

June 5, 2018

Mr. Terry Hansen
Watershed Planning and Coordination Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 3565
Tallahassee, Florida 32399-2400

Dear Mr. Hansen:

Members of our three organizations (Suwannee-St. Johns Group Sierra Club, Ichetucknee Alliance, and Our Santa Fe River) have closely tracked your department's development of the updated Basin Management Action Plan (BMAP) for the Santa Fe River. After careful review of the recently released BMAP draft, we have concluded that adoption of this draft BMAP will not lead to a satisfactory or timely restoration of water quality within 20 years, as required by law.

We recommend that you address the following concerns and make appropriate adjustments to the draft before it is approved by the Secretary:

1. Resident and tourist populations are expected to grow substantially in the Basin between now and 2038. So will the use of agricultural fertilizer. This inevitable growth, and its impact upon the TMDL target, is poorly addressed in the draft BMAP.
2. Similarly, the draft discusses seven projects that reduce nitrogen loading from existing septic systems but makes no mention of the potential impact of new septic systems likely to be approved by the State (currently about 10,000 new septic systems are installed every year in the State).
3. FS 373.811 prohibits land application of Class A or Class B sewage sludge except in certain circumstances. The draft is silent on whether there are such applications in the three priority focus areas.
4. The Springs Protection Act lays out specific requirements for what must be included in springs BMAPs – for example, “a list of all specific projects and programs identified to implement a nutrient total maximum daily load,” including a priority ranking, a cost estimate, and a nutrient load reduction target for each. This requirement appears to have been loosely adhered to, if adhered to at all, in the draft.
5. Nitrogen-reducing benefits from many listed projects, particularly those critical to meeting the 20-year targets, appear to be significantly exaggerated. Claiming 2.7 million pounds of nitrogen reductions per year from “peanut hay mix pasture systems” is particularly egregious. Where are the citations supporting the benefits of this and other similar projects?
6. Research citations justifying nitrogen reductions from agricultural Best Management Practices (BMPs) are undocumented.

Mr. Terry Hansen
June 5, 2018
Page Two

7. The Nitrogen Source Information Loading Tool (NSILT) was used to estimate the amount of nitrogen which various sources are contributing to groundwater, but it was not used to calculate how much nitrogen must actually be reduced at the land surface or in waters reaching the groundwater. As a result, estimates of the amount of nitrogen that must be reduced to reach the 20-year goals are significantly underestimated.

8. The rationale is weak for including in the BMAP both long-completed projects and already-implemented BMPs.

9. The cost/benefit calculations underlying the projects in Table 14 are markedly over-optimistic.

10. The discussion of Section 403.067 on page 94 ignores the fact that advanced BMPs should, under the law, have already been initiated.

We appreciate the excellent cooperation that we have received from you and your team at FDEP. Nevertheless, the intent of the law is clear, and we intend to insist that it be carried out faithfully. We urge you, in the month remaining before the June 30 deadline, to take our concerns into account and to adjust the Santa Fe River BMAP appropriately. In the meantime, we remain ready as always to discuss our concerns with appropriate FDEP personnel.

Sincerely,



/s/ John D. Jopling



Whitey Markle, Chair
Suwannee-St. Johns Group
Sierra Club

John Jopling, President
Ichetucknee Alliance

Mike Roth, President
Our Santa Fe River