



FLORIDA STORMWATER ASSOCIATION

Leadership in Stormwater Management and Utilities

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April 17, 2025

U.S. Environmental Protection Agency
EPA Docket Center, Water Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW, Washington, DC
Submitted via Federal eRulemaking Portal: <https://www.regulations.gov>

RE: Comments – Implementation of the Definition of Waters of the United States-
Docket ID No. EPA-HQ-OW-2025-0093

The Florida Stormwater Association (FSA) appreciates the opportunity to submit the following comments on the Proposed Implementation of the Definition of Waters of the United States (WOTUS).

As an association representing over 350 organizational members, primarily consisting of municipal and county governments. FSA's membership also includes various water control districts, water management districts, academic institutions, and many consulting and engineering firms. There are 5,600 individuals who are closely watching this process as the updates to the wetland designation and permitting process are a critical piece of stormwater management.

Wetlands preservation plays an integral role in stormwater management, and we are requesting new federal requirements and guidance that ensure adequate protection of existing wetlands. We recognize the complexities surrounding past approaches to designating and determining wetlands, and we welcome any streamlined processes. Florida is a unique state dominated by aquatic systems, including both coastal and inland wetlands, so the protection of these areas is critical as the state grows and works to address water quality restoration efforts statewide. The proposed focus on wetlands with direct surface connections to navigable waters raises concerns about the protection of isolated wetlands. Although not directly linked, these wetlands contribute significantly to our local ecosystems. We urge EPA to acknowledge the ecological importance of these wetlands and to explore methods of protection, such as through state or local programs.

FSA welcomes EPA's efforts in organizing public listening sessions and seeking feedback on the proposed revisions. Active participation from local governments and stakeholders is crucial to ensure that the revised definition considers on-the-ground realities and the diverse functions that various water bodies serve.

Finally, regardless of the final definition adopted, local governments will require support to implement and comply with new regulations. We request that EPA provide clear guidance, training resources, and financial assistance to help local entities adapt to changes and effectively manage water resources. Collaborative efforts between federal, state, and local agencies will be essential to achieve the goals of the Clean Water Act while addressing the practical challenges faced by local governments.

Melissa M. Long, PE
President
City of Jacksonville

Melanie Weed, CPM, ENV SP
Vice President
Pinellas County

Mark Heidecker, CPM
Secretary-Treasurer
City of Tallahassee

Danielle Hopkins, CMP
Executive Director

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We appreciate EPA's commitment to revising the WOTUS definition in a manner that is legally sound, environmentally protective, and practically implementable. FSA is dedicated to assisting our members as they safeguard water resources and ensure that federal policies support those efforts without imposing undue burdens. We look forward to continued collaboration with EPA and other stakeholders throughout this rulemaking process. As always, we stand ready to assist EPA with any comments or questions concerning how these updated definitions and wetland regulations may impact members. Thank you for your time and consideration.

Sincerely,
FLORIDA STORMWATER ASSOCIATION, INC.

A handwritten signature in black ink that reads "Danielle Hopkins". The signature is written in a cursive style with a large, prominent initial "D".

Danielle Hopkins