

From: George Arimes <g.arimes@intky.com>
Date: June 16, 2021 at 11:41:24 AM EDT
To: "Levy, Kelli H" <klevy@co.pinellas.fl.us>
Cc: "Almonte, Tom" <talmonte@co.pinellas.fl.us>, "Silverboard, Jill" <jsilverboard@co.pinellas.fl.us>, "Lyon, Blake G" <blyon@co.pinellas.fl.us>, Pergo <pergo@gulfcoastconsultinginc.com>, SCashen <scashen@gulfcoastconsultinginc.com>
Subject: FW: Pinellas Nutrient Removal code / Regulatory Relief

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Hi Kelli,

Below are some additional comments on the Stormwater Manual from Sean Cashen.

George

From: Sean Cashen <SCashen@gulfcoastconsultinginc.com>
Sent: Wednesday, June 16, 2021 11:35 AM
To: George Arimes <g.arimes@intky.com>
Cc: Robert Pergolizzi <pergo@gulfcoastconsultinginc.com>
Subject: RE: Pinellas Nutrient Removal code / Regulatory Relief

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Comments for DCAG regarding Stormwater

I echo Chris's sentiments below and have a few more comments

Hillsborough County allows percolation to occur in the stormwater model for Dry Retention Areas. Pinellas County not only has the most restrictive Water Quality criteria but on top of that, they do not allow any percolation into the storm model which is akin to poring salt on a wound.

I suggest allowing percolation as a means of discharge within a Dry Retention Area with a "sliding Scale" similar to Hills County based on depth to Seasonal High Water (SHW) Elevation such as:

Depth from Pond Bottom To SHW EL

Percolation Kh Factor of Safety

1 to 2 feet	4.0 (eg—if Kh is 20 feet/day)
2 to 4 feet	3.0
4 to 8 feet	2.0
➤ 8feet	1.5

I think it would also be a good idea to have some flexibility with Small Sites or institute Small Site Criteria—maybe those sites 1.5 acres or less because these are the sites that we and our clients struggle with from both a site layout and economic perspective.

Typical Case: We have a 1 acre site that is an old dilapidated run down office and we have a client that wants to expand the building and add some parking for a Veterinarian Office. There is an existing dry retention area that can be expanded somewhat to provide ½” of WQ Treatment. We do not meet county exemption criteria and per the Stormwater Code we have to meet the Water Quality standards which requires an underground vault to store the additional treatment volume needed to meet County criteria. The cost for this underground vault is cost prohibitive and site does not get redeveloped as a result. So you end up with a still-rundown eyesore of a site that will not get redeveloped due to the onerous County criteria and a local resident (the Veterinarian) will not look for sites OUTSIDE unincorporated Pinellas County for his Vet Office. This is just one example of the Unintended Consequences of codes put in place---however well-intentioned—that discourage or altogether prevent redevelopment of sometimes blighted sites that scream to be redeveloped.

If there was an additional charge or surcharge or additional tax---this cannot also be cost prohibitive---that this client could pay to offset not meeting the County SW Criteria for this Small Site this money could go to possibly improving other county facilities or to purchasing a site for a regional stormwater pond. This would be a stormwater fee in lieu of as mentioned by Chris below.

Thank you and please send to Kelli Levi or whoever else you deem appropriate

Thank you George

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A pessimist sees the difficulty in every opportunity; an optimist sees the opportunity in every difficulty. -- Winston Churchill

For as tempting as ease may be, our life shrinks in direct proportion to our inability or unwillingness to handle problems. – Bryan Ward

Then you will know the truth, and the truth will set you free – John 8:32

"Truth sounds like hate to those who hate the truth."

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From: George Arimes <g.arimes@intky.com>

Sent: Tuesday, June 15, 2021 1:29 PM

To: Chris Weddle <chris@auroracivil.com>; John C. Landon <landon@lmaengr.com>

Cc: Sean Cashen <SCashen@gulfcoastconsultinginc.com>; Jeffrey Leadbetter <Leadbetter@lmaengr.com>; Erik Madsen <Madsen@lmaengr.com>
Subject: RE: Pinellas Nutrient Removal code / Regulatory Relief

Chris/John,

Did you want me to send the below to Kelli? I will add it as a DCAG agenda package addition.

From: Chris Weddle <chris@auroracivil.com>

Sent: Saturday, June 5, 2021 9:54 AM

To: John C. Landon <landon@lmaengr.com>; g.arimes@intelligentconsulting.org

Cc: Sean Cashen (scashen@gulfcoastconsultinginc.com) <scashen@gulfcoastconsultinginc.com>; Jeffrey Leadbetter <Leadbetter@lmaengr.com>; Erik Madsen <Madsen@lmaengr.com>

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George

My thoughts....

1. SWFWMD started implementing net improvement for nutrients back in 2008. Why not just go with that! Having two sets of stormwater rules (one State and one Local) is cumbersome and wasteful.
2. I have been consistent in my view that removing nutrients from stormwater is VERY difficult. There is precious little testing of the actual systems in the real world.
3. The "cook book" approach that is prescribed by the County Stormwater Manual makes redevelopment of all sites, and especially small sites, expensive and sometimes impractical.
4. Is that what the County wants? To discourage redevelopment of old sites into new sites? That is illogical!
5. If conditions are ideal, several feet of depth to Seasonal High Groundwater and high "perc" rate, then designing a system to meet the manual requirements is possible. Still at a HIGH cost to construct (and back to my opinion that the systems don't work).
6. If conditions are not ideal, then adding fill to a site is inevitable. Small sites with 2 or 3 feet of added fill makes the conditions at the project edges TOUGH. Steep driveways, ADA issues. Walls at the property limits. More cost.
7. I REALLY think that the County should consider a fee for stormwater. Charge developers a fee per acre of impervious and use the money for large scale stormwater systems (meandering wetland systems) that might actually WORK!

Thanks!

Chris Weddle, P.E.

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From: John C. Landon <landon@lmaengr.com>

Sent: Friday, May 28, 2021 6:15 PM

To: g.arimes@intelligentconsulting.org

Cc: Sean Cashen (scashen@gulfcoastconsultinginc.com) <scashen@gulfcoastconsultinginc.com>; Chris Weddle <chris@auroracivil.com>; Jeffrey Leadbetter <Leadbetter@lmaengr.com>; Erik Madsen <Madsen@lmaengr.com>

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George

These are some preliminary thoughts I have discussed with the DCAG group, however nothing is official. Suggest we forward to Kelli etc. to get some feedback and start a discussion.

Would also recommend holding off on changes to flood ordinance especially since doing nothing will not affect our CRS rating.

Need more time to study effects of various options. So Option 1, no action for now.

Have a good weekend

John C. Landon, P.E.



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