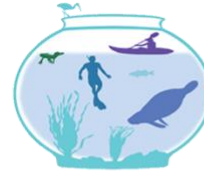


Commissioner Bill Proctor, District 1  
Commissioner Jimbo Jackson, District 2  
Commissioner Rick Minor, District 3  
Commissioner Brian Welch, District 4  
Commissioner Kristin Dozier, District 5  
Commissioner Nick Maddox, At Large  
Commissioner Carolyn Cummings, At Large



Howard T. Odum  
**FLORIDA  
SPRINGS  
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## **To Protect Wakulla Springs, Please Pass a Strong Fertilizer Ordinance that Includes a Ban on Summer Applications**

Dear Commissioners:

The Upper Wakulla River and Wakulla Springs Basin Management Action Plan (BMAP), adopted by the Florida Department of Environmental Protection (DEP) in 2018, determined that Wakulla Springs is impaired by excess nitrogen loading. At the time the BMAP was drafted, nitrogen levels at the Wakulla Springs vent were approximately 25% greater than the total maximum daily load water quality standard. The BMAP identifies urban turf fertilizer as the third largest contributor of nitrogen in the basin, behind septic tanks and agricultural run-off. According to DEP, urban fertilizer is responsible for 10% of the nitrogen loading to groundwater in the Wakulla Basin.

Under current Florida laws and rules, it is unlikely that agricultural nitrogen pollution will decrease during the 20-year lifespan of the BMAP. In fact, it is much more likely that agricultural nitrogen loading will increase due to more intensive agriculture and a lack of meaningful state regulations to address agricultural loading.

Progress is being made in reducing nitrogen loading from septic tanks in the Wakulla Basin. However, as you know, connecting septic tanks to wastewater treatment facilities or upgrading to advanced nitrogen removing systems is extremely expensive and the benefit on a per system basis is small relative to the amount of nitrogen that must be reduced to achieve water quality goals.

One of the most cost effective and timely means to reduce nitrogen pollution to Wakulla Springs, and the waters of Leon County, is to adopt a strong urban fertilizer ordinance. Already, fourteen

counties and over one-hundred municipalities have adopted strong fertilizer ordinances that include strict rainy season bans on the application of fertilizer containing nitrogen and/or phosphorus. These ordinances, and the rainy season bans, are based on the best available science. In fact, state law requires that each ordinance stronger than the DEP Model Ordinance is “science-based, and economically and technically feasible.”

Leon County shares responsibility for the degradation, and therefore the restoration, of Wakulla Springs, one of Florida’s great natural treasures. As such, Leon County can be a leader on adopting local laws and ordinances that protect the underground drinking water aquifer and local waterways. At the very least, Leon County needs to keep up with other environmentally conscious local governments by passing a fertilizer ordinance that meets the minimum standards set by Sierra Club Florida, the premier expert on this subject within Florida’s environmental community.

Most importantly, the draft fertilizer ordinance prepared for consideration on May 11<sup>th</sup> needs to be amended to include a ban on nitrogen and phosphorus containing fertilizer applications between the months of June and August. Any ordinance that does not include a “rainy season” ban misses a critical opportunity to reduce nutrient pollution to Wakulla Springs and other ailing waters. To spend millions of dollars on septic tank remediation, while passing a weak fertilizer ordinance is not only bad environmental policy, but bad economic policy as well.

In 2020, Leon County received \$500,000 in springs restoration funding to help replace septic tanks. The County Commission should consider that passing a weaker fertilizer ordinance than other local governments that are competing for the same limited funding may put the County at a disadvantage as the perception spreads that Leon County is not serious about protecting Wakulla Springs.

The Florida Springs Institute and Florida Springs Council believe that blue springs are more important than green yards. As such, our recommendation is that Leon County do everything within its power, including considering a year-round ban on nitrogen and phosphorus containing fertilizer or assessing a fertilizer tax dedicated to water restoration projects, to prevent nitrogen loading from urban fertilizer. At a minimum, we urge you to amend the draft fertilizer ordinance to reflect the recommendations of Sierra Club Florida’s letter date April 6, 2021.

Sincerely



Bob Knight  
Executive Director  
Florida Springs Institute



Ryan Smart  
Executive Director  
Florida Springs Council