

December 10, 2019

Cris Costello
Organizing Manager
Sierra Club
2127 S. Tamiami Trail
Osprey, FL 34229
941-914-0421
cris.costello@sierraclub.org

The Sierra Club urges you to publicly and officially, as part of the formal recommendations this body makes to the Governor, eschew, reject, renounce the use of the phrase “naturally occurring” to describe Red Tide, Red Tides, or *karenia brevis*.

The phrase “naturally occurring” to describe Red Tide, Red Tides, or *karenia brevis* is not scientific or science-based, is utter nonsense, and the use of it is disingenuous. We call it the red herring that it most certainly is. A red herring may have some kernel of truth, but is used as a distraction to keep our eyes *on* less important matters and *off* the actual bottom line.

Red Tide is constantly referred to as “naturally occurring” supposedly because it has been reported since Spanish explorer days. Is it customary to use this term for rats or mosquitos? I think you will agree that rats and mosquitos have been around since Spanish explorer days too.

Rats *are* “naturally occurring” but no one would use that term to describe them. Human civilizations have known for hundreds of years that if you dump garbage in the street, you will get rats. Keep dumping garbage and you will get more rats, and those rats will have more baby rats. So we don’t leave garbage in the street! If you make garbage (like all of us do at home), you pay for its management through a system organized by the government. Does that eliminate rats altogether? No. They are still around and once in a while you will get an infestation somewhere. But, keeping garbage out of our streets reduces the frequency, intensity, and duration of rat infestations.

Mosquitos *are* “naturally occurring” but no one would use that term to describe them either. What is our first line of defense against mosquitos? It is not control measures but rather we get rid of the circumstances that promote their reproduction; we eliminate their prime living conditions by keeping standing water out of our yards and ditches. Control measures (the spraying of insecticide, the placement of mosquito devouring fish, etc.) are secondary, not only because control measures may bring negative unintended consequences, but because they are more expensive.

There are many similar examples: “Don’t bother washing your hands after you use the toilet or handle raw meat – we can pump everyone full of antibiotics after people get sick” is not what the signs in the restroom say. Of course not, that would be hazardous to public health and much more expensive than managing the culprit before it turns into an outbreak.

Using “naturally occurring” to describe Red Tide creates a false narrative that takes attention away from the need to manage/address the factors that fuel *karenia brevis* blooms: the fertilizer/sewage/manure pollution and the climate change that increases the frequency, intensity, and duration of most if not all harmful and nuisance algal blooms.

There must be method to the madness. “Naturally occurring” is seen by the public as a PR move by polluters and those who protect them because pollution source control is (and should be) paid for by the polluter. Just like homeowners pay for garbage pickup, large and small polluters should pay to manage their pollution so that it does not end up in our State and Federal waters.

Every time Mote or FWC uses “naturally occurring” it is repeated by any number of politicians and just as many reporters and the false narrative is perpetuated. It is a false narrative that you, the Harmful Algal Bloom/Red Tide Task Force, can stop with a strong recommendation to reject its use. There is no need to point fingers at why the phrase has been used or by whom in the past.

The Sierra Club trusts and expects you to take action to renounce the use of this phrase in your official recommendations that are made available to the public. In so doing, you will abide by your charge to bring a science-based approach to your subject matter.