

June 20, 2025

Petitioner

TREPO

Three Rivers Estates Property Owners Association

PO Box 148, Fort White, FL 32038

Co-Petitioner

Ichetucknee Alliance, Inc.

5323 NW 92 Way Gainesville, FL 32653

Re: Application Renewal for Springs Protection Zone

Dear Commission,

On behalf of Three Rivers Estates Property Owners' Association (TREPO) and Ichetucknee Alliance, Inc., we wish to renew the request for a Springs Protection Zone on the Lower Ichetucknee River located between Ichetucknee Springs State Park and the Santa Fe River, south of the Highway 27 bridge.

**Specifically, we seek an SPZ for the Lower Ichetucknee which prohibits anchoring, mooring, beaching and grounding along with a more heavily enforced NO WAKE zone, as authorized by section 327.45(2) Florida Statutes.**

### **TREPO**

The Three Rivers Estates Property Owners' Association Inc. was established 40+ years ago for the purpose of managing 3500 parcels in Suwannee and Columbia Counties adjacent to the Ichetucknee River. The association controls 11 parcels located on the Ichetucknee and Santa Fe Rivers used for member-based recreational access. In 2024, TREPO had 981 members. We anticipate over 1,000 members in 2025. All of our members have a direct economic interest in the river's ecological health, as it immediately affects their property values. Above and beyond their economic stake in the river's health, our members treasure the Lower Ichetucknee's beauty and recreational opportunities.

### **Ichetucknee Alliance**

Ichetucknee Alliance is a 501c3 non-profit organization working to restore and protect the Ichetucknee River and its many springs. Founded in 2013, our organization has led numerous successful campaigns that have produced real change. Through community outreach, we educate residents and local leaders about the many factors affecting the health of the Ichetucknee River system. Over the years, our membership has grown steadily—and continues to grow every day. We

currently have approximately 500 members who receive our newsletters and 2000 followers on social media.

## **Current Harm**

The steady decline in the health and quality of Florida's many springs, including the Ichetucknee, has been well-documented and visually apparent for many years. The causes of degradation are multifaceted and challenging to create fast solutions for under current law. **On the Lower Ichetucknee, however, for which this SPZ is sought, the predominant and direct cause of ecological damage is heavy motorized boat traffic, over which the FWC has complete authority under the provisions of section 327.45, Florida Statutes.**

It is easily observable that the increase in boat traffic on the Lower Ichetucknee is causing harm to the fragile aquatic ecosystem. Propeller strikes, anchoring, mooring, beaching, and grounding erode the shoreline, uproot submerged aquatic vegetation, and stir up sediment, reducing light needed for aquatic plant growth.

The obvious harm and destruction of critical aquatic plants in the Lower Ichetucknee caused by boating-related activities is abundantly apparent from photographic and video evidence, a small sample of which we have attached in the form of graphics and an accompanying video tour. Perhaps even more compelling is the obvious difference in the health of SAV above the highway 27 bridge where the state has enforced a complete ban on boating for the past 30 years as compared to the widespread obliteration of SAV downstream where heavy boat traffic exists.

## **Preventing Ecosystem Collapse**

Submerged aquatic vegetation, also known as SAV, is the primary producer of a thriving aquatic ecosystem. Declining SAV in the Lower Ichetucknee negatively impacts the function of this sensitive habitat in the following ways...

### **1. Loss of Habitat and Biodiversity**

- Submerged aquatic vegetation (SAV) provides essential **habitat and shelter** for a variety of aquatic organisms—**fishes, invertebrates, amphibians**, and even some birds.
  - It serves as a **nursery ground** for young fish and other small aquatic species, helping to sustain the rich biodiversity of spring ecosystems.
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## 2. Diminished Water Quality Improvement

- SAV acts as a **natural filter**, **trapping sediments**, and **absorbing excess nutrients** like nitrogen and phosphorus from the water column.
  - Through **photosynthesis**, SAV produces oxygen, **increasing dissolved oxygen levels** vital for aquatic life.
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## 3. Destabilization of Sediments

- The root systems of SAV anchor into the spring bed, **preventing erosion** and reducing the resuspension of sediments.
  - This helps maintain the springs' **clarity** and prevents the **murkiness** that can result from algae-dominated systems.
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## 4. Less Regulation of Algae

