



FLORIDA STORMWATER ASSOCIATION

Leadership in Stormwater Management and Utilities

PO Box 13688 - Tallahassee, FL 32317 - www.florida-stormwater.org - 888/221-3124 - info@florida-stormwater.org

December 10, 2025

Emily Lang, Environmental Administrator
Division of Water Restoration Assistance
Florida Department of Environmental Protection
3900 Commonwealth Boulevard, MS#3602
Tallahassee, Florida 32399

RE: Draft Rule Language – Synthetic Turf - 125.572 Florida Statutes (F.S.)

Dear Ms. Lang:

The Florida Stormwater Association (FSA) appreciates the opportunity to submit comments on the updated draft rule for synthetic turf (Section 125.572 Florida Statutes (F.S.)). As an association representing over 360 members, including local governments, private consulting firms, and other stormwater-focused organizations, FSA has a direct interest in the development of this rule. FSA is committed to supporting the development of a rule that provides clear, science-based guidance, and we appreciate your review of the first set of comments submitted in August 2025 and the opportunity to provide a second review and additional feedback on the updated language.

We also note that FSA stands by the comments submitted in August 2025, as the Department did not accept all of the suggestions offered at that time. We continue to believe that several of those recommendations remain important to ensuring a rule that protects water quality and aligns with established statewide priorities.

As noted in our first comments, the state of Florida has long promoted and invested in the concept of Florida Friendly Landscaping (FFL), and the FFL program explicitly states that synthetic turf does not meet its foundational principles and has published research outlining the environmental risks associated with its use. As FDEP moves forward with new Basin Management Action Plans (BMAPs) and is now incorporating increased nutrient reductions in communities that implement FFL principles, we believe the rule should protect those areas working to achieve reductions. The following proposed language for Section 1 would provide important support for those communities.

(c) A local government may retain its adopted additional or more stringent standards if, as part of a comprehensive, science-based program to address nonpoint nutrient pollution that is both economically and technically feasible, it demonstrates that these standards are necessary to adequately reduce urban fertilizer contributions to nonpoint source nutrient loading to a water body that is impaired or part of an effective nutrient water quality restoration effort.

Melanie Weed, CPM, ENV SP
President
Pinellas County

Mark Heidecker, CPM
Vice President
City of Tallahassee

Lee Mullon, PE
Secretary-Treasurer
Drummond Carpenter

Danielle Hopkins, CMP
Executive Director

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FSA welcomes the opportunity to support FDEP in the development of the draft rule and remains available to discuss our comments and proposed language in greater detail. Thank you for your time and consideration of our input.

Sincerely,
FLORIDA STORMWATER ASSOCIATION, INC.



Danielle Hopkins