Eric, We have run some comparisons on previously approved projects and find table 3.2 yields are markedly less predevelopment loading. Here also are the rest of the criteria which make the handbook problematic.

Stormwater quality handbook concerns:

1. Pre-development loading rates are considerably lower compared to previous methodology
    a. Converting 0.00769 kg/ac-inch/yr N and 0.00226 kg/ac-inch/yr P yields 0.00079 mg/l of N and 0.000232 mg/l of P.
    b. Those numbers equate to less than 10% of the amount of nutrients found in nutrient readings in areas such as those.
    c. We are having to plug in a high c-value for post development which is realistic and compare that with a very low built in c-value (Aprox. high 30's) for pre development that is just not found in our area.
    d. We have run comparison loadings with the new table and previously approved projects. They are considerably different.

    The areal table doesn't work ….plain and simple

2. Required soil borings and hydraulic conductivity tests are an added cost that need to be vetted with hydrogeologists.
3. Dry retention bleed down requirements will be hard to achieve in areas where the water table is only a few feet below the ground surface in the wet season , Dry season works fine.
4. 0 load from Hydric soils (aka wetlands?)- Deal killer in south Florida. Not reasonable
5. No wet detention in limerock. Again does not make sense in south florida
6. Natural vegetation loading instead of true existing conditions isn't reasonable.
7. Discharge to impaired waters" is not defined (we have two miles from the impaired waters and that was interrupted to be a direct discharge) This really needs to be reasonable and well defined

I know this Handbook is a monumental task and it will never be perfect in the eyes of the practitioners. I haven't had time to go through it in detail what is your present plan of attack?

Frederick T. Barber III, P.E.
Chief Executive Officer
Agnoli, Barber, & Brundage Inc.
7400 Tamiami Tr. N., Suite 200, Naples, FL 34108
Phone (239) 597-3111
Fax (239) 566-2203
barberr@abbinc.com