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# Wakulla Springs Alliance

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

TO: Brett Cyphers, Tom Frick, Theresa Heiker, and Trina Vielhauer

DATE: May 9, 2016

FROM: Seán McGlynn, Chair, Wakulla Springs Alliance

RE: Request to postpone state funding of Woodville Sewer System Project Phase I

The final 2014 *Basin Management Action Plan for the Upper Wakulla River and Wakulla Springs Basin* (section 1.3.4) defines the Onsite Treatment and Disposal System (OSTDS) Initiative as the primary action required to reduce nitrate loadings to the system in an effort to attain the Total Maximum Daily Load (TMDL) target of 0.35 mg/L nitrate-nitrogen. The objective of the OSTDS Initiative is to "identify effective, financially feasible . . . comprehensive and sustainable management and engineering strategies . . . to reduce existing loading and prevent future nutrient loading from OSTDS sources" (pp. 11; 12). With limited state financial resources available to restore springs statewide, it is essential that those monies be spent in a manner that maximizes cost-effectiveness and minimizes unintended impacts on Wakulla Springs and the quality of life in rural Leon and Wakulla counties.

Toward that end, the Wakulla Springs Alliance respectfully urges FDEP, the Northwest Water Management District, and Leon County to remove the Phase I Woodville Sewer System Project from the list of projects to be funded in this cycle with state Springs Restoration monies (HB 5001, March 11, 2106). We recommend that state and county funds be used instead for the Bellair/Annawood Sewer System Project or the Northeast Lake Munson Sewer System Project, both of which are listed as potential future projects for state funding and both of which are located within the Tallahassee-Leon County Urban Services Area (USA).

We believe the Woodville Sewer System Project requires further evaluation prior to state funding for two reasons:

1. The Woodville Sewer System Project was identified over a decade ago, as a means to reduce OSTDS nutrient loadings from the Woodville area and to enable growth and development as designated by the Comprehensive Plan that is currently constrained by state regulations dictating minimum lot sizes where OSTDSs are used to manage sanitary wastewater. Leon County has not considered any other engineering technology or management approaches. Viable alternative technological and management approaches are available, and identifying alternatives best suited to remediating nitrate loading from OSTDSs within the

Wakulla BMAP area is precisely what is to be done under the BMAP OSTDS Initiative with input from the OSTDS Advisory Committee. Such analyses also are encompassed by the Alternative Sewer Solutions Project (formerly project #39/43) included in Blueprint 2020 Sales Tax Project 49 - Water Quality and Stormwater Funding, i.e. development of a Wastewater Treatment Facilities Plan and Facilities Financing Plan (see attached copy of Project #39, pdf pp. 7-8).

2. A final decision to finance this project also should account for the additional total nitrogen loadings to groundwater in the Wakulla Springs Primary Focus Areas that could result from both treated wastewater and urban storm water generated by build out to the maximum intensities that could be supported by the capacity of the proposed transmission system. The as-yet unspecified capacity of that transmission system will enable providing sewer service to currently vacant land both within the Woodville Rural Community (WRC) and may also have capacity to extend sewer service to areas west and north of the WRC that are outside the USA. Doing so would enable development within the WRC at densities greater than currently allowed under state regulations and, in areas outside the WRC, at densities greater than allowed under extant zoning and future land use categories designated in the Tallahassee-Leon County Comprehensive Plan.

The methods used to calculate net total nitrogen load reductions to groundwater have not yet been fully vetted. The resulting estimates are the foundation for assessing the cost effectiveness of both state and local expenditures for OSTDS remediation projects. These methods are especially critical to evaluating projects such as the proposed Woodville Sewer System Project that may enable development of significant areas of currently vacant land at potentially greater densities than currently permitted under state regulations and/or local zoning.

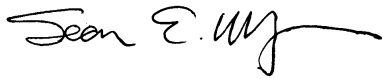
It is important for these methods to account for residual discharges to the Upper Floridan Aquifer after treatment at a central wastewater treatment plant and for actual loadings to groundwater that reflect attenuation and recharge rates rather than just end-of-system discharges. Methods and assumptions used by the Water Management District, Leon County, and Wakulla County differ from each other and are not fully consistent with FDEP's Nitrogen Source Inventory and Loading Tool (NSILT) that was the basis for setting the Upper Wakulla River TMDL. Those estimates are the foundation for assessing the cost effectiveness of both state and local expenditures for onsite treatment and disposal system (OSTDS) remediation projects. These methods are especially critical to evaluating projects such as the proposed Woodville Sewer System Project that will enable development of significant areas of currently vacant land at potentially greater densities than currently permitted.

We believe that vetting of those methods should be accomplished in the context of the BMAP OSTDS Initiative with input from the OSTDS Advisory Committee before alternatives are assessed for OSTDS remediation within the Wakulla BMAP and before projects such as the Woodville Sewer Project are funded.

A number of configurations of cluster and individual septic systems utilizing alternative advanced nitrogen removal technologies could provide more cost-effective nitrogen loading reductions for existing and future development without engendering the fiscal and political pressures to allow higher density development within the Woodville Sewer Project target area as well as in areas through which a transmission system is constructed. Such methods also might meet with greater acceptance by existing property owners as they can be better tailored to the timing and extent of demand. These alternatives should be evaluated using a fully vetted method of estimating total nitrogen loading reductions, before scarce state Springs Restoration funds are used to fund any phases of the Woodville Sewer System Project and any other septic-to-sewer projects that would enable development of significant areas of vacant land.

Over the near-term, the Bellair/Annawood and Northeast Munson Sewer projects present straightforward, cost-effective initiatives consistent with the purposes of the state Spring Restoration funding program and the Wakulla BMAP. These projects will convert existing OSTDS systems to central sewer in areas immediately adjacent to the existing sewer transmission system within the USA. We encourage all parties to move these projects forward expeditiously while holding off on funding the Woodville project until alternatives are fully assessed.

Sincerely,

A handwritten signature in black ink, reading "Seán E. McGlynn". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Seán E. McGlynn, Ph.D., Chair  
Chairman, Wakulla Springs Alliance  
568 Beverly Court  
Tallahassee, Fl. 32301

cc: John Buss, Tony Park, Ben Pingree