

Response to Draft BMAP
Upper Wakulla River
September 24, 2013

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Citizen Stakeholder

Comments & Recommendations:

"Sufficiency of Effort Approach:

No legislative or rule making authority has been cited for using this approach. If it exists, please provide evidence of such authority. In the absence of any overt authority, I strongly suggest that you follow the rules and name entities responsible for pollution reductions and the reduction amounts they must achieve.

Nitrate Reductions:

The TMDL target for nitrate levels has been set at .35 mg/l. DEP staff characterize the most recent water quality data results as being inconclusive, quite variable and/or volatile. What is known however, is that the target level has not been reached. Thus DEP must name responsible parties and the reduction levels for which they are responsible. Such reductions could be phased over a number of years to lessen the financial impacts. It is not acceptable for DEP to allow an additional 5 years to lapse before any projects to reduce nitrates must be underway.

Future Growth and Development in the PSPZ:

- I. At minimum -- and particularly essential in the absence of any nitrate reduction requirements: the BMAP should preclude additional growth and development in the Primary Springs Protection Zone unless all such development uses Wastewater Treatment systems operating at AWT levels.
2. The BMAP should require, within 24 months, that both Leon and Wakulla Counties establish Wastewater Management Entities (RME level 4 or comparable structure) that include an adequate revenue stream to fund essential duties such as inspection, repair, and replacement of existing and future systems/facilities .
3. The BMAP should require that both Leon and Wakulla Counties commence development of a Master Wastewater Plan for their jurisdictions – to be completed within 30 months of BMAP adoption. This plan should include guidelines on which treatment system is to be employed by development in delineated areas of the jurisdiction based on soil type, water table, aquifer vulnerability, etc. Such plan should utilize all available technologies, not relying exclusively on OSTDS and central sewer.

Recommended DEP Actions - External to the Wakulla River BMAP Process

DEP should take a leadership role in presenting to the Florida Legislature a bill that would allow local governments with adopted TMDLs that cite OSTDS as sources of nitrate pollution to establish programs to reduce such pollution.

DEP should earmark existing departmental funds to support formation of local government RMEs; development of Wastewater Master Plans; and pilot programs using technologies other than OSTDS and central sewer to reduce nitrate levels in wastewater. Alternatively, DEP should approach the EPA and the Florida Legislature to provide such funding.