

Ichetucknee Alliance, Inc.

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Hank Vinson, Staff Director
Division of State Lands
Office of Environmental Services
Florida Department of Environmental Protection
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Comments on the Unit Management Plan for Ichetucknee Springs State Park For Transmittal to Members of the Acquisition and Restoration Council

Dear Mr. Vinson and Members of the Council:

The Ichetucknee Alliance, Inc., is a federally recognized 501(c)(3) educational nonprofit organization. Our mission is to restore, protect and preserve the Ichetucknee River and its associated springs and ecosystems as well as the Floridan aquifer that feeds the river and springs.

The Alliance is strongly in favor of having the following two points added to the new Unit Management Plan for Ichetucknee Springs State Park.

1. Tubing should be prohibited on the upper portion of the Ichetucknee River.

Thirty years of river transect studies have demonstrated serious long-term damage that swimmers and tubers have caused to the rivers and spring runs, as described in this quote from the current plan:

There is ample evidence, however, that swimming and tubing activities continue to cause some negative impacts to the springs and spring runs, particularly in the upper reaches of the river. Although much of the submerged aquatic vegetation that is trampled or uprooted during the summer months seems to regenerate reasonably well during the offseason, aquatic plant beds located in shallow water areas do not fare as well. *Their lack of complete recovery during the periods of little or no tubing may lead to a long-term decline in ecosystem health.* One result may be a decrease in macrophyte species diversity in portions of the river, with some species disappearing completely. *In fact, river monitoring has provided evidence that this has already occurred along the upper Ichetucknee.* Another result of intense tubing

activity in shallower parts of the river is that *water clarity downstream becomes noticeably impaired*. (pp. 88-89, emphases ours)

Eliminating tubing in the upper portion of the Ichetucknee would not affect the numbers of people who are able to tube the river. Visitors would still be able to tube from the Midpoint and from Dampier's Landing. Eliminating tubing in the upper river would also create a better experience for and increase the numbers of people in canoes and kayaks and on stand-up paddleboards, since many people who prefer these forms of recreation now avoid the Ichetucknee during the summer tubing season.

Eliminating tubing in the upper portion of the river would have the added benefit of making the headspring area more attractive to local residents for swimming, picnicking, family reunions, church socials and baptisms. The headspring was a traditional site of such functions for Columbia County residents before tubing became popular. One survey has shown that most of the people who now tube the Ichetucknee come from outside Columbia County.

In summary, eliminating tubing from the upper portion of the river would:

- Encourage the restoration, preservation and protection of underwater ecosystems in the river and spring runs.
- Improve water clarity for the benefit of visitors as well as underwater biota.
- Have no effect on the numbers of people who could tube the Ichetucknee, since tubing would still be permitted on the lower portion of the river.
- Create a better year-round experience for canoers, kayakers and stand-up paddle boarders. Effects of paddle boarders on underwater vegetation would need to be monitored.
- Encourage restoration of the historically popular uses of the headspring area for social and cultural activities.
- Have no effect on swimming at the headspring, since that would still be permitted.

2. The unit management plan should stress the importance of the Suwannee River Water Management District's management of river flows for the benefit of manatees.

Manatees have been using the Ichetucknee as a warm water refuge in winter since about 2002; however, their ability to enter the Ichetucknee and swim upriver can be limited by the Ichetucknee's low flows over limerock shoals at the confluence of the Ichetucknee and Santa Fe rivers. If the water level is not high enough, manatees cannot swim over the shoals.

The Ichetucknee has lost approximately 1/4 of its historical average flow and has been designated as being "in recovery" by the Florida Department of Environmental Protection.

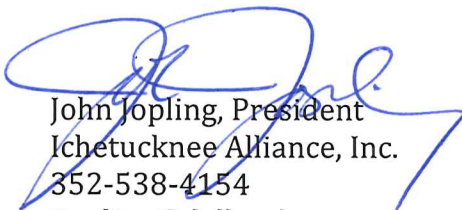
In summary:

- The inability of manatees to enter the Ichetucknee River because of low flows/low water levels should be clearly identified as a problem in the unit management plan.
- The plan should stress that it is the Suwannee River Water Management District's responsibility to ensure that water levels are high enough to enable manatees to enter the Ichetucknee.

It is my understanding that Jim Stevenson of the Alliance's Advisory Board has shared similar information with you. If I may provide additional information, please let me know.

Please ensure that members of the Acquisition and Restoration Council receive this communication. Thank you for your help and consideration.

Sincerely yours,



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