



City of Gainesville

Lauren Poe, Mayor



April 8, 2021

VIA EMAIL

St. Johns River Water Management District Governing Board
4049 Reid St.
Palatka, FL 32177

Re: Request for St. Johns River Water Management District Governing Board to Delay Approval of the Recovery Strategy for Lake Brooklyn and Lake Geneva Minimum Flows and Levels (MFLs)

Mr. Chair and Governing Board Members:

I am writing this letter on behalf of the Gainesville City Commission to request that the St. Johns River Water Management District (District) Governing Board delay approval of the proposed minimum flows and levels (MFLs) and related recovery strategy for Lakes Brooklyn and Geneva. It is our understanding that the proposed recovery strategy will be presented to the District Governing Board for approval at the April 13, 2021 board meeting. The recovery strategy and cost recovery plan are being developed very quickly, and we need time to provide stakeholder input and vetting of these important documents. We request that approval of both the recovery strategy and the MFL be delayed for a minimum of 120 days.

The Gainesville City Commission governs Gainesville Regional Utilities (GRU), which is owned and operated by the City of Gainesville. GRU provides potable water supply to over 200,000 residents as well as numerous businesses and institutions in the Gainesville area. The City of Gainesville and GRU are committed to providing clean, safe, affordable drinking water to our community while protecting our precious natural resources.

Our community's commitment to environmental stewardship and protection of water resources is reflected in our residential per capita water demand of 61 gallons per day per capita which is well below district average of 91 gallons per day per capita. Additionally, over 70 percent of the water GRU withdraws from the aquifer is returned to the aquifer in large part due to the aquifer recharge and environmental restoration projects GRU has engaged in such as the Sweetwater Wetlands/Paynes Prairie Sheetflow Restoration Project. GRU participated extensively in the development of the North Florida Regional Water Supply Plan and is implementing several important projects contained in the plan.

The City of Gainesville/GRU is committed to solutions which are based on sound science and are equitable. Our staff have been engaged as stakeholders in the Lake Brooklyn and Geneva MFL development process for several years. Based on the MFL being proposed, the only viable option for meeting the MFL for our region is the Black Creek Water Resource Development (WRD) Project. In order to offset the proportional impacts of water demands from our community and to meet GRU's regulatory obligation to comply with the MFL, the Gainesville City Commission is willing to consider participation in funding of the Black Creek project. However, it is crucial for us to understand the financial obligation involved and the risks and assurances to our community and our water supply.

From the recovery strategy being presented for District Governing Board approval on April 13, it is unclear what our community's financial obligations would be, and it appears that our water supply allocation may be at risk. Furthermore, the recovery strategy published on April 5, 2021 for consideration by the Governing Board is significantly different from the previous draft that was provided on March 30, 2021, which was significantly different from the previous draft of December 3, 2020.

In conjunction with the recovery strategy, District staff recently presented a proposed cost share agreement to GRU staff that would require GRU to contribute approximately \$5 million to the project, which is a substantial sum of money to our community. Additionally, GRU's consumptive use permit allocation would potentially be reduced by 10 percent. Other terms and conditions of the proposed agreement are unclear. Furthermore, it appears that GRU and a few other communities may be being singled out for cost recovery, and the basis of the proposed cost share calculation is unclear.

The City Commission and GRU have an obligation to our ratepayers and community to ensure that significant financial commitments such as this be fully transparent and equitable, and must be approved by the City Commission in a public hearing. We would like to continue to work with the District to further develop the recovery strategy and cost participation plan in order to help make the Black Creek WRD project a success. However, District Governing Board approval of the recovery plan on April 13 prevents us from working through these issues with the District and commits us to unknown financial obligations and risks. Therefore, the Gainesville City Commission requests that the District Governing Board delay adoption of both the recovery plan and the MFL for Lakes Brooklyn and Geneva for a minimum of 90 days.

Thank you very much for your consideration. Should you have any questions about this letter or desire a meeting to discuss these concerns, please do not hesitate to contact me.

Sincerely,
Lauren Poe, Mayor City of Gainesville

cc: Ann Shortelle, Ph.D., Executive Director (via email)
Adam Blalock, Esq., FDEP (via email)