

January 31, 2023

To: SRWMD, SJRWMD, partnership@sjrwmd.com

Re: **Water budget, limit water withdrawals, do better aquifer recharge, NFRWSP**

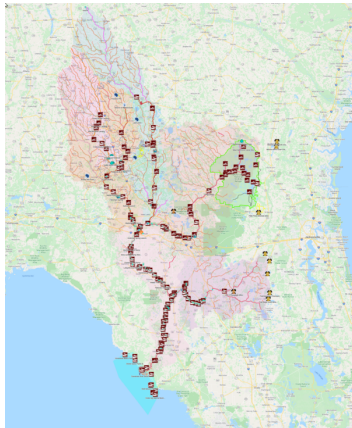
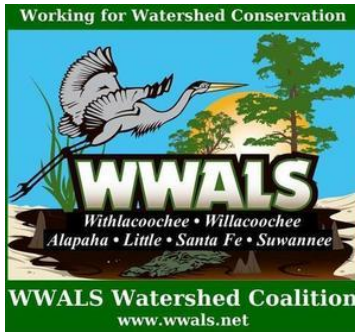
Dear Water Management Districts,

Thank you for the opportunity for public input.

At the November 15, 2022, public meeting about the North Florida Regional Water Supply Plan (NFRWSP), I thanked the presenters for all the hard work they had put into the details, such as in the [North Florida-Southeast Georgia \(NFSEG\) regional groundwater flow model](#).

I have some issues with another level. I noticed repeated assertions in the public meeting that demand or projected demand are just taken as givens. So basically anybody who wants to build a golf course, or start another titanium mine, or plant almond trees that need lots of water, that's just a given, that's demand.

Chapter 2 Hydrology of the Area



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WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.

Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.

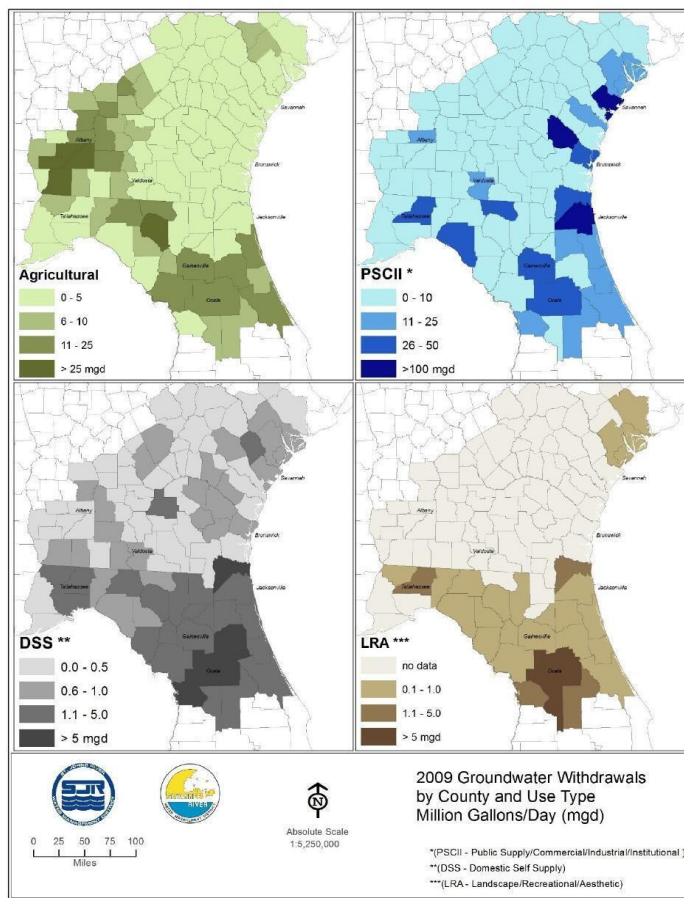


Figure 2-47. Groundwater withdrawals by county and use type (MGD), 2009

St. Johns River Water Management District

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It seems strange.



