**2-12-21 WSA Special Board Meeting Minutes**

Board Members Present

Bob Deyle

Gail Fishman

Albert Gregory

Cal Jamison

Brian Katz

Howard Kessler

Andreas Hagberg

Terry Ryan

Lindsay Stevens

Jim Stevenson

Tom Taylor

Members and Guests

Doug Barr

Kathleen Coates

Sue Damon

David Edwards

Anthony Gaudio

Peter Goren

Mark Heidecker

Chuck Hess

Chris Keller

Scott Knight

Sondra Lee

Dallas Marshall

Johnny Richardson

Bruce Ritchie

Ryan Smart

Paul Thurman

Robert Williams

**Presentation by Bob Deyle**

* Wakulla County upgrading the Otter Creek WWTF to be incompliance with < 3 mg/l advanced wastewater treatment standard
* Disposal is now at a spray field that was exceeding the allowable level of nitrate in ground water.
* Wakulla County purchased a RIB site from Jerry Moore N of Hwy 98 near intersection with Spring Creek Highway
* The site is in the PFA 2.
* Wastewater effluent flow originating within the Basin is projected to increase from 0.59 mgd in 2020 to 1.43 mgd in 2040
* WSA sent letter to Wakulla County January 28th encouraging relocation of the RIB site outside the PFA
* Commissioner Ralph Thomas wrote an article in the Wakulla News indicating that the Wakulla County Commission is willing to consider other sites.
* The 2021 to 2026 implementation schedule was presented.
* County Administrator David Edwards provided a map of sites that Wakulla County has considered.
* Bob found 2 other sites over 100A. Edwards said they would be too wet.
* Gaby property is 250 A and soils are similar to the Moore tract.
* Sinkholes/karst windows may indicate caverns on the Gaby site. The Moore site also has karst windows.
* Gaby constraints include land cost, transmission infrastructure, willingness of the FDEP and WMD to provide spring protection funds to offset costs that may total $3.4-3.9 million.
* Funding for the wastewater facilities improvements plan as currently conceived will come from loans from the State Revolving Fund to be repaid from utility fees.
* A Protect Florida Springs grant could offset the costs of a more expensive alternative RIB site. The WMD has indicated, however, that they are reluctant to divert monies from other projects, they want to minimize exporting water out of the spring basin and they view the nitrogen load to Wakulla Spring from the planned RIB as minor.
* The WMD’s draft recommended allowable flow reduction is 38.3 mgd. Using data provided by the county’s consultant, Deyle estimated that the volume exported in 2027 would be 0.6 mgd and 0.98 mgd in 2040, which would comprise 0.4% and 0.6% of the recommend allowable flow reduction respectively.
* The BMAP goal for N load reduction to Wakulla Springs to Wakulla Spring by 2038 is 139,564 lbs-N/yr which will need to come primarily from moving OSTDS to sewer or converting existing OSTDS to enhanced N-removal OSTDS technology. An RIB only within PFA2 would generated about 1.2 to 1.4% of the 2038 nitrogen reduction goal. An RIB with a constructed wetland could reduce that to less than 1% depending on the nitrogen removal capability of the wetland.
* Connecting additional OSTDS to sewer to mitigate the residual nitrogen from an RIB or RIB + wetland within PFA2 at $27,000/OSTDS would cost approximately $19 to 23 million to mitigate the residual nitrogen from an RIB and $4.7-5.7 m for the RIB + wetland.
* A conservative back-of-the-envelope of the cost of using the Gaby property for an RIB is $3.4-3.9 m.
* FFONSI (FL Finding of No Significant Impact) comments due to the FDEP State Revolving Fund by Monday. Objections must be based in statute, regulation or ordinance. FDEP can require environmental enhancements or rescind the FFONSI and prepare an EIS.
* Options are to object to the FFONSI, critique the environmental assessment or something else. We could do a follow-up letter to Wakulla County and urge the county to conduct a comparative analysis of the Moore and Gaby sites for RIB + wetland.

**Q&A and Comments**

* Q – How accurate are the BMAP basin and PFA boundaries? A – They are in statute and used in planning but may be functionally fluid.
* Q – Are Moore and Gaby properties equal in terms of karst features? A – Both have karst features on site and near by.
* Q – Is the contemplated constructed wetland considered in the FFONSI? A – No. It was not part of the facilities plan submitted to FDEP.
* C – Grants reduce the cost to Wakulla County and to those connecting to the system thereby encouraging more growth.

**Motion and Discussion**

* Motion by Tom Taylor with a second by Debbie Lightsey for the WSA to send a letter objecting to the FFONSI and requesting analysis of RIB + wetland and other onsite, soil-based alternatives for the Moore, Gaby and other sites, as an enhancement to the environmental assessment, and sending a letter to the Wakulla County Commission offering to work with them. The EC will approve the letters.
* C – We can’t get to the 140,000 lbs-N/yr by reducing OSTDSs. There are 6000 OSTDS at 9.5 lb-N per septic tank. We can’t get there if we put more N in the BMAP basin with a RIB.
* C – We need a letter objecting to the FFONSI and support folks in Wakulla County.
* C – We need to encourage Wakulla County citizens to speak up. There will be N loading with any site. People will be moving here and will be on OSTDS if sewer is not available. We need to keep citizens informed.
* C – We should send letter of objection because all the options have not been addressed and align with the citizens.
* C – We have good examples of constructed wetlands in Gainesville and other places.
* C – The constructed wetlands in Gainesvile are for treating urban stormwater rather than treated wastewater effluent.
* C – We need to take advantage of the FFONSI opportunity and work to express willingness to work with Wakulla County and Commissioner Ralph Thomas.
* C – I am not sure of the results of our objection but we should object.
* C – We need to consider other sites including in the National Forest.
* C – The County will only consider sites they can own in fee-simple. Don’t want to lease land.
* The motion passed unanimously

**Other Comments**

* C – Gaby looks like the only other option. We should not limit consideration of “effluent enhancement” to just constructed wetlands. There are soil-based alternatives.
* C - Do we need to add that there be a lined wetland. The engineers say wetlands need to be lined.
* C - We can send the FFONSI objection to Edwards with an explanation of our interest in working with Wakulla County.
* C - BMAP numbers need to be revisited.
* C - The ALJ ruling on the BMAP was due in August and we are concerned about the delay. The chief expert has argued that the calculations were wrong. There is more loading than acknowledged and the projected reductions have been less. DEP is committed to consistent calculation approaches across BMAPs. We can address them now with Julie Espy at DEP after the ALJ ruling.
* C – Rob Williams, representing Apalachee Audubon, is willing to co-sign the letter. A – We will copy AA, Big Bend Sierra Club, 1000 Friends, Florida Springs Council and Florida Wildlife Federation on the letters.
* C – BMAP update for Wakulla Springs will start in 2022.
* C – There will be a community meeting in Wakulla County tomorrow at 4:00. Doug Barr, Sean McGlynn, Chuck Hess and others will speak. Terry Ryan is going. There will be a car parade too on Tuesday Feb 23. The Wakulla County Commission meeting will be live streamed on Facebook. See Clean Water Wakulla.
* Rob Williams = [redhillsbirder@gmail.com](mailto:redhillsbirder@gmail.com)
* C – Where does the 25% attenuation rate for RIBs come from? A – There may be a biological community in standing water which may do some attenuation. It will vary by flow rate and temperature. The BMAP uses 25% as a mid point of a range between 10 and 50%.