



November 2, 2020

US EPA, Region 4 Water Division, OWSPB
c/o Kelly Laycock
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Via Email to: 404Assumption-FL@epa.gov

**RE: Addendum to Comments in Opposition to FDEP's Assumption Application Package:
Docket No. EPA-HQ-OW-2018-0640, FRL-10014-54-Region 4**

Dear Mr. Laycock,

In addition to the comments submitted by Waterkeepers Florida on behalf of organizations across the state in opposition to Florida Department of Environmental Protection's ("FDEP") application to assume jurisdiction under Section 404(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1344, for wetland permitting in waters of the United States, Waterkeepers Florida submits this addendum for the record.

Waterkeepers Florida is a regional entity composed of all 14 Waterkeeper organizations working in the State of Florida to protect and restore our water resources across over 45,000 square miles of watershed which is home to over 15 million Floridians. Waterkeeper organizations have been working in their individual capacities in the state of Florida for over 20 years to protect and restore Florida's water resources.

Retained Waters List

Despite the inadequacy of the retained waters list and map provided in FDEP's application, Waterkeepers Florida conducted a cursory review of some of the waters which would not be retained under Army Corps jurisdiction if this new regulatory regime were to move forward. This review revealed that many of our waterways and wetlands would lose critical federal oversight. The table below includes waterways that we are formally requesting be included in the list of waters retained under the Army Corps of Engineers' Section 404 permitting authority should this application package move forward.

Waterbody Name	County
SANTA FE RIVER	Alachua
LAKE SANTA FE	Alachua
TURKEY CREEK -- MACCLENNY	Baker
CEDAR CREEK	Baker
SOUTH PRONG ST. MARYS RIVER	Baker
NORTH PRONG ST. MARYS RIVER	Baker