



Florida Conservation Coalition

TAKING ACTION FOR FLORIDA

Chairman

Bob Graham

Vice Chairman

Lee Constantine

Organizations

CONSERVANCY OF
SOUTHWEST
FLORIDA

DEFENDERS OF
WILDLIFE

FLORIDA WILDLIFE
FEDERATION

LEAGUE OF
WOMEN VOTERS

1000 FRIENDS OF
FLORIDA

SIERRA CLUB
FLORIDA

ST. JOHNS
RIVERKEEPER

Individuals

Craig Diamond

Ryan Smart

Victoria Tschinkel

Estus Whitfield

March 11, 2020

Heather Mason

Environmental Administrator

Florida Department of Environmental Protection

2600 Blair Stone Road

Tallahassee, Florida 32399

Heather.Mason@FloridaDEP.gov

Re: February 19, 2020 Notice of Proposed Rules Regarding 404 Assumption

Dear Ms. Mason:

The Florida Conservation Coalition (FCC) is an alliance of over 80 conservation organizations dedicated to protecting Florida's lands, water, and wildlife. In 2018, the FCC opposed the Florida Department of Environmental Protection's pursuit of state assumption of federal Clean Water Act Section 404 dredge and fill permitting.

We write now to express our continued opposition to the state's proposed rules to assume jurisdiction over the federal wetlands permitting authority. The state's proposal would remove the U.S. Army Corps of Engineers' role in reviewing and issuing Section 404 dredge and fill permits in assumed waters, including the Corps' environmental analysis process under the National Environmental Policy Act (NEPA). There remains uncertainty about how compliance with other important environmental laws, including the Endangered Species Act, would be ensured. The state's proposal does not include the provision for any additional staff or financial resources to undertake the 404 program.

Florida has already lost a substantial amount of historical wetlands, and remaining intact wetland ecosystems are at risk from the projected human population increase to 33.7 million residents by 2070. Florida is one of the most biodiverse areas in the nation, and is home to dozens of listed species. In the face of increased growth and development, the protection

and restoration of Florida's wetlands is better accomplished by maintaining the existing involvement of both state and federal authorities.

We therefore respectfully request that the Department abandon the pursuit of assumption, and maintain the current process for the benefit of Florida's wetlands. At a minimum, we request that the Department hold public hearings around the state to permit stakeholders to express their views on this issue of exceptional importance.

Respectfully,

A handwritten signature in black ink that reads "Bob Graham". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bob Graham
Chairman
Florida Conservation Coalition

A handwritten signature in black ink that reads "Lee Constantine". The signature is cursive and somewhat stylized, with a prominent "L" and "C".

Lee Constantine
Vice Chairman
Florida Conservation Coalition