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Wakulla Springs Alliance

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

December 7, 2017

Dear Mr. Long and Members of the Leon County Commission – I write on behalf of the Wakulla Springs Alliance to commend staff for their response to comments received on the original Scope of Services for the Comprehensive Wastewater Treatment Facilities Plan (CWTFP). They did an outstanding job of acting on the comments submitted and documenting how they disposed of those comments in the draft RFP that will come before the Commission on December 12th. At this point we have one remaining concern to raise and a few minor refinements to recommend.

We urge the County Commission to provide clear direction that the RFP should instruct the contractor to fully assess alternatives to central sewer for remediating septic tank impacts within all 14 of the Unsewered Target Areas defined in the *City of Tallahassee 2035 Master Sewer Plan Update* (Hatch Mott MacDonald, 2016), including the Woodville Rural Community. These areas were designated for connection to central sewer without the benefit of the comprehensive cost-effectiveness assessment of alternatives which the CWTFP is intended to provide.

We recognize that Comprehensive Plan Policy 4.2.5: [C] states that “the preferred method of wastewater treatment in the PSPZ within the Woodville Rural Community . . . shall be connection to sewer facilities designed to achieve Advanced Wastewater Treatment standards.” However, that policy also was not informed by a comprehensive analysis of alternatives as intended by the CWTFP. While the contractor should acknowledge the predisposition of Policy 4.2.5[C], their analysis should provide the basis for assessing the cost-effectiveness of that policy choice against the other technical and engineering alternatives.

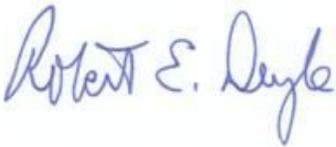
Our minor recommendations include the following.

1. We do not read Section 28 of the Florida Springs Protection Act of 2016 as prohibiting any and all onsite treatment and disposal systems (OSTDS) on lots of less than 1 acre as stated on page 2 of the staff report. The statute (Section 373.811(2)) prohibits within a priority focus area “New onsite sewage treatment and disposal systems on lots of less than 1 acre, if the addition of the specific systems conflicts with an onsite treatment and disposal system remediation plan incorporated into a basin management action plan . . .” We read this as requiring that any new or replacement OSTDS installed on lots of less than 1 acre must comply with any design or technology standards contained within the Wakulla OSTDS Remediation Plan which is to be adopted no later than July 2018.

2. The RFP (Attachment #1, p. 2 of 11) should acknowledge in Section II. A. State of Florida Activities that FDEP is developing revised nitrogen source inventory and loading (NSILT) estimates as well as a revised BMAP that will include an OSTDS Remediation Plan which is to be adopted by July 2018.
3. Section II.B. Leon County Activities item #14 (Attachment #1, p. 8 of 11) concerning lake TMDLs also should mention the 2012 federal TMDL for Upper Lake Lafayette which calls for a 0 percent reduction in total nitrogen and a 36 percent reduction in total phosphorus.
4. In Section 1 of the Scope of Services the list of criteria to be considered in establishing target nitrogen reduction rates (Attachment #1, p. 10 of 11) should specify use of the attenuation and loading factors in FDEP's revised NSILT rather than the 2014 NSILT (see preceding comment #2).
5. The Section 1 Scope of Services list of criteria to be considered also should include the BMAP OSTDS Remediation Plan that is to be adopted by July 2018.
6. In Section 5 of the Scope of Services, the RFP should direct the contractor to document their assumptions about the following in estimating total annual nitrogen reduction that will be achieved:
 - a. Participation rates by property owners in the recommended retrofit strategy for each area;
 - b. Rates at which existing conventional septic tanks will fail thereby triggering required retrofits per the policies set forth in Comprehensive Plan Policy 4.2.5[C]; and
 - c. Any other policy assumptions that dictate which properties must engage in what retrofits at what point in time over the 20-year planning horizon.

Thanks for making this an open and transparent process for developing the project scope of services. We believe that as a result, the CWTFP will have the potential to be a critically important element in our community's efforts to remediate nutrient impacts on water resources in our county and to do our share to restore Wakulla Springs.

Sincerely,

A handwritten signature in blue ink that reads "Robert E. Deyle". The signature is written in a cursive style with a large initial 'R'.

Robert E. Deyle, Vice Chair
Wakulla Springs Alliance