

Dear Eric,

I attended the May 18, 2010 workshop in Jacksonville, Florida. I thought your presentation went well. I write this email to briefly share with you some thoughts that I have had that may assist you in your efforts to implement the new statewide stormwater rule.

In the workshop it was said that more data is being collected for various land uses. I am a strong believer in gathering accurate data and providing scientific justification prior to implementation of new rules. From what I have seen, some water quality data from some land uses such as commercial and industrial developments have not been evaluated. Therefore I believe that there is not enough data collected and examined yet to implement the new rule. Furthermore, I do not see how one can obtain enough quality data in such a short period of time (as the schedule presented) to determine annual loads. Longer data collection times and more time to evaluate data would seem necessary to establish a valid database to substantiate the proposed stormwater rule.

Also, I believe that the N & P constraints may be appropriate for some land uses, but not in others. For example commercial and industrial sites have the most impervious and likely the least N & P discharges. This would suggest N & P indicators as used in the proposed rule are not appropriate for these pollutant removal considerations.

In addition, I am also not sure that when all the data comes in that the new rule will be economical for all land uses and sizes. Some economy of scale must be considered with appropriate thresholds. Also as you suggested, regional systems rather than piecemeal systems need to be promoted. And last but not least, methodology on how to demonstrate compliance with the rule should be well documented.

Right now, I personally am not overly for or against this rule. Please note that this letter expresses my own personal view and not necessarily the company I work for. However, as we most likely agree, your continued efforts in scientific justification as well as your careful economic analysis prior to implementation of this statewide stormwater rule is greatly appreciated.

Please feel free to call me or write me to discuss this further.

Sincerely,

Victor

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