

Central Florida Water Initiative



Comments and Responses

for the May 2015

DRAFT REGIONAL WATER SUPPLY PLAN

2015

A comprehensive plan for Orange,
Osceola, Polk, Seminole, and
southern Lake counties

This document is the Comments and Responses Document for the Central Florida Water Initiative (CFWI) May 2015 Draft Regional Water Supply Plan (RWSP). Staff from the South Florida Water Management District (SFWMD), St. Johns River Water Management District (SJRWMD), and Southwest Florida Water Management District (SWFWMD) worked together and in conjunction with members of various CFWI technical teams to generate this document.

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ACRONYMS AND ABBREVIATIONS

AG	agriculture
ASR	aquifer storage and recovery
AWS	alternative water supply
B	billion
BCWMA	Blue Cypress Water Management Area
BEBR	University of Florida's Bureau of Economic and Business Research
BMAP	Basin Management Action Plan
BMP(s)	best management practice(s)
CFWI	Central Florida Water Initiative
CS&F	Central and Southern Florida
CUP	consumptive use permit
DACS	Department of Agriculture and Consumer Services
DEP	Florida Department of Environmental Protection
DFWCD	Delta Farms Water Control District
DMIT	Data, Monitoring, and Investigations Team
DSS	domestic self-supply
DRWSP	draft regional water supply plan?
DWSP	district water supply plan
ECFT	East Central Florida Transient groundwater model
EOP	end of permit
EPA	U.S. Environmental Protection Agency
ERP	environmental resource permit
F.A.C.	Florida Administrative Code
FAS	Floridan Aquifer system
FDACS	Florida Department of Agriculture and Consumer Services?
FDEP	Florida Department of Environmental Protection
FDOT	Florida Department of Transportation
FFL	Florida Friendly Landscaping

FGUA	Florida Governmental Utility Authority
FLWAC	Florida Land and Water Adjudicatory Commission
FNGLA	Florida Nursery, Growers and Landscape Association
F.S.	Florida Statute
FW	freshwater
GIS	geographic information system
GLRSTA	Grove Land Reservoir and Stormwater Treatment Area
gpc	gross per capita
gpcd	gallons per capita per day
GW	groundwater
HAT	Hydrologic Assessment Team
HOA(s)	homeowner association(s)
HSPF	Hydrologic Simulation Program – Fortran
HWU/P	historical water use per person
IAS	intermediate aquifer system
ICW	intracoastal waterway
JAX	Jacksonville
JEA	Jacksonville Electric Authority
JEPB	Jacksonville Environmental Protection Board
KCOL	Kissimmee Chain of Lakes
KRR	Kissimmee River Restoration
KRRP	Kissimmee River Restoration Project
Land/Rec	Landscape and recreation
LEED	Leadership in Energy and Environmental Design
LFA	lower Floridan aquifer
LUSI	Lake Utility Services, Inc.
M	million
MFLs	Minimum Flows and Levels
mgd	million gallons per day
MS4(s)	municipal separate storm sewer system

MSSW	Management and Storage of Surface Water
NASA	National Aeronautics and Space Administration
NE	northeast
NFRWSP	North Florida Regional Water Supply Plan
NRC	National Research Council
O&M	operations and maintenance
OACGA	Orange Avenue Citrus Growers Association
OCU	Orlando Utilities Commission
OSS	other self-supplied
PCEC	Putnam County Environmental Council
PP	Microsoft PowerPoint presentation
PS	public supply
PWS	public water supply
RCID	Reedy Creek Improvement District
RIB(s)	rapid infiltration basin(s)
RWSP(s)	Regional Water Supply Plan(s)
SAS	surficial aquifer system
SC	Steering Committee
SE	southeast
SFWMD	South Florida Water Management District
SJID	St. Johns Improvement District
SJRWMD	St. Johns River Water Management District
SLRWI	South Lake Regional Water Initiative
SPT	Solutions Planning Team
STA	stormwater treatment area
STOPR+2	regional water utility partnership which includes City of St. Cloud, Tohopekaliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission
SWERP	statewide environmental resource permitting
SWFWMD	Southwest Florida Water Management District

