

I have a couple comments that I would like to offer on the draft statewide stormwater rule.

1. I would suggest that the entire solution to the nutrient problem is unnecessarily overly complicated. The proposed treatment methods do not have enough supporting data to indicate that they will actually solve the nutrient problem.

I believe that local, state and federal regulations have created a regulatory system that is currently ineffective as compared to the economic burden of implementation. I would suggest a much simpler logical approach that would include fertilization use reduction and data collection of stormwater runoff be implemented with a possible phased application of nutrient reduction treatment methods.

2. I believe that the nutrient loading issue, specifically the green algae in the St. Johns River, is potentially due to the current/historical practice of fertilizer use and the changing weather patterns. The weather pattern changes include an increase in rainfall rates. I believe we have had many years during the late 1980's and early 1990's of low rainfall rates with continued application of fertilizer. It is my opinion that these increased rainfall rates are now flushing the buildup of fertilizer that has occurred for many years through the stormwater systems into the St. Johns River. I would argue that the first solution should include scaling back if not prohibit fertilizer application until further data can be developed on runoff characteristics.

3. I understand the need for corrective action, but the timing and the scope of the entire rule is going to hurt the current economy even further. Currently, it is very difficult to redevelop property due to the need to add large stormwater systems when the land area just does not exist. Most of the time, redevelopment is placed on hold until a better plan can be developed. In fact, it is easier to build new than it is to redevelop. This needs to be reversed in order to prevent further urban sprawl.

4. The current stormwater rules do not apply to military installations. A typically military installation includes large land areas with complex drainage systems (wetlands, ditches, pipes, ponds, stormwater reuse...). In addition, right-of-ways or easements do not exist on military property and the larger facilities typically include innovative stormwater solutions that are being pushed from a federal level. Some federal facilities have a significant staff to support stormwater management and maintenance. I would suggest that a specific exemption or rule section be developed for military facilities. I would be interested in participating in the development of specific language for this item if needed.

5. I would also suggest that schools, utility companies, other governmental agencies be exempt with the proposed water quality requirement rule. These other agencies should be targeted for specific in-house procedures to address nutrient reduction. These facilities would also be an important resource for data collection/evaluation of implemented programs.

6. Lastly, I am concerned about the requirements for perimeter wells to withdraw stormwater for irrigation. This will be expensive and maintenance intensive. I have to question why effluent reuse holding ponds do not require filtration, but a stormwater pond does. Stormwater reuse will

be one of the few options in northeast Florida that will provide a positive result. This option needs to be economically feasible.

Sincerely

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