

**May WSA Board Meeting**

**Friday, May 20, 2022, 9:00 am to 11:00 am**

**Meeting Highlights**

* WSA will send a letter to the Tallahassee Commission advocating for the use of sheep and other alternatives to herbicides on the city solar farm.
* WSA sent an email to the Wakulla County Commission supporting a letter by Chad Hanson opposing a rezoning that would allow 88 new homes with traditional septic tanks without nitrogen reducing features in the Wakulla Springs BMAP area and will send letters to Wakulla County on the nitrate trends, another to DEP and then to the Wakulla County Commission just before the next vote to emphasize the fiscal and environmental costs of the plan amendment.
* Send questions for candidates at the Big Bend Environmental Forum to Rob Williams and he will compile and submit them.
* We need 3 things that we want candidates to commit to like actions on BMAP projects
* Tom Taylor encouraged WSA to develop an outreach campaign for Wakulla Springs that can be modeled off of efforts of the Free the Ocklawaha Coalition featured in the 1000 Friends of Fl webinar, “[Lessons from the Ocklawaha](https://1000fof.org/upcoming-webinars/past/).” Brian Luipani offered to work on this. Others should contact him to help with planning WSA outreach efforts.

Everyone is encouraged to review the [WSA Strategic Action Plan](https://docs.google.com/document/d/1fUeXuM0DL0eHWG_7K4_FEyePC0RbdZUPEfAow7iPEs4/edit), offer suggestions and identify what you are willing to do to enhance the future of our favorite Florida spring.

**Meeting Minutes**

Action items are underlined

**Opening**

* Welcome and introductions (See Appendix B) – Rob Williams
* Agenda review (See Appendix A) – Rob Williams
* Bob Deyle made the motion to approve, seconded by Howard Kessler, which passed unanimously

**Approval of the minutes**– Tom Taylor

* The minutes were mailed to everyone with the agenda prior to the meeting.
* Rob Williams made the motion to approve, seconded by Howard Kessler, which passed unanimously

**Approval of the financial report** – Jim Davis

* Howard Kessler made the motion to approve, seconded by Tom Taylor, which passed unanimously.

**Update on Tallahassee stormwater ordinance —** Bob Deyle

* Former City Growth Management Director Karen Jumonville’s position is open so there has not been any action.

**Update on Wakulla County springs protection ordinance** — Bob Deyle

* Bob has talked with the County Administrator David Edwards, who says staff is talking about next steps.
* Alan Baker will provide a presentation next month to WSA about the Leon County and Wakulla County aquifer vulnerability assessments – the factors that were used and their applicability to assessing aquifer vulnerability at the parcel level. David Edwards will participate.
* Hal Davis will be invited to address the vulnerability of sinkholes and cave systems to surface pollution.

**Solar Farm proposed letter —** Bob Deyle and Jim Stevenson

* We have worked on this for a year to address the use of herbicides and the impact on Wakulla Springs.
* Jim has researched the use of sheep. Origis uses sheep on some of their other locations.
* We sent a letter to David Byrne, with the City, asking them to take the lead on this. He says he forwarded the letter is waiting for a response from Origis.
* We have a draft letter to the City Commission, see Appendix D.
* Tom Taylor made the motion to approve sending the letter, seconded by Rob Williams, which passed unanimously.
* Homeowners in the area are willing to have their wells tested. FDEP had been asked to test the wells before and after the next herbicide application. However, in the absence of any information from Origis about when and what they may have applied herbicides this spring, Bob has requested that FDEP test the wells for their whole suite of herbicides. That request is being sent up through the chain of command for approval.
* Jim Stevenson sent an email with a list of questions to Michael Olsen but has not received a reply.
* Origis is considering mechanical removal rather than herbicides.
* The sheep herder in Arcadia with whom Jim has been communicating rotates his sheep between several properties to keep vegetation under control without herbicides.

