



# FLORIDA STORMWATER ASSOCIATION

Leadership in Stormwater Management and Utilities

PO Box 13688 - Tallahassee, FL 32317 - [www.florida-stormwater.org](http://www.florida-stormwater.org) - 888/221-3124 - [info@florida-stormwater.org](mailto:info@florida-stormwater.org)

December 1, 2022

Florida Department of Environmental Protection  
ATTN: Borja Crane-Amores  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Submitted via email: [Stormwater2020@floridadep.gov](mailto:Stormwater2020@floridadep.gov)

RE: Proposed Revisions Updating the Stormwater Design and Operation Regulations

Dear Mr. Cranes-Amores:

The Florida Stormwater Association (FSA) appreciates the opportunity to submit comments to Department on Sections 2, 8, 9, and 12 of the proposed revisions to the Applicants Handbook. Please note we have added additional detail related to previous comments (Sections 2, 8, and 12) and have highlighted these for easy identification. We continue to include all comments to date to restate our support for those earlier comments.

FSA continues to support the work and recommendations of FDEP's Clean Waterways Act Stormwater Rulemaking Technical Advisory Committee (TAC) as contained in their Summary Report. The recommendations of the TAC came after many months of discussion and debate.

We strongly urge the Department to incorporate the recommendations of the TAC unless there are sound, scientific reasons to do otherwise. In cases where the TAC's recommendations are not incorporated into the drafts of the proposed rule revisions, we request the Department to provide the specific reasons for departing from the TAC's recommendations as contained in the Summary Report.

Attempts were initiated by FDEP to update stormwater design standards and criteria on a statewide basis 15 years ago but were abandoned in early 2010. We hope that the current effort is successful and is adopted in time for ratification by the Legislature during the 2023 Session.

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

Sincerely,  
FLORIDA STORMWATER ASSOCIATION, INC.

Danielle Hopkins

Elizabeth Perez, PE  
*President*  
Collective Water Resources

Shane Williams, PhD, PE  
*Vice President*  
Alachua County

Melissa Long  
*Secretary-Treasurer*  
City of Jacksonville

Danielle Hopkins, CMP  
*Executive Director*