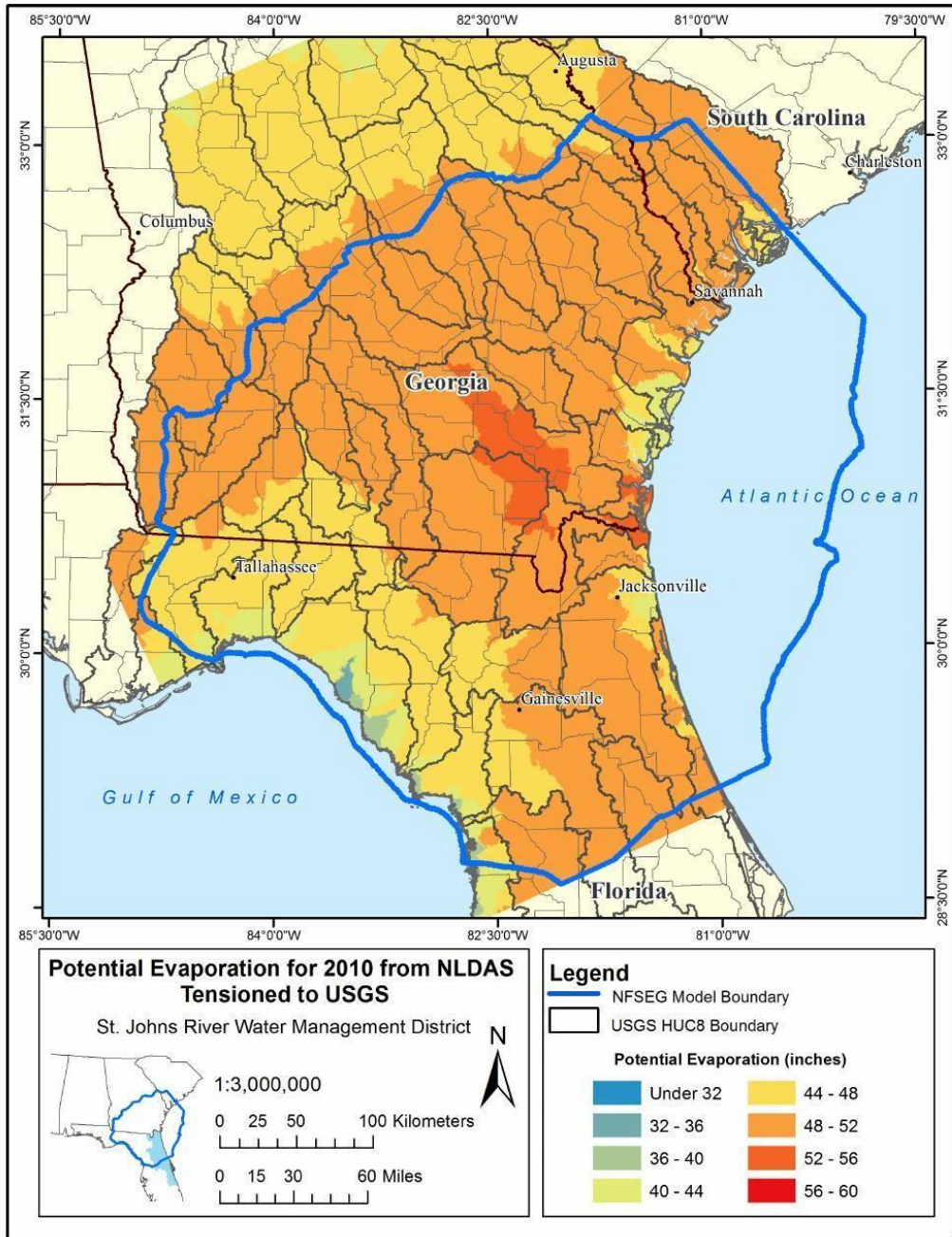


Figure 9-12. Potential evaporation for 2010 from NLDAS tensioned to USGS

St. Johns River Water Management District

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[Figure 9-12. Potential evaporation for 2010 from NLDAS tensioned to USGS](#)

You've gone to a great deal of trouble to compile a water budget in the sense of here's evapotranspiration, here's aquifer recharge, and so forth.

