

April 13, 2026

To: Suwannee River Water Management District Governing Board

Cc: writtencomments@srwmd.org, hugh.thomas@srwmd.org

Re: **Water First North Florida (WFNF)**

Dear SRWMD Board,

This comment is related to item 10 on the agenda, "Public Hearing for Approval of Order Number 26-003, Modified Phase II Water Shortage," but it is perhaps best considered as a general comment. I will bring 11 printed copies to the meeting at 9AM, April 14, 2026.

Regarding the Water First North Florida (WFNF) project, I have repeatedly heard SRWMD Board members and staff say opponents are merely repeating misinformation. But extraordinary claims require extraordinary evidence. It is SRWMD (and SJRWMD and JEA) that is proposing this huge, complex, and expensive project. **The promoters bear the burden of proof.**

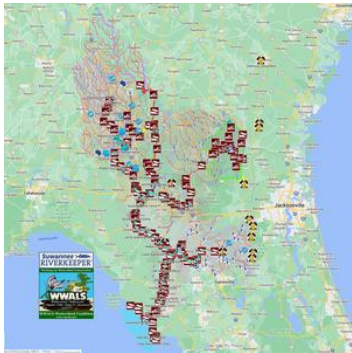
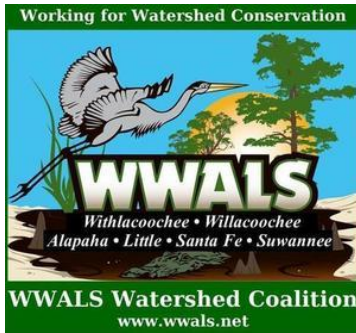
Many elected officials representing people of the Suwannee River Basin oppose WFNF, as no doubt you are aware. Five county commissions and the town council of Branford thus far have passed letters or resolutions in opposition. The twelve-county River Task Force has also passed such a resolution, as has its parent body, the North Central Florida Regional Planning Council (NCFRPC). Madison County and Branford call for a moratorium on WFNF until further study, and the Task Force and NCFRPC effectively call for the same.

The people themselves are overwhelmingly against WFNF, as you saw [at UF IFAS in Live Oak on March 19](#), at county commission meetings, and at your own Governing Board meetings.

Lower flows and levels in springs and rivers are a real problem, but there are better ways to address it. For example, Dennis James Price, P.E., of Hamilton County has for years proposed digging **aquifer injection wells at overflows of wetlands at the bottom of planted pine plantations**. <https://wwals.net/?p=69519> Yet that option does not appear to be among the hundred we are told SRWMD and SJRWMD considered before settling on WFNF. Perhaps it is time for that plan to be reviewed and considered.

The biggest withdrawer of groundwater is the city of Jacksonville. It could decrease or cease doing so in any of three ways:

1. **Potable reuse**. Treat wastewater sufficiently to feed it into Jacksonville's drinking water supply. If it's not that clean, why should the Suwannee River Basin accept it to seep into groundwater and come back up in drinking water wells?
2. **River water**. If Philadelphia can get drinking water from the Schuylkill River, Jacksonville can get it from the St. Johns River. That was an option in the Clay County Utility Authority (CCUA) January 2016 Initial Assessment of Alternative Water Supply Options. <https://www.clayutility.org/aws/documents/AWSTechnicalReport.pdf> CCUA did not take it up at that time due to costs. Yet now there are 41 brackish water desalination plants in south Florida, according to the South Florida Water Management District (SFWMD). If they can do it, Jacksonville can do it. <https://www.sfwmd.gov/our-work/alternative-water-supply/desalination>
3. **Seawater desalination** was rejected, according to a document sent by SRWMD, because of cost, difficulty of dealing with the brine byproduct, and because it does not help with SB 64. <https://wwals.net/?p=69648> SB 64 is SJRWMD's problem, not SRWMD's; see below. Meanwhile, the Texas [Harbor Island Seawater Desalination Facility](#) produces 100 mgd of drinking water. Multiple California desalination facilities produce up to 50 mgd, such as [the one in Carlsbad](#), which dates to 2015. Tampa does it, and there are two seawater desalination plants in south Florida. Here are half a dozen seawater desalination plants in the Middle East and Australia that produce more clean water than WFNF and cost less per million gallons per day. <https://wwals.net/?p=69861> They dispose of their brine somehow; best to ask them how they do it.



