project of its kind in the Lower

Basin. Jax Beach will be spending \$5 - \$6 per treated gallon per day on its TMDL improvements, as will JEA. The City of Green Cove Springs will likely spend \$8 per treated gallon per day just to improve the effluent from its South Wastewater Treatment Plant.

When all of these improvements are completed, Cities, businesses, and taxpayers will be up to their ears in hock for water quality improvements that meet the current TMDL. None of these improvements will meet the unrealistic, scientifically-unsound standards being proposed in EPA's numeric nutrient rules which Mr. Orth supports. If Mr. Orth and Riverkeeper have their way, the cost of the Numeric Nutrient rules will become even more expensive. Last week the Riverkeeper filed another lawsuit to remove parts of the Numeric Nutrient rules they do not like.

Hopefully, the Riverkeeper will be unable to find another sympathetic EPA bureaucrat to cut another backroom deal that will cost Floridian more money to get less pollution cleanup.

I normally don't support lawsuits as an effective way to clean up the environment. However, in this case I fully support the suit filed by Mr. McCollum, Ms. Bondi, Mr. Bronson, and Mr. Putnam as long as it keeps EPA off of Team Florida's backs. We don't need any more EPA meddling that costs us expensive design changes and construction change orders. Team Florida has a really good plan and the way to get the job done is to get off our boats, roll up our sleeves, and keep building the projects.

Merry Christmas,

Mike Kelter, PE
Green Cove Springs City Council, Seat One.