

Bell Feed & Farm, Well & Pump

September 19, 2024

Florida Department of Environmental Protection

Office of Water Policy

3900 Commonwealth Blvd.

Tallahassee, FL 32399

Re: Comments on Lower Santa Fe and Ichetucknee Rivers (LSFIR) and Priority Springs
Minimum Flows and Levels (MFLs)

Dear Sir/Madam,

I am writing to you on behalf of Joseph Daniel Hart, 2272, BFFWP, a licensed water well contractor operating in North Central Florida. We wish 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 dedicated member of the water well contracting industry, we have been serving the community for [number] years and are committed to ensuring high-quality well construction while protecting environmental resources and securing safe water supplies. Our concerns regarding the proposed rule are outlined below:

1. Economic Impact on Our Business

The proposed ban on new private residential irrigation wells would have a significant adverse impact on our business and the broader water well drilling industry. As a small, family-owned business, this restriction could lead to job losses, reduced revenue, and operational limitations, ultimately affecting our ability to serve our customers effectively.

2. Economic Impact on Property Owners

By mandating reliance on municipal water for irrigation, the proposed rule could strain existing water systems, necessitating costly upgrades that may result in increased taxes and water rates for property owners. Private wells offer a cost-effective and valuable alternative, particularly for those in rural and suburban areas, and eliminating this option imposes an undue financial burden on residents.

3. Water Conservation and Management

Private wells often encourage responsible water usage and conservation. Well owners, mindful of the costs of overuse, tend to manage their water more efficiently than municipal systems might ensure. The proposed rule could inadvertently undermine effective water conservation practices.

4. Property Rights Concerns

The proposed prohibition on private residential irrigation wells infringes upon property owners' traditional rights to utilize natural resources on their property. This level of regulatory intervention may set a concerning precedent for future regulations impacting individual freedoms and property rights.

5. Environmental Impact

Private wells generally have a lower environmental impact compared to municipal water systems, which require energy-intensive treatment and transportation. Private wells provide untreated water with beneficial minerals, reducing the need for chemical fertilizers. The proposed ban may increase the environmental impact of municipal systems, which also rely on the Floridan aquifer.

Given these concerns, we respectfully urge the Florida Department of Environmental Protection to reconsider 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 recommend a collaborative approach with stakeholders to develop balanced solutions that safeguard Florida's water resources while allowing for the continued use of private wells.

Thank you for considering our perspective. We are open to engaging in further discussions and contributing our expertise to find mutually beneficial solutions.

Sincerely,

Joseph Daniel Hart jr.

Owner, Bell Feed & Farm, Well & Pump

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