



# FLORIDA WILDLIFE FEDERATION

*Affiliated With National Wildlife Federation*

Manley K. Fuller, III, President  
2545 Blairstone Pines Drive, Tallahassee, FL 32301  
Post Office Box 6870, Tallahassee, FL 32314-6870

Phone: 850-656-7113  
Fax: 850-942-4431  
e-mail: wildfed@aol.com  
website: www.fwfonline.org

December 19, 2005

Colleen M. Castille, Secretary  
Department of Environmental Protection  
3900 Commonwealth Blvd.  
Tallahassee, Florida 32299

Dear Secretary Castille:

Wakulla Springs is surely one of the greatest treasures of the Florida State Park System. We feel certain that you and your staff share our goal of restoring and protecting this Outstanding Florida Water for the benefit of this and future generations.

In recent years, nitrates in ground waters supplying the spring have produced nuisance amounts of filamentous green algae and hydrilla. While these plants are pests wherever they occur, their rate of production of organic carbon is so high here that eutrophication has caused Wakulla Springs and River to be placed on the list of Florida Impaired Waters. Because it is located in the Woodville Karst Plain only a short distance away from Wakulla Springs, the most likely candidate for the source of this nitrate pollution is the City of Tallahassee's Tram Road Sprayfield, which is used to dispose of effluent from the T.P. Smith and Lake Bradford Road Treatment Plants. When this facility was first permitted and later renewed, the Department used the best information available at the time to determine that the sprayfield would not cause or contribute to violations of water quality standards or other Department rules. There was little reason to believe there would be a pollution problem in nearby surface waters. Since then, however, much new information about the Woodville Karst Plain has been developed and the waters of Wakulla Springs and River are no longer pristine, but are seriously impaired.

As long as questions remain about the City's proportionate role in this pollution and its possible need to upgrade treatment, no significant pollution control efforts are likely to be undertaken in the Wakulla Springshed. In the meantime, the City will be connecting additional wastewater sources, and new houses on septic tanks will continue to be built in southern Leon and northern Wakulla Counties. Wakulla Springs will remain the same or get worse.

The City has submitted an application to renew its permit to dispose of treated wastewater at its Tram Road Sprayfield. As a condition for receiving this permit, Department rules (62-610.850, F.A.C.) require the City to provide reasonable assurance that its sprayfield is not causing or contributing to violations of water quality standards in Wakulla Springs. If this were a new permit, the Department could simply deny it if the applicant failed to provide reasonable assurance. But in this case, denial would have no effect because the City's sprayfield must continue to remain in operation. However, just

as for a new permit, the Department does have the authority to specify the information it must receive from the City in order to make an informed judgment about renewal of the existing permit. If the Department fails to exercise that authority, there could be an endless series of piecemeal submissions of particular kinds of information chosen by the City, but deemed insufficient by the Department after examination.

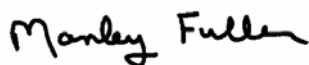
For more than a year, the City has been operating under an expired permit through an administrative continuance granted by the Department. During this period, the Department has not formally specified the technical information that the City must provide for reasonable assurance. The City has undertaken studies of its own choosing. However worthwhile these studies may be, the Department has not established that they will be sufficient to provide reasonable assurance. Moreover, the City is not required to complete these studies as designed or complete them on any particular schedule. The Department has given the City substantial latitude to do as it wishes, when it wishes. Consequently, there is no assurance that the City will provide the Department with timely, accurate information about the extent of the City's responsibility for polluting Wakulla Springs. This administrative continuance could go on for an indefinite period. It provides the public no opportunity to press for corrective action.

Florida Wildlife Federation believes it is the Department's responsibility to ensure that the City produces adequate information about its proportionate responsibility for Wakulla Springs nitrate without delay. We suggest that the Department require that the City conduct studies specified by the Department as a condition for continuing operations under its expired permit. We believe that the Department should ensure that competent, independent experts review both the design and results of these studies. We also believe that the Department should impose a reasonable schedule for completion of these studies.

Florida Wildlife Federation has expended considerable money and energy to protect Wakulla Springs State Park over the past 15 years. The Federation was responsible for preventing very undesirable, adjacent development, and it played a key role in tripling the buffer area surrounding the Park. Our request to you is straightforward and is in line with the Department's role as regulator of pollution and protector of the Park. We ask you to bring certainty to the process of determining the cause of pollution of Wakulla Springs so that significant corrective action can be taken in a timely manner.

We would like to meet with you prior to publication of a Notice of Intent to Issue the City's permit to operate the T.P. Smith Plant and Tram Road Sprayfield so that we can discuss ways to strengthen and condition this permit. Thank you for considering our thoughts on this matter.

Sincerely,

A handwritten signature in black ink that reads "Manley Fuller". The signature is written in a cursive, slightly slanted style.

Manley K. Fuller, III,  
President