

Wakulla Springs Alliance

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

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May 27, 2022

Shawn Hamilton, Secretary
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, FL 32399

Dear Secretary Hamilton:

I write on behalf of the Wakulla Springs Alliance Board of Directors to urge the Department of Environmental Protection to find that Wakulla County Comprehensive Plan Map Amendment CPM21-09 (Watkins Properties, LLC, Applicant; Golden Construction Company, Inc./Robert Miller, Agent) will adversely affect an important state resource, namely Wakulla Spring which is a first magnitude Outstanding Florida Spring impaired for nitrate.

The applicant intends to construct 88 single-family residences served by conventional OSTDS on the subject property at a maximum density of 2 dwelling units per acre. The property is situated within the Wakulla Spring BMAP Priority Focus Area PFA2. This land use change will add approximately 2,100 lb-N/yr to the nitrogen load to Wakulla Spring that must be mitigated to meet the TMDL of 0.35 mg/L. Furthermore, allowing construction of these new units with conventional OSTDS will effectively negate \$2.6 million of state and local expenditures to convert a comparable number of standard OSTDS to sewer connections in the nearby Wakulla Gardens and Magnolia Gardens subdivisions.

We urge the Department to recommend that Wakulla County either withdraw the proposed map amendment or require that houses built at this location be served by enhanced nitrogen reducing OSTDS.

Please let me know if you have any questions about our recommendations.

Sincerely,



Robert A. Williams, Chair

cc: David Edwards, Wakulla County Administrator