- By **competing with algae for nutrients and light**, SAV helps **suppress algal blooms**, which have become a growing threat in Florida Springs due to nutrient pollution.
  - Healthy SAV meadows are an indicator of a **balanced ecosystem**, while their decline often signals **eutrophication** or excess turbidity due to motor boat turbulence.
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## 5. Decreased Carbon Sequestration and Climate Buffering

- SAV contributes to **carbon storage** by absorbing CO<sub>2</sub> during photosynthesis and trapping organic material in the sediments.
  - This makes SAV a part of the larger conversation on **climate change resilience** and **carbon cycling** in freshwater systems.
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## Threats and Vulnerability

- While submerged aquatic vegetation is under pressure along the entirety of the Ichetucknee from nutrient pollution and groundwater withdrawal, the direct and devastating impact to SAV from boating activity is clearly evident by comparison of SAV above versus below the highway 27 bridge.
- Loss of SAV can lead to **ecosystem collapse**, marked by decreased biodiversity, increased algae, and reduced water quality.

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In short, SAV is a **keystone component** of all spring runs, safeguarding both the **ecological integrity** and **aesthetic beauty** of these unique freshwater systems. Its preservation is essential for maintaining the springs as vibrant, life-supporting ecosystems.

## **Economic Value of a Thriving Lower Ichetucknee**

### *Lower Ichetucknee Baseline Assessment*

“Springs represent an important part of the local economy, especially in rural communities. An economic analysis was performed at four springs in Florida State Parks - Ichetucknee, Wakulla, Homosassa and Volusia Blue - to quantify their economic impact on the surrounding communities and the characteristics of visitor usage. Total estimated spending by visitors at Ichetucknee Springs State Park was approximately \$23 million per year (\$34/ visitor) and 90% of the visitors to the park were from locations outside of Columbia and Suwannee counties. Of the four springs-based state parks studied, visitors at Ichetucknee Springs State Park contributed the most money to the local economy. High visitation at Ichetucknee Springs State Park translated into higher cumulative wages and salaries for park staff, concession vendors, tube rentals, stores, campgrounds and other visitor-related businesses at \$5.1 million per year. This study also concluded that increasing environmental problems (such as increased algae, low flows and turbid water) translates into fewer visitors and lower activity for the local economy.”

- *Florida Springs Institute, 2016*

## EVIDENCE OF HARM on Lower Ichetucknee

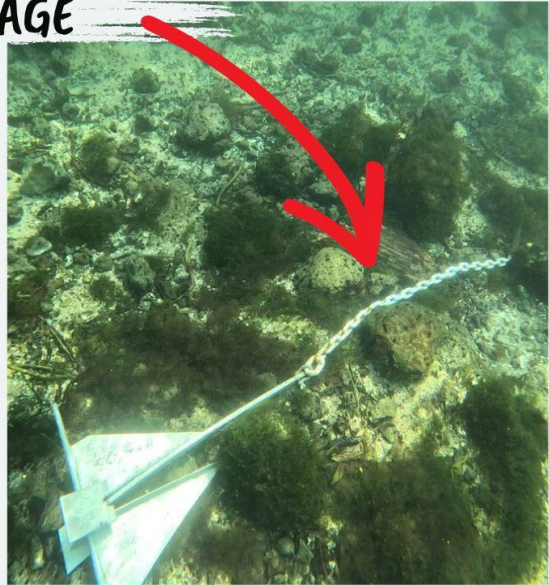
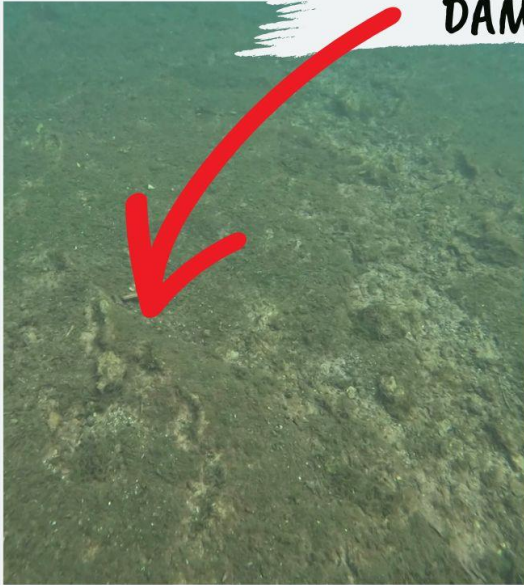