SWIMAL	Saltwater Intrusion Minimum Aquifer Level
SWUCA	Southern Water Use Caution Area
TBW	Tampa Bay Water
TDS	total dissolved solids
TMDLs	total maximum daily loads
TWA	Tohopekaliga Water Authority
UCOL	Upper Chain of Lakes
UF IFAS	University of Florida, Institute of Food and Agricultural Services
UFA	Upper Floridan aquifer
US DOI	U.S. Department of the Interior
US EPA	U.S. Environmental Protection Agency
WCCF	Water Cooperative of Central Florida
WMD(s)	Water Management District(s)
WMP	water management plan
WRP	water resource plan
WSIS	water supply impact study
WSP	water supply plan
WSO	water supply option
WSPO	water supply project option
WWT	wastewater treatment
WWTF	wastewater treatment facility

INTRODUCTION

The work of the Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) consists of two volumes. Volume I is the 2015 Regional Water Supply Plan (RWSP) with Appendices (Volume IA). Volume II consists of the RWSP: 2035 Water Resources Protection and Water Supply Strategies Plan (Solutions Strategies) (Volume II) with Appendices (Volume IIA). Each of these documents is available from www.cfwiwater.com.

These CFWI RWSP documents (Volumes I, IA, II, and IIA) were available for public review and comment from May 8 through August 17, 2015. A series of public meetings and workshops were also conducted during this period. The comments submitted by the public and other stakeholders were received through a variety of forums including online through the web portal, by mail, at public meetings and workshops, or via email. These comments (unedited for grammar or spelling) were compiled along with responses into this CFWI RWSP Comments and Responses Document that describe any changes made to the documents.

Note: “The views expressed by individual public commenters on the Central Florida Water Initiative Regional Water Supply Plan (CFWI RWSP: Volumes I, IA, II, and IIA) are their own and do not reflect the views of the South Florida Water Management District (SFWMD), the St. Johns River Water Management District (SJRWMD), or the Southwest Florida Water Management District (SWFWMD).”

COMMENTS AND RESPONSES TO VOLUME I: THE RWSP

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Volume I: Comments to the RWSP with Responses

Table 1. Comments to the RWSP with Responses from the CFWI Team.