**Action on Wakulla comp plan amendment CMP21-09 —** Bob Deyle

* This comprises a Large-Scale Comprehensive Plan Map Amendment to alter the future land use from Agriculture to Rural 2 on a 176-ac parcel located south of Dr. Martin Luther King Jr. Memorial Road, west of Spring Creek Highway, and north of the Park Subdivision.
* The applicant, Watkins Properties LLC intends to construct eighty-eight single-family residential units on the property if the Application is approved. Because the property is outside the county’s spring protection zone, aka Wakulla Springs Special Planning Area, the houses would have standard septic systems. However the property is within the BMAP Priority Focus Area (PFA).
* The executive committee sent an email to the Wakulla County Commission regarding the amendment and supporting the letter written by Chad Hanson, see Appendix E.
* Clean Water Wakulla notified WSA.
* Our email recommended denial of the application.
* Chad Hanson, a Wakulla County Planning Commissioner and WSA member, sent a letter (see appendix E).
* At an average cost of $29,300 per conversion, 88 new standard septic systems will negate $2.6 million of state funds used to reduce nitrogen pollution of the spring by connecting some of the existing septic tanks to sewers in the nearby Magnolia Gardens and Wakulla Gardens subdivisions.
* We can send a letter to DEP asking them to comment on this plan amendment.
* Commissioner Ralph Thomas has a graph on his website that shows nitrate levels nearing the TMDL 0.35 mg/l
* Bob’s chart shows little change since 2013. The downward trend could be more affected by rainfall and sinking stream flows than by reduced loading from septic tanks or other sources.
* Sean McGlynn has recorded levels well above the 0.35 mg/l and as high as 0.5 since July 2021.
* A plot of nitrate and rainfall (7-day cumulative rainfall 10 days prior to the nitrate measurement) was presented.
* Cal says that rainfall at the airport is different than in the national forest or at Wakulla Springs.
* Chad Hanson asked about measuring concentration, load and flow.
* The flow from the south is related to the rainfall and the saltwater wedge.
* Can you look at Spring Creek? A – it is too complicated to use flow.
* We need the state to put pressure on Wakulla County or it will be approved.
* To get earliest possible notice on such issues it is best to track meetings of the technical review committee.
* There is no longer state approval of plan amendments but their comments can affect future funding.
* It can be true that nitrate levels are improving AND that this plan amendment is a bad idea.
* The adjacent properties need to be considered along with the sloughs and caves below.
* There are also road access issues. They may tie into Martin Luther King.
* The developer presentation showed about 10 A of wet areas.
* Former Wakulla County Commissioner Moore is involved.
* Tom Taylor made the motion, seconded by Cal Jamison, which passed unanimously to send letters to the Wakulla County Commission to clarify the nitrate trend, another to DEP and then to the Wakulla County Commission just before the next vote to emphasize the fiscal and environmental cost of the plan amendment.
* The comp plan map amendment adoption vote by the County Commission after the State review will probably be later this summer.
* Send the letter to FDEP Secretary Shawn Hamilton and DEAR Director Greg DeAngelo and others. Getting DEP to act will be challenging. It may be better to focus on influencing the Wakulla County Commission. Focus on the issue of wasting money.
* Emphasize that protecting Wakulla Springs can be a victory message for DEP.
* The 0.35 mg/l level may not be a valid number. The history of TMDLs is based on a lot of studies and there is no basis for the 0.35. It is a political number.
* Cal and Chad showed the trend from 7-21 to 5-22 and the nitrate levels are going up.
* DEP is only using the boat dock data to assess compliance with the TMDL and not Sean McGlynn’s data, which can be used in the just approved WSA letter.
* Q – Is there a biological component in the BMAP as well as the 0.35 nitrate level. A – We were told it would be in the BMAP but it isn’t.
* The USGS mobile app water data site is another source and the levels are about 0.45 mg/l. There have been problems with periodic fouling of the USGS probe at the boat dock but the USGS numbers are similar to McGlynn’s data.
* Kathleen Coates with the NWFWMD suggested getting grab sample data from FDEP and USGS.

