

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

The Florida Natural Areas Inventory has prioritized several conservation areas partially or wholly within Lake County, including, but not limited to: the Green Swamp, and the Wekiva/Ocala Greenway. Select ecosystems of Lake County are thus fragile and closely linked with the ecological sustainability of communities within and beyond the county's boundaries. Issues of plant and animal biodiversity and water supply are among the most important environmental considerations for the County.

The county is faced with the challenge of balancing development pressures with the preservation of the natural environment. To this end, Lake County will comply with all legislation (Federal, State, Regional and Local) as it pertains to Lake County's environmental sensitive areas.

*COMMENT: I recommend tailoring the above preface statement to the particular sub-element, in this case Sanitary Sewer. Please refer to both legislation and regulations in the last sentence.*

**GOAL SAN 1**

Provide for the Adequate Disposition of Wastewater and By-Products in a Cost Effective Manner Balancing the Needs of Growth, Environment and Public Health, Safety and Welfare.

**OBJECTIVE SAN 1.1: MAXIMIZE THE USE OF EXISTING FACILITIES.**

Lake County shall guide the orderly growth and development of the County by coordinating service delivery with the municipalities, private enterprise and individuals. The coordination of service delivery shall be in a manner that provides maximum use of existing facilities.

**Policy SAN 1.1-1: Coordination of Services with the Municipalities.**

Lake County shall execute Interlocal Agreements with the municipal utility suppliers within Lake County for establishing service areas so as not to duplicate services and to provide for conditions for the establishment of and the operation within the service areas. Municipal service areas shall be based upon the available capacity reported, and the future service areas delineated in the Comprehensive Plans of each municipality which provides sanitary sewer service. Prior to the execution of Interlocal Agreements, the County shall allow municipalities to provide service in the unincorporated part of Lake County in accordance with the area set forth in the adopted Comprehensive Plans of each

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

municipality which provides sanitary sewer service, and with the criteria set forth in the Lake County Comprehensive Plan.

**Policy SAN 1.1-2: Temporary Wastewater Service Criteria.**

Lake County shall prepare and adopt temporary wastewater service criteria for developments which are consistent with the Comprehensive Plan and approved by the Board of County Commissioners. ~~but where regional/subregional utility service is not available within the development time frame. The temporary wastewater service criteria shall include design, construction and operation provisions specific to the projected length of time of operation. At the County's option, temporary facilities not covered under Policy san 1.1-3 will be dedicated to the County, removed from service when regional/subregional facilities become available or be allowed to operate as a Public Service Commission regulated enterprise, provided the facilities meet and continue to meet Lake County regulations and requirements of the Lake County/Developer Utility Agreement. Developments with a density greater than 1 unit per acre must be connected to a regional sewer system, defined as a central sewer system with a capacity of 500,000 GPD or greater. However, a central sewer system having a capacity of at least 100,000 GPD or more may be permitted on a temporary basis until such time as a regional system becomes available. The temporary system shall be staffed by a class C or higher operator for a minimum of three hours per day for five days per week and one visit on each weekend day a Florida licensed waste water treatment plant operator in accordance with State regulation and code (this allows for code changes in the future without requiring Comp Plan amendment). Further, these temporary facilities shall be planned, designed, and constructed so that they either serve as the nucleus of a future regional system that later developments will also connect to, can act, with minimal modification, as a lift station when connected to a regional system or can be abandoned and the system merged into a regional sewer system constructed at another location.~~

*COMMENT: Please clarify that the density threshold is 1 unit per net acre.*

**Policy SAN 1.1-3: Mandatory Connection Ordinance.**

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

Lake County shall review and revise, as appropriate, its existing Mandatory Connection Ordinance. The revised ordinance shall require, at a minimum that, ~~all private treatment systems unless exempted by Lake County via public hearing be joined and hooked to a regional/subregional wastewater system when the regional/subregional wastewater system comes within one thousand (1,000) feet of the private treatment system or any of the central lines of the private treatment system. The private treatment system shall be required to be joined and hooked within eighteen (18) months of the availability of the regional/subregional wastewater system. A regional/subregional wastewater system shall mean a system that is designated by the Lake County Board of County Commissioners. as a regional/subregional system. Notwithstanding the one thousand (1,000) feet mandatory connection requirement, existing development utilizing a private treatment system shall be required to connect to a regional/subregional wastewater system when there is endangerment to the environment, public health, safety, and welfare. **Within the Urban Land Use Series,** existing homes must connect to public utilities sanitary sewer supply where planned within five years or present when:~~

