

October 11, 2023

Dear Connie Brecheen, Mayor Ron Frazier and members of the Town Council.

I am writing to you as a concerned citizen regarding the request for Preliminary Approval of the proposed Subdivision Gwynn Farms Plat. **Preliminary approval is premature in light of the many unanswered questions regarding the project.**

I recently noticed a small 8.5 X 11 yellow sign posted on a fencepost on CR 18. In order to read it I had to pull over and get out of my car. It reads:

NOTICE TOWN OF FORT WHITE CONSIDERATION OF THE APPROVAL OF A PRELIMINARY PLAT ENTITLED GWYNN FARMS.

SD23-01, a petition by Lisa Ford for approval of a Preliminary Plat consisting of 49.43 acres and 43 lots entitled Gwynn Farms which is located on C.R. 18 and shown on the location map.

The notice states that on Oct. 16<sup>th</sup> there will be a meeting at the Fort White Town Hall. On the agenda for Planning and zoning the issue is listed as Item #4 under new business. It is not clear exactly what that entails and has raised a series of questions. I hope these will be clarified during the Oct. 16<sup>th</sup> meeting and until they are I do not see any urgency in moving ahead with a vote. **A few of these questions are as follows:**

1. The ERP (Environmental Resource Permit) request for the proposed Subdivision shows 3 Phases of the proposed development. It is my understanding that this request is for Preliminary Approval of Phase 1 only (minus lot #1 that has already been built out located at 5766 SW COUNTY ROAD 18, FORT WHITE, FL 32038) and will not involve any additional construction (roads, ponds, etc.) beyond the area identified on the posted sign. There are major concerns with unresolved impacts of proposed Phases 2 and 3. **The ERP has not yet been approved by the Water Management District.**
2. Where is the plan for water? While the original plan was to build a pipeline to bring water in from Ellisville there is no evidence that construction has started anywhere near Fort White. Is this project indeed going forward? If construction of the subdivision is to take place before the pipeline is completed will there be need for a well for each home? The well installed for the home built on Lot #1 was compromised by the existence of **pathogens (reported to the Health Department) from an unknown source.** If additional wells were to be installed there is no guarantee that the water would meet requirements. This should be of serious concern.
3. How will septic/wastewater be handled. As of July 1, 2023, any septic system built on an acre or less within the PFA (Priority Focus Area) will require by law an

advanced nitrogen removing system. This proposed development is within a PFA Traditional systems will not be permitted I received this from the Columbia County Health Department regarding the construction on Lot#1 and requirements moving forward:

*" It does have a septic system, and it is not a nitrogen reducing system. The application submitted 4/22/2022 states the property was 148.52 acres at the time. The law at the time required parcels that were less than one acre and located within the Priority Focus Area install the nitrogen reducing system. The septic was issued a final approval on 1/1/23 (with the property still being 148.52 acres). It appears that .5 acres was sold off from this 148.52 acres in 6/2023. Therefore, if this stand- alone .5 acre lot were to apply today for a new septic system, they would be required to install the nitrogen reducing system."*

I have also confirmed this with the Suwannee River Water Management District. These advanced systems are more costly than traditional septic systems.

4. Is Phase stand-alone? In other words, if approved is it possible that Phase 2 and 3 will not go forward? **Phases 2 and 3 pose the greatest threats to both the local groundwater and the Santa Fe River.**

- a. **Threat to sensitive Karstic landscape** (sinkholes, subsidence areas, connection to the Devil's Ear system of springs on the Santa Fe River.) I have attached a quotation and map from a retired hydro-geologist from the SRWMD, Thomas Greenhalgh. (scroll down to end of letter to see map).

