

August 17, 2015

South Florida Water Management District
CFWI Comments
ATTN: Dean Powell
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406

Re: Expansion of Purposes of Taylor Creek Reservoir in Central Florida Water Initiative
Regional Water Supply Plan and 2035 Water Resources Protection and Water Supply
Strategies Plan to Include Agricultural Use

Dear Mr. Powell,

The Central Florida Water Initiative (CFWI) Regional Water Supply Plan Draft – May 2015 (CFWI RWSP) and the CFWI 2035 Water Resources Protection and Water Supply Strategies Plan Draft – May 2015 (“Solutions Plan”) identify the St. Johns River/Taylor Creek Reservoir – SW1 as a regional alternative water supply (AWS) project that will develop a fresh water source and supply water from a nontraditional source to meet 2035 future public water supply demands. (See RWSP p. 146; RWSP Table F-1 item 126; Solutions Plan page 63; Solutions Plan Appendix C page C-56.)

The Solutions Plan identifies the City of Cocoa, East Central Florida Services, Orange County, Orlando Utilities Commission, and the Toho Water Authority as project partners for this St. Johns River/Taylor Creek Reservoir AWS project. (Solutions Plan page 64.) This letter is intended to be the joint comment of these project partners.

The identified project partners are currently engaged in mediation to work out the terms for developing this St. Johns River/Taylor Creek Reservoir AWS project. In the course of this mediation, the project partners have agreed that the purpose of the St. Johns River/Taylor Creek Reservoir AWS project set forth in the draft CFWI RWSP and Solutions Plan may be expanded to include agricultural use in addition to public supply. One of the project partners, East Central Florida Services, will be the entity using water from the St. Johns River/Taylor Creek Reservoir AWS project for agricultural purposes, in addition to public water supply purposes.

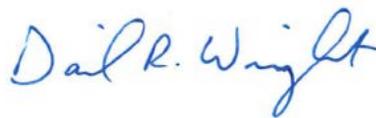
Therefore, the project partners respectfully request that the references to the water supply purposes of the St. Johns River/Taylor Creek Reservoir AWS project contained in the CFWI RWSP and Solutions Plan be modified to indicate that this project will meet 2035 future public water supply or agricultural demands, or both. It should also be noted that implementation of the St. Johns River/Taylor Creek Reservoir AWS project is contingent on execution by the project partners of one or more agreements regarding terms for developing and operating the St. Johns River/Taylor Creek Reservoir project. Consequently, the reference to this project in the Solutions Plan should be revised as indicated by the strike-through and underlined language on Exhibit A to this letter.

The language regarding the St. Johns River/Taylor Creek Reservoir AWS project appearing in Appendix C of the Solutions Plan should be similarly revised.

The addition of agricultural use is not intended to limit in any way, or interfere with, the ability of this project to be a part of meeting 2035 public water supply demands. Similarly, meeting of public supply demands for 2035 through the project is not intended to limit in any way, or interfere with, the project being a part of meeting 2035 agricultural supply demands. The quantities of water from the St. Johns River/Taylor Creek Reservoir AWS project available to public supply and agriculture will be determined by the project partners in the mediation process subject to applicable consumptive use permitting requirements.

Representatives of Orlando Utilities Commission, Toho Water Authority, the City of Cocoa, and Orange County have authorized us to represent their agreement to this request. We thank you for your attention to our request.

Respectfully,



David Wright

For EAST CENTRAL FLORIDA SERVICES

cc: Ann Shortelle
Mike Register
Mary Ellen Winkler

Mediation Participants

EXHIBIT A

The St. Johns River/Taylor Creek Reservoir (SJR/TCR) option is a regional alternative water supply (AWS) project that will develop a fresh surface water source and would supply water from a nontraditional source to meet 2035 future demands. (Note: SJRWMD considers all sources other than fresh groundwater to be nontraditional.) It will also involve the addition of new storage capacity for surface or groundwater and will utilize surface water captured predominately during wet-weather flows. The project would withdraw up to 60 mgd of surface water to yield up to 54 mgd of long-term average finished water from both the Taylor Creek Reservoir and the St. Johns River at State Road (SR) 520.

Contingent upon the project partners executing one or more agreements regarding the terms for developing and operating the project, the St. Johns River/Taylor Creek Reservoir (SJR/TCR) option is a regional alternative water supply (AWS) project that will develop a fresh surface water source and would supply water from a nontraditional source to meet 2035 future public supply, or 2035 future agriculture water supply, or both. This project was and will remain a “regional” project as contemplated by applicable Florida law, irrespective of the addition of an agricultural water supply component to the previous descriptions of this project in prior water supply plans.

A conceptual-level project description was originally developed by SJRWMD in 2005. From 2006 to 2009, water supply entities (City of Cocoa, East Central Florida Services, Orange County, Orlando Utilities Commission, the City of Titusville, and the TWA), the SJRWMD, and the SFWMD funded and developed a preliminary design report (PDR) and environmental information document (PDR/EID) for this project (CH2M/PB Water JV, 2009). Based on the preliminary design, the preferred project configuration yielded 54 mgd AADF of water above the existing permitted allocations (City of Cocoa, 8.83 mgd) from the TCR.

To address concerns with potential environmental effects of withdrawals from the St. Johns River, the District conducted the St. Johns River Water Supply Impact Study (WSIS) (St. Johns River Water Supply Impact Study Technical Publication SJ2012-1) from 2007 to 2012. In the WSIS, the SJRWMD concluded that the St. Johns River could yield 55 mgd, on an average day withdrawal basis, near Lake Poinsett without unacceptable ecologic and hydrologic impacts. Information from the WSIS should be used in formulating project design and operational regimes to avoid any adverse impacts to the river.

The project includes several components, including raw water intakes, raw water transmission mains, potable water treatment plant and storage facilities, potable water transmission mains, and potentially potable water re-treatment by the end users. The addition of new storage capacity for this surface water project also includes reservoir enhancements that are planned to be implemented by the SJRWMD, such as raising and improving the L-73 levee, expanding the S-164 structure, and updating the operation schedule for the reservoir. Planning level capital costs are estimated to be \$637.5 million. It is anticipated that project detailed design and construction can be completed within 10 years.

The current project partners are the City of Cocoa, East Central Florida Services, Orange County, Orlando Utilities Commission, and the TWA. These partners are working on governance and the final project

configuration and implementation details. Since 2009, consumptive use permit applications have been in review by the SJRWMD and are currently pending until the partners finalize the project governance.