

In response to Mr. Chris Weddle's comments:

1. All of the water management districts, including SWFWMD, regulate an expansive, multi-County area. SWFWMD needed to develop rules that would apply across their entire 16 county jurisdiction, most of which is much less developed and all of which is less densely populated than Pinellas County. Additionally, none of the other Counties in SWFWMD's jurisdiction have the unique challenges faced by Pinellas County with regards to water quality and quantity.
2. There are numerous studies and example projects which have conducted testing on the nutrient/pollutant removal capability of various stormwater BMPs. Most of these studies include deployment of a BMP and associated sampling, tested by a NELAC certified laboratory, analysis of the results and recommendations for practitioners. Pinellas County is currently conducting a similar study on three different green infrastructure BMPs at our Sunstar EMS facility and will make those results available once the second year of data is analyzed.
3. The stormwater manual was written, and is currently being revised, to make the requirements for development/redevelopment, clear, simple, easy to follow and to provide tools to make meeting those requirements easier, including pre-made CAD templates, site planning guidance, and availability of some exemptions/waivers. Please let us know what specifically you are referring to in our approach that is making redevelopment impractical.
4. No, the County seeks to encourage thoughtful, sustainable redevelopment which does not exacerbate our existing water quality/quantity issues.
5. Given the site conditions at a particular location, such as SHGWT and soil types, there are some BMPs that would not be suitable. However, there are numerous other options available to creatively design a site that meets the water quantity/quality standards. The stormwater manual outlines these options and provides a plethora of tools to help applicants design their sites.
6. See response #5 above.
7. Pinellas County is investigating several regional stormwater management facilities; however, they are not at the scale of what would be possible in a less developed County like Hernando or Pasco. The Lealman area (Joe's Creek) and McKay Creek are two areas where this is being evaluated. Benefits provided by such a facility would be specific to the watershed and likely would be implemented through a credit process. There is also a regional facility in Palm Harbor which provides stormwater treatment and attenuation for the downtown area. Lack of suitable vacant land and high land costs reduce the cost-benefit ratio and limit the feasibility of these types of projects in Pinellas County. Additionally, much of the development/redevelopment occurring here is decentralized and dispersed throughout the entire County, making use of a regional site often impossible or impractical for many sites. Even with these challenges, there are efforts to

make regional stormwater a reality and the County is pursuing regional systems wherever possible as part of our comprehensive approach to stormwater management.

In response to Mr. Sean Cashen's comments:

Pinellas County stormwater regulations are not the most stringent in the State. Each of the five Water Management Districts (WMDs) has their own set of stormwater rules, and the requirements for stormwater treatment volume vary from the first ½" up to the 1.25 times the percent impervious cover plus an additional ½" of runoff (SJRWMD). Alachua County takes a similar pollutant load-based approach to Pinellas County, and they require greater removal efficiencies. Those are just two of many examples throughout the State of Florida.

Pinellas County evaluated modification of the exemptions into a tiered approach similar to the City of Tampa; however, based on data from application submittals in recent years, it is very rare for a submittal to be between 3,000 and 9,000 square feet. The additional impervious is typically well under 3,000 or significantly over 9,000 square feet. Further, the City of Tampa does not allow exemptions within their stormwater "red line" area or within basins considered "volume sensitive," or anywhere there are existing flooding issues, and in Pinellas County, most of our basins could be described similarly.

Hillsborough County considers percolation as an appropriate means of decreasing detention requirements only when sufficient testing results and other data are supplied. Section 5.1.3.8 outlines that required data, and much of this is not currently required to be submitted to Pinellas County in consideration of a permit. Hillsborough County also requires that sites using this method of discharge must be designed to ensure that any potential pond overflows can be conveyed/accommodated with minimal damage to adjacent properties or public safety. This is only applicable to sites equal to or less than 10,000 SF or which directly outfall to Tampa Bay or the by-pass canal.

Pinellas County may consider this option on a case-by-case basis, but significantly more site-specific testing/data would be required to demonstrate reasonable assurance that percolation would be an adequate means of discharge/positive outfall without causing adverse impacts to adjacent sites or public safety. Given site conditions common in Pinellas County and our highly dense, urban environment, this option is only viable in certain areas, subject to approval by County staff.

We would love the opportunity to get more specific site condition details for the example you provided about the hypothetical veterinarian office so that we may use that to further evaluate your concerns and provide a more thorough response on that subject. For example, how much impervious was proposed at this site? Was pervious driveway and parking area utilized? What is the SHGWT and soil type? Why was an underground vault deemed the only acceptable design for to meet treatment volume requirements at this site? What alternatives were explored and why were they not feasible, such as above ground BMPs like swales? If we are able to more thoroughly investigate this, we can more accurately address your concerns. A

surcharge has not been previously considered by Pinellas County, but has been used in other municipalities – if we had a feasible regional site or nearby facility which could be expanded or improved within the same watershed, that may be something the County could investigate as well. Pinellas County has also expanded the administrative adjustment allowance from 1 to 2 acres and we are adding an adjustment, at County staff’s discretion, of up to 10% on the nutrient removal criteria if County staff deems the return on investment is too low to justify designing for the specific removal efficiencies identified in the manual.