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

WWALS advocates for conservation and stewardship of the surface waters and groundwater of the Suwannee River Basin and Estuary, in south Georgia and north Florida, among them the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds, through education, awareness, environmental monitoring, and citizen activities.



Name	Where	mgd	Cost ¹	mgd/\$1B	% ²	Years
NAQA'A	U.A.E.	150	\$0.82	183	20%	5
Alkimos	Western Australia	72.4	\$1.95	37	98%	5
Birkat Miriam	Israel	72.4	\$0.44	165	22%	5
Sorek	Israel	169	\$0.489	345.6	11%	4
Sorek B	Israel	177	\$0.6	295	12%	4
WFNF	FL U.S.	40	\$1.1	36.4	100%	13

¹ Cost in \$billion USD ² % of WFNF cost/mgd

Several of the plants in the table produce more drinking water than the 120 million gallons a day (mgd) that JEA distributes. https://www.jea.com/about/water_supply/ Please publish the results of a brackish and seawater desalination study that includes all of these and other comparables.

I am told by SJRWMD that each mgd reduction in Jacksonville’s water withdrawals would have only a fractional effect on levels and flows in rivers, springs, and groundwater in the Suwannee River Basin. **But what would be the effect of reduced Jacksonville withdrawals combined with planted pine wetland wells?**

SB 64 is Jacksonville and JEA’s problem, not SRWMD’s. But JEA could use the same loophole in SB 64 that fits WFNF, <https://wwals.net/?p=69428>, to rehydrate wetlands within the St. Johns District, without any 60+ mile pipeline. <https://wwals.net/?p=69949>

There are bigger costs than money from JEA or the Districts. As Suwannee County wrote, <https://wwals.net/?p=69669>

When your representative was asked questions about the safety of the “treated” water, he kept saying he was not a scientist so he could not answer any questions, but we should simply trust that the water will be safe. That is not a risk North Florida can afford to take.

Once the spigot is turned on, it is impossible to predict the consequences which will impact literally every person in the area. Our citizens should not suffer the consequences of such hubris.

I ask you to think again. I ask you to correct **“the utter disrespect that has been shown to the Board and citizens of Hamilton County.”** <https://wwals.net/?p=69937>

The SRWMD Governing Board has the power to halt WFNF until all of the above considerations are investigated. Or at the least to fund such investigations, with independent third party scientists and engineers involved for peer review. Not like [in 2024](#):


Decision-makers from the Partnership used a series of facilitated workshops to discuss the technical outcomes at each step of the process (**Table 2.1**). Through progressive, data-driven screening, workshop dialogue, and consideration of both individual and collective value of alternatives, the Partnership was able to move from over 800 initial alternatives to the four alternatives identified for additional study.

Table 2.1 Workshops with Sponsor Organizations

Workshop	Date	Theme
1	Jan 2024	Intro and Development of Scorecard Criteria
2	Mar 2024	Sample of Initial Project Concepts
3	Apr 2024	Tier 1 Screening: Fatal Flaws and Clear Low Value
4	Jun 2024	Tier 2 Methods: Conceptual Costs and Benefits
5	Jul 2024	Tier 2 Results – High Performing Projects
6	Sep 2024	Scorecard Evaluation: Recommended Projects for Feasibility Assessment

This time with public notices and public hearings.

Thanks for your consideration.



John S. Quarterman, Suwannee Riverkeeper and Executive Director