

There are no attachments in this message. [Learn more](#).

From: "Katrina Shrode" <katrinashrode@gmail.com>
Subject: Regulatory strategy and new rules to restore the Lower Santa Fe and Ichetucknee Rivers
Date: Sep 13, 2024 at 7:04:48 PM
To: "OWP_Rulemaking@floridadep.gov" <OWP_Rulemaking@floridadep.gov>, "waterworksjack@verizon.net" <waterworksjack@verizon.net>

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Subject: Comments on Proposed Rules for Lower Santa Fe and Ichetucknee Rivers and Priority Springs Minimum Flows and Levels (MFLs)

Dear Florida Department of Environmental Protection

I am writing to you as the owner of Water Works Well Drilling, based in Venice, Florida, where I have been dedicated to irrigation and shallow well drilling since 1980. As an active member of the Florida Ground Water Association (FGWA), I am deeply concerned about the proposed regulatory changes concerning the Lower Santa Fe and Ichetucknee Rivers, particularly the new rules that would prohibit the construction of private residential irrigation wells.

The FGWA, representing hundreds of water well contractors throughout Florida, has a long-standing mission to advance the groundwater industry and advocate for the responsible use of groundwater resources. We are particularly troubled by the implications of the proposed rule, which we believe are detrimental to property owners, water well contractors, and small businesses.

Our specific concerns with the proposed rule are as follows:

1. **Inconsistent Application and Water Use Issues:** The proposed rule permits water use for public supply, municipalities, agriculture, golf courses, and commercial purposes, provided an impact offset plan is in place, while banning private residential irrigation wells. This approach is unfair, as all these uses draw from the same source—the Floridan aquifer.

Moreover, the current surge in Water Use Permits for new subdivisions exacerbates the problem. I have witnessed firsthand the impact of this issue, especially during the recent heavy rain event in Southwest Florida. It was alarming to see new subdivisions with water cascading from their communities onto our roads, while their sprinkler systems were running continuously. This reflects a broader issue: the lack of oversight and management of water use in these developments, which have blanket water use permits. We are facing a situation where residential well users are struggling with reduced water availability due to the unchecked consumption by these new developments. The proposed ban on residential irrigation wells only exacerbates this problem by unfairly targeting private well users without addressing the more significant issue of wasteful water practices in large-scale developments.

2. **Erosion of Property Rights:** Historically, property owners have had the right to access and utilize natural resources on their land, including groundwater. The proposed regulation infringes upon these rights by restricting homeowners' ability to drill wells for irrigation purposes. This restriction undermines self-sufficiency and property value, particularly for those with extensive landscapes or agricultural uses.
3. **Impact on Property Value and Utility:** Property owners are often required by homeowner associations, zoning regulations, or community rules to maintain their properties through irrigation. The inability to drill a well could decrease the appeal of properties to prospective buyers who value

irrigation capabilities for landscape and garden maintenance.

Given these concerns, I urge you to reconsider the proposed prohibition on new private residential irrigation wells. Addressing the more significant issues of water management in new subdivisions and ensuring equitable access to groundwater resources should be prioritized to support both property owners and the broader community.

Thank you for considering my perspective on this matter. I look forward to your response.

Sincerely,

John R. Shrode

941-484-3634

Water Works Well Drilling
Venice, Florida