



AECOM
2090 Palm Beach Lakes
Boulevard
Suite 600
West Palm Beach, FL 33409
www.aecom.com

561 684 3375 tel
561 689 8531 fax

September 18, 2013

NPDES Stormwater Section
Florida Department of Environmental Protection
Mail Station 2500
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Attn: Allen P. Hubbard, P.E.

Subject: Palm Beach County MS4, NPDES Permit No. FLS000018 (Cycle 3)
Year 2 Annual Report Comments for City of Belle Glade

Dear Mr. Hubbard:

The following is in response to your letter dated August 6, 2013. The comments for the City of Belle Glade are repeated below, with our responses in bold type:

- 1) **Stormwater Management Program Resources, Part II.F** Requires each permittee to report the SWMP budget in the Annual Report. If the program resources have been decreased from the previous year, a discussion of the impacts on the implementation of the SWMP shall be provided.

The figures reported in the Annual Report for SWMP budget were in error. The SWMP budget was actually increased for FY 12/13 to \$1,356,890 of which \$318,560 is operating budget, \$248,801 is for projects, and \$789,529 is reserves set aside for future stormwater projects.

- 2) **Florida Friendly Fertilizer Ordinance** Part III.A.6.of the MS4 Permit requires that if a Florida Friendly Ordinance is not adopted, all local governments within the watershed of a nutrient impaired water body shall adopt the Department's Model Ordinance for Florida Friendly Fertilizer Use on Urban Landscapes or an ordinance that includes all of the requirements set forth in the Model Ordinance. The ordinance is required to be adopted within 24 months of permit issuance.

The City of Belle Glade has not adopted a Florida Friendly Fertilizer Ordinance. It is the new Public Services Director's goal to have the ordinance adopted this coming permit year.



- 3) **SWMP Inspection Schedule** – All co-permittees shall meet the minimum inspection requirements detailed in Table II.A.1.a. of the MS4 permit. The City of Belle Glade did not meet the requirement to perform Proactive Illicit Discharge Inspections.

The City's Code Enforcement Division continues to be understaffed, plagued by turnover, and overwhelmed by code enforcement issues and therefore, has not been able to dedicate time specifically to perform "proactive" inspections where a problem may or may not exist. They are currently down to 1 code enforcement officer and will be advertising soon to hire a second officer once again.

Please let us know if you have any further questions.

Sincerely,

Karen D. Brandon, P.E.
Senior Project Manager

KDB/dw

Enclosures

cc: Marcos Yvo Montes De Oca, P.E., City of Belle Glade
Annette Parchment, City of Belle Glade