

Precautionary Principle

- Visual presence of bloom used as threshold instead of numeric toxin value because:
 - Lag time between sample collection and dissemination of results
 - Allows the public to make decisions about recreating in a water at the time of use
 - High spatial and temporal variability in algal cell and toxin concentrations
 - Very low incidence of toxins in waters without visible bloom present
 - Application of EPA's recommended criteria would not cause any additional waters in Florida to be listed as impaired
 - Concerns regarding EPA's derivation of cyanotoxin thresholds