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From: "Patrick Sless" <psless@yahoo.com>
Subject: Regulatory strategy and new rules to restore the Lower Santa Fe and Ichetucknee Rivers
Date: Oct 25, 2024 at 2:34:39 PM
To: "OWP_rulemaking@floridadep.gov" <OWP_rulemaking@floridadep.gov>

EXTERNAL MESSAGE

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Dear Members of the Florida Department of Environmental Protection,

I am a lifelong resident of Florida and have worked in the water well business for almost 15 years. I am writing to express my deep concern regarding the rule the FDEP is proposing to ban the installation of private irrigation water wells. While I understand and respect the need for water conservation and the protection of our natural resources, I believe that this ban would have unintended and devastating consequences for a large portion of Florida's economy and workforce.

The water well industry, including businesses that drill wells, wholesalers, manufacturers, and a myriad of other small and medium-sized enterprises, has been an essential component of Florida's economy for decades. If this ban is passed, it would severely impact thousands of jobs, many of which are held by skilled workers who have dedicated their lives to this trade. Moreover, the ripple effects could lead to significant revenue losses for these businesses, their suppliers, and other related industries.

In addition, this rule will do little in the way of conserving water as it seems to simply shift revenue to municipalities from private water well businesses. There are many things that could be implemented with private water systems to conserve water. Private water systems also don't require miles of mainline which data shows have leaking issues and create a whole new set of water conservation challenges. This is a huge problem that municipalities have been dealing with for decades due to aging infrastructure. It's estimated that 25% of municipal is non-revenue which leakage is the main contributor too.

There are more effective ways to approach water conservation that do not involve banning private irrigation wells. I would suggest that we all collaborate to develop more sustainable and innovative solutions that protect our water resources while preserving jobs and livelihoods. Some potential solutions could include stricter regulations on water usage, promoting water-efficient technologies, and possibly incentivizing homeowners that have invested in these water saving solutions. Together, we can balance environmental sustainability with economic viability.

I urge the Department to reconsider this proposed rule and to engage with stakeholders from the water well community to develop a more balanced and effective solution. The consequences of this ban would reach far beyond water conservation and could irreparably harm businesses and families who have been the backbone of Florida's water industry for generations. The same families that came to the rescue during the pandemic crisis to ensure the people of these counties had water, the most essential nutrient to life.

Thank you for your time and consideration. I look forward to the opportunity to work with the Department to find a solution that benefits both Florida's environment and its economy.

Patrick Sless
407.450.1104 (cell)
psless@yahoo.com