

Stormwater Regulatory Policy Changes and Ongoing Efforts



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Welcome

Introduce speakers

Query number of drainage folks, roadway folks, maintenance, others.

Summary what we are going to discuss:

- (1) recent inter-agency stormwater initiatives
- (2) recent changes in regulatory policy that drives our stormwater design

Activities of the Working Group

- ◆ How we got here...
 - ✓ Deputy Secretaries (DS) – House Bill (HB) 599
 - ✓ Discussions with DEP at Permitting Summer School (2012)
 - ✓ Ongoing discussions with DS Munson
 - ✓ Addressed WMD Executive Directors (EDs) in October 2012
 - ✓ Monthly Meetings with Assistant Executive Directors (AEDs) in January 2013



Working Group is a DEP/WMD/DOT group that is charged with moving forward interagency efforts

Activities of the Working Group

- ◆ Vision...

The WMDs' and DOT's missions will be much better served by embracing a holistic inter-mission partnership rather than a purely project by project, developer/regulator relationship.



DEP / WMDs:

1. DOT is not just another developer: Environmental stewardship is in DOT's mission.
2. Do not exact regulatory costs from DOT beyond what we would if the funds for compliance were coming out of our own budget.
3. Get past regulations and the status quo to embrace mission to mission cooperation.

Expected Areas of Cooperation

- ◆ Permitting
- ◆ Erosion Control
- ◆ TMDLs
- ◆ Water Supply
- ◆ Minimum Flows & Levels
- ◆ Wetland Re-hydration
- ◆ Stormwater Research
- ◆ Everglades Restoration
- ◆ Stormwater Re-use



Facilitate communications at all levels

Resolve disagreements

Spot opportunities

Activities of the Working Group

- ◆ Environmental Look Around (ELAs)

The right people, from the right agencies, at the right time, in the same room, creatively focusing on the missions of all agencies present.

- ◆ Occasions for ELAs:

- ✓ PD&E Projects
- ✓ Design Projects
- ✓ Basin Management Action Plans (BMAPs)
- ✓ Periodic Meetings



ELA's

1. Work program: DOT initiates, DEP/WMDs/FWC/Municipalities respond
2. BMAPs / periodic meetings: DEP initiated, DOT responds;

Likely, ELA in PD&E or as part of design scoping

Update on SFWMD changes –

- ◆ Wet Pond Dimensional Criteria at Control Elev.
 - ✓ 100' minimum average width
 - ✓ 0.5 acre in area
- ◆ 150% Treatment Volume for Impaired Basins
- ◆ Upstream extent of Impairment



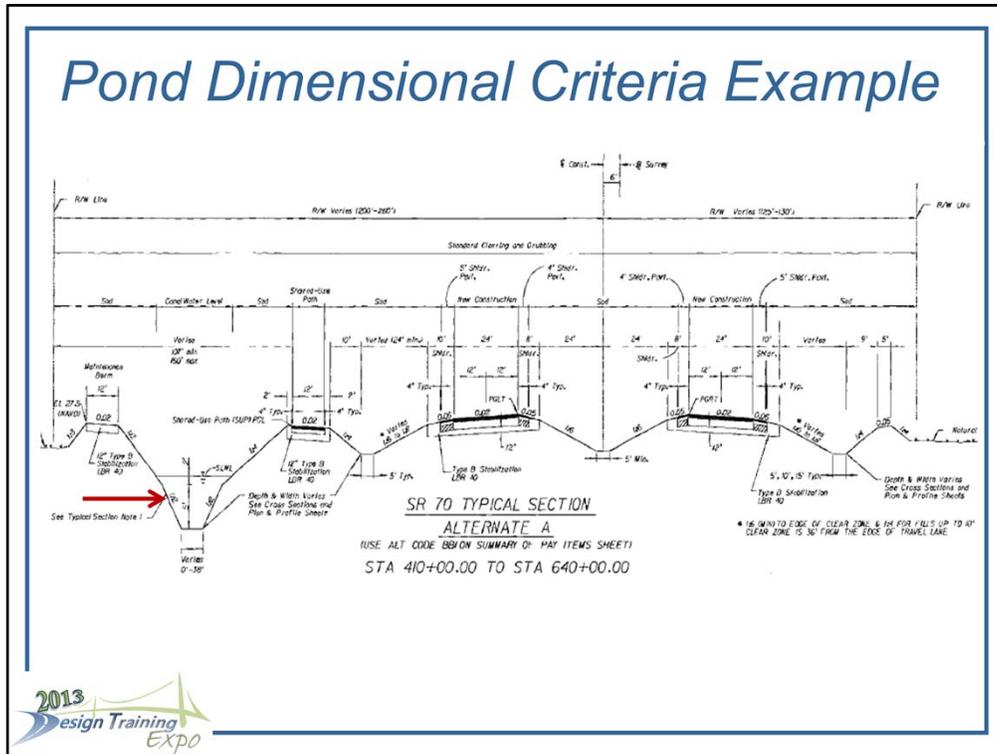
DOT Only

Targets wet detention ponds (the criteria were originally crafted as a safety net for poor maintenance, such as might be expected from private entities)

Nutrient impaired basins (the 150% policy was originally enacted to mimic the higher standard of an OFW; Harper's nutrient loading approach was not available then)

How far upstream (TMDL/BMAP program uses transport/fate of pollutant approach to identify upstream reaches that are impaired or establish DPVs)

Pond Dimensional Criteria Example



SR-70 in western St. Lucie County in D4 (thanks to Kevin from D4)

