



City of DeLand

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October 23, 2014

Jason P. Davis
County Chair
County of Volusia
123 W. Indiana Avenue, Room 301
DeLand, Florida 32720-4612



C. J. Dinnen
MAC
J. Anguilli
R. McGee

Re: Water Quality Resolution

Dear Chairman Davis:

Pursuant to your request, on October 20, 2014, the DeLand City Commission reviewed County Resolution 2014-132. Generally, the Commission found that the broad based goals contained in Section I of the resolution and the action items listed in Section II are consistent with the City's Code of Ordinances, Strategic Plan and general policies. The Commission expressed general support for the resolution with several caveats which we would like you to consider as follows:

1. Resolution goal b and action item c propose to eliminate the discharge of all treated wastewater to surface water bodies. The City of DeLand has invested (and continues to invest) in an extensive reclaimed water distribution system, and is currently bidding a reclaimed water interconnect project to supply neighboring cities and the County of Volusia with additional highly treated reclaimed water for irrigation. DeLand therefore has little need to discharge to the St. Johns River. During unusually wet weather conditions, however, (as experienced during the hurricanes in 2004 and 2005), the City must maintain the ability to discharge excess wastewater to the St. Johns River to avoid flooding. During this extreme condition, discharge of highly treated wastewater to the river does not pose an environmental threat.
2. Local funding for the activities listed will be difficult to obtain in the foreseeable future. Significant progress on the stated goals will therefore rely on state and federal grants and will, realistically, take considerable time to implement.

As you know, the West Volusia Utilities (including Volusia County Utilities) are working closely with the St. Johns River Water Management District on a master plan to address the minimum flow requirements (MFR) for Blue Spring as well as our region's future potable and irrigation water needs. This plan includes, not only the reclaimed interconnect projects discussed above, but also aquifer recharge facilities and the development of a wellfield outside the Blue Spring springshead. Funding of these projects is expected to be very challenging for the participating utilities. We are concerned that the projects contemplated in the County Resolution may impact our ability and that of our partners to participate in the regional projects already programmed,

particularly if septic tank elimination is given a higher priority than the projects in the current master plan.

3. With regard to the Fertilizer Ordinance, we are concerned that strict enforcement by the County or the City will be difficult, if not impossible, given both governments' reactive code enforcement capabilities. Our joint participation in an educational campaign, particularly aimed at licensed applicators and homeowners, will likely be the best mechanism to obtain some reduction in nutrient loading from this source.
4. We believe that a much higher level of collaboration between the City and County at all levels in refining the goals and formulating the action plans discussed in the County's Resolution is necessary. Specifically, we believe it would be very beneficial for the County and all cities to develop and distribute uniform educational materials regarding the County Fertilizer Ordinance. We also request the opportunity to collaborate in the early stages of project development to prioritize the various actions to be taken pursuant to this Resolution and other needed actions, and to determine whether a given project is a countywide responsibility or a regional (e.g. West Volusia) issue.

In closing, let me assure you and members of the County Council that the City of DeLand strives to be the best possible steward of both the environment and our citizens' fiscal resources. As such, we offer our qualified support for the projects and activities outlined in County Resolution 2014-132 and the Countywide Fertilizer Ordinance. We look forward to future discussion and collaboration with you and your staff.

Sincerely,



Robert F. Appgar
Mayor/Commissioner

RFA//lb

cc: DeLand City Commission
Members of the Volusia County Council
James T. Dinneen, County Manager
Mayors and Managers, Volusia Cities