- Any substantial repair is required on an existing septic system
- Within five years for existing systems installed in or before 1995, or
- Within ten years for systems installed in 2005 or thereafter.
- All septic systems installed in or after 2005 shall meet best industry standards for the reduction of nutrients and other potential groundwater contaminants.
- If greater than 1,500 GPD or greater if economically feasible, if not, within 1,000 feet.

Within the Urban Land Use Series, any new development which exceeds 5 ERU's/1,500 GPD must connect to a public sanitary sewer supply. Any other development must hook up if they are within 1000 feet.

*COMMENT: It is not clear which of the bulleted criteria would be applicable individually or together. For example in the Urban Land Use Series, would having a broken septic system require a landowner to hook-up, even if miles away? The fourth bullet is a separate requirement regarding nutrient reduction, rather than a condition for hook-up.*

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

*It seems that the last paragraph is overly restrictive because it would literally force a landowner within the Urban Land Use Series to develop at urban densities and perhaps pay for the extension of utilities over a very long distance. Why should a developer not be allowed to build at rural densities within the urban land use series if wells and septic tanks are not an environmental problem at those rural densities? In addition to distance, should topography also be a consideration due to the possible need for additional lift station(s)? Please define ERU.*

**Policy SAN 1.1-4: Connection of On-site Disposal and Privately Owned Collection/Treatment Systems Where Necessary.**

In furtherance of Policy SAN 1.1-3 requiring Lake County to adopt a Mandatory Connection Ordinance, Lake County Shall require the connection of on-site disposal systems and collection/treatment systems to centralized utility services when there is endangerment to the environment, public health, safety and welfare. Financial assistance, to partially offset the cost of connecting to centralized utility services for individuals and non-profit utility service providers may be provided by Lake County through application for federal and state grants/loans or through the establishment of a construction fund funded by user charges and/or special benefit assessments.

~~**Policy SAN 1.1-5: Priority Listing of System Deficiencies.**~~

~~Lake County shall prepare and maintain a priority list of: 1) system deficiencies that require funding for corrective action and 2) areas with failing wastewater systems in need of assistance, where the provision of centralized service would protect the health, safety, and welfare of these residents. The County hereby identifies the Astor area, the Bassville Park area and the area to the east of the City of Fruitland Park as the first, second and third priorities, respectively, for corrective action and shall ensure that regional/subregional wastewater services are provided in the areas.~~

*COMMENT: Why is this policy being deleted. It is appropriate to maintain a priority list for corrective action. Please specify what department or individual determines priority and whether such a list would be subject to BCC approval.*

**Policy SAN 1.1-6: Coordination of Services with Private Enterprises.**

Lake County shall identify, and exempt from mandatory connection, those privately owned facilities located within those portions of Lake County, where centralized wastewater services

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

are available or planned, which have been and have the ability to continue to meet the minimum level of service, and where mandatory connection would not be required for the economic viability of a centralized system nor in the public interest as required under Policy SAN1.1-3. Those privately owned facilities not meeting the above criteria shall be required to connect to the centralized system when available. Lake County shall identify those areas within the County where centralized utilities are needed and can be better served by a privately owned utility, through an agreement with Lake County, for the provision of the service.

*COMMENT: This policy seems to provide for easy exception since providers usually have the ability to meet the levels of service they currently provide. (Please note that Policy SAN 1.2-3 does not have a public interest requirement--although it did as previously worded.) "Available" is not defined. Please clarify that the last sentence applies to a sewer utility. Can a privately-owned facility include an individual septic tank?*

**OBJECTIVE SAN 1.2: LEVEL OF SERVICE STANDARDS**

Formatted: Font: 12 pt, Bold

Lake County shall maximize the use of existing facilities and discourage urban sprawl by eliminating the use of septic tanks and package plants within existing and planned service areas where possible and prohibiting the extension of sanitary sewer facilities outside of existing and planned service as depicted on the Future Land Use Map.