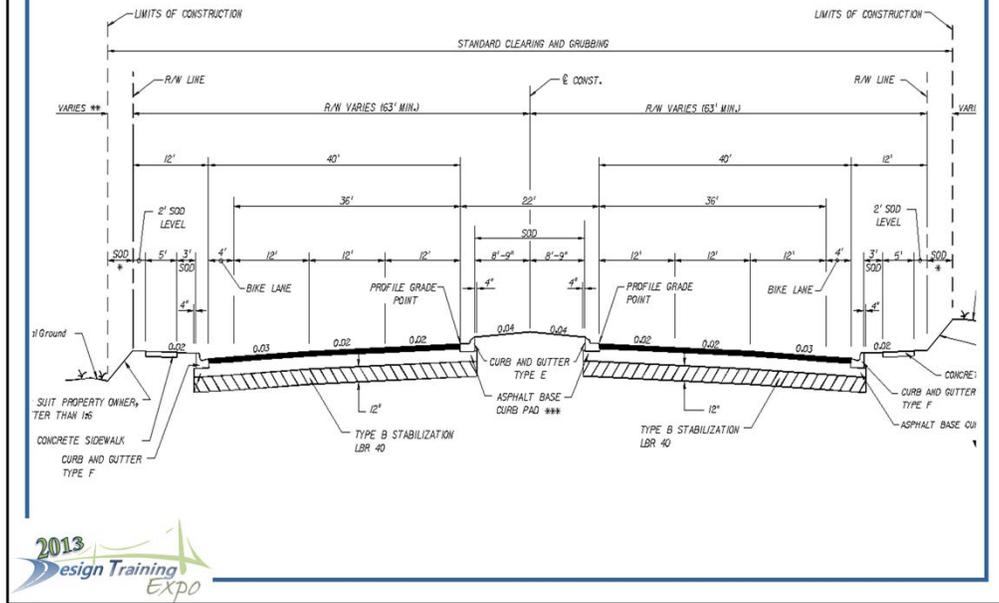
Note canal – [click to enlarge](#)

Canal receives significant runoff from cattle farms and citrus – provides orders of magnitude more TN & TP removal than the detention ditches

but not given WQ credit in permitting!!!

Ditches were needed anyways, we will receive BMAP credit, and costs were not impacted.

150% Criteria Example



Example for comparing criteria amongst WMDs and SFWMD 150% criteria

6-lane typical section from PPM – assumed basin length = 1000 ft. of 6-lane roadway

Treatment Pond Comparison

- ◆ Roughly Square Ponds
- ◆ 12 ft. Permanent Pool Depth
- ◆ 1.5 ft. Treatment Volume Storage Depth
- ◆ Nutrient Removal per Harper (2007)



Square ponds to negate shape effects

12 ft. deep = typical practice to avoid anaerobic conditions

1.5 storage depth is typical

Location = West Palm Beach

Pond Comparison Results

Controlling Criteria	% of 14-day Wet Season Pool Volume	Annual Residence Time	TN Reduction	TP Reduction	% of 14-day Pond Area
14-day Residence Time	100%	34	39%	68%	100%
SFWMD Normal Treatment Volume	213%	72	41%	73%	126%
SFWMD 150% Treatment Volume	374%	127	42%	78%	155%



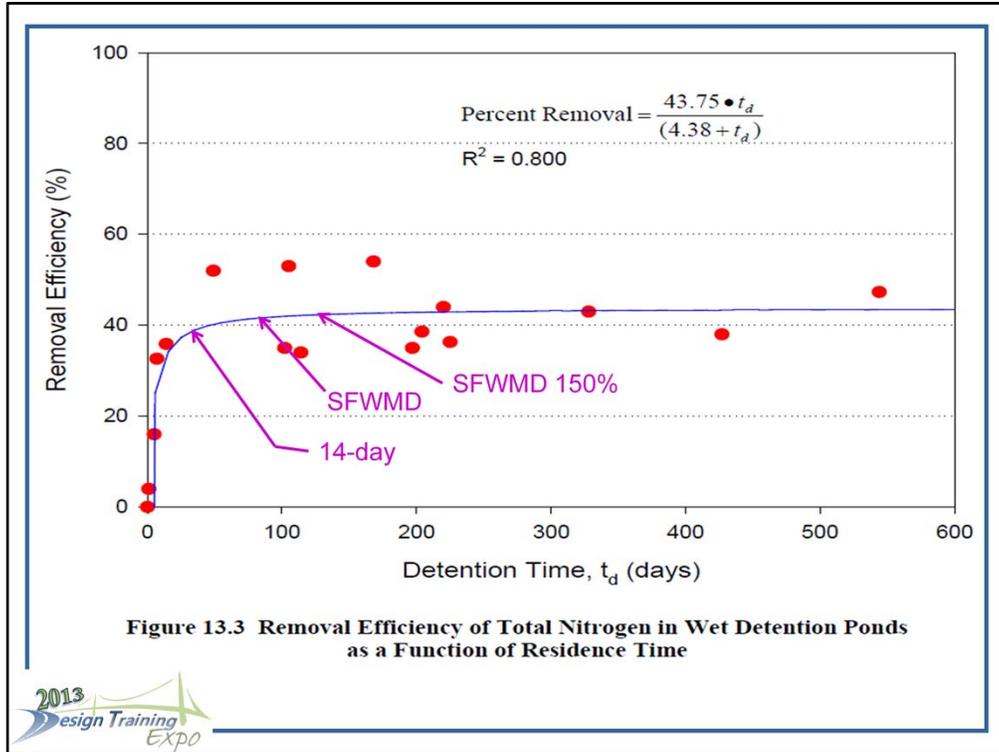
The larger the base pond, the larger % increase in overall pond parcel area...reason: for a larger pond, sideslopes are a smaller % of pond parcel area – economy of scale

Residence time = pond pool volume / average rate of inflow over period of interest – wet season or annually

14 day wet season residence time = 34 day annual residence time (average rate of inflow is higher over the wet season – will vary around the state)

