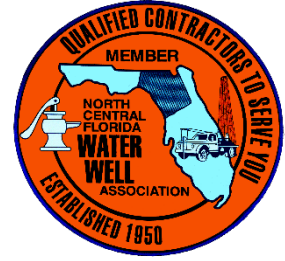


North Central Florida Water Well Association (NCFWWA)  
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386-454-9355



September 11, 2024

Florida Department of Environmental Protection  
3900 Commonwealth Blvd.  
Tallahassee, FL 32399

Subject: **Comment on Lower Santa Fe and Ichetucknee Rivers (LSFIR) and Priority Springs Minimum Flows and Levels (MFLs)**

Dear Sir/Madam,

I am writing on behalf of the North Central Florida Water Well Association (NCFWWA) to express our concerns regarding the proposed regulatory strategy and new rules for restoring the Lower Santa Fe and Ichetucknee Rivers, **specifically the prohibition on new private residential irrigation wells.**

As a chapter of the Florida Groundwater Association and with 74 years of history, NCFWWA represents approximately seventy licensed Florida Water Well Contractors in North Florida. Our mission is to ensure high-quality well construction while protecting the environment and securing safe water supplies for current and future generations.

We are deeply concerned that the proposed rule could adversely affect the water well industry, small businesses, and property owners. We urge the agency to remove the proposed section of the rule prohibiting the construction and use of new Floridan Aquifer irrigation wells for private residences for the following reasons:

1. **\*\*Economic Impact on the Water Well Industry\*\***

The proposed ban would significantly impact Florida's essential water well drilling and service industry, which consists mostly of multi-generational small family businesses. This restriction would result in job losses and revenue declines for thousands of contractors and businesses across the state, severely limiting our ability to operate and serve our customers.

2. **\*\*Economic Impact on Property Owners\*\***

Requiring property owners to rely solely on municipal water for irrigation could overload existing systems, necessitating costly upgrades that may lead to higher taxes and water rates. Private wells add value to homes by providing a cost-effective alternative to municipal water. Banning these wells would impose a financial burden on Florida residents.

### 3. **\*\*Water Conservation Control\*\***

Contrary to the rule's intentions, private wells often promote water conservation and responsible resource management. Well owners, aware of the costs associated with overuse, tend to manage their water usage efficiently. Municipal systems do not inherently guarantee better conservation practices.

### 4. **\*\*Infringement on Property Rights\*\***

Homeowners have traditionally relied on private wells to utilize natural resources on their property. The proposed rule infringes on this right by eliminating the option for private residential irrigation. This level of government interference could set a troubling precedent for future regulations affecting individual freedom and self-sufficiency.

### 5. **\*\*Environmental Impact\*\***

Using well water has a lower environmental impact compared to municipally treated water, which requires significant energy for both treatment and transportation. Private wells provide untreated water, often enriched with natural minerals that can be more beneficial to plants and soil than the treated water supplied by public systems. For residential irrigation, treated water is not only unnecessary but also not recommended. Relying on public water supply for irrigation could worsen the cone of depression in the Floridan Aquifer, which can extend for miles from the well. In contrast, small, widely spaced private irrigation wells create minimal drawdown in the aquifer.

Given these concerns, NCFWWA opposes the current proposed rule language for 62-42.300 Minimum Flows and Levels and Recovery and Prevention Strategies, as published on July 31, 2024. We urge the Florida Department of Environmental Protection to reconsider this proposal and collaborate with stakeholders to develop balanced solutions that protect Florida's water resources with consideration of homeowners and Florida's small businesses.

Thank you for considering our perspective. We are eager to engage in discussions and offer our insights based on our extensive experience as licensed professionals in the water well industry.

Sincerely,

The North Central Florida Water Well Association and its membership