



Alachua County Board of County Commissioners

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County Manager

January 29, 2013

Linda Ann Clemens, P.G.
Florida Department of Environmental Protection
Office of Water Policy
3900 Commonwealth Boulevard
Tallahassee, FL 32399

RE: Florida Administrative Code, Chapter 62-42 Lower Santa Fe River
Ichetucknee River and Priority Springs - Minimum Flows and Levels and Recovery Plan

Dear Ms. Clemens:

Alachua County is pleased to have the opportunity to provide comments on the proposed Lower Santa Fe River, Ichetucknee River and Priority Springs Minimum Flows and Levels and Recovery Plan dated January 17, 2014 (see attached comments). We urge the Department to incorporate these comments into the adopted Rule.

Alachua County shares the sense of urgency indicated by the Department and the Water Management Districts regarding the need for Rule adoption as soon as possible. Without Rule adoption, the long awaited Recovery Strategy cannot begin. We remain hopeful that the Rule adoption process can be completed in time for the 2014 Legislative Session.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lee Pinkoson", is written over the word "Sincerely,".

Lee Pinkoson, Chair
Alachua County Commission
chr14.043

LP/CB/go

Enclosures

cc: Board of County Commissioners
Betty Baker, County Manager
David Wagner, County Attorney
Chris Bird, Alachua County Environmental Protection Director
Ann Shortelle, SRWMD Executive Director
Hans Tanzler, SJRWMD Executive Director
Janet Llewellyn, FDEP Water Policy Administrator

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ATTACHMENT

Alachua County General Comments on Draft MFLs and Recovery Strategy: Lower Santa Fe River Basin

1. Alachua County recognizes the sense of urgency and importance of adopting the Lower Santa Fe River Basin MFLs and Recovery Strategy as soon as possible.
2. Alachua County urges the District to implement the rule within an adaptive management framework that encourages continuous improvement, including but not limited to future amendments to the MFLs and Recovery Strategy based upon best available data and analyses.
3. The County remains concerned that the proposed MFLs and Recovery Strategy for the Lower Santa Fe River Basin may underestimate the contribution of groundwater pumping on aquifer levels and river and springs flow rates.
4. The County remains concerned that the proposed MFLs and Recovery Strategy for the Lower Santa Fe River Basin may over estimate the contribution of rainfall in recharging aquifers.
5. Alachua County supports the issuance of water use permits with a five-year maximum duration as part of implementation of the Recovery Strategy.
6. The District's water conservation program should be expanded to include cost share funding for local governments and others to develop and implement water conservation outreach programs.
7. To reduce losses to evaporation, irrigation restrictions should be extended to prohibit irrigation from 10 am to 6 pm and should be limited to once a week year round within the North Florida Regional Water Supply Planning Area.
8. The District should require all agricultural CUP permit holders to implement the current water conservation BMPs and to monitor and report water use by 2020.
9. The District should create a comprehensive water conservation educational program. Water conservation notices should be sent regardless of drought conditions. Connecting conservation measures to droughts does not reinforce the idea that we need to conserve year round regardless of climate.
10. Include language that requires all feasible conservation efforts prior to developing and implementing alternative water supplies.
11. Include language throughout the document acknowledging that agricultural water use amounts are estimated values, as many agricultural uses are not currently metered.
12. Recent changes in agricultural land uses (e.g. row crops) should be considered. Florida Fish and Wildlife Conservation Commission staff has indicated that there are recent considerable changes from silviculture to more intensive agriculture in the region, primarily in Gilchrist County and Suwannee County.

Alachua County Specific Comments on Draft Recovery Strategy Document (January 17, 2014 version)

Page 4- Paragraph 4- Hornsby Springs should be included.

Page 23- Paragraph 2- Utilize cost share funding to encourage producers to switch to less water intensive crops.

Page 23- Paragraph 3- The document states that the first 4 phases of the October 2012 cost share program is projected to save 5.2 MGD in agricultural water use. This value seems inflated, as the calculated conservation potential for Alachua, Bradford, Columbia, Gilchrist, and Union is 5.5 MGD.

23 Paragraph 4- Some cost share funding may result in net increase in water use if producers take advantage of the funds to switch from low water use crops to high water use crops. Water use monitoring, reporting, and a demonstration of a net reduction in water use should be required of all cost share projects.

Page 25- Paragraph 5- The report reads that the District "may" partner with IFAS and other agencies to ensure that new and innovative water conservation practices are implemented as developed. Helping to develop new technologies and ensuring implementation is going to be key to realizing water conservation goals in agricultural.

Page 27-Paragraph 2 – Evaluation methods should be included in public awareness programs to evaluate the effectiveness of efforts.

Page 28-Paragraph 2 and 3- The District should provide incentives for new residential, commercial, and institutional construction meeting Florida Water Star Standards

Page 29-Paragraph 5- The District should prohibit the installation of new domestic self supply and irrigation wells on parcels that are serviced by public supply sources.

Page 28-Paragraph 2- Archer, Newberry, Alachua, and High Springs also have conservation rate structures.

Page 29-Paragraph 3- Water Conservation Plans for CII CUPs should require monitoring, reporting, and demonstration of water use reductions (or at a minimum that elements of the plan have been implemented).

Page 30-Paragraph 3 - Use of the intermediate and surficial aquifers may not have a significant impact on the Lower SFR directly; however, it has the potential to result in lower surficial and intermediate aquifer water levels. On a large scale this can potentially negatively impact wetlands and water available for stream base flow, particularly in the Upper SFR.

Page 30-Paragraph 5 - Large scale diversion, storage, and use of "excess surface water during moderate to high flow periods" may have detrimental impacts to the downstream river(s) and estuary.

Page 37 Section 6 b) - All agricultural operations within the North Florida Regional Water Supply Planning Area (rather than just the SRWMD portion) should be required to participate in the MIL program.