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From: "Anne Gibson" <gibfamag@gmail.com>
Subject: Comments on Draft Recovery Strategy
Date: Sep 3, 2024 at 8:30:27 AM
To: "OWP_rulemaking@floridadep.gov" <OWP_rulemaking@floridadep.gov>

EXTERNAL MESSAGE

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Good Morning,

It's come to my attention that the Santa Fe and Ichetucknee Rivers are in desperate need of advocacy from Florida citizens. You've allowed these rivers to violate their MFLs since 2015, and need to take urgent accountability. I visited these rivers recently and genuinely could not believe how low the water level hit alongside the banks. I witnessed the delicate health of multitudes of springs along the Santa Fe River, and a few on the Ichetucknee. Anyone who visits these river systems could easily identify their critical conditions the possibility of permanent, possibly irreversible, damage in the coming years. The health of so many springs is at stake if you do not do your mandatory part in revitalizing the Santa Fe and Ichetucknee. These river systems are extremely crucial to our aquifers, our wildlife, our tourism, and our state as a whole. They are sacred, ancient springs that are being destroyed all too quickly at the hands of man. And your recovery strategy is not good enough!!!! DEP and WMD need to face accountability for your consistent violations to the MFLs and the law. And instead of putting off your recovery strategy, you need to work double time to reverse your disastrous effects on these delicate environments. I'm writing to put pressure on you to speed up your recovery process because your current draft is not good enough. We need action now!! Action in 2026 allows for 2 more years of damage to continue, when we could put a stop to it right now. I urge you to strongly consider proposals laid out by The Florida Springs Council. Here are some of their recommendations:

- DEP should establish MFLs for each Outstanding Florida Spring using the best available information, as required by Florida law.
- The timeline for existing users to complete offset should be based on the minimum time required to complete the project, which in no case should be more than five years from when they submit their plan.
Permittees should be allowed a single five-year extension if it is in the best interest of the public.
- Existing users who commit to an offset project, but fail to offset their impacts, should have their permits reduced to address the proportionate share of impacts.
- Applicants for new water use permits after rule adoption should be required to offset their impacts before being allowed to withdraw water. In no case should a new permit be issued after rule adoption that impacts an MFL Recovery Point.
- When a permittee has failed to complete a required offset project, they should not be eligible for a permit renewal until the offset is completed.
- Impacts and offsets should be determined by actual water use and flow data.

You cannot ignore the wants and needs of the people whose land and homes you are destroying. Face accountability and get your shit together. REAL action is needed NOW!

Thank you,
Anne Gibson