

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.**

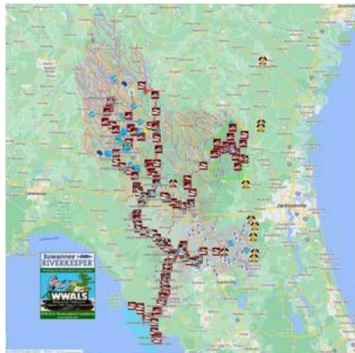
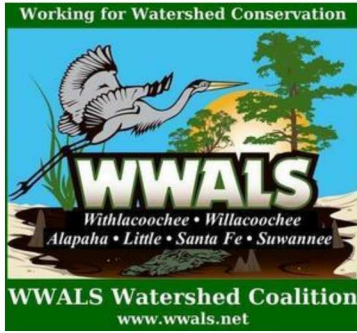
Many elected officials representing people of the Suwannee River Basin oppose WFNF, as no doubt you are aware. Five county commissions and the town council of Branford thus far have passed letters or resolutions in opposition. The twelve-county River Task Force has also passed such a resolution, as has 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.