*COMMENT: This is an excellent statement, but should it be here under level of service, or as a separate objective and/or policy?*

**Policy SAN 1.2-1: Adoption of Level of Service Standards**

The County hereby adopts the following level of service standards, and shall adopt land development regulations which ensure that existing and projected needs are met through provisions which ensure that development orders are not issued which degrade the level of service standards. These levels of service standards shall be used unless the applicant can demonstrate that the proposed use utilizes less capacity through historic records or studies of similar uses.

*COMMENT: Shouldn't this policy actually be the text under the above objective?*

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

**Policy SAN 1.2-2: Detailed Methodologies**

The Land Development Code shall contain detailed methodologies for determining available capacity and the impact upon capacity of any proposed development.

**Policy SAN 1.2-3: On-Site Wastewater Treatment Systems**

Use of on-site wastewater treatment systems shall be limited to the following conditions:

1. Existing septic tank and package treatment plants may remain in service until central service is available, as long as they perform satisfactorily in accordance with FDEP and DOH standards.
2. For areas not characterized by severely rated soils, use of septic tank systems for new development shall be limited to areas where central service or existing package plants are not available, in accordance with DOH septic tank rules, and shall only be permitted subsequent to the receipt of all applicable DOH and DEP permits.
3. Use of new package treatment plants shall be prohibited, unless it is the most environmentally sound alternative. Central facilities shall be required in areas where septic tanks are prohibited due to severely rated soils, and for land uses proposing generation or processing of hazardous waste or high density or intensity use (based upon DOH and FDEP rules). The installation of such facilities should only be permitted by the County subject to the receipt of all applicable DOH and FDEP permits. When central facilities become available, developments shall be required to hook-up within a reasonable timeframe.

*COMMENT: Please include a 1 dwelling unit per net acre threshold, rather than just DOH/FDEP rules.*

4. For areas characterized by severely rated soils, the County shall require that alternative types of septic tanks, including aerobic systems and alternative drainfields, be required for development proposing densities of greater than one

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

dwelling unit per acre (unless central facilities are required by DOH).

*COMMENT: This standard contradicts a previous policy stating that septic tanks are prohibited on greater than 1 unit per acre.*

- ~~5. The County shall pursue the feasibility of obtaining 201 facility plan monies and any other potential funding source for a county wide master facilities plan.~~
- ~~6. Septic tanks which are proposed for nonresidential uses shall not exceed the sewage flow limitations of the Florida Department of Health and Rehabilitative Services and the Department of Environmental Protection.~~
7. Any change of use for an existing dwelling from residential to nonresidential

*COMMENT: It appears that some additional text is missing from the end of this sentence.*

*COMMENT: Please add a policy stating that notwithstanding the Comp Plan or Land Development Regulations, Lake County shall require compliance with all Department of Health rules regarding the use of enhanced Onsite Sewage Treatment Systems within the Wekiva Study Area.*

**OBJECTIVE SAN 1.3: SEWAGE TREATMENT AND DISPOSAL FACILITIES WITHIN FEDERAL, STATE AND/OR LOCAL DESIGNATED ENVIRONMENTALLY SENSITIVE AREAS.**

Formatted: Font: 12 pt, Bold

Lake County shall require the implementation of advanced wastewater treatment and disposal facilities where central services exist within Federal, State and/or Local designated environmentally sensitive areas to minimize impact on surface and groundwater resources, consistent with state agency rules.

