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"...to provide scientific knowledge of ground and surface water resources and advocate for the application of that knowledge toward management, conservation and protection."

November 18, 2015

The Honorable Bill Montford
214 Senate Office Building
404 South Monroe St.
Tallahassee, FL 32399-1100

Dear Senator Montford:

I am writing on behalf of the Wakulla Springs Alliance concerning SB 552 which is going to be heard in the Appropriations Committee this week. On the whole, we are disappointed in this weak version of the springs legislation that was introduced in 2014. Instead of a new approach, it relies on expediting the existing BMAP and MFL processes which have utterly failed to protect our springs.

Recently, DEP finalized a BMAP for Wakulla Springs which once again calls for yet another study, instead of real action to restore a spring which is today on the brink of ecological collapse. At the very first meeting of the BMAP two years ago, the City of Tallahassee made a compelling case that a further reduction in nitrate pollution to Wakulla Springs required doing something about the 7,000 septic tanks close to the spring. We have made very little progress since. The expensive and time-consuming process of the BMAP has only confirmed what everyone already knew, and kicks the can down the road for another five years by proposing an "OSTDS Initiative" to study and propose solutions to the septic tank problem.

But even then, there may be a further delay, because the local governments are expressing concern that they may not have authority to implement some of the solutions that have been proposed. This is what the BMAP says:

"Authority To Address OSTDS– To successfully implement the strategies that will be identified through the OSTDS Initiative, some stakeholders have expressed a need for the authority for local governments to address OSTDS loading, and this authority will need to come from the Florida Legislature. Any rules initiated by stakeholders cannot be less stringent than any state rules for OSTDS. During the first BMAP iteration, proposed

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legislation maybe drafted by local stakeholders, in collaboration with interested parties, such as the Wakulla Springs Alliance."

We think that the time to address this issue of authority is in the pending legislation. What is needed is a simple amendment to make it clear that local governments have authority to establish a responsible management entity to manage pollution from onsite treatment and disposal systems. We suggest the following language:

After line 3162, insert:

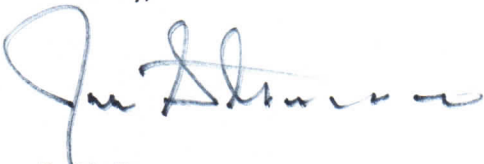
(c) As part of the remediation plan, a municipality, county, or appointed regional entity may establish, upon approval by the department, a responsible management entity for the prevention, reduction, and control of nutrient pollution caused by discharges from onsite sewage treatment and disposal systems. Responsible management entities may implement rules and maintenance programs in coordination with the department.

Similar language was part of the original springs legislation introduced by Senator Dean in 2014. It does not mandate responsible management entities; it only makes clear that the local governments have the authority to establish such entities under the supervision of DEP.

This amendment will not fix the weaknesses of the overall legislation, but it might speed along the restoration of Wakulla Springs, one of the largest, if not the largest springs, in the world.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Stevenson".

Jim A. Stevenson
Vice Chairman
Wakulla Springs Alliance
Florida_springs@comcast.net