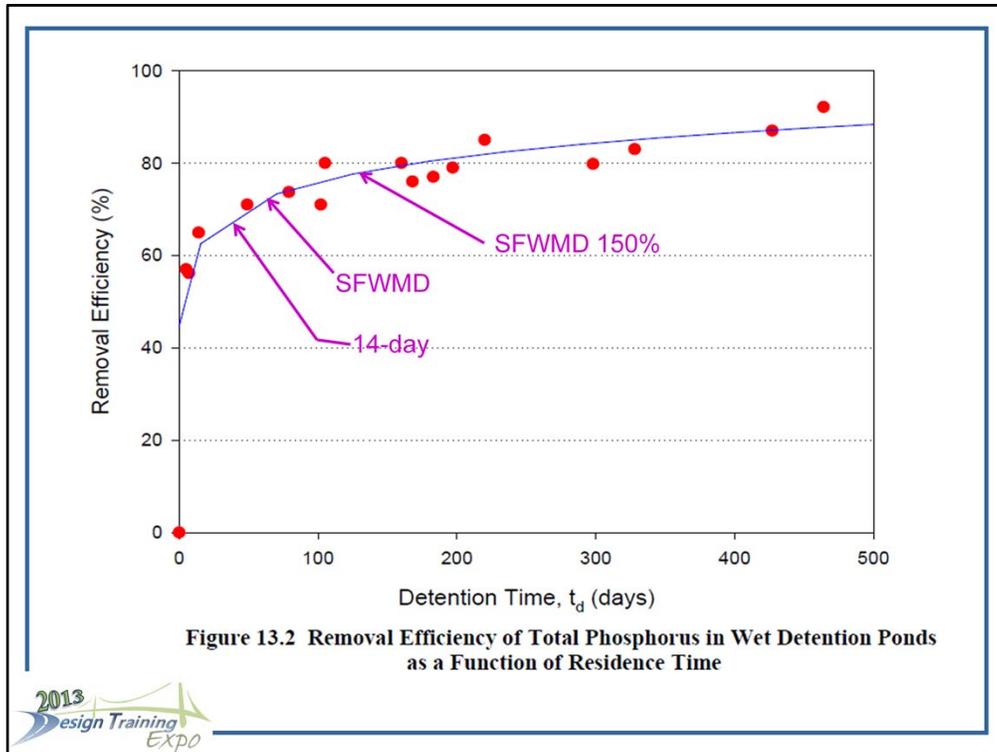
Pond area at control elevation.

Note lack of increased removal, especially for TN.... Why? **click**



Removal curve for TN from Harper 2007 – R^2 is a bit weak.

Click to show ponds' removal



Removal curve for TP from Harper 2007 – note the MUCH better fit for the data ($R^2=0.979!$).

Click to show ponds' removal

So we see that the additional storage from the SFWMD 150% criteria – though at one time was the best approach available – is now shown to be a poor investment for nutrient removal in nutrient impaired basins.

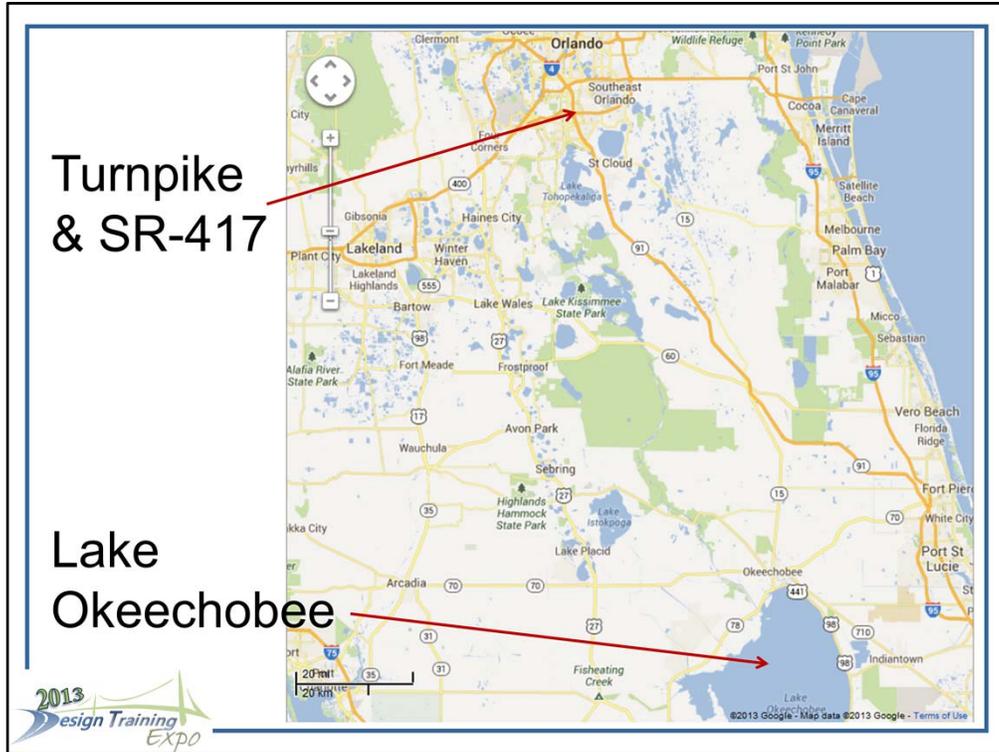
Upstream Extent of Impairment

- ◆ Verified Nutrient-Impaired Basins
- ◆ Nutrient Pre/post: How Far Upstream?



