From: FL-Rules@dos.state.fl.us
To: Crane-Amores, Borja; Coram, Taylor
Subject: One-time User Comment From FLRules.com
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FLRules.com one-time comment:

Name: Danielle Hopkins
Email: danielleh@ampuptoday.com
Title: FSA Public Comment - Stormwater Rule
Comment: The Florida Stormwater Association (FSA) appreciates the opportunity to support the Department in their mission to protect and preserve Florida's iconic and valuable natural resources. Governor DeSantis has actively pushed to address environmental concerns, via Executive Orders 19-12 and 23-06, and signed into law the Clean Waterways Act, developed and passed during the 2020 Florida Legislative session. Updated regulatory programs and policies, some of which have not been revised in decades, will help meet the Governor's request for action and address the demands of a rapidly growing population to ensure our land and aquatic environments are protected and preserved for the future. As an association representing over 330-member local governments, private consulting firms and other stormwater organizations (4,500 individuals) in Florida, FSA appreciates the Department's willingness to work with all parties affected by the revised state stormwater regulations to build consensus through compromise.

FSA continues to support the work and recommendations of the Department's Clean Waterways Act Stormwater Rulemaking Technical Advisory Committee (TAC), a group of 13 credentialed professionals exceptionally familiar with stormwater permitting policy and practices in Florida. The TAC's recommendations took time and energy, 13 meetings and 11 months of discussion and debate. FSA closely monitored the TAC's meetings along with attending all rulemaking workshops, providing comments at each opportunity, and being available to support Department staff by answering questions and providing information as rule language was developed. As a stakeholder in the entire rulemaking process, FSA believes that a rule was developed that meets the requests of both the Florida Legislature and Governor DeSantis. With this in mind, we fully support the Proposed Rule language as posted in the Florida Administrative Register on February 24, 2023.

FSA members realize these changes will be impactful on some, but we also understand that developing a less stringent rule will not answer the Governor's request to move forward and protect Florida resources. FSA is aware of last-minute requests to weaken the rule, and fully believe this is in direct contradiction to what was a requirement of the Governor approved 2020 Clean Waterways Act and Florida Statute 373.4131. Of note, FSA believes that the state must have a minimum treatment performance standard that addresses nutrients in a significant manner, consistent with the Governor's initiatives and the recommendations of the TAC.

As an engaged stakeholder we are thankful for the Department's efforts and look forward to taking this opportunity to make the needed updates to the Stormwater Rule and improve water quality.

As always, we stand ready to assist the Department in that effort in any way possible.

Danielle Hopkins
Florida Stormwater Association