Formatted: Font: 12 pt, Bold

*COMMENT: This blanket reference to federal, state, or locally designated environmentally-sensitive areas can not be justified. The need depends on the ecosystem. Not all environmentally-sensitive areas necessarily require Advanced Wastewater Treatment (AWT). An overbroad objective such as this casts doubt on its applicability anywhere. Based on qualified data and analysis, the county should specify what environmentally-sensitive areas require this special level of treatment. Furthermore none of the policies below even discuss AWT!*

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

**Policy SAN 1.3-1: Provision of Sewer Water Systems within Federal, State and/or Local Designated Environmentally Sensitive Areas.**

Central sewer systems shall be required within Federal, State and/or Local designated environmentally sensitive areas where provision of such system is shown to be economically feasible or environmentally necessary, as determined by the County. The development of a regional sewage treatment system is encouraged in order to augment the feasibility and desirability of providing central sewage treatment facilities consistent with policies in the Potable Water Sub-element. for service to occur within areas such as, but not limited to the Mt. Plymouth-Sorrento Urban Compact Node when densities are such that centralized services are feasible.

*COMMENT: This policy is extremely overbroad and permissive of central utilities throughout most of the entire county, including designated rural areas within the Wekiva basin and or Green Swamp. The "OR" in the first sentence should be replace with "AND" since utilities should certainly not be extended into environmentally-sensitive rural areas unless there is a compelling environmental need to do so. The second sentence has been lifted from a prior policy for the Mt Plymouth-Sorrento area, but it has been modified to include potentially the entire county by adding the words "such as, but not limited to". As written, this policy provides no restriction on the extension of utilities anywhere that it is feasible to do so. Rather than having a widely interpretably and overly permissive policy like this, the county should craft a set of geographically specific policies ( including maps as needed) that target areas where central services should be provided. This should also be coordinated with future land use.*

**Policy SAN 1.3-2: Central Sewer System within Federal, State and/or Local Designated Environmentally Sensitive Areas Where Hydrologic Basin Protection Zones Have Been Identified by Regulation.**

The provision of a central sewer system within Federal, State and/or Local designated environmentally sensitive areas where Hydrologic Basin Protection Zones have been identified by regulation shall be required. Such provision shall be through public or private sources, or a combination thereof and shall be utilized where sufficient density can be attained (making centralized facilities cost effective) through application of the density point rating system (in a clustered development).

*COMMENT: Please delete this policy completely. It is even more blatantly sprawl-inducing than POT 1.4-2. As written, this policy requires central water lines to be extended into any environmentally-sensitive area based solely on whether it is feasible*

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

*for a developer to do so. Furthermore it infers that public money will be used to accomplish this and densities will be increased in the process. The concept of clustering is a good, but not in the context of poorly crafted policy such as this.*

*The ramification of policies such as this one and the previous one are staggering. Even if the county initially prepares a very good future land use map that appears to establish sound growth boundaries, poorly worded policies like these will allow applicants to swiftly justify future land use changes that undermine growth management, hurt the environment, promote sprawl, and contravene the public interest.*

**OBJECTIVE SAN 1.4: ON-SITE DISPOSAL SYSTEMS**

Lake County shall require the implementation of enhanced on-site disposal systems that utilize advanced treatment technology in order to minimize environmental impact within the Federal, State and/or Local environmentally sensitive areas, consistent with state agency rules.

**OBJECTIVE SAN 1.5: Wastewater Sludge**

Lake County Shall prohibit the surface spreading or depositing of wastewater sludge within Federal, State and/or Local environmentally sensitive areas.

*COMMENT: This blanket reference to federal, state, or local environmentally-sensitive areas could be interpreted as almost anywhere in the county or nowhere in the county. The Comp Plan needs to be more specific about where sludge disposal will be prohibited, or identify criteria that the county will use to make this determination. Please clearly state that depositing of sludge or wastewater residuals within the Wekiva River Protection Area, Wekiva Study Area, and Green Swamp Area of Critical State Concern shall be prohibited.*

**OBJECTIVE SAN 1.6: ENVIRONMENTAL POLICIES**

The County shall cooperate with State and Local regulatory agencies to endeavor to ensure that the provision of sewer service and the operation of wastewater treatment facilities is accomplished in a manner which will minimize adverse impacts on the environment, public safety, residential neighborhoods and surrounding properties.

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

**Policy SAN 1.6-1: ~~River Protection~~ Environmentally Sensitive Areas**

The County shall require the use of central sewer for all new subdivisions consistent with provisions enacted by Federal, State or local law, rule or regulation. The purpose of this policy is to provide central sewer services to projects where it can be

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

demonstrated that the provision of such services will minimize adverse water quality impacts that would otherwise be caused by the use of individual septic systems.