**Definition of Harm in Proposed Rule for SB 552** - Ryan Smart

* There was a new definition of harm. DEP said they were soliciting comments for 5-years with no evidence of contacts with the public.
* After 6 years they have done nothing.
* Springs Council drafted a revised rule. They generated 1000 letters opposing the proposed rule. DEP has not responded.
* DEP developed the [Central Florida Water Initiative](https://cfwiwater.com/), which they link to the [Outstanding FL Springs](https://www.flrules.org/gateway/ruleno.asp?id=62-41.402).
* The proposed rule will not achieve the purpose of the [Springs and Aquifer Protection Act](https://floridadep.gov/comm/comm/documents/springs-and-aquifer-protection-act).
* DEP says there is no harm so there are no restrictions on withdrawals.
* This applies to every consumptive use permit.
* The law says “harm” and the proposed rule addresses this.
* 80% of springs have BMAPs.
* Springs Council lawyers are planning litigation.
* Q – What can WSA do? A – We can comment on the proposed rule when published and support litigation if that happens.
* Q – What about the Soil and Water Conservation District legislation? A – Some are finding someone with agriculture land and get a job with them for $10/year and thereby qualify for SWCD positions.

**Springshed and river update** – Cal Jamison

* Tannic levels have dropped.
* Visibility depth has increased about 5’/week.
* Manatees appear to have become permanent residents.
* Quarterly submerged aquatic vegetation, SAV analysis was just done. Grasses are increasing nicely in the swimming and other areas. There is not much diversity in plant life.
* Tour boats are still docked and there is a borrowed boat operating but it is too big to go in the back canal.
* You can see wildlife on the [Friends of Wakulla Springs](https://wakullasprings.org/) site.
* Another new pontoon boat will hold 45 people.
* The lip of the spring cave would be good for measuring sea level rise. [WKPP](https://www.facebook.com/woodvillekarstplainproject/) could help with this.
* WKPP has new maps. Andreas worked on a map of Sally Ward people could access with a QR code.

[**Big Bend Environmental Forum**](http://www.bbef.org/) **—** Rob Williams

* The primary is Aug 23
* Thursday, August 4 BBEF at City Hall and by Zoom
* Another BBEF will be in October
* We have paid our dues and need to get as many people there as possible and to submit specific questions. Send questions to Rob Williams and he will compile and submit them.
* We need 3 things that we want candidates to commit to like actions on BMAP projects that can be included in a letter.
* C – This is an important activity and can have an impact.
* Tom Taylor encouraged WSA to develop an outreach campaign for Wakulla Springs that can be modeled off of efforts of the Free the Ocklawaha Coalition featured in the 1000 Friends of Fl webinar, “[Lessons from the Ocklawaha](https://1000fof.org/upcoming-webinars/past/).” Brian Luipani offered to work on this. Others should contact him to help with planning WSA outreach efforts.
* John Quinton is on the call and he is a candidate for Wakulla County Commission.
* Commend Ryan for the [FL Springs Summit](https://www.floridaspringscouncil.org/summit). It was well attended and well done. Anna Eskamani was the guest speaker.
* The water sampling team made the front page of the Wakulla Sun, a new newspaper.
* FL Springs Council will do 5 mini conferences including one in Tallahassee.
* Brian Luipani would like to help with BBEF.

**Adjourn**

* Cal Jamison made the motion to adjourn, seconded by Bob Deyle, which passed unanimously.

Appendix A



**May Board Meeting Agenda**

**Friday, May 20, 2022, 9:00 am to 11:00 am**

**Opening**

* Welcome and introductions – Rob Williams
* Agenda review and approval – Rob Williams

**Approval of the minutes** – Tom Taylor
**Approval of the financial report** – Jim Davis
**Update on Tallahassee stormwater ordinance —** Bob Deyle
**Update on Wakulla County springs protection ordinance** — Bob Deyle **Solar Farm proposed letter —** Bob Deyle and Jim Stevenson
**Action on Wakulla Comp Plan Amendment CMP21-09 —** Bob Deyle

**Springshed and river update** – Cal Jamison
**Big Bend Environmental Forum —** Rob Williams
**Upcoming meetings and events
Adjourn**