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
1	Jean-Luc Giraud, Concerned Citizen	5/21/15 I have a solution to your Algae Bloom problem and want to show the solution to the public with "official tests" so that everybody will know that it works. Please contact me.	Thank you for your comment.
2	Marc Walch, Dewberry	5/26/15 On Page Appendix F-38 of the RWSP Table F-1, The Judge Farm Reservoir and impoundment project shows a capacity of 2.0 MGD and Capital cost of \$16.91 M. Actual costs for this project are mentioned in several other document locations (page 124 of Table 17 of Solution Plan Public Draft) reflecting 5.0 MGD of capacity and an estimated \$28.3 M. Can the Table F-1 be updated or footnoted to reflect the actual project estimates?	Volume II (Solutions Strategies), Table 17 is correct. A clarifying statement has been added to Volume IA (RWSP), Table F-1 which refers readers to Volume IIA (Solutions Strategies), Appendix D, Table D-1 for the most updated WSPO information.
3	Marc Walch, Dewberry	5/27/15 The proper name of the FGUA is miss-defined....see extracted text below. (pg. 279 of 340) The locations where these conditions are observed within the CFWI Planning Area include the City of Winter Springs, City of Cocoa, City of Oviedo, Town of Chuluota operated by Florida Governmental Utility Association, and two facilities operated by the City of Sanford. The FGUA is the Florida Governmental Utility Authority....not Association	Volume I (RWSP) was updated to reflect the change noted.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
4.1	David Gore, Concerned Citizen	6/3/15 The Summary and Chapter 1 states the Floridan aquifer as the primary source of most of our water. This is misleading the general public and elected officials to not know that the source of all water flows, all well or surface withdrawals, spring flow, stream flow and outflows is only by water emptying from space at the water table level. This misleading idea effects the outcome of the way that this plan can address the goals it has and to more effectively identify the causes of the water problems of the area.	As stated in Volume I (RWSP) , the Floridan aquifer is the primary source. As further explained in the CFWI Document Series the relationship of the Floridan aquifer with other water resources in the Planning Area is also included. These relationships were incorporated into the Groundwater Modeling. <i>Please refer to the updated modeling discussion in Volume II (Solutions Strategies), Chapter 4 and Volume IIA, Appendix E.</i>
4.2	David Gore, Concerned Citizen	6/3/15 Chapter 5 limits the idea of water conservation as only in the use of water. The concept of conserving water should include addressing other ways that cause the waste or loss of our freshwater resources. It should be recognized that the reason for any conservation effort is being done to prevent the loss of the elevation of the water table and that any type of action that effects the elevation of the water table to prevent loss to it or to increase this critical factor of our hydrology should be a conservation action. This is an important fact that effects the outcome and ways to meet the goals of the plan.	Water conservation (conservation) includes any activity or action, which reduces the demand for water including those that prevent or reduce wasteful or unnecessary uses and those that improve efficiency of use. The resulting impact of estimated and project water demands, as well as water resource protection is addressed in the groundwater modeling. <i>Please refer to Volume I (RWSP), Chapter 3 and Chapter 4.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
5.1	Sarah Whitaker, SWM GeoSciences (consultant to many Lake County cities)	<p>6/4/15 Link (Comments #5.1 & 5.2)</p> <p>Concerned that the BEBR population numbers used in the CFWI SLRWI area are extremely low and do not account for large planned developments in both Minneola and Groveland. Two new development areas, with over 5,000 homes each, are Groveland's Villa City and in Minneola's Mountain Properties partnership. Development will also be assisted in this area with the opening of the new FDOT Minneola interchange on the Florida Turnpike. Without acknowledging the growth and water demands of the area, proper solutions cannot be developed.</p> <p>Concerned that population projections are too low for Groveland and Minneola - new developments Villa City and Sugarloaf Mountain properties. Lower Floridan Aquifer uncertainties. Need additional recharge in recharge area.</p>	<p>As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Population and Water Demand Subgroup (Demand Subgroup) was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. It should be noted that these projections were made using a snapshot in time and were developed using the best available information at the time developed for the 2035 planning horizon. Water supply plans are updated every five years to capture changing conditions.</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
5.2	Sarah Whitaker, SWM GeoSciences (consultant to many Lake County cities)	6/4/15 Questioned how the CFWI BEBR populations were developed for the SLRWI area. In the District's document (Table A-1), the BEBR population number assigned to the total CFWI Planning Area for Lake County in 2035 is listed as 237,314, while the BEBR population for ALL of Lake County (Bulletin 162) list a population projection of 472,800 - or twice that of the CFWI table. Since the CFWI table already includes the large growth areas of Clermont, LUSI and all of the SLRWI municipalities (plus Leesburg and Mount Dora) where else in the County is this additional growth occurring? It is difficult to know how the SLRWI numbers were assigned when part of the County is outside the CFWI and the CFWI tables do not identify the BEBR population for all of Lake County.	<i>Please refer to Volume I, RWSP Comment #5.1 response.</i> As previously noted, population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. The countywide population projections were spatially distributed, based on the best available data, via a Geographic Information System (GIS) model that projected where in the county growth was likely to occur and applied growth rates similar to historic patterns (controlling overall to county BEBR Medium). Utility service areas were overlaid to determine utility specific projections. During the development and review of population and demand projections, the Population and Water Demand Subgroup (Demand Subgroup) provided projections for all of Lake County to Lake County and their consultants for distribution to all Lake County utilities/municipalities.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
