

From: [Harvey H. Harper III](#)
To: [Landini, James](#)
Cc: [Stormwater2020](#)
Subject: Statewide Stormwater Rule
Date: Wednesday, September 30, 2020 2:21:25 PM
Attachments: [image001.jpg](#)

Hi James,

I wanted to pass along some comments and suggestions regarding the new Statewide Stormwater Rule process:

1. The rainfall data which we used in our 2007 Report should be updated to include recent data. Although the total annual rainfall may not have changed, the distribution of rain event depths may have changed, and this information is used to calculate annual runoff volumes and retention system efficiencies.
2. The emc database needs to be updated to include new studies. We have updated the original 2007 emc values multiple times to incorporate studies which we have conducted, but we should put out a general call for studies and data collected by other sources.
3. We also have additional data for the performance efficiencies of wet detention ponds, and we should revise the TP and TN removal curves to incorporate this new data.
4. Many engineers have asked about the impacts of high infiltration rates on the dry retention efficiency curves. We conducted analyses for this as part of the TAC meetings during 2008, but it has never been incorporated into a document.
5. One of the most uncertain areas of stormwater BMP efficiencies is dry detention. This practice is used extensively throughout the State. Our recent FDEP funded study showed highly variable efficiencies which are heavily impacted by the amount of infiltration which occurs. I believe that we can develop an algorithm to calculate dry detention efficiencies which includes infiltration and pond concentration reductions.
6. Impacts of reuse irrigation need to be incorporated in emc values and calculations.
7. We have conducted extensive research over the past 15 years on sediment nutrient release in lakes, and I believe that we can use this information to develop guidelines for evaluating the need for pond sediment removal/maintenance practices in wet ponds based on a simple sediment test in the pond.
8. Gross pollutant separators were not included in our 2007 report since it was limited to current stormwater practices only, but I think that this issue should be addressed in a new Stormwater Rule with research-based efficiencies.
9. We should also consider impacts of maintenance practices on wet detention pond performance such as littoral zone removal and the use of copper sulfate herbicides.

That is all that I can think of at the moment. If you would like to discuss any of these comments, please feel free to contact me.

Thanks,
Harvey

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