

June 14, 2010

Mr. Eric Livingston, Chief
Bureau of Watershed Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS #3555
Tallahassee, FL 32399-2400

RE: Proposed Stormwater Treatment Rule

Dear Mr. Livingston,

Tampa Bay Water is the wholesale drinking water provider for our six member governments that include Hillsborough, Pasco and Pinellas counties and the cities of New Port Richey, St. Petersburg, and Tampa. Through are six member governments we provide drinking water to over 2.4 million people. Tampa Bay Water is concerned with water quality and ecological protection of our water sources, which include the Hillsborough and Alafia rivers, as well as regional wellfields and the desalination plant. We support programs and initiatives that protect the environment. One of those initiatives is the Department's proposed stormwater treatment rule.

We understand that the proposed rule will provide the mechanism to mitigate additional nutrient loads resulting from new development, as well as erosion and sediment control from construction sites. This will assist in the protection of Florida's rivers and streams and will promote the application of more environmentally-friendly development approaches. The rule should also address the hydrologic impacts of land use changes. As research has shown, increases in pollution loads are a result of both increased volumes and increased concentrations associated with changes to the natural system.

Changes in hydrology are topics of concern for water utilities such as Tampa Bay Water that use surface water because our water supply system relies on the volume of water available above a given minimum flow. New development generally causes a higher runoff volume, but also causes an acceleration of the flow wave, which in turn reduces the water supply opportunities

Hydrologic changes of concern for Tampa Bay Water are not only those associated with infrequent storm events such as those with return periods larger than 10 years, which are associated with flood control, but those discharges that occur from more frequent storms such as those with return periods of 1 year and the mean annual storm event. We respectfully request that FDEP considers, at the minimum, introducing in the rule the requirement to meet pre-development conditions for peak flows during the mean annual storm event. Tampa Bay Water can provide the support necessary to address those issues.

Tampa Bay Water staff appreciates the opportunity to comment on the proposed stormwater treatment rule. Please contact me at (727) 796-2345 if you have any questions, or if you need any further information.

Sincerely,

Ivana Blankenship
Environmental Planner