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Southwest Florida Water Management District

2379 Broad Street, Brooksville, Florida 34604-6899

(352) 796-7211 or 1-800-423-1476 (FL only)

WaterMatters.org

Bartow Office

170 Century Boulevard
Bartow, Florida 33830-7700
(863) 534-1448 or
1-800-492-7862 (FL only)

Sarasota Office

78 Sarasota Center Boulevard
Sarasota, Florida 34240-9770
(941) 377-3722 or
1-800-320-3503 (FL only)

Tampa Office

7601 U.S. 301 North (Fort King Highway)
Tampa, Florida 33637-6759
(813) 985-7481 or
1-800-836-0797 (FL only)

July 10, 2026

Ben Prewitt, P.E.
Half Associates, Inc.
1000 N Ashley Drive Suite 900
Tampa, FL 33062

Subject: Clarification of Received Information

Project Name: Marina Rack Club
Application/Petition No.: 921286
County: Pinellas
Sec/Twp/Rge: S17/T32S/R16E, S20/T32S/R16E

Reference: Chapter 62-330, Florida Administrative Code (F.A.C.)
Section 373.4141 and 120.60, Florida Statutes (F.S.)

Dear Ben Prewitt, P.E.:

Thank you for responding to our request for additional information. Your permit application/petition still lacks some of the components necessary for us to complete our review; the enclosed checklist describes the missing information.

Please ensure that your response to the checklist, including any payment of the fee (if not submitted),

- is received in this office within 90 days from the date of this request;
- references the permit application/petition number; and,
- includes a copy of **all** requested information (if submitted on paper).

Failure to provide this information within 90 days will delay the processing of the permit application/petition, and may result in the permit application/petition being denied. If the additional information cannot be provided within that time period, you may make a written request for a time extension, provided that an acceptable justification for the time extension accompanies the request.

Pursuant to 120.60(1), F.S., if you believe this request for additional information is not authorized by law or rule, then upon your written request, the District shall proceed to process the application.

If you have questions regarding the information requested or the District's procedure, please contact me at the Tampa Service Office, at 8134456584. For assistance with environmental concerns, please contact Emma DeAbreu, 8133750672.

Sincerely,

Alex Tolksdorf
Engineering Supervisor
Environmental Resource Permit Bureau
Regulation Division

Emma DeAbreu
Environmental Scientist
Environmental Resource Permit Bureau
Regulation Division

Enclosures: Checklist

cc: TV Investment Holdings LLC
Alistair S. Brice, P.E.

PROJECT INFORMATION REVIEW LIST
Environmental Resource Permit Application
Individual

DATE:	July 10, 2026
PROJECT NAME:	Marina Rack Club
APPLICATION ID NUMBER:	921286
DATE APPL. RECEIVED:	June 30, 2025
APPLICATION REVIEWER(S):	
ENGINEERING:	Alex Tolksdorf
ENVIRONMENTAL:	Emma DeAbreu

In order to provide that reasonable assurance is given for those "Conditions for Issuance of Individual and Conceptual Approval Permits" found in Rule 62-330.301, Florida Administrative Code (F.A.C.), and those "Additional Conditions for Issuance of Individual and Conceptual Approval Permits" found in Rule 62-330.302, F.A.C., the following additional information is required as indicated. The items requested are also extracted from Rules 62-330.060, F.A.C., "Content of Applications for Individual and Conceptual Approval Permits", 62-330.010(4)(a), F.A.C., "Southwest Florida Water Management District Applicant's Handbook Volume I", 62-330.010(4)(b)4, F.A.C., "Southwest Florida Water Management District Applicant's Handbook Volume II", and 40D-1.607, F.A.C., "Permit Processing Fee".

ENVIRONMENTAL CONSIDERATIONS:

1. Based on a review of information submitted to date, reasonable assurance that adverse impacts to fish and wildlife will not occur as a result of the proposed increase in slips has not been provided. Please see the correspondence received from Florida Fish and Wildlife Conservation Commission (FWC) on July 10, 2026, for additional information. Please revise the project to reduce the number of proposed slips and/or provide reasonable assurance that adverse impacts to fish and wildlife will not occur. Coordination with FWC prior to submitting a response to the District is recommended. [Rules 62-330.060(2), 62-330.301(1)(d) and 62-330.302(1)(a)(2), F.A.C. and Subsection 10.2.2, A.H.V.I.]

DRAINAGE INFORMATION:

2. The submitted response states that there is no increase in impervious area, however the submitted plans show the existing impervious area as 228,326 square feet and the proposed impervious area as 260,534 square feet. It is unclear why this is inconsistent with the submitted drainage report which shows the impervious area as 265,783 square feet in the existing condition and 264,723 square feet in the proposed condition. Please remedy this inconsistency and provide an exhibit that shades what is considered impervious area. It was suggested in a recent meeting that significant pervious coverage under a roof was considered as pervious area. This is not appropriate and if this is considered in the calculations, it should be revised accordingly. [Rule 62-330.301(1)(i), F.A.C.]
3. If impervious area is to increase under this authorization, this application was not deemed complete by December 28, 2025 and is now subject to the water quality treatment performance criteria established in Senate Bill 7040, ratified on June 28, 2024. Due to an increase in impervious areas and potentially directly connected impervious area (DCIA), it appears that new criteria will be required. If this project cannot be demonstrated to be grandfathered under Section 3.1.2. of A.H.V.I, new criteria will be in effect, and a major modification or new individual permit will be required. Please determine if this project is grandfathered under Section 3.1.2. of A.H.V.I and if so, demonstrate how with sufficient supporting documentation. If this project cannot be grandfathered, the minor modification applied for is no longer appropriate and this application should be withdrawn. When reapplying, please note this site

appears to be located within Tampa Bay HUC 12 subwatershed. The HUC 12 subwatershed appears to contain OFW and an impairment which also appears to be located downstream of the site. The stormwater treatment system is to accomplish the greater of the following nutrient load reduction criteria. [Section 8.3, A.H.V.I.]

- a. A reduction such that the post-development condition average annual loading of nutrients does not exceed the predevelopment condition nutrient loading.
- b. A 95 percent reduction of the average annual post project runoff loading of total phosphorus (TP) and an 95 percent reduction in the average annual post runoff loading of total nitrogen (TN).

TV Investment Holdings LLC
Attn. Anthony Saravanos
1000 Century Park Dr.
Tampa, FL 33607



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