Only for Verified Nutrient-Impaired Basins

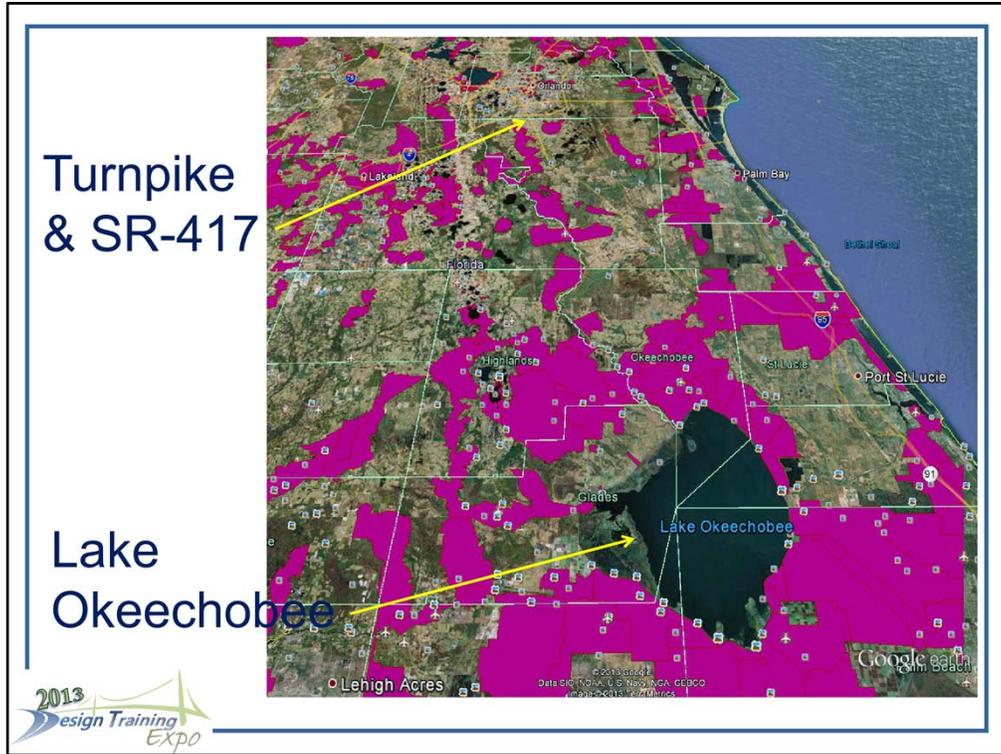
How far is “far enough?”



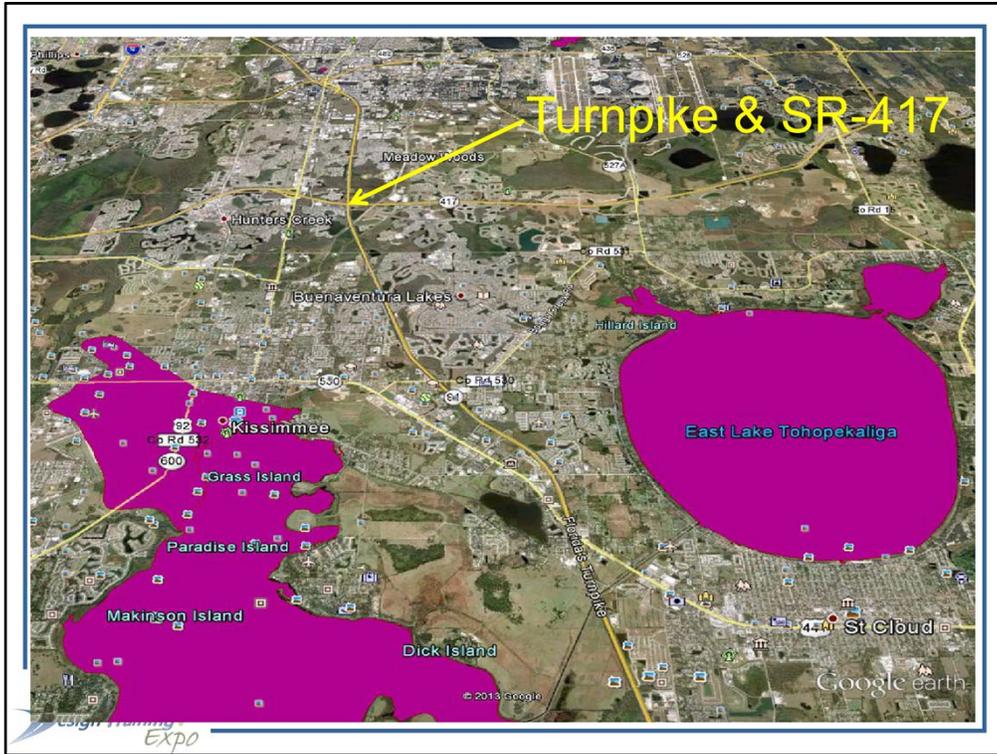
For example...

Several hundred miles and several unimpaired lakes between Lake O. and the project.

Significant costs to pre/post nutrients



Purple areas are impaired basins



A close up view...

Project is a significant distance from nearest impairment with intermediate unimpaired lakes

Upstream Extent of Impairment

- ◆ Pre/post Nutrients When Direct Discharge to Impaired WBIDs
- ◆ Do more treatment if cost effective
 - ✓ Usually Ok if no extra R/W is needed
 - ✓ Obtain concurrence from DDrE
 - ✓ Beware of condemning property without a permit requirement!



WBID – Water Basin ID

To increase storage, use available land, dig ponds deeper, strand water in ditches **if** there is sandy soils

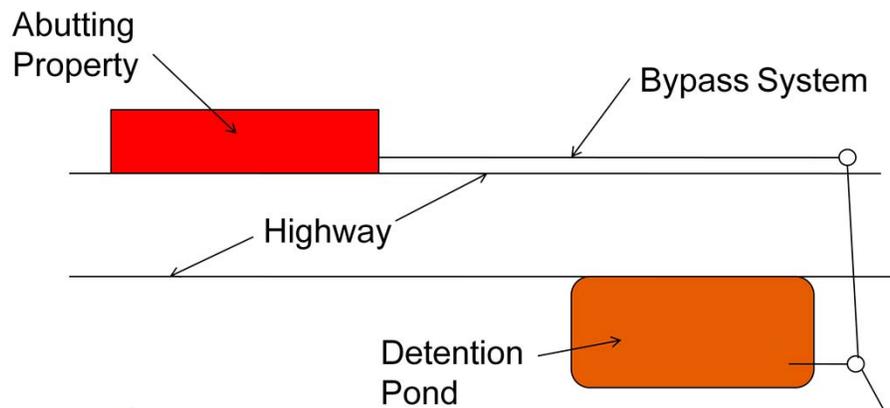
BUT... remember that additional wet pond storage might not be getting you much – go with upstream retention in ditches, if possible.