**Propeller  
STRIKES**





**Anchor  
DAMAGE**



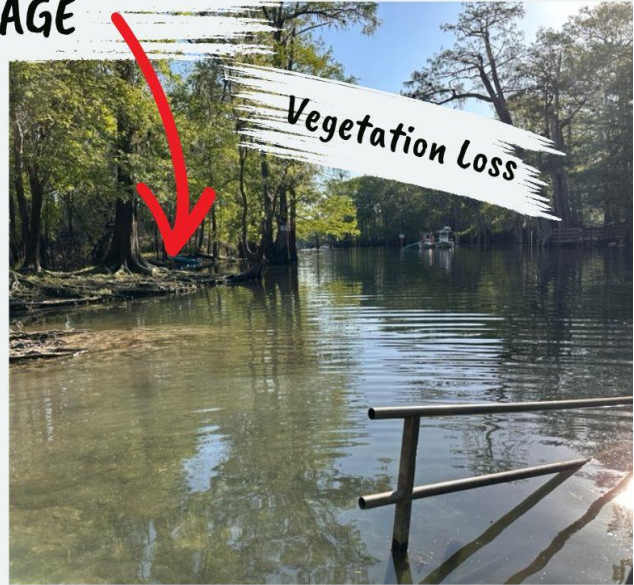


**Turbidity**  
caused by motorized boats





**Beaching & Grounding  
DAMAGE**





**Jet ski hang out  
absent SAV caused by mooring**



**barren river bed**



**Regrowth post-Helene  
since jet skis had no access**

# North of Hwy 27 Bridge in State Park



**Healthy & abundant SAV  
NO motorized boat traffic**



## Just South of Hwy 27 Bridge



**Intact, low-lying SAV**  
**LOW boat traffic**



# Lower 1/3 of Ichetucknee



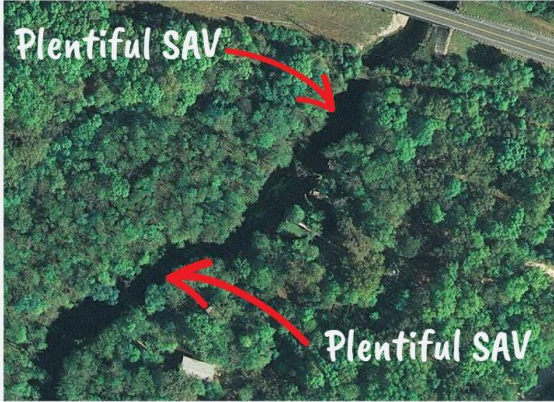
**SAV is absent**  
**HEAVY boat traffic**



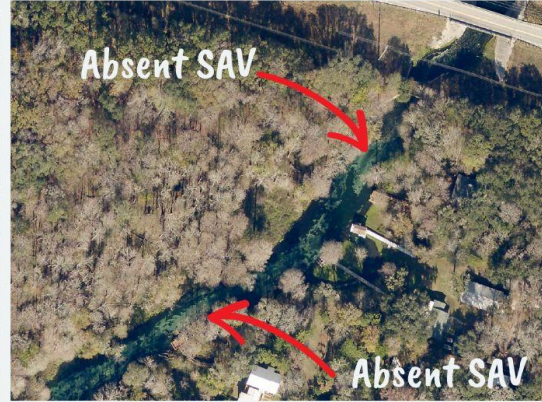
# Increased Absence of SAV - barren riverbed visible

