



Alachua County Environmental Protection Department

Stephen Hofstetter, Director

May 1, 2025

Florida Department of Environmental Protection

Re: 2025 Silver Springs and Upper Silver River and Rainbow Springs Group and Rainbow River Basin Management Action Plan

To Whom it May Concern,

Thank you for this opportunity to provide comments on the 2025 Draft Silver Springs and Upper Silver River and Rainbow Springs Group and Rainbow River Basin Management Action Plan (BMAP). While Alachua County is committed to protecting and improving water quality within this basin, our review of the document has been limited by the short comment window for multiple BMAPs at the same time.

Alachua County supports the proposed language requiring all new septic systems/OSTDS within the BMAP area to be DEP-approved enhanced nutrient reducing systems regardless of lot size. We also support the requirement to upgrade all existing systems within the BMAP to DEP-approved enhanced nutrient reducing systems meeting 65% nitrogen reduction as these systems come in for repairs, modifications, and/or replacements. This requirement will increase participation in the County's current rebate program and will help meet the TMDL targets. It will be essential to continue to provide state funding for these upgrades to offset property owner costs.

The timeline to meet the 100% milestone is unrealistic due to the lack of source specificity provided in the BMAP.

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.

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, 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.

Ordinances should not be combined with Outreach for crediting purposes.

Alachua County has one of the most protective fertilizer ordinances in the State with a prohibition on fertilizer containing nitrogen from July – February. The County actively implements this ordinance by notifying property owners and businesses about the ordinance. Signage is provided to all stores selling fertilizer. During routine inspections, staff discusses the ordinance and reviews records of landscaping companies. The current crediting process combines ordinances and outreach and limits credit to 6% of the total loading from urban sources, which disincentivizes committing staff resources to further implement and enforce the ordinance.

Local government project options are often limited to addressing septic systems, which alone are not going to achieve allocations. Maintenance requirements may need to be reduced to accelerate upgrades.

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 (especially when systems are far apart, as they are in this basin), and most residents do not want to connect 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. 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.

Agricultural Best Management Practices (BMP) monitoring and verification needs to be performed by FDEP. Loading sources in this basin includes 23% from livestock operations and 9% from farm fertilizer. Reductions and resulting credits from these sources rely on the implementation of BMPs. The effectiveness of the BMPs has not been verified by FDEP, which is a critical need if we are to improve water quality.

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 black ink that reads "Stephen Hofstetter". The script is cursive and fluid, with the first name "Stephen" and last name "Hofstetter" clearly legible.

Stephen Hofstetter, Environmental Protection Director

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