

**COMMENTS UPON REVIEW OF DRAFT DOCUMENT ENTITLED “LEON
COUNTY COMPREHENSIVE WASTEWATER TREATMENT FACILITIES
PLAN SCOPE OF SERVICES”**

**BY
CURTIS BAYNES
October 9, 2017**

With these comments, I am presenting, more than anything else, questions that came to mind as I read the draft document. One of the questions I have is whether we are involving land use enough? There is a clear emphasis on “engineering” but I am not sure how much engineering is possible without a more complete inclusion of land use considerations. There are also a number of assumptions necessary to prepare this plan; this may require clarification from policy makers. Perhaps there are easy explanations for these points and, if there is, it probably ought to be included here so that a consultant has a firmer understanding of what the county expects.

1. **What is the purpose of Comprehensive Wastewater Treatment Facilities Plan (“Plan”)** (Page 1; “Introduction”)? The last sentence in Project Background indicates that Leon County will manage the CWTF Plan. When I think of “county,” I imagine two key components: Land Use (current, future, potential, etc.) and, in Leon County’s case, Environmental Standards. In term so purpose, in my mind, it’s a question of “how does the county expect to use this plan?” For example, when I combine Land Use/Environmental Standards with a CWTF plan, I wonder: “What kind of wastewater disposal systems does the county need to ensure that its land use decisions can meet its environmental standards?” A clear purpose statement would help the consultant to better, more easily understand what the county needs from them. Some of the questions that started going through my mind, and these are in no particular order, or particular significance:
 - a. What is the planning horizon: five, ten, 20 years? More? Less?
 - b. How will this plan help to ensure that land use will meet environmental standards?
 - c. How will this guide us into the future?
 - d. Is this a plan, or an “action plan?”
 - e. Will the county implement this, or should we think in terms of a new, different agency?

Comments upon review of draft document entitled “Leon County Comprehensive Wastewater Treatment Facilities Plan Scope Of Services”

By Curtis Baynes

October 9, 2017

Page 2 of 4

2. **What are the environmental standards to which the CWTF Plan is to be focused** (Page 1 “Project Background”)? The background refers to the TMDL of 0.35 mg/L of nitrates. However, if I understand it correctly, TMDL is a measure of concentration, not system performance. Yes, it could be proxy for evaluating overall environmental health, but does it help the consultant to understand what the plant needs to achieve; e.g., 50%, 70%, or 90% reduction of nitrates from the effluent.
3. **Why would the county want to spend its money for another evaluation or “environmental review”** (Page 2; Scope of Services; “1. Environmental Support”)? The draft document calls for the consultant to “Provide environmental review of alternatives for Facilities Plan.” However, it seems to me that much of this has already been provided in previous studies, such as LAVA, Lombardo, etc. Rather than ask the consultant to do this again, why not have staff prepare a review and include it in the draft document? It seems to me that the last thing the county would want to do is pay another consultant to do the same thing that other consultants have done before them. It seems to me a better use of resources to include a review of what the previous consultants have done to frame the work for the next consultant.
4. **What kind of engineering does the county expect from the consultant in this study** (Page 2; Scope of Services; “3. Utility Engineering”)? The draft document calls for the consultant to “Provide environmental review of alternatives for Facilities Plan.” To do so, presumably, they are to “evaluate groundwater susceptibility to nitrates throughout the unincorporated area....” However, it seems to me that much of this has already been provided in previous studies, such as LAVA, Lombardo, etc. Rather than ask the consultant to do this again, why not have staff prepare a review and include it in the draft document? It seems to me that the last thing the county would want to do is pay another consultant to do the same thing that other consultants have done before them. Wouldn't it be a better use of resources to include a review of what the previous consultants have done to frame the work for the next consultant?

A word of caution: An engineer can engineer any system you need. “Engineering” to me connotes how we are going to do something. The “what,” “where,” and “why” we are going to do something is very different than “engineering.” When one knows the “what,” “where,” and “why,” “engineering” helps us to understand “how” and “how much.” Engineering can be a substantial time sink and serious drain on the

Comments upon review of draft document entitled “Leon County Comprehensive Wastewater Treatment Facilities Plan Scope Of Services”

By Curtis Baynes

October 9, 2017

Page 3 of 4

project’s resources. How far is the county expecting the consultant/engineer to drill down into the CWTF Plan? Is there some way to help the consultant/engineer here? Perhaps stratifying the work somehow, based upon existing policy preferences, or logical relationships? For example,

- a. All lots inside the city and the urban service area will be sewerred.
 - b. On-site disposal systems will only be allowed on lots of ½ acre or more, depending upon zoning/land use (the current standard of two units per acre).
 - c. No on-site disposal systems on any lot (improved, or unimproved) that is less than ½ acre. Future disposal systems would require some form of shared system (e.g., cluster system).
 - d. No existing zoning will be changed to accommodate future use.
5. **Some areas in the draft document seemed to me to be a vague.** I will list those here; perhaps someone can clear them up for me.
- a. **What do we mean in terms of “upgrade of OSTDS”** (Page 2; Scope of Services; “3. Utility Engineering”; first sentence)? The draft document calls for an evaluation “to include upgrade of OSTDS.” Are we talking about replacing existing systems with new systems? Retrofitting existing systems to increase nitrate removal? For example, what occurred to me is that there may be
 - i. Modify existing systems to improve nitrate reduction (e.g., retrofit an existing system to provide advanced treatment).
 - ii. Install new OSTDS systems in new construction on lots of ½ acre or more that provide advanced treatment to reduce nitrates.
 - iii. Connect lots of less than ½ acre with a cluster system.
 - b. **What do we mean in terms of “benefit/cost analysis”** (Page 2; Scope of Services; “3. Utility Engineering”; next to the last sentence)? The draft document calls for consideration of “benefit/cost analysis.” What kind of

Comments upon review of draft document entitled “Leon County Comprehensive Wastewater Treatment Facilities Plan Scope Of Services”

By Curtis Baynes

October 9, 2017

Page 4 of 4

analysis do we mean: dollar cost/benefit, environmental cost/benefit? evaluation “to include upgrade of OSTDS.”

- c. **What do we mean in terms of “develop prioritization criteria for Facilities Plan implementation”** (Page 2; Scope of Services; “3. Utility Engineering”; next to the last sentence in the paragraph)? The draft document calls for the consultant to “develop prioritization criteria for Facilities Plan implementation.” This took me back to goes back to an earlier question: What is the purpose of this study? It would seem to me that this study should produce an action plan of some kind, not criteria to use in some future action plan. Is the county looking for a plan, or an action plan?
 - d. **What do we mean in terms of “State Revolving Fund Loan Program”** (Page 2; Scope of Services; “3. Utility Engineering”; last sentence)? The draft document states that the “final report shall be sufficient to meet requirements of State Revolving Fund Loan Program.” This is the second time the SRFLP has been mentioned. It seems to be that someone has funding on their mind. Rather than have the consultant spend research time trying to find these requirements, it seems to me that it should be spelled out in the Project Background, or elsewhere.
6. **Land Use.** Upon reading the document, I perceived weaving throughout it current and land use, but another dealing with “engineering.” I will not repeat my earlier comments about “engineering.” However, I wonder how much more focus should be on land use versus engineering. One of the questions I had is, given what our future land use plans are, how does this comprehensive plan help to deal with the wastewater generated from that use? Is this something that can be “engineered” in a comprehensive wastewater facilities plan?