## 2007

## 2023



Just south of Hwy 27 bridge



Just south of Hwy 27 bridge



Midway down lower section



Midway down lower section



Near Sante Fe confluence

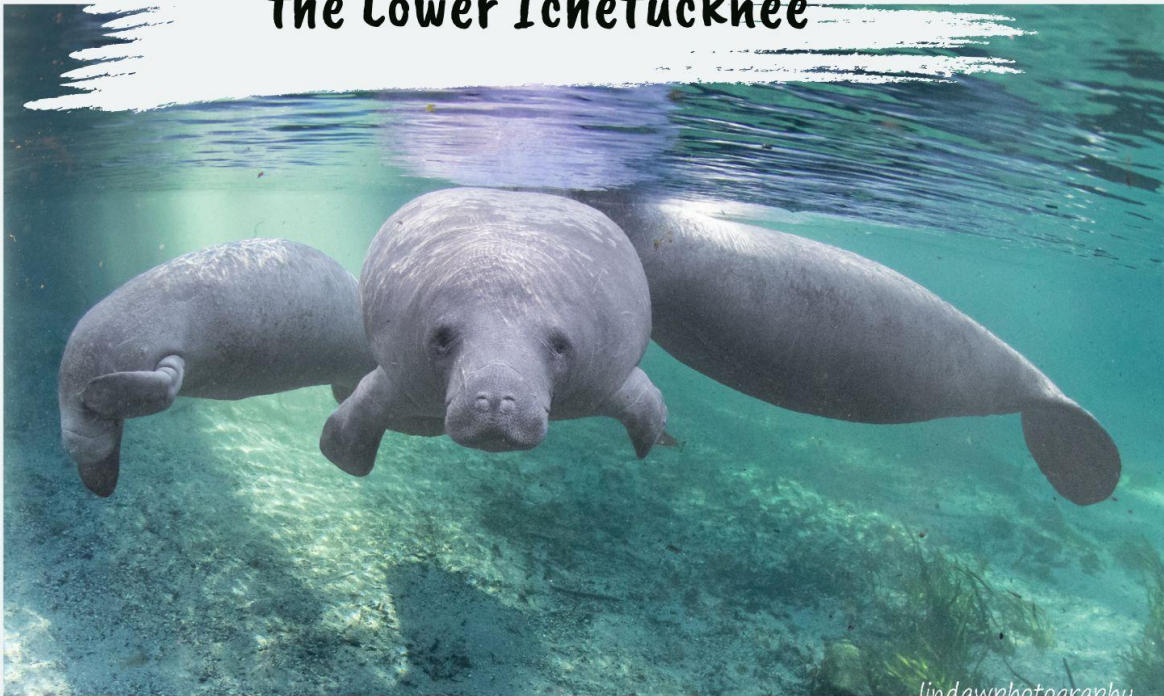


Near Sante Fe confluence

# Endangered Species Refuge



**SAV Restoration needed for  
the Lower Ichetucknee**

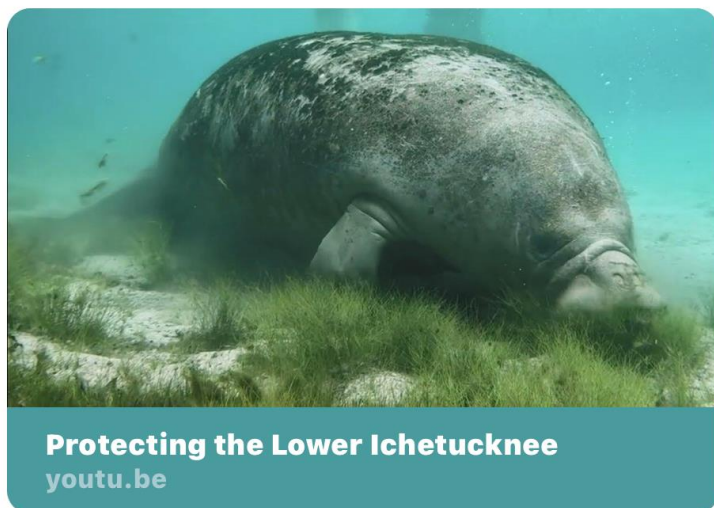


*lindawhitephotography*

## VIDEO FOOTAGE



## Video link





CLICK HERE to view current conditions of the Lower Ichetucknee:

<https://youtu.be/SUUIq96ixkY> - copy / paste in browser if needed

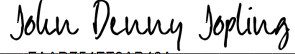
PETITIONERS

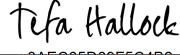
**Three Rivers Estates Property Owners, Inc. (TREPO)**

Signed by:  
  
7E303219795A471... Date 6/22/2025  
Terri Hester  
*President*

DocuSigned by:  
  
E7F8598E3F264B9... Date 6/21/2025  
Glenn Hunter  
*Board Chairman*

**Ichetucknee Alliance, Inc.**

Signed by:  
  
FAAD754FF9AB46A... Date 6/21/2025  
John D. Jopling  
*President*

DocuSigned by:  
  
3AEC65D09F5C4B2... Date 6/21/2025  
Tefa Hallock  
*Vice President*