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June 18, 2010

Mr. Doug Fry
Florida Department of Environmental Protection
3900 Commonwealth Boulevard M.S. 49
Tallahassee, Florida 32399

RE: Comments on March 2010 Draft Applicant's Handbook
Statewide Stormwater Treatment Rule

Dear Mr. Fry:

England-Thims & Miller, Inc. (ETM) is pleased to provide feedback regarding the March 2010 Draft Applicant's Handbook (AH), in hopes that further refinement will be made to recognize the regionally significant challenges in Northeast Florida.

Specifically, none of the nutrient reduction strategies currently included in the Draft AH are feasible in Northeast Florida to bridge the gap between the 45% TN removal provided by wet detention and the 85% TN removal required by the proposed performance standard:

- **Percolative methods (dry retention, swales, pervious pavement, etc.) have a history of failure in this area due to clogging caused by the high percentage of fines in our native soil, and by the high groundwater table throughout much of the region.**
- **Stormwater harvesting is not viable at economically feasible development densities due to lack of adequate land for disposal by irrigation.**
- **Green roofs are not implementable for the great majority of land uses.**
- **Pond enhancement methods (littoral zones, MAPS) have limited efficiencies and are subject to freeze damage.**

ETM suggests that Source Control strategies be added to the AH to provide reliable methods to remove nutrients before they enter the water column:

- **Fertilizer controls to reduce nutrient loading from vegetated areas**
- **Street sweeping to remove nutrients from paved areas prior to runoff**
- **Air emission reductions at power plants to reduce airborne nutrient loading**

Thank you for this opportunity to comment on the Draft Applicant's Handbook.

Sincerely,

England-Thims & Miller, Inc.



Douglas C. Miller, P.E.
Principal / CEO

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