



Everglades Coalition

March 9, 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 Everglades Coalition has over 60 member organizations committed to the protection and restoration of America's Everglades. In 2018, the Everglades Coalition passed the enclosed resolution opposing SB1402 and HB7043, the bills that authorized the Department to pursue state assumption of federal Clean Water Act Section 404 dredge and fill permitting.

We write to express our 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 programs.

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 the Greater Everglades—an ecosystem largely comprised of wetland habitats—is better accomplished by maintaining the existing involvement of both state and federal authorities.

Committed to full protection and restoration of America's Everglades

1000 Friends of Florida
Angler Action Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Bay Forever
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Peace River Audubon Society
Reef Relief
Sanibel-Captiva Conservation Foundation
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee Group
Sierra Club Miami Group
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

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, appearing to read "Mark Perry".

Mark Perry
Co-Chair

A handwritten signature in black ink, appearing to read "Marisa Carrozzo".

Marisa Carrozzo
Co-Chair

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