Offsite co-mingling

- ◆ Technical Background
- ◆ Design Policy / Guidance
- ◆ Some Areas Still Under Discussion...



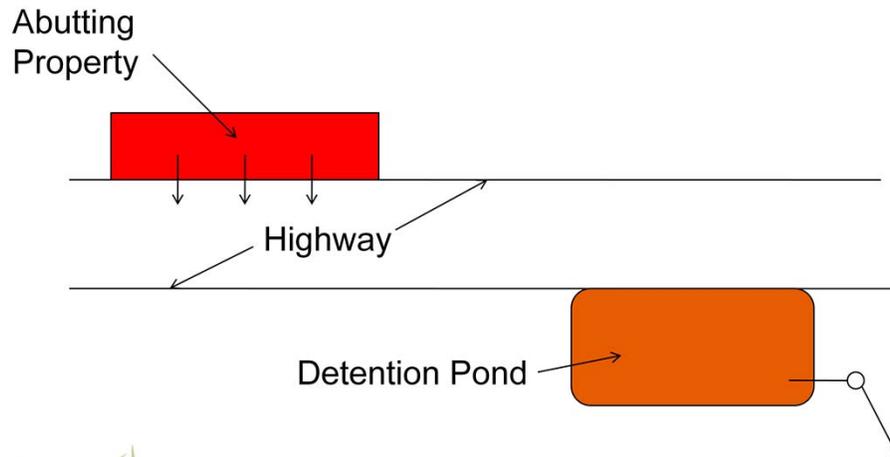
Offsite Area Bypassed



2013
Design Training
EXPO

This is the most common occurrence except in SFWMD

Offsite Area Co-mingled



Detention pond is the same size as in the previous slide.

Offsite co-mingling:

- ◆ Wet Detention Pond
- ◆ Infiltration Type BMPs

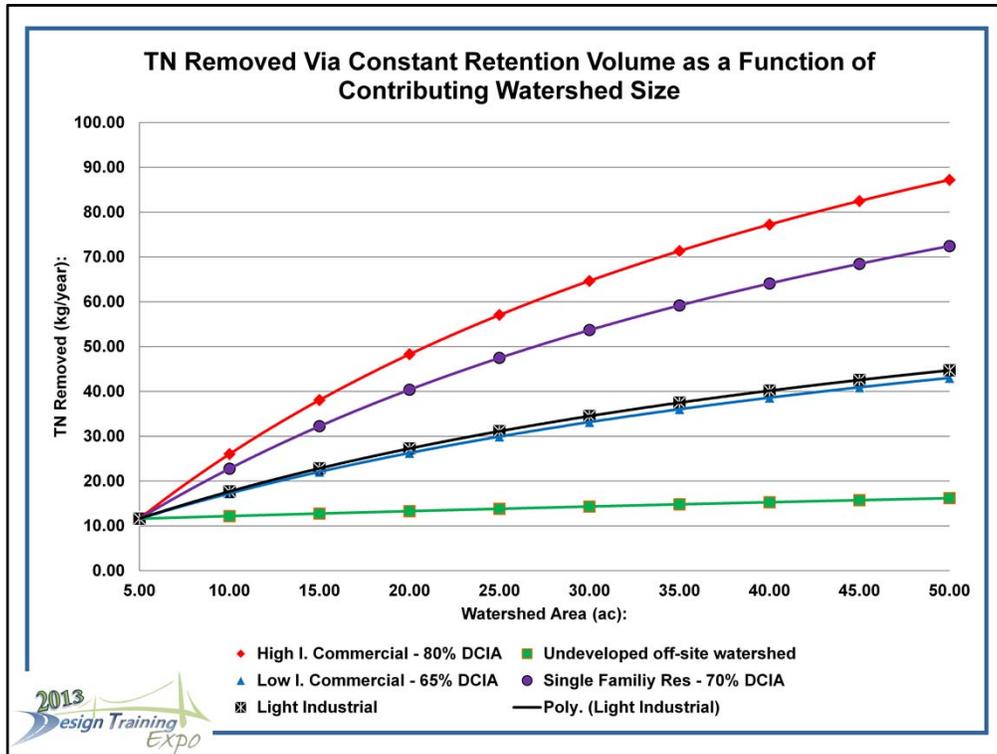


Discussion divided into two cases:

