



December 13, 2016

Mr. Jonathon P. Steverson, Chair
Acquisition and Restoration Council
3900 Commonwealth Boulevard M.S. 100
Tallahassee, Florida 32399
Via: hank.vinson@dep.state.fl.us

RE: State Road 319 Easement through Wakulla Springs State Park, ARC Agenda Item 17, December 15, 2016

Dear Mr. Steverson and Members of the Acquisition and Restoration Council:

On behalf of the Apalachee Audubon Society, Audubon Florida, Defenders of Wildlife, Florida Wildlife Federation, Friends of Wakulla Springs, and the Wakulla Springs Alliance, we respectfully request that you condition FDOT's easement through Wakulla Springs State Park in the following ways.

- (1) **Mitigation acquisition:** Encourage FDEP to prioritize the Sparks, Richardson, Robbins and Wilson Trust properties among the eight listed in Exhibit A. These are of particular importance because their acquisition would (a) facilitate park staff management of existing parcels protecting Upper Rivers Sink (Sparks or Richardson properties) and Turner Sink (Robbins property) and (b) enable restoration of a buffer along McBride Slough and additional access to the Wakulla Springs Trail (Wilson Trust property).
- (2) **Reduction of stormwater pollution of Wakulla Spring:** Require FDOT to design its stormwater management ponds on state lands to minimize nitrogen loading impacts to Wakulla Spring which is impaired because of excess nitrate-nitrogen. As currently designed, these dry retention ponds could result in nitrogen loadings to Wakulla Springs as much as 40 times greater than those from the existing highway because of the highly porous nature of the soils and underlying geology at these sites. Pond design technology exists using engineered soils that can significantly reduce these impacts. While on other lands FDOT may be held to meeting basic minimum standards, on state lands, ARC's compatible uses policy requires that they minimize impacts—a higher standard. Without these protections, this easement does not pass ARC's compatible use test.
- (3) **Wildlife underpass:** Require a wildlife underpass and fencing to maintain connectivity between state park lands. As currently designed, the expanded highway will become a more dangerous obstacle to many forms of wildlife due to its width and six-foot elevation. Consistent with ARC's compatible use test, an underpass will minimize impacts to wildlife and will enhance the safety of motorists by reducing wildlife – vehicle collisions and related deaths, injuries, and property damage.

DOT's expansion of US 319 will necessarily require an easement through this portion of Wakulla Springs State Park, but it is ARC's responsibility to ensure that the terms negotiated protect the public trust and Florida's investment in these resources. By requiring the above conditions, we believe ARC can be confident the project meets your standard for compatible linear facilities. We look forward to discussing this more at this week's meeting.

Sincerely,

Robert Williams, Chair, Conservation Committee, Apalachee Audubon Society
Julie Wraithmell, Deputy Executive Director, Audubon Florida
Kent Wimmer, Northwest Florida Representative, Defenders of Wildlife
Manley Fuller, President, Florida Wildlife Federation
Sean McGlynn, President, Friends of Wakulla Springs
Robert Deyle, Vice Chair, Wakulla Springs Alliance