



A NEW DAY.

City of Jacksonville, Florida

Donna Deegan, Mayor

Neighborhoods Department
Environmental Quality Division
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Jacksonville, Florida 32202
(904) 255-7100
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February 1, 2024

Moira Homann
Florida Department of Environmental Protection
BMAPProgram@floridadep.gov

RE: Draft Clean Waterways Act – Wastewater Treatment Plans and Onsite Sewage Treatment and Disposal System Remediation Plans

Dear Ms. Homann:

The City of Jacksonville (City) is responding as the County Agency for Duval County. The Lower St. Johns River (LSJR) Basin Management Action Plan (BMAP) has been adopted for Total Nitrogen for our area and it was determined by you that Septic Tanks contribute more than 20% of the nutrient load. Within the Duval County portion of the LSJR BMAP, there are 4 wastewater treatment entities: JEA, City of Jacksonville Beach, City of Neptune Beach, and City of Atlantic Beach. There are also Onsite Sewage Treatment and Disposal Systems (OSTDS) within the City of Jacksonville and the Beach communities previously listed.

The City of Jacksonville Beach, City of Neptune Beach, and City of Atlantic Beach are submitting separately for their efforts on this requirement.

Wastewater Treatment Plans

The wastewater systems within the City of Jacksonville are owned, operated, and maintained by JEA. Information related to their permitted capacity, the permitted TN and TP limits and loads, the capacity analysis for each facility (considering future growth), and construction schedules are included in three attachments: WW Nutrient Monthly Averages (excel spreadsheet), 2023 WW CAR (pdf), and JEA Nutrient Limits (excel spreadsheet).

JEA has completed all required facility construction, expansion, or upgrade obligations associated with its LSJR nutrient BMAP obligations, with adequate additional reductions achieved to allow for any foreseeable water quality trade request from COJ or other parties. Ongoing construction is to address the expansion of JEA's service area or to upgrade and replace infrastructure that is reaching the end of its service life, as well as to provide reclaimed water to new customers.

The City of Jacksonville Beach, City of Neptune Beach, and City of Atlantic Beach are submitting separately for their efforts on this requirement.

Septic Tank Remediation Plans

The City has partnered with JEA to invest and implement a septic tank phase out program. Ordinance 751 was modified in 2017 to incorporate a program to expand main lines from the JEA facilities, connect homes to those connection points, and abandon the septic tanks. The City and JEA developed a priority matrix base on the following priorities:

- a) 70 percent of the scoring:
 - a. DOH Failure Areas
 - i. Repair Score based off the number of repair permits
 - ii. Score for size of lot
 - iii. Soil Potential
 - iv. Seasonal high-water table
 - v. Threat to potable water
 - vi. Sanitary conditions (based on bacteria levels of nearby tributaries)
 - vii. Proximity to SJR
 - viii. Potential for flooding
 - b. Those sites within 150 meters of a waterway (credit received for BMAP)
 - c. Tributary exceedance factor
- b) 30 percent of the score:
 - a. If the neighborhood was developed prior to 1968
 - b. Median home value
 - c. If potable water was available
 - d. Elimination of proliferation score
 - e. Offsite economic development opportunities

These scores are further explained on the first page of the Septic Tank Matrix 2023 attached. Each neighborhood is ranked in accordance with their score. These scores are evaluated each year and adjustments are made for any change in ranking. Once funding is identified for the next priority neighborhood, work will begin, and that neighborhood is no longer actively scored. To date, Biltmore is complete with 212 connections; Beverly Hills is actively connecting with 479 connections to date; Christobel is currently under design; and Riverview community outreach will begin in the current quarter.

The Septic Tank matrix covers 35 neighborhoods originally identified by the Department of Health for a septic tank education program where there were concerns about septic tank failures. This list contains approximately 23,167 septic tanks and there are approximately 60,000 to 75,000 septic tanks in Duval County (maps of each are attached). The overall estimated cost of connecting these neighborhoods in today's dollars is approximately \$1.5 billion. The 2 neighborhoods that are currently complete or actively connecting total \$59 million. Christobel, while under design, is estimated to cost \$34 million removing approximately 500 septic tanks. And, while very preliminary, project costs for Riverview are anticipated to exceed \$100 million and will remove approximately 2,300 septic tanks. While the City has been phasing out septic tanks for over 20 years, the current Septic Tank Phase-Out program has been in operation for 7 years. In the next 20 years, we believe we may be

able to complete five neighborhoods: Riverview, Champion Forest, Emerson, St. Nicholas, and Eggleston Heights if the ranking stays as is.

The City, in coordination with JEA, has met the BMAP obligation without further septic tank connections and does not require upgrades to enhanced nutrient-reducing (ENR) septic tanks to meet any further obligation at this time. However, there are 15,364 septic tanks within 200 meters of a waterbody and an additional 14,624 within 200 meters of a stormwater ditch directly connected to surface waters. These numbers do include some septic systems that are in the identified septic tank phase out areas. But these are the ones we identified that may need upgrading to ENR septic tanks if further reductions are necessary. The cost of distributed sewer, one option, is approximately \$20,000 per tank. If only those tanks within 200 meters of a waterbody were upgraded, the cost would be upwards of \$300 million.

The Jacksonville Environmental Protection Board has approved funding for a county wide septic tank vulnerability study. That legislation will be introduced to City Council in the next couple of months and we are hopeful that they will approve the use of those funds for this project. If the project is approved, it is anticipated to be completed by December 2025.

Please let me know if you have any questions about our efforts on Septic Tank Phase-Out. You can reach me at (904) 255-7101 or email me at melissaL@coj.net.

Sincerely,

Melissa M. Long, PE
Division Chief
Environmental Quality

Cc: Nina Sickler, PE, Public Works Director for City of Jacksonville

Attachments:

JEA: WW Nutrient Monthly Averages
2023 WW CAR and
JEA Nutrient Limits

Septic Tank items:
Septic Tank Matrix 2023 record
Waterbody and Flowlines for FDOH Septic Tanks
FDOH Investigate (all septic tanks in county – zip file)
STPO Septic (shape files for priority neighborhoods)