**Policy SAN 1.6-2: Monitoring of Rule Revisions**

The County shall continue to monitor proposed revisions to Rule 17 62-640 F.A.C., “Domestic Wastewater Sludge” and to Rule 17 62-610 F.A.C., “Reuse”.

**OBJECTIVE SAN 1.7: COORDINATION AND URBAN SPRAWL**

The County shall coordinate the extension of service or increase of facility capacity with adjacent municipal and private facilities to discourage urban sprawl.

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

**Policy SAN 1.7-1: Extension of Service to New Development**

The County shall continue to require new development to connect their wastewater facilities to municipal or private utility systems where possible.

*COMMENT: Please modify this to require that new development fund the extension of their own utilities (as worded in the Potable Water Element.)*

**Policy SAN 1.7-2: Prohibit Provision of Sanitary Sewer as Sole Justification for Land Use Amendments**

Lake County shall prohibit the provision of sanitary sewer as sole justification for amendments to the Future Land Use Element where new or expanded development will adversely impact resource/ conservation areas or neighborhoods or will otherwise be deemed to exacerbate the problem.

*COMMENT: This is a very good policy, but it potentially contradicts and competes with SAN 1.3-1 and SAN 1.3-2. It is important that policies within the Comprehensive Plan are internally consistent.*

*More is needed here to adequately control urban sprawl. The county should adopt a set of geographically specific policies (including maps as needed) within the Comp Plan that clearly define and plan for areas where central services are deemed appropriate and where they should be excluded. This should also be carefully coordinated with the future land use map and supported by future land use policies.*

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

**GOAL SAN 2**

Recognizing that septic systems are one of several common sources of added nutrients to a naturally low-valued nutrient springshed system, areas of high existing septic system density within springsheds will receive high priority toward their central sewerage to help reduce the input of nutrients into the springshed waters.

*COMMENT: Replace the word "springshed waters" with "groundwater". I suggest making the goal about reducing the negative impact of wastewater on the health of springsheds, and then include the above goal as an objective/policy. The content here is*

**~~OBJECTIVE SAN 2.1-1: CENTRAL SEWERING OF EXISTING DEVELOPED AREAS~~**

~~Within the designated primary and secondary protection zones remove nutrients from the springshed system by the central sewerage of existing developed areas while limiting the expansion of central sewer lines into the undeveloped areas.~~

**OBJECTIVE SAN 2.1-2: IMPACT OF SEPTIC SYSTEMS WITHIN THE SPRINGSHED**

The County will work with the Florida Department of Health to minimize the impact of septic systems within the springshed, particularly within the designated primary and secondary zones.

*COMMENT: Please specifically state that the county shall require compliance with all rules adopted by the Department of Health, DEP, and St Johns River Water Management District regarding the use of Advanced Wastewater Technology and Onsite Sewage Treatment and Disposal Systems within the Wekiva Study Area. Also state that the county shall work with state agencies to establish a OSTDS maintenance program as appropriate within the Wekiva Study Area.*

**Policy SAN 2.1-3: Septic System Inspection Program**

Establish a septic system inspection program. Require each existing system to be inspected and certified as properly functioning whenever a property is sold, system is modified or at least every (X) years.

*COMMENT: Is this policy intended to be countywide, or specifically within springsheds?*

**Draft PUBLIC FACILITIES ELEMENT  
SANITARY SEWER SUB-ELEMENT  
GOALS AND OBJECTIVES  
9J-5.011(2)**

*COMMENT: Please add a policy stating that the county shall work with the DOH to develop a regular pump-out program for septic tanks within the Wekiva Study Area, similar to that which exists in the Green Swamp.*

**ADDITIONAL COMMENTS:**

*-Please restore former policy 6A-2.2 requiring that potable water supply and distribution systems be provided in a manner consistent with the Future Land Use Map.*

*-Please explain why former policies 6A-1.2 through 6A-1.11 have been deleted and the status of the programs that they reference.*

*-Please explain the current status of activities described in former policy 6A-3.2 (Provision of Wastewater Service to South Lake County.)*