



Alachua County Environmental Protection Department

Stephen Hofstetter, Director

March 24, 2025

Florida Department of Environmental Protection

Re: 2025 Orange Creek Basin Management Action Plan

To Whom it May Concern,

Thank you for this opportunity to continue to provide comments on the 2025 Draft Orange Creek Basin Management Action Plan (BMAP). Alachua County is committed to protecting and improving the Orange Creek Basin and has been an active stakeholder throughout the development of the Total Maximum Daily Load (TMDL) and resultant BMAPs. This letter summarizes our comments on the 2025 Draft Orange Creek BMAP, in addition to feedback already provided during the March 3, 2025 public meeting.

The timeline to meet the 100% milestone is unrealistic due to the lack of source specificity provided in the BMAP and the challenges with internal loading.

While the BMAP identifies sources of nutrients and then allocates responsibility to various agencies, it does not provide detailed information on where these sources are located. This lack of information has required considerable staff time and resources and has delayed our ability to meet deadlines. Alachua County (with financial assistance from FDEP, SJRWMD, and the legislature) has spent over \$830,000 to identify and implement projects in the Newnans Lake Watershed, which has resulted in essential information regarding future projects but no load reduction credits. A restoration project has recently been identified and is in the initial planning stages.

Internal recycling is a dominant source of total nitrogen that needs to be addressed.

The draft BMAP states that no plan to address the internal loading of nutrients in the Lakes will be developed until management actions are in place to reduce loading from the watershed. Management actions are occurring and stakeholders are being asked to identify, in the January 2026 STAR report, actions to completely meet 100% of allocations. Unfortunately, load allocations cannot be met for Newnans and Lochloosa Lakes without addressing internal recycling. Alachua Sink load allocations cannot be met unless Newnans Lake internal recycling is met. FDEP needs to begin addressing

the internal nutrient loads now and state in the BMAP that it will be addressing internal loading.

Most of the remaining nutrient load to Alachua Sink is from Newnans Lake internal recycling and other sources that are not potentially controllable.

It appears that further load reductions in Alachua Sink would require nutrient load reductions in Newnans Lake discharge through Prairie Creek. This further emphasizes the need to address the internal loading of nutrients in the Lake.

More detailed modeling and analysis are needed to ensure nutrient sources are accurately quantified.

We applaud the undertaking of the St. Johns River Basin nutrient modeling effort. This effort will be critical in more accurately defining and quantifying nutrient sources and transport which are essential to make cost-effective decisions regarding nutrient reduction projects. The lack of this information has resulted in delays in implementing projects to date. Most of the existing information is based on modeling from 20 years ago which was based on limited data and was conducted expeditiously to meet regulatory deadlines at the time. Local stakeholders have made significant investments and progress in identifying and reducing nutrient loads. However, the magnitude of the remaining load reductions and the associated costs make it critical that we understand the natural systems involved and the sources and transport of nutrients to ensure that the substantial investments required will yield the desired results. We are hopeful that the current efforts will include a robust analysis of the Orange Creek Basin, which is a very complex system.

With the current modeling effort not being completed until 2028, stakeholders will be limited in their abilities to make informed decisions on appropriate projects to meet the nutrient reduction goals.

Projects take years to plan and implement and it is not fiscally responsible to start working on new projects when the load allocations may change in 2028. Potential changes to stakeholder load allocations resulting from the SJRWMD modeling effort will not be made until at least 2028. This makes requiring stakeholders to identify projects in 2026 to fully meet allocations and to be implemented by 2030 problematic. Also, if allocations increase, the draft BMAP is not clear that additional time will be given to stakeholders to meet these new allocations. We recommend that stakeholders are given at least an additional 2 years to allocate funds and implement.

At some point FDEP should consider re-evaluating some TMDLs.

It is our understanding that the St. Johns River Basin modeling effort will not include re-evaluation of the TMDLs and associated load reductions and allocations. At some point FDEP will need to re-visit this TMDL to consider the natural state and succession of the water body and whether the current TMDL is appropriate and achievable through stakeholder management efforts and agriculture BMPs.

Documented behavior change projects should receive more credit than traditional education efforts.

Alachua County utilized 319 funding to develop a research-based fertilizer campaign that is reducing fertilizer use throughout the County. Alachua County, the City of Gainesville, and FDOT have contributed over \$121,000 in paid media since the creation of the campaign which has resulted in over 22 million impressions. Survey data was combined with the very models that yielded BMAP loading and allocations (NSILT and Simple Model) to estimate that the first year of the campaign resulted in total nitrogen reductions of over 8,000 pounds to surface waters and 12,000 pounds to groundwater. The “removal” costs per pound of nitrogen ranged from \$1.31 to \$8.28 compared to up to \$500 per pound for construction projects, demonstrating that it is much more cost effective to prevent pollution than to remove it from an impaired watershed. However, the current crediting system of limiting outreach credit to 6% of the total loading from urban sources (299 pounds of nitrogen for Alachua County), disincentivizes behavior change education programs, since these campaigns require funding that is instead allocated to less effective projects for the goal of receiving reduction credits.

Local government project options are often limited to addressing septic systems, which are not going to achieve allocations.

During public meetings and stakeholder meetings, FDEP encourages local governments to reach out to the Department for assistance with identifying projects to achieve nutrient reductions. It has been suggested that Alachua County focus on connecting septic systems to regional wastewater collection facilities (which Alachua County does not operate) or to upgrade to Enhanced Nutrient Reducing systems (ENR). Connecting to centralized sewer systems is very expensive, and most residents do not want to connect, even if the connection costs are covered by the utility or government, because they will then have monthly wastewater fees.

Alachua County has a FDEP funded 50% rebate program up to \$10,000 per system to encourage property owners to upgrade to ENR systems in the Santa Fe and Silver Basins (funding has not been awarded in the Orange Creek basin during the past two funding cycles). In the first two years of the program, two properties have upgraded. A major barrier is the ongoing operating costs of Aerobic Treatment Units (ATUs), as

these require an operating permit from DOH/FDEP and a contract with a maintenance entity. These requirements result in three site visits per year. While it is important to maintain and inspect ATUs, reducing the frequency of required inspections would bring down operating costs for property owners and may reduce barriers.

Additionally, depending on the location of the septic system each upgrade results in 1 to 7 lbs of nitrogen reduction credit. To put this in perspective, Alachua County has been allocated 108,995 pounds of nitrogen in the Orange Creek, Silver, and Santa Fe BMAPs (not including an additional 208,137 lbs in shared allocation watersheds). To achieve our allocation, we would need to upgrade most of the septic systems in the County.

We appreciate the opportunity to share our concerns about these water resources that are vital to our local economy and ecology. Please contact Stacie Greco, Water Resources Program Manager, at Sgreco@alachuacounty.us or 352-264-6829 for additional information.

Sincerely,

A handwritten signature in cursive script that reads "Stephen Hofstetter".

Stephen Hofstetter, Environmental Protection Director

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