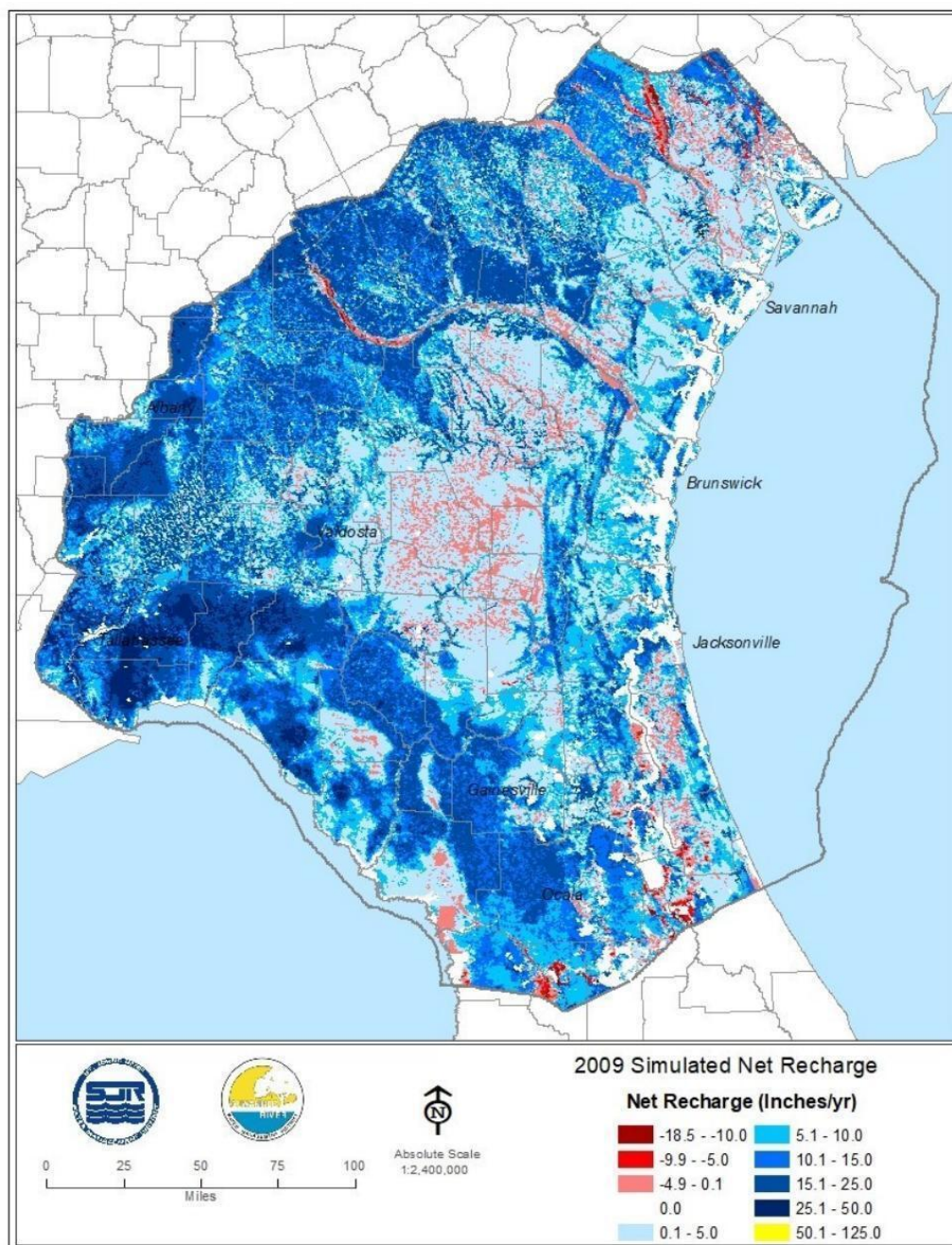


Figure 4-60. Simulated net recharge rates (inches/year), 2009

St. Johns River Water Management District

4-91

Figure 4-60. Simulated net recharge rates (inches/year), 2009

But all we see for a plan to deal with that is changing MFLs. Which seems to translate to lowering the limits for the water levels. I didn't see anything about planning to limit or review use permits for water withdrawal.