*"The proposed Gwynn Farms subdivision is in a portion of Columbia County where the Floridan Aquifer system has been determined to be the most vulnerable to contamination. The LiDAR confirms the karstic nature of the area with several sinkholes and karst depressional areas on the Lisa's Land parcel. The Outstanding Florida Springs springshed cover indicates the parcel is in the Devil's Ear Spring springshed.*

- b. Geology report. Core samples were done at the request of Lisa's Land, Inc. The report indicates that these were requested in specific areas and not necessarily on the parcel as a whole. Shallow particulate sampling was done on a broader area. In the past 15 years 2 sinkholes have opened up at the end of Paisley Court (most recently in 2011). These have been filled with truckloads of material from off site. To date one can see clear depressions in those areas. My question is, does shallow sampling of these soils provide an adequate evaluation of whether the geology will support heavy equipment, extensive digging and filling, construction of

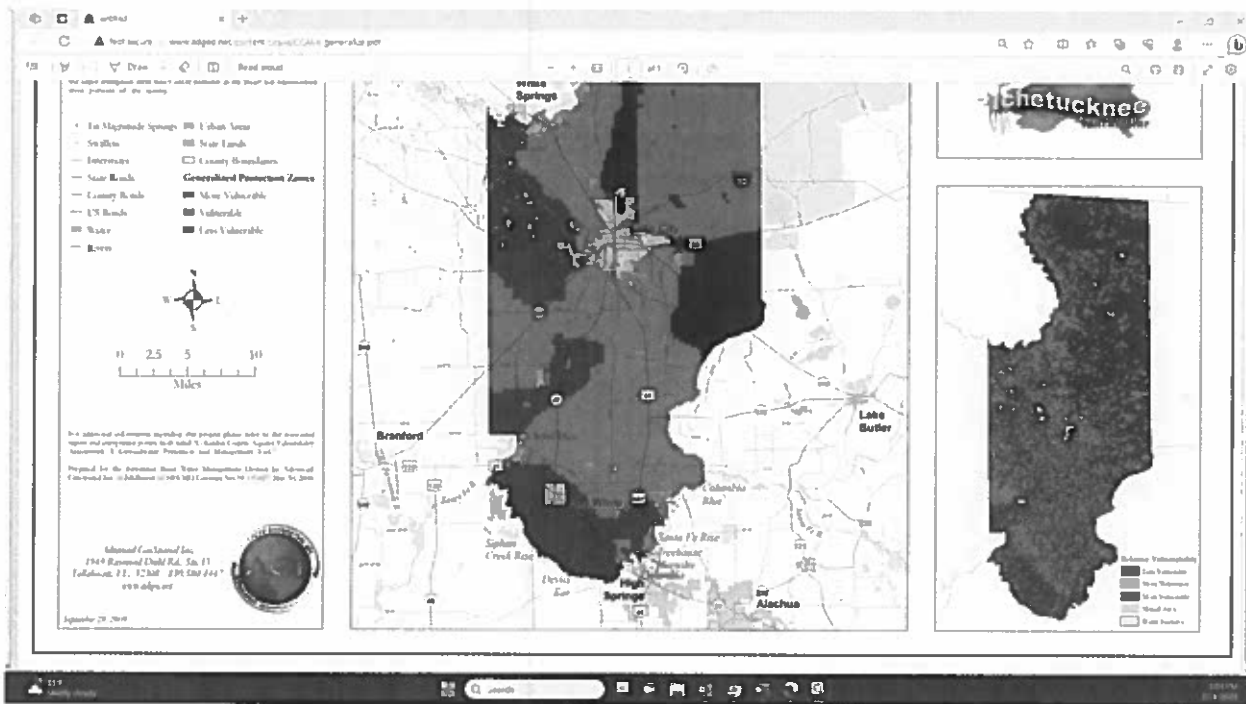
roads, etc. Has the Karstic profile been thoroughly examined to avoid collapse of the structure and pollution of groundwater?

- c. Phase 2 includes a road that will be built across the existing sinkhole area in order to connect with Paisley Court. Engineering drawings do not address any modifications or improvements to the road which continues to erode since the construction of Fort White Park in 2004. In the current condition the road will be seriously compromised as construction traffic increases. Local traffic is also of extremely grave concern to the residents of Paisley Court. What is the plan?

I do not see any urgency even for a Preliminary approval until these questions are properly addressed. I would support your request to table a vote at this time.

