



Save the Manatee® Club

The Voice for Manatees Since 1981

St. Johns River Water Management District
Palatka, Florida

Suwannee River Water Management District
Live Oak, Florida

Submitted via electronic mail to nfrwsp-comments@sjrwmd.com

December 5, 2016

Re: North Florida Regional Water Supply Plan (2010-2035 Planning Horizon)

Save the Manatee Club (SMC) appreciates the opportunity to review and comment on the North Florida Regional Water Supply Plan (NFRWSP). Save the Manatee Club is an award-winning national 501(c)(3) nonprofit, established in 1981 by singer and activist Jimmy Buffett and former US Senator Bob Graham. The organization represents 11,000 members and supporters throughout Florida and an additional 33,000 nationwide in efforts to protect endangered manatees and their aquatic habitat from threats posed by human activity, including habitat destruction and water quality degradation. As a member of the Florida Springs Council (FSC), SMC supports and incorporates herein the comments offered on behalf of the Council, and submits the following additional comments for consideration. All comments refer to the October 4, 2016 Draft NFRWSP.

As a preliminary matter, the Water Management Districts should begin with a firm acknowledgement that Florida is running out of water. Even water-rich North Florida lacks sufficient groundwater to supply projected demand over the next twenty years without causing unacceptable impacts to water resources (thus triggering the NFRWSP process). And yet, this concerning fact is obfuscated by the Districts' assertion in its frequently asked questions portion of the public website by the conclusion that the Districts have identified 200 million gallons per day (mgd) of additional water supplies to meet the growing 117 mgd in demand, albeit using alternative supplies which include a range from sensible and cost-effective solutions, such as reclaimed water, to the costly and environmentally damaging, such as desalination. The finding that there are insufficient regional water supplies to cover a 20-year planning horizon should be the subject of intense public discussion and urgent policymaking, but is instead glossed over in a planning document whose projects and recommendations are nonbinding on water users and permitting agencies.

The minimum flows and levels rulemaking process for the lower Santa Fe and Ichetucknee Rivers and associated springs found that these water bodies are already experiencing consumptive use beyond that which they can sustain without incurring significant harm. As such, recovery efforts must be fully accounted for in the NFRWSP. Although prevention and recovery strategies are mentioned for these water bodies and the total estimated recovery needed to achieve the MFL under anticipated 2035 conditions are given, the Draft RWSP does not clearly discuss the alternative water sources or conservation measures anticipated or available to make up that difference with a specific regional focus on alleviating impacts to those waterways.

Similarly, the Draft plan notes that four priority springs will show reductions greater than ten percent under 2035 conditions, and that the remaining four priority springs and both priority rivers also show flow reductions, though less than ten percent. The draft RWSP should therefore anticipate that the MFL process may require prevention and recovery strategies (or at least impose certain water withdrawal limits so as not to exceed significant harm), and should identify alternative water sources or conservation reuse opportunities within those watersheds as well.

SMC recognizes the need to identify additional and alternative sources of water as well as to identify opportunities for water conservation. However, the use of alternative water supplies (AWS) as a general term in regional water supply planning is misleading, and specific types of AWS should be discussed with a view toward determining what types of projects might be appropriate to offset use of groundwater in a particular area. The use of alternative water supplies generically is further complicated because of the interconnected nature of surface water, groundwater, recharge, and brackish groundwater. Despite the fact that AWS are statutorily authorized sources for the Districts' consideration in water supply planning, some assessment and modeling of the relationship among these sources should be accounted for in water supply planning efforts that rely on use of AWS to supplement traditional groundwater. The incorporation of MFLs touches on this but does not explicitly or fully address the issues involved because the water budget inappropriately distinguishes between groundwater and surface water in recovering systems. For the NFRWSP to be an effective tool for both local government and state permitting agencies, these reductions and offsets should be analyzed regionally with appropriate conservation and AWS projects outlined and clear funding opportunities identified.

The uncertainties and complications associated with climate change are discussed late in the document, but should be addressed earlier in its sections discussing demand calculations, drought, and saltwater intrusion. The Draft NFRWSP includes in its demand calculations a 1-in-10 year drought water demand figure to represent an event that would increase water demand that has a ten percent probability of occurring in any given year. In the final draft, SMC asks the Districts to clarify how they determined the likelihood of drought occurrence, and how modeling accounts for the potential impacts of climate change. Already areas of North Florida are experiencing rising temperatures and altered rainfall patterns. The Draft should also take into account seasonal changes in rainfall fluctuations as a result of changing climate and weather patterns. If, as stated in the Draft plan, a single one-in-ten year drought event can increase demand an additional 6%, it seems that demand estimates may be too low given the potential for previously rare drought events to occur with increasing frequency and intensity as the climate changes. Moreover, the impacts of drought should also be discussed in the plan's section on saline water intrusion. A small drop in aquifer levels can result in substantial saltwater intrusion; thus groundwater pumping combined with drought could have a serious deleterious impact on fresh groundwater availability, and that possibility and calculations should be incorporated into the RWSP assessment.

Given the above considerations as well as additional details provided in the Draft plan, SMC supports the designation of the entire NFRWSP as a Water Resource Caution Area (WRCA).

Lastly, SMC believes that even greater emphasis should be placed on the use of reclaimed water, both for non-potable and potable reuse. The Water Management Districts should strongly incentivize implementation of potable reuse projects within their jurisdictions. Conversely, substantially less investment should be encouraged for water supply development projects that tap "new" sources of water; use of brackish groundwater and Lower Floridan Aquifer withdrawals are detrimental to the long-term sustainability of North Florida's water supply and should be discouraged. SMC appreciates the emphasis on water conservation and demand reduction projects. In particular, SMC supports the Districts' support of tiered public supply billing rates, landscape and irrigation restrictions and design codes, meter reading technology (including for agricultural water use, which is not discussed), agricultural efficiency, and more effective outreach and education.

Thank you for the opportunity to comment on the Draft NFRWSP. Please do not hesitate to contact me with any questions regarding this letter.

Regards,

Anne Harvey Holbrook
Staff Attorney
Save the Manatee Club