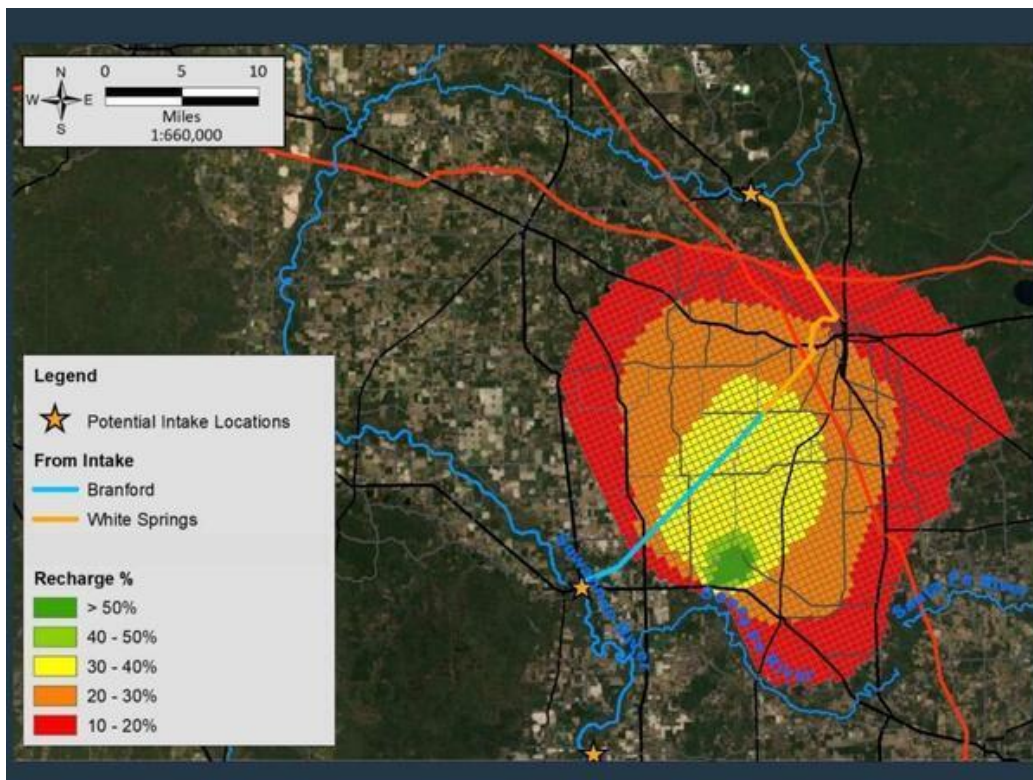
I know I heard something about, well, that's the regulatory arm. But this plan includes aquifer recharge projects, such as I believe there's a 48-inch pipe planned to go from the Suwannee River to recharge the Ichetucknee headsprings. See Appendix J from 2016. https://northfloridawater.com/watersupplyplan/documents/draft/Appendix_J.pdf More detail: <https://wwals.net/?p=15981>