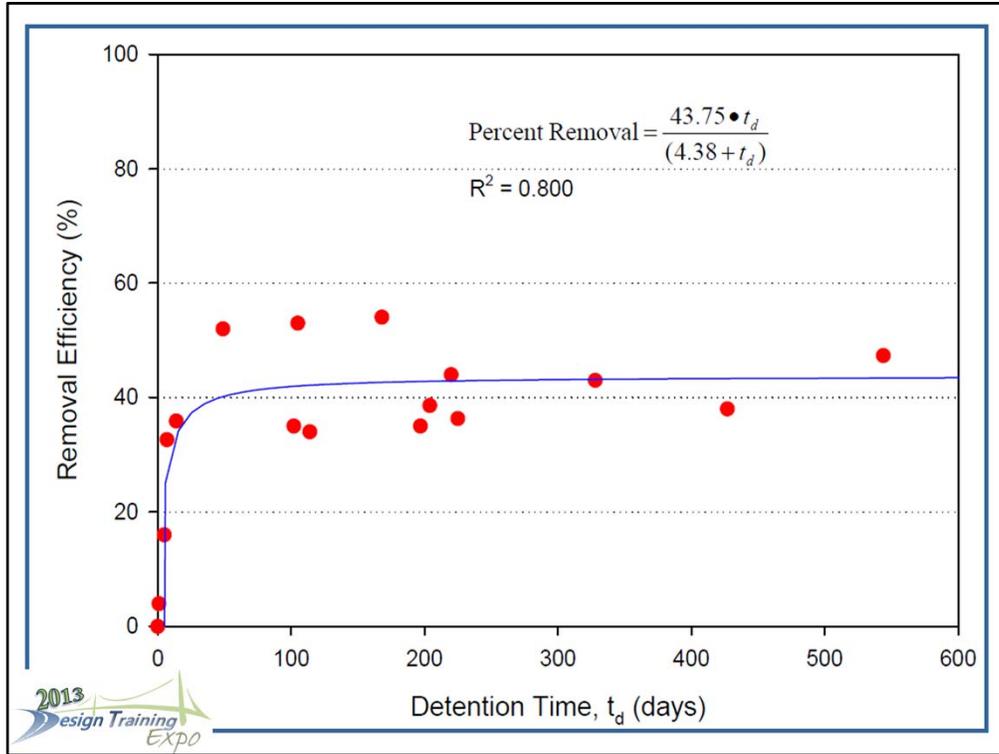
1. Wet detention ponds (pictured)
2. Infiltration BMPs: retention, dry detention, swales, rain gardens, etc.

Using nutrients as a surrogate...

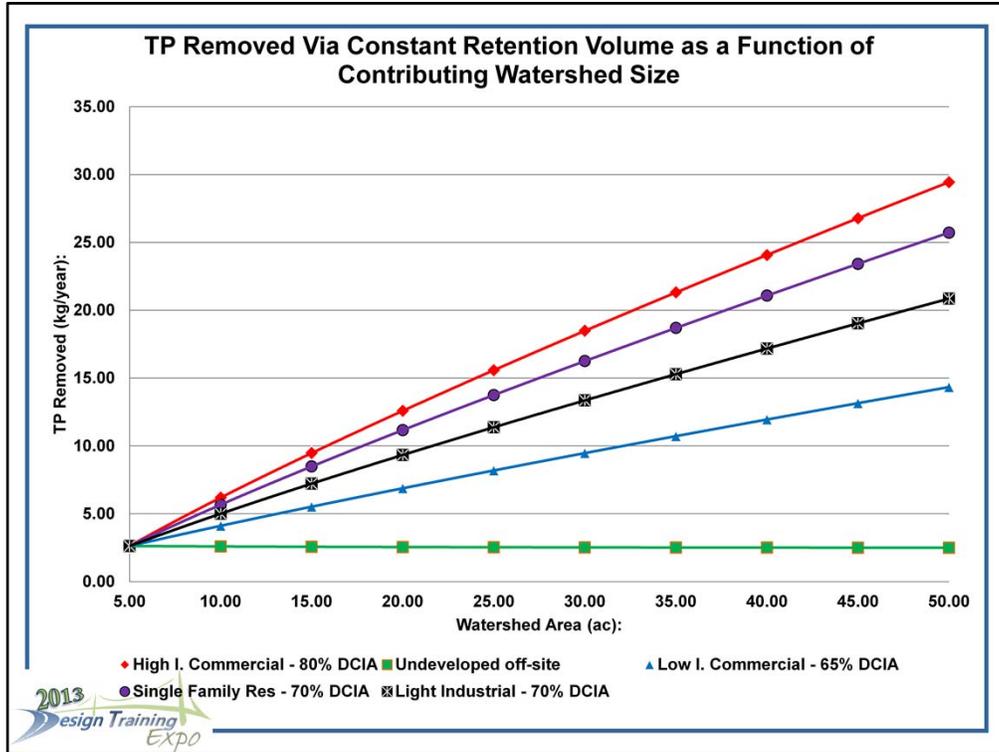
Conservative, since we are targeting dissolved pollutant rather than TSS



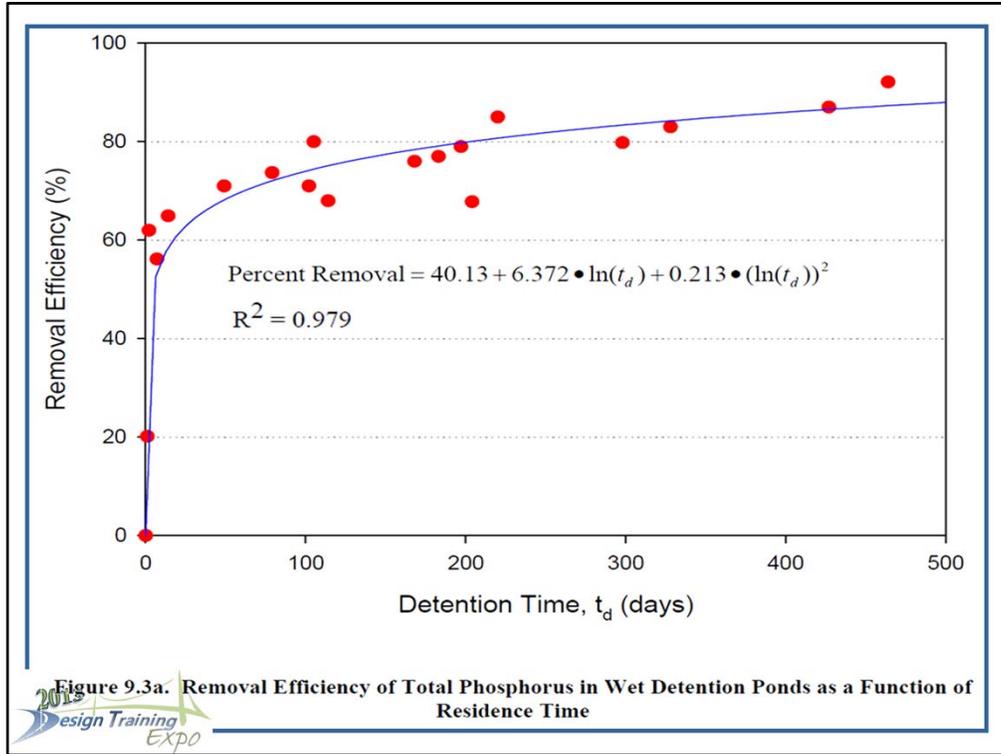
Always improved TN removal... why?