Thank you for your service to our community, the Town of Fort White.

Jacqueline Sulek  
209 SW Paisley Court  
Fort White, FL 32038



## Nitrogen-Reducing Systems for Areas Affected by the Florida Springs and Aquifer Protection Act (updated May 2021)

The "Florida Springs and Aquifer Protection Act", passed during the 2016 legislative session, directed the Department of Environmental Protection (DEP) to develop restoration plans, known as Basin Management Action Plans (BMAPs). Under these plans, new septic systems on lots of less than one acre and located in some sensitive springs areas (Priority Focus Areas, or PFAs) are required to be nitrogen-reducing. New conventional systems are no longer permitted in these areas except when a sewer will be available within five years. For more information about DEP's BMAPs, go to this link: [www.floridadep.gov/springs/protect-restore/content/protecting-floridas-springs](http://www.floridadep.gov/springs/protect-restore/content/protecting-floridas-springs).

### Which new septic system permits are affected?

New septic system construction permits issued after the date BMAPs become effective on lots less than one acre and located in a PFA require nitrogen-reduction. For information on what is considered a "new" system, please see [www.floridahealth.gov/environmental-health/onsite-sewage/forms-publications/documents/dceh19-004.pdf](http://www.floridahealth.gov/environmental-health/onsite-sewage/forms-publications/documents/dceh19-004.pdf).

### How do I know if a lot is in a PFA?

DEP provides a tool to find whether a lot is within a PFA or not: [www.floridadep.gov/PFAmap](http://www.floridadep.gov/PFAmap).

### When do these new requirements come into effect?

In January 2019, the spring BMAPs for Crystal River, DeLeon, Gemini, Homosassa-Chassahowitzka, Wakulla, Weeki-Wachee, Jackson Blue and Wacissa became effective. Five other BMAPs (Suwannee, Santa Fe, Volusia, Wekiwa and Silver/Rainbow) were challenged, which "stayed" the requirements of these BMAPs. On May 18, 2021 the DEP Secretary signed the final order making the BMAP nitrogen-reducing requirements effective in the challenged BMAPs.

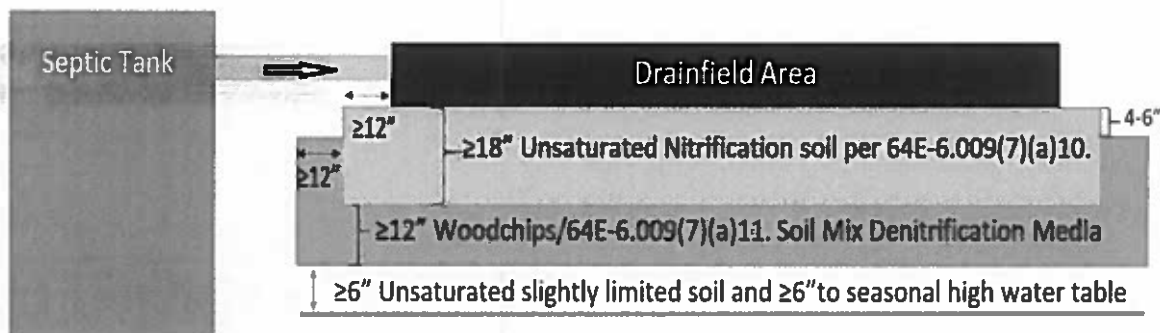
### What Florida Department of Health (DOH)-approved nitrogen-reducing septic systems exist?

Nitrogen-reducing options include in-ground nitrogen-reducing biofilters (INRBs), nitrogen-reducing (NSF 245-certified) aerobic treatment units, and nitrogen-reducing Performance-Based Treatment Systems. Each of these options is described below.

