

**Giving the River a Voice
Since 2007**



**2070 SW CR 138
Ft White, FL, 32038
352-474-8418**

July 31, 2024

Re: Draft LSFIR Regulatory Strategy - July 31, 2024 Workshop
Lower Santa Fe and Ichetucknee River MFL Rulemaking Workshop
Department of Environmental Protection
Office of Water Policy and Ecosystems Restoration

To whom it may concern:

We have seen the deterioration of our springs, and the reduced flow from our aquifer. Population growth and its inherent increased demand on our water resources is a challenge. In order to meet the projected 32% increase in water use while also reducing current use, is a tight balancing act we must make to protect our springs and our water needs.

SB 552 calls for us to take “immediate action” and though eight years drafting an updated MFL doesn’t qualify as immediate in most people’s world view, it is lightning fast in tree years. **Is offering a 20 year grace period for permit holders to reduce and offset their water use considered immediate action?** This proposal is much too lenient, even trees might take issue with that timeline. In order to comply with SB 552, we should consider reducing the compliance schedule to five years, or issue an immediate moratorium on applications until the MFL’s for our impacted springs, are brought back to their legal limit.

We appreciate the water conservation incentives that are worked into the proposal. Water conservation projects are four times more cost efficient than water supply/resource development projects. These projects will only be successful if properly funded and applied. **Will there be funding available to ensure that these projects are being applied and are having the intended results?**

We are concerned that the plan uses models rather than actual flow data. **Is it true that the MFL compliance point being measured is in the river rather than the springs? Is this a violation of F.S.373.042?**

Cherry-picking data is demonstrated when establishing Base Condition Water Use BCWU. BCWU is defined as the average quantity of groundwater used, in million gallons per day, between 2014 and 2018. Allowing permittees to artificially increase their values, AND providing them with another 20-year offset AFTER the effective date, AND no deadline for completion, is a serious flaw in this proposal.

The proposal also states that New permit applicants need to offset 100% of their impact *at some point in the future*. **Does this mean that all new permits will be approved provided they submit an offset plan within the next twenty years?** Don't worry, if 20 years isn't enough time, you will be issued another twenty? By that time my sapling will be a full grown tree and still no offset compliance.

Finally, we are concerned that phosphate mining with an approved reclamation plan is exempt from filing an environmental resource permit (ERP.) Nutrien in Hamilton County has a permit allocation of 84.16 million gallons per day of groundwater withdrawal. They report their actual groundwater use is approximately 25 to 30 million gallons per day. In comparison, the City of Gainesville pumps between 23 to 54 MGD. **Is this industry exempt from groundwater reductions? Will their permit be adjusted to their actual BCWU?**

https://wwals.net/pictures/2023-03-28--hamco-planning-packet/Final-Report_Five-Year-Renewal-of-Special-Permit-03-1_submitted-01-16-2023.pdf

We should be RAISING the MFLs, not lowering and extending reductions into the future. Instead of reducing pumping, we are continuing to allow harmful withdrawals and pushing spring restoration into the future. Would that we live as long as trees so we might see our springs fully restored. This policy has some good working parts but it's failing our springs while we watch the demise of our Florida waters. Why do we have so little trust or confidence in our protective agencies?

Joanne Tremblay, President
Our Santa Fe River, Inc.

Our Santa Fe River, Inc. EIN 42-1756985
A Florida 501 (c)(3) Non-Profit Corporation

*FDACS Registration #CH41570

A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE WITHIN THE STATE. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL OR RECOMMENDATION BY THE STATE. 1-800-HELP-FLA (800-435-7352) OR (OUTSIDE STATE) (850) 410-3800.