



TO: Eb Roeder PhD, PE Onsite Sewage Programs Section Lead
CC: Kevin Coyne, Damann Anderson, Senator Debbie Mayfield, Governor DeSantis,
Eric Charest
FROM: Judy Orcutt
DATE: November 30, 2021
RE: TAC Meeting #6

The TAC Committee was given 2 charges: to make recommendations about the setbacks of Septic Systems (OSTDS) from groundwater and surface water and to make recommendations to expedite the use of Enhanced Nutrient Reducing (ENR) Technology.

At this time, the final report is being written and **the TAC has failed to address the charge from the Legislature to make recommendations regarding setbacks.**

During the discussion, it was stated by Kevin Coyne of FDEP that all impaired watersheds with Basin Management Action Plans will need more stringent regulation similar to the Springs Focus Area. There are 38 BMAPs in Florida, covering about 1/3 of Florida. These priorities areas should be clearly mapped and more stringent set-backs defined based on the local conditions. Additional funding needs to go to these priority areas.

Damann Anderson boldly stated that “the low hanging fruit” to clean up Florida’s waters is to immediately eliminate all pre-1983 OSTDS – because they have less than 75 feet of setback from surface water and less than 2 feet separation between the drainfield and high water table. It should be considered that in some areas, OSTDS installed with 2 feet of separation may no longer have that vadose zone due to rising sea levels. Additionally, due to soil conditions the 2 feet separation is not sufficient in many sandy areas such as barrier islands.

There is also additional research that has been conducted regarding the impact of OSTDS in various areas of Florida. That research was not presented to the TAC. Dr. Brian LaPointe of FAU Harbor Branch, Dr. Peter Barile of Marine Research & Consulting and Dr. Claudia Listopad of Applied Ecology have all done extensive research.

The FDEP standard to provide nutrient reduction credit is the ArcNLET Model. That model does not include 2 important nutrients in its calculations: phosphorus and ammonia. Both of these pollutants are severely impacting Florida’s waters. By omitting these nutrients from the model, insufficient credits are awarded for septic to sewer conversion – thus discouraging this expenditure by utilities.