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# *Wakulla Springs Alliance*

*"Protecting and restoring water quality, spring flow and ecological health of Wakulla Spring"*

February 7, 2022

Dear Planning Commissioner XX:

The Wakulla Springs Alliance Board strongly urges you to recommend denial of the application by Southwest Georgia Oil Company to change the Future Land Use map designation of its property on the northwest corner of routes 319 and 267 (CPM21-12) from Agriculture to Rural 2 to enable rezoning the property from Ag to C-2 to allow for development of the site as a gas station.

Doing so would pose a risk of damaging contamination of the Floridan Aquifer and Wakulla Spring via the Chips Hole Cave system from cumulative spills during fueling of vehicles as well as a containment system failure or human operator error. A medium-sized gas station that pumps an average of 100,000 gallons per year can be expected to generate about 125 gallons of spilled gasoline per year during vehicle fueling.<sup>1</sup> While state rules require secondary containment systems with leak detection, infrequent monitoring or human operator error could permit a leak to go undetected.

The consequences of a major spill or leak at this location could be severe. As shown on the map below, portions of the site are situated directly over the Chips Hole cave system which flows toward Wakulla Spring.<sup>2</sup> The WKPP has informed the Alliance Board that the cave is only 100 feet below the ground surface at that location and is up to 40 feet in diameter. A dye test conducted by the WKPP on June 12, 2021, demonstrated a direct connection to the main cave system that flows to Wakulla Spring from the Leon Sinks area. The WKPP estimates that the travel time from that location to the Wakulla Spring main vent is 7 to 8 days. Geologists with whom we have consulted indicate that gasoline spills would very likely percolate through the soil and the underlying limestone into the aquifer and cave system. Remediation of gasoline contamination of ground water in the aquifer and cave system would be extremely difficult and may not be feasible within the short time period before flows reach the spring.

Land use law experts with whom we have consulted confirm that property owners are not entitled to comprehensive plan map changes in Florida. Therefore, this decision is entirely discretionary on the part of the County

Commission. Given the severe consequences of contamination that could occur, approving such an amendment would be inconsistent with all that Wakulla County has done to protect Wakulla Springs and the intent of Comprehensive Plan Conservation Element objectives 2.0 and 5.0 to protect surface water and ground water quality.

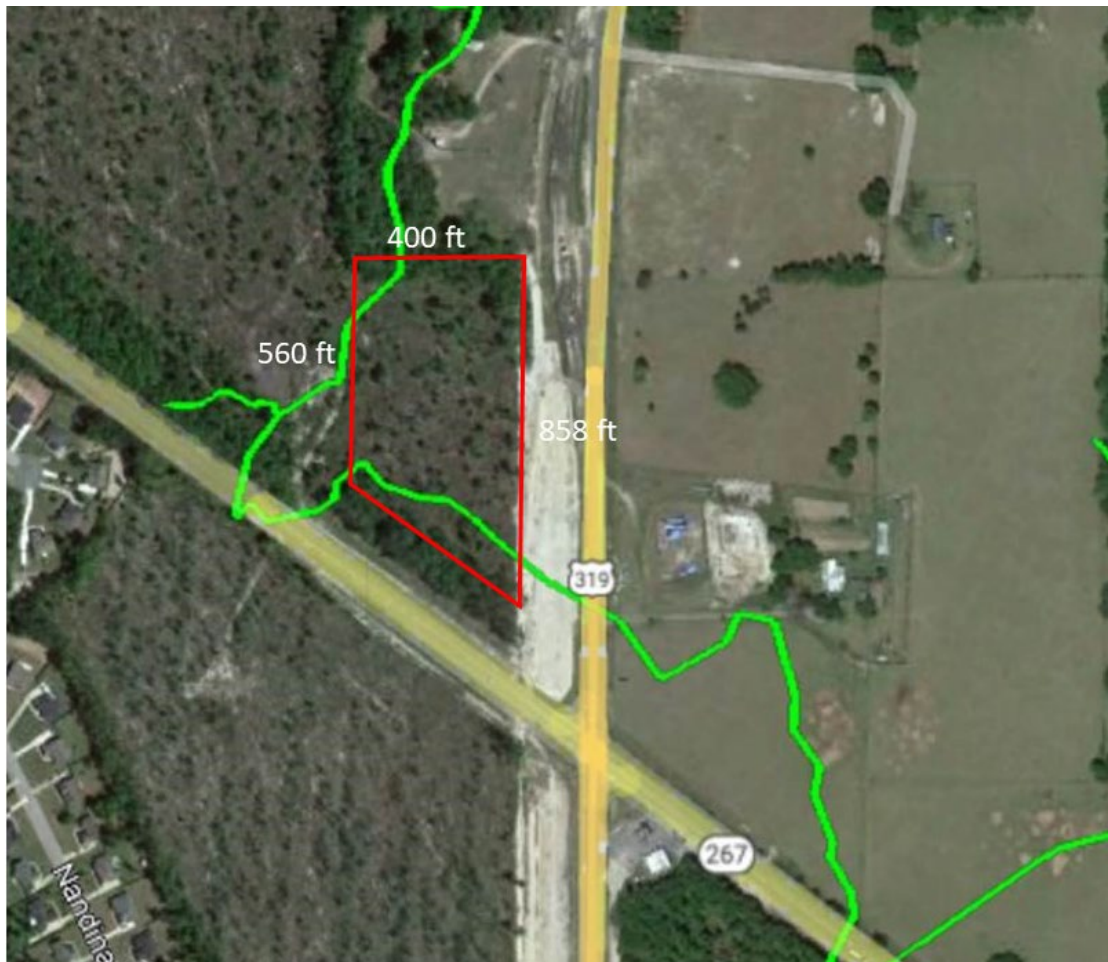
The more prudent course would be to retain the current Agriculture Future Land Use designation and rezone the southeast corner of this parcel to Ag to correct the current inconsistent zoning of that small corner of the property.

Sincerely,



Robert E. Deyle, Chair  
Wakulla Springs Alliance

cc: David Edwards, County Administrator  
Sommer Pell, Director Planning and Community Development



<sup>1</sup> Hilpert, et al. 2015. Hydrocarbon Release During Fuel Storage and Transfer at Gas Stations: Environmental and Health Effects. *Current Environmental Health Reports* 2: 412–422. [https://link.springer.com/article/10.1007/s40572-015-0074-8#:~:text=For%20instance%2C%20about%200.01%20%25%20of,\(worst%2Dcase%20scenario\).](https://link.springer.com/article/10.1007/s40572-015-0074-8#:~:text=For%20instance%2C%20about%200.01%20%25%20of,(worst%2Dcase%20scenario).)

<sup>2</sup> Cave system map provided by the Woodville Karst Plain Project (WKPP). Property boundary overlay is approximate based on digital transparency overlay by Deyle. GIS-based overlay underdevelopment.