



Alachua County Board of County Commissioners

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Ken Cornell
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Administration
Michele L. Lieberman
County Manager

September 30, 2024

Hugh Thomas, Executive Director
Suwannee River Water Management District
Hugh.Thomas@srwmd.org

Mike Register, Executive Director
St. Johns River Water Management District
mregister@sjrwmd.com

Shawn Hamilton, Secretary
Florida Department of Environmental Protection
Shawn.Hamilton@floridadep.gov

Re: Lower Santa Fe and Ichetucknee MFL Regulatory Strategy

To Whom it May Concern,

Alachua County is committed to protecting the Santa Fe and Ichetucknee rivers and their associated springs and understands the importance of adopting prevention and recovery strategies that support the Minimum Flows and Levels (MFLs). Environmental Protection Department (EPD) staff have provided comments during every stage of this MFL process. Our formal comments on the proposed language of the July 2024 draft Regulatory Strategy are attached and below are additional public comments on the overall process and regulatory strategy.

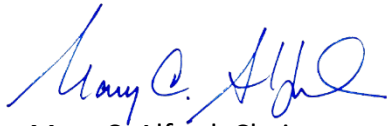
Landscape irrigation can account for almost 60% of residential water use and must be addressed to achieve the MFL. The rules dictating irrigation restrictions within the SJRWMD and SRWMD should be revised in tandem with this rulemaking, or language superseding the current irrigation rules should be included in the Regulatory Strategy. At a minimum, revisions should allow local governments to implement stricter irrigation restrictions and remove some of the existing exemptions for reclaimed water or micro-irrigation, to name a few.

The rule appears to not require offset plans for permits with an impact less than 0.01 cfs. While we recognize staffing limitations, we are concerned that the cumulative impact of these smaller permits could be significant. Prior to adopting this rule, please share with the public the cumulative impact of not offsetting these uses.

Utilities have found tiered pricing and water budgets to be successful water conservation tools to reduce discretionary water use, while keeping essential water use affordable. Unfortunately, some high-water users install irrigation wells to avoid fees associated with their excessive and wasteful water consumption. Landscape irrigation wells need to be prohibited when potable or reclaimed water is available. Irrigation wells also increase uncertainty in water use data, which is essential to water supply planning. We commend your staff for attempting to include a prohibition on new irrigation wells on private residential lots in the current draft, but the prohibition should apply to all irrigation wells and additional language and rule changes may be necessary to successfully implement this essential step, as outlined in our comments on the draft language.

We appreciate the opportunity to share our concerns about our shared water resources that are vital to our local economy, ecology, and water supply. Please contact Stacie Greco, Water Resources Program Manager, at Sgreco@alachuacounty.us or 352-264-6829 for additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary C. Alford".

Mary C. Alford, Chair
Alachua County Commission
Chr24.053

xc: Board of County Commissioners
Michele L. Lieberman, County Manager
Sylvia Torres, County Attorney
Steve Hofstetter, Director, EPD
OWP_rulemaking@floridadep.gov