Audubon Florida - Comments on the draft MOU dated September 15, 2015

#### Whereas clauses

There should be a "whereas" clause near the beginning that emphasizes the need to reduce our demand for water through cultural and technological changes as the preferred method for meeting the needs of water users since this avoids environmental harm and moves us toward more sustainable communities.

Add a "whereas" clause stating that several water bodies are not currently meeting their established MFLs and impacts have been identified in non-MFL wetlands.

### Section III. Water Supply Planning, subsection B.1.c) (page 6):

Change text to "... investigations of **demand management**, traditional, and alternative water supply options."

## Section III. Water Supply Planning, subsection C.1 (page 8):

Change text to "Completing these strategies will help prioritize the **demand management**, water resource development, and water supply projects..."

## Section III. Water Supply Planning, subsection C.2 (page 8):

Change text to "... the Districts will consider the recommendations for the **demand management** and water supply project options..."

## Section III. Water Supply Planning, subsection E. Technical Assistance to Local Governments (page 10)

Change text to "In order to achieve consistency in **demand management** and water supply planning-related ..."

# Section IV. Water Use Regulation, subsection B. Coordination Team (page 10)

Change "the team shall meet at least twice per year" to "the team shall meet at least quarterly."

## Section IV. Water Use Regulation, subsection E. Consistent Rules for Application... (page 11)

The December 31, 2016 deadline for governing board authorization for the initiation of rulemaking means the process of rulemaking may not begin until 2017. It is not clear why such a delay is required, especially given the importance of the rules in question. This date should be moved forward and text should be added explaining that any preliminary work necessary for rulemaking will commence before this date.

#### Section V. Water Conservation, subsection A. (page 12)

Change text to "... voluntary, regulatory, and incentive-based initiatives..."

Later, change text to "... to exceed savings identified in the Solutions Plan (or any updates to expected savings based on improved information)..."

At the end of the paragraph change text to "... water use standards for new construction and retrofit of existing buildings over a 20 year period. The Districts agree to recommend standards for local government programs to assist homeowners, rental-property owners, and businesses with water conservation and efficient uses."

### Section VII. General Provisions (page 14)

Add statement that a non-consumptive use stakeholder will be added to the Steering Committee.