

SPRINGS PROTECTION EFFORTS

In Florida's Suwannee River Springs Region

By

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NEGOTIATIONS

6 MEETINGS WITH FDEP AND FDACS OFFICIALS IN 2016-2018

FSC submitted suggestions and questions, often repeated in next meeting because no progress was made by the officials in the interim. Very little progress.

2 MEETINGS WITH GENERATION FARMS

Largely discussions about agricultural profitability and scale in North Florida. Cover crops, soil and water conservation. Alternative crops, No-till farming, and cover crops; Corporate farming's view of BMAPs.

1 PUBLIC MEETING TO UNVEIL THE DRAFT BMAP

After criticizing, we were accused of “putting us farmers out of business”. My response: *“We like farmers and farming much more than development. We should work together.”* No progress.

CRITICISMS

Compliance with the law. 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 ignored in many of the draft BMAPs.

Overly optimistic assumptions. Nitrogen-reducing benefits from many listed projects, particularly those critical to meeting the 20-year targets, appear to be significantly exaggerated. Skewed data, poor methodology.

Poor documentation. Research citations justifying gains from agricultural Best Management Practices are poorly documented and do not support the nitrogen removal estimates in various spring BMAPs.

MORE CRITICISMS

- **Nitrogen Source Information Loading Tool.** NSILTs are being used to estimate the amount of nitrogen which various sources are contributing to groundwater but are not being used to calculate how much nitrogen must actually be reduced at the land surface. As a result, estimates of the amount of nitrogen that must be reduced to reach the 20-year goals are significantly underestimated.
- **Growth**
The BMAP fails to account accurately for future growth in resident/tourist populations and in agricultural activity.

SOLUTIONS

REWRITE THE BMAP

1. INCLUDE PROJECTED LAND USE CHANGES to comply with 403.067-7 (a)2. Identify MECHANISMS that deal with future land use and pollutant loading.

FDEP data indicates 30% growth in Agriculture and Population (30% more fertilizer, water usage) . Cheap land price= out- of-state farmers moving in and planting multiple crops= more water and fertilizer usage. **NOT INCLUDED IN THE BMAP.**

2. INCLUDE EFFECTIVE PROJECTS WITH ADEQUATE FUNDING.

Description of pounds N reduction each project will produce. **NOT IN BMAP.** A few farmers get huge cost-share funding often at out-of-proportion matches (90/10%). Many municipal agencies don't apply due to lack of legislative funding in the end. If projects continue to be funded this way, TMDLs will not be reached.

3. EFFECTIVELY MONITOR BMPs.

Increase FDACS staffing to provide adequate monitoring. Keep records of water use or fertilizer use.

MORE SOLUTIONS

4. IMPLEMENT PRIORITY FOCUS AREAS in the BMAP. 373.811 F.S. prohibits CAFO's and Sewer Sludge application in Priority Focus Areas. NOT INCLUDED IN BMAP.

5. ALLOW ADEQUATE TIME FOR DEVELOPMENT OF BMAPS 13 BMAPs were "completed" 30 months after the Springs Protection Act was enacted. All 13 BMAPs were not approved until the last month of the statutory deadline.

6. PHASED RELEASE OF DRAFT BMAPS to allow time for analysis and dialogue.

The BMAPs that have been approved cannot realistically achieve the statutory requirement for nutrient pollution.