Project Location and Potential Pipeline Alignment



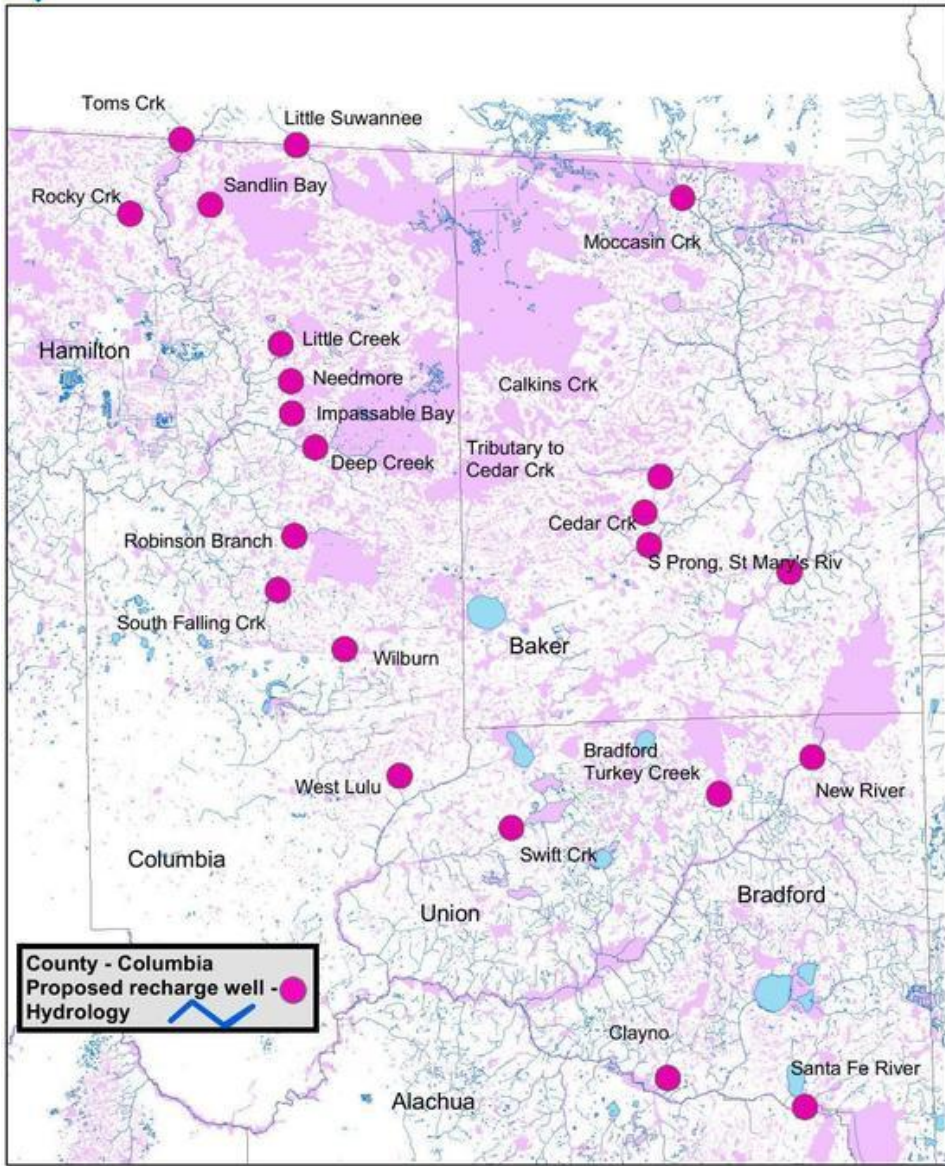
Project Location and Potential Pipeline Alignment

Four years later, SRWMD added a plan for another such pipe, from Branford. <https://wwals.net/?p=55981>



Map: Recharge % in SRWMD's slides [Prevention and Recovery Strategy for the Lower Santa Fe and Ichetucknee Rivers and Priority Springs](#).

There are much simpler ways to recharge the aquifer than these very expensive water pipelines, as Practicing Geologist Dennis J. Price pointed out back in 2016. <https://wwals.net/?p=54126> Drill wells at the bottom of planted pine ditches.



UPPER FLORIDAN
 RECHARGE PROJECT

Flatwoods recharge wells with names of basins or creeks, located upstream of stream entrenchment, at discharge from larger basin, upstream of, but on, roads

Map: Flatwood Recharge Wells

Planning aquifer recharge water pipelines is a policy. A bad policy, but still a policy.

Limiting permits is also a policy. Limiting new withdrawal permits and phasing down quantities of older permits should be in this plan.

I brought this up [six years ago](#), as did [many other people](#),



Model inadequate, notice, process, table –John S. Quarterman, Suwannee Riverkeeper at joint SRWMD-SJRWMD Board Meeting 2017-01-17

and it was basically [shrugged off](#). Both districts just proceeded to [pass the plan as is](#).



[Boards vote to approve; say they heard nothing new at joint SRWMD-SJRWMD Board Meeting 2017-01-17](#)

I hope that there may be some change in course possible at this point. Because I really wouldn't want all your hard work to just go towards further reducing MFLs and decreasing water levels for the springs and rivers.

For the rivers and the aquifer,
John S. Quarterman,
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Attachments:

- WWALS NFRWSP comment letter of December 5, 2016 <https://wwals.net/?p=27688>
- Proposal for the Recharge of the Upper Floridan Aquifer –D.J. Price P.G. 2016-11-14 <https://wwals.net/?p=54126>