Appendix B

**5-20-22 WAKULLA SPRINGS Board Meeting Participants**

**\* Indicates those present**

Officers

Robert Williams, Chair \*
Robert E. Deyle, Vice-Chair \*
Tom Taylor, Secretary \*
Jim Davis, Treasurer

Directors

Gail Fishman
Rob Gelhardt \*

Albert Gregory

Andreas Hagberg \*

Cal Jamison \*
Howard Kessler \*

Mike Keys

Debbie Lightsey

Brian Luipani \*

Lindsay Stevens

Members and Guests

James Call \*

Kathleen Coates \*

Gil Damon \*

Sue Damon \*

Anthony Gaudio \*

Maddy Hart \*

Chad Hanson \*

Chuck Hess\*

John Quinton \*

Ryan Smart \*

Jim Stevenson \*

Paul Thurman \*

**Appendix C**

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Appendix D

**Draft letter regarding solar farm herbicide use**

Dear Mayor Dailey/Commissioner X:

I write on behalf of the Wakulla Springs Alliance Board to seek your assistance in persuading staff of the city Electric and Gas Utility to be more proactive in lobbying Origis Services to stop using herbicides to control vines and weeds under the solar panels at the airport solar farm. As you may know, Origis manages the solar farm for the owner, KKR, which leases the land from the city to produce electricity which it sells to the city.

An inquiry that we initiated on May 21, 2021, revealed that Origis was using Roundup and Oust at that time to control weeds under the lower ends of the fixed solar panels where their mowing equipment could not reach. We attempted to encourage Origis to take a serious look at using sheep grazing in lieu of the herbicides as is being done by several electric utilities in Florida and at some other solar farms managed by Origis.

Ultimately Origis rebuffed our proposal after we requested more detailed information about their use of herbicides. In February, we asked David Byrne to assist in persuading Origis to consider the sheep grazing alternative (see attached letter). Mr. Byrne’s response has been that he sent a copy of our letter to Origis and that they have not replied.

We believe that as lessor of the land upon which the solar farm operates and as the sole customer for the power, the City of Tallahassee ought to be making certain that the operation does not pose risks of ground water contamination that may negatively affect nearby private wells and/or the water quality of Wakulla Spring. We detail this argument in the attached letter to Mr. Byrne.

We request that you call upon city staff to brief the City Commission on this matter and that you urge them to be more proactive about making certain that one of our city’s most noteworthy environmental initiatives is, in fact, not posing a potential hazard to the local environment.

Sincerely,

Rob Williams, chair

Wakulla Springs Alliance

Appendix E

**WSA Email to Wakulla County Commission on Com Plan Amendment**

**From:** Robert Deyle <rdeyle@fsu.edu>
**Sent:** Monday, May 16, 2022 11:08 AM
**To:** Ralph Thomas <rthomas@mywakulla.com>
**Subject:** Recommendation to deny the application for Comprehensive Plan Map Amendment CPM21-09

Dear Commissioner Thomas:

The Executive Committee of the Wakulla Springs Alliance, on behalf of the WSA Board, joins Chad Hanson in urging you to deny the application for Comprehensive Plan Map Amendment CPM21-09 submitted by Watkins Properties, LLC. We endorse Mr. Hanson’s findings and reasoning in the attached letter.

The Northwest Florida Water Management District’s recent Minimum Flows and Levels Technical Assessment documents that groundwater from Priority Focus Area 2 is flowing north to Wakulla Spring more frequently than in the past due to the declining head differential between Wakulla Spring and the Spring Creek springs group.

Allowing development with standard septic tanks at this location would be a step backwards. Doing so would partially offset the very large investments of county and state funds to reduce nitrogen loading from the Otter Creek wastewater treatment facility and from standard septic tanks elsewhere in the county.

The County Commission is under no legal obligation to grant the proposed comp plan amendment. We urge you to deny the request, consistent with the goal we all share to improve the water quality of Wakulla Spring.

Thank you,

Rob Williams, chair, Wakulla Springs Alliance

Robert Deyle, vice chair

Tom Taylor, secretary

JIm Davis, treasurer