From Harper 2007



Always improved TP removal... why?



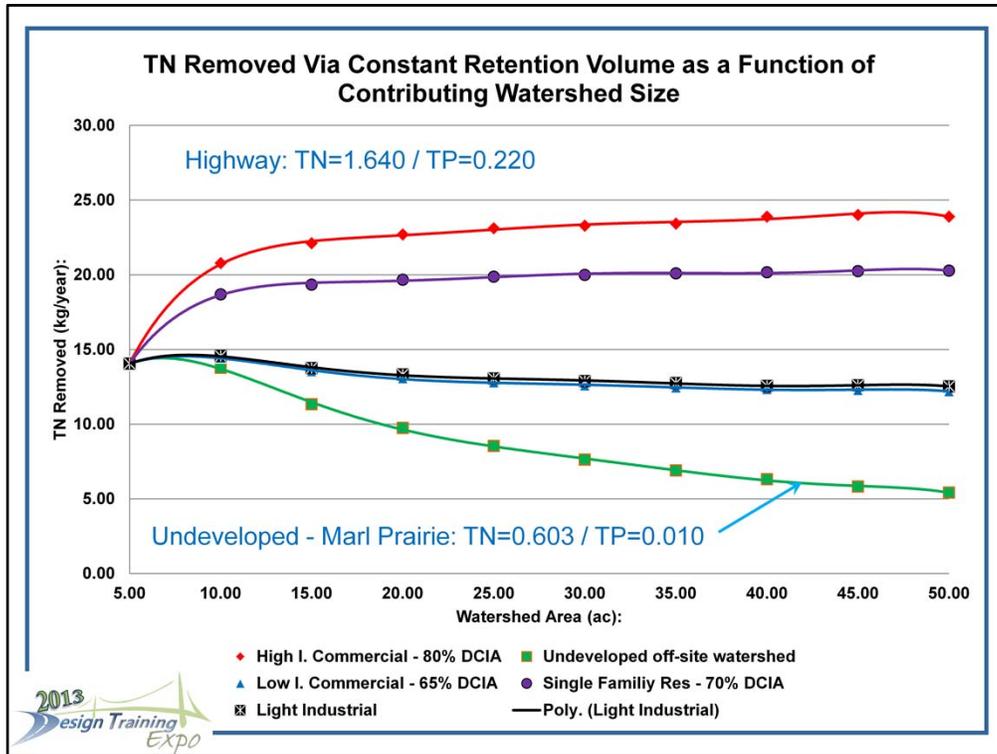
From Harper 2007

Offsite co-mingling:



2013
Design Training
EXPO

We have already looked at ponds, now let's look at Infiltration BMPs (retention, dry detention, swales, rain gardens, etc.)



Removal curves for retention

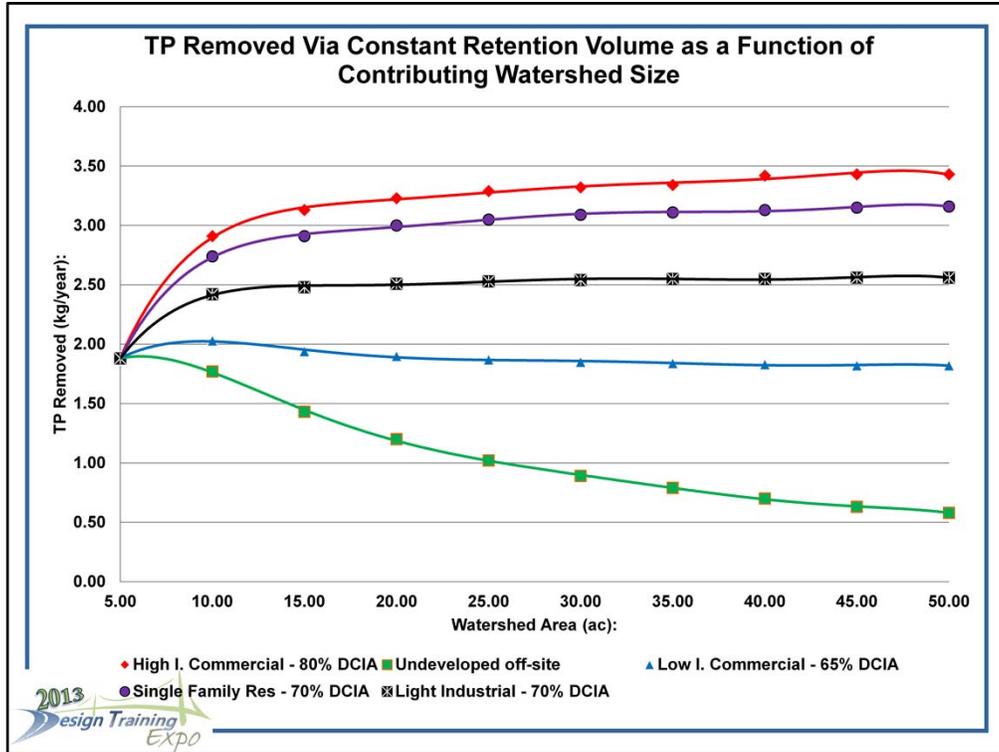
Onsite = 5 ac roadway

Offsite = differing land uses at 5 ac size increases, up to 10 times the onsite area

Retention sized to treat the 5 ac roadway.