#### *In-Ground Nitrogen-Reducing Biofilters (INRBs)*

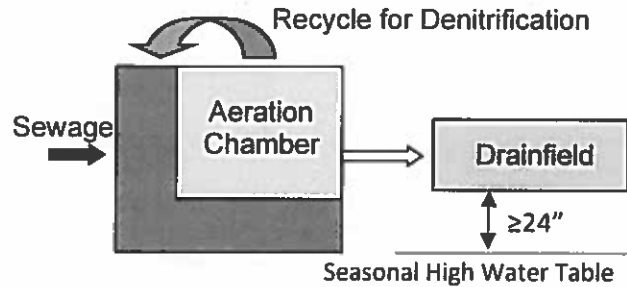
- Include a nitrate-reducing filter layer below the drainfield with material that reacts with nitrate.
- Reduce nitrogen in sewage by around 65%.

DOH adopted rules allowing for INRBs as Rule 64E-6.009(7), Florida Administrative Code (FAC) on July 31, 2018. See page 22 of Rule 64E-6, [www.floridahealth.gov/environmental-health/onsite-sewage/forms-publications/documents/64e-6.pdf](http://www.floridahealth.gov/environmental-health/onsite-sewage/forms-publications/documents/64e-6.pdf) for the rule language. The Florida Onsite Wastewater Association (FOWA) sometimes offers courses on how to construct, install, and maintain these systems. For more information, visit [www.fowaonsite.com](http://www.fowaonsite.com).



***Nitrogen-Reducing (NSF-245 certified)  
Aerobic Treatment Units***

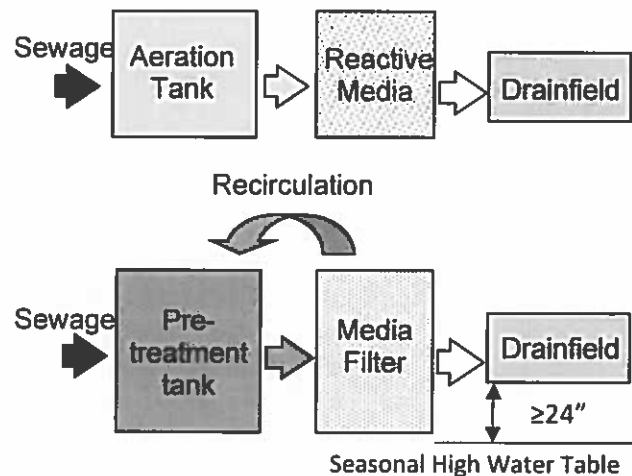
- Include recirculation or some other method of reducing nitrate.
- Require a maintenance contract and operating permit from the county health department.
- Are certified by NSF International as capable of providing at least 50% nitrogen reduction under test center conditions before treated wastewater is discharged to the drainfield.
- When installed with less than 24" between the bottom of the drainfield and the seasonal high water table in compliance with 64E-6 Florida Administrative Code (FAC), must be capable of reducing nitrogen by at least 65% before discharge to the drainfield.



For a list of DOH-approved, NSF 245-certified aerobic treatment units, see [www.floridahealth.gov/environmental-health/onsite-sewage/products/documents/245cert-atu-18.pdf](http://www.floridahealth.gov/environmental-health/onsite-sewage/products/documents/245cert-atu-18.pdf).

***Nitrogen-Reducing Performance-Based Treatment Systems***

- Vary widely, but sometimes include a nitrogen-reducing aerobic treatment units and other components.
- Must be engineer-designed and require a maintenance contract and operating permit from the county health department.
- When installed with at least 24" between the bottom of the drainfield and the seasonal high water table, must be capable of reducing nitrogen by at least 50% before discharge to the drainfield, for at least 65% overall treatment, including the drainfield.
- When installed with less than 24" between the bottom of the drainfield and the seasonal high water table in compliance with 64E-6 Florida Administrative Code (FAC), must be capable of reducing nitrogen by at least 65% before discharge to the drainfield.



For a list of DOH-approved, nitrogen-reducing Performance Based Treatment System components and associated nitrogen-reduction data, see [www.floridahealth.gov/environmental-health/onsite-sewage/products/documents/npbts-components.pdf](http://www.floridahealth.gov/environmental-health/onsite-sewage/products/documents/npbts-components.pdf).