



**CHARLOTTE HARBOR NATIONAL ESTUARY PROGRAM**  
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June 11, 2010

Eric Livingston  
Bureau of Water Management, Florida Department of Environmental Protection  
2600 Blair Stone Road (MS3510)  
Tallahassee, Florida 32399-2400

Re: Florida's Statewide Stormwater Treatment Rule and Applicant's Handbook

Dear Mr. Livingston:

Thank you for the opportunity to review and comment on the draft Statewide Stormwater Treatment Rule and Applicant's Handbook, especially at this early time in their development. We understand that after the next revision, another round of public workshops will be conducted in Fort Myers, Tampa, and Orlando. At that point, we will be provided with another opportunity to comment on the rule and handbook. In the meantime we have the following comments:

- We commend the general quantitative approach of the rule and handbook. We encourage the Department and its partners to continue developing additional data to quantify best management practices.
- We endorse the stormwater treatment performance standards shown in table 3.1. It is a logical approach to address Outstanding Florida Waters (OFWs), verified impaired waters and impaired waters with adopted Total Maximum Daily Loads (TMDLs)/Basin Management Action Plans (BMAPs).
- Using the predevelopment vegetative communities as the "pre" condition is appropriate. However, in the case of urban soils, we recommend predevelopment vegetation maps be used where they are available. In addition, rather than assume "grassland" for the native alternative of urban soils, perhaps adjacent native upland communities could be used as a surrogate to calculate predevelopment loadings.
- We encourage the addition of recertification requirements to the rule to ensure maintenance of these stormwater systems.

We look forward to working with you and your staff on this important issue. If the CHNEP can be of further assistance, or if you have any questions regarding the above information, please contact me at the CHNEP office a (239) 338-2556 x 235 or via e-mail at [lbeever@swfrpc.org](mailto:lbeever@swfrpc.org).

Sincerely,

A handwritten signature in black ink that reads "Lisa B. Beever".

Lisa B. Beever, PhD, AICP  
Director