Why the decline? A: cleaner water is taking the place of roadway runoff - **click**

Undeveloped area is Marl Prairie: the cleanest natural condition - **click**.



Change from TN is the result of the different relative EMCs for the land uses.

What's missing in this analysis? There is a significant conservatism? Clue: especially as the undeveloped offsite are in creases? **Time of concentration!** Thus, we will likely re-visit this modeling.

Offsite Co-mingling: Guidance

- ◆ For Wet Detention
 - ✓ Co-mingle offsite inflows unless cost or hydraulic issues lead to bypassing
- ◆ For Dry Retention
 - ✓ Co-mingle developed offsite inflows unless cost or hydraulic issues lead to bypassing
 - ✓ For inflows from lower EMC areas, consult DDrE
 - Calculate change in nutrient removal
 - If reduction in treatment, evaluate B/C



When would hydraulics dictate bypassing? When the offsite property is low lying and will be flooded by the roadway pond control structure.

When would it cost more to co-mingle? Likely, NEVER

Still resolving issue of clean offsite inflows to infiltration BMPs

Onsite co-mingling

Existing highway with new parallel facility

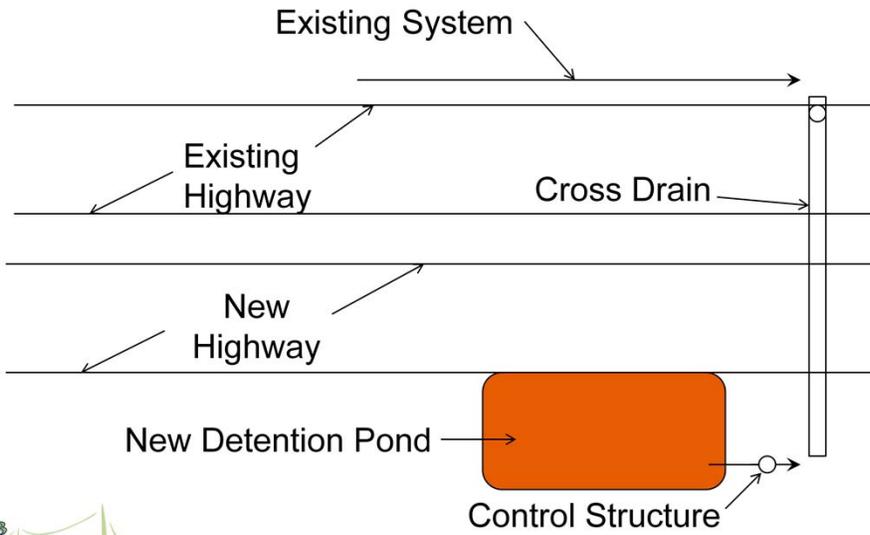
Not explicitly addressed in HB 599, but....

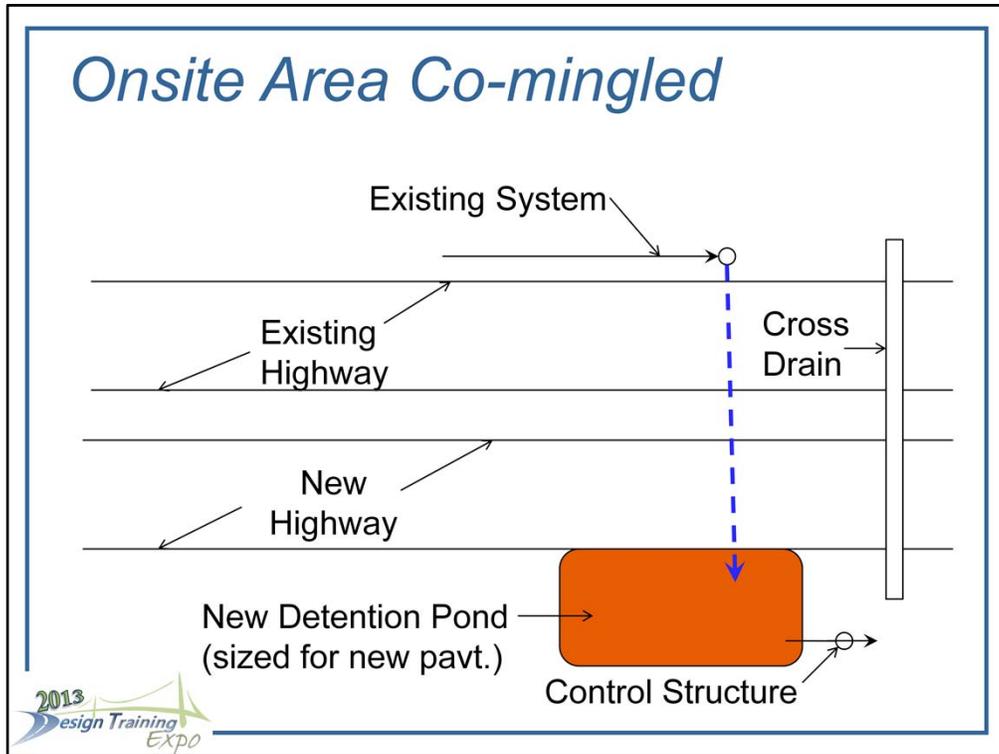
what would you expect?



Attentive listeners will surmise that environmental treatment always improves with co-mingling onsite.

Onsite Area Bypassed





Pond is same size as before (except minor changes for hydraulics)

Blue pipe is new (extra cost)

Onsite Co-mingling: Guidance

- ◆ Existing onsite runoff - same pollutant EMC as new road
- ◆ Pollutant removal always increases with co-mingling
- ◆ Additional costs likely, especially if high ADT
- ◆ **Co-mingle, if possible**
 - ✓ **Consult DDrE for decision, especially if costly**



Additional cost will be in connecting old roadway system to the new pond

Questions?

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