

# Wakulla Springs Alliance

*"Protecting and restoring water quality, spring flow and ecological health of Wakulla Spring"*

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June 13, 2022

Dear Mayor Dailey:

The Wakulla Springs Alliance Board urges you to vote against adopting the proposed amendments to the Urban Services Area (LTA202201) for the Woodville Highway east parcel (#31302000200000) and the Southwood Plantation Road parcel (#3102204130000) and the proposed future land use and zoning classification changes for the Woodville Highway east parcel (LMA202202) and the Southwood Plantation Road parcel (LMA 202203) sought by D.R. Horton, Inc.

The proposed changes are not consistent with the governing objectives and policies of the Land Use element of the Comprehensive Plan. They also would allow increased development densities in areas not served by central sewer thereby unnecessarily adding to the nitrogen pollution of the aquifer that feeds Wakulla Spring.

The reasoning relied upon by staff to justify these Urban Services Area (USA) expansions and accompanying future land use and zoning map classifications turns logic on its head.

- The staff report states that “The applicant proposes that this Urban Services Area expansion will allow limited development to occur on the constrained portions of the parcel, where existing road and infrastructure already exist.” In fact, full infrastructure access does not exist on two of the three parcels for which USA expansion is proposed:
  - The 82.01-acre Woodville Highway east parcel has access to Capital Circle SE but no central sewer access. It is not clear from the staff report if the parcel has access to public water.
  - The western 22.01-acre portion of the Southwood Plantation Road parcel has access to Southwood Plantation Road and is within the USA but does not have access to water or central sewer. The remaining 107.79-acre eastern portion is outside the USA and has no access to any public infrastructure.
- Staff argues that expanding the USA to include these properties supports objectives and policies that call for restricting development to the USA to
  - “have Tallahassee and Leon County grow in a responsible manner, with infrastructure provided economically and efficiently, and surrounding forest

and agricultural lands protected from unwarranted and premature conversion to urban land use” (Objective 1.1 [L])

- o “discourage urban sprawl” (Policy 1.1.1 [L])
- o “guide and coordinate land use densities and intensities with the availability of capital infrastructure and to discourage urban sprawl” (Policy 1.1.11 [L])

This reasoning is inside out. Expanding the USA so that proposed development will be within it, especially where one or more of the three principal urban infrastructure services (roads, water, and sewer) are not available, is in fact inconsistent with these objectives and policies: Their intent is for the USA to guide the location of development rather than for proposed development to guide the location of the USA.

- Staff also justifies these expansions with the fatuous argument that the properties are not suited to be classified as “Rural” land use because the presence of road access contravenes Policy 2.1.1[L] which “indicates that urban services are not planned or programmed for lands in the Rural future land use category.” By this logic, only properties without road access should be classified as Rural future land use. Staff ignores the absence of water and/or sewer services on the east Woodville Highway and Southwood Plantation Road parcels.
- The staff analysis fails to demonstrate any need to expand the USA to accommodate future growth within the 20-year planning horizon of the comprehensive plan. The staff report (p. 3) misquotes Objective 1.1 [L] leaving out the planning horizon time frame. The full text reads as follows:

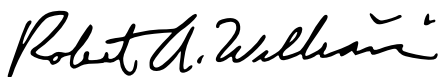
“The location and size of the USA shall be depicted on the Future Land Use Map and is based upon the area necessary to accommodate 90% of new residential dwelling units within the County by the Plan Horizon . . .”

Prior to the Welaunee USA expansion Dr. Pam Hall demonstrated that there was still more than sufficient land available within the applicable planning horizon. With the Welaunee USA expansion, there is likely enough developable land already inside the USA for the next 45 years.

Expanding the USA and amending the applicable future land use and zoning classifications to allow higher development densities in areas not served by sewer will negatively affect Wakulla Springs. Doing so will increase nitrogen pollution of ground water via septic systems that provide minimal nitrogen removal compared to the T. P. Smith Water Reclamation Facility which treats wastewater from sewered properties.

For these reasons, the Alliance Board urges you to vote against adopting the proposed USA expansions and future land use and zoning changes for the east Woodville Road parcel and the Southwood Plantation Road parcel. Please let me know if you have any questions concerning our recommendations.

Sincerely,



Robert A. Williams, Chair

cc: Reese Goad, City Manager  
Artie White, Planning Director