6	David Norvell, Concerned Citizen	6/5/15 The plan places far too little emphases on conservation. Conservation can achieve extremely large reductions in consumption. There should be a combination of new policy and funded incentives to incentivize the conservation activity. A significant portion of the water management existing budgets should be redirected to incentivize conservation activities and increased enforcement.	Significant conservation has occurred within the CFWI Planning Area to date as described in the 'Water Conservation Trends in the CFWI Planning Area' section of Volume I (RWSP), Chapter 2 . CFWI RWSP Volumes I and II both support increased conservation efforts. Please refer to Volume II (Solutions Strategies), Chapter 7 , section 'Implement Water Conservation Programs' and Volume I (RWSP), Chapter 11 , in the 'Water Conservation' section. The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
7	Charles Nichols, Concerned Citizen	<p>6/5/15</p> <p>I believe there is a massive water conservation possibility with the banning of the use of St. Augustine grass in central florida. I believe there could also be a huge reduction in demand by offering an incentive program to replace current St. Augustine lawns with more florida friendly lawn alternatives. This grass is a massive sponge of water, and I know of communities that require all the homeowners in said community to plant and keep these lawns.</p>	<p>The Districts support Florida Friendly Landscaping (FFL) principles and water conservation. However, the Districts do not have any regulatory authority to restrict the type of grass used for landscaping. The CFWI RWSP Volume II (Solutions Strategies) identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc.</p> <p>Section 373.185(3)(b) F.S., quoted below, negates HOA and community regulations that would require landscaping plants that are inappropriate for the natural conditions at the site: "A deed restriction or covenant may not prohibit or be enforced so as to prohibit any property owner from implementing Florida-friendly landscaping on his or her land or create any requirement or limitation in conflict with any provision of part II of this chapter or a water shortage order, other order, consumptive use permit, or rule adopted or issued pursuant to part II of this chapter."</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
8	David Gore, Concerned Citizen	<p>6/6/15</p> <p>The plan is flawed because the science used to base it on does not effectively recognize and address that a big part of the cause of the declining water table elevations and associated natural systems is caused by other human actions besides water use that effect the lands natural water containment ability and water flow rates that is effecting water storage capacity. That ability of the land to contain water from lateral flow is a very critical factor. The plan should recognize and consider that changing the lands containment is how human actions can impact Fla's hydrological condition positively or negatively the greatest to effect the cause or to solve the problem.</p> <p>The measuring sticks of the plan are most all measuring and recording change of surface water levels of lakes wetlands that are receiving water from higher surrounding land area by man made drainage alterations of filling sloping channeling and piping that give deceptive measurements of the overall problem. The loss of water table level and water storage action within most all of the higher upland land area is very poorly measured and unknown. This effect is likely more seriously seen in the CFWI land area because it has a lot of higher elevation land area and very difficult to measure and sound science would require adequate recorded time to know of changes. The increasing loss of the water table elevation and storage capacity in the higher CFWI land area is reducing the amount of water available to maintain our natural systems and human needs. This plan must consider this human impact a cause of the problem and how this plan will solve the problem or restore damage to natural systems. Most of the solutions being considered are to take more water from the already stressed water table elevation and more water away from our natural systems. As I have suggested before some increase in the</p> <p>Comment #8 continued on next page</p>	<p>We agree that there are multiple contributing factors to wetland stress and lowered groundwater levels within the CFWI planning area. This fact is explicitly recognized in Volume II (Solutions Strategies) page 89 where you will find this statement: "It should be noted that the distribution of stressed wetlands in the updated Reference Condition includes wetland stress from all causes, not just from groundwater withdrawals. The strong correlation of wetland stress with field observations of substantial hydrological alteration, especially in urbanized plains areas, strongly suggests that factors other than groundwater withdrawals are a major contributor to wetland stress in much of the CFWI Planning Area."</p> <p>It is also true that the measuring sticks were designed to isolate and evaluate the effects groundwater withdrawals on groundwater levels. This approach is consistent with the intent and purpose of a water supply planning initiative. However, there are numerous ongoing environmental restoration projects in this area that are intended to address impacts from hydrologic alteration. An excellent example is the ongoing Kissimmee River Restoration project that is expected to cost around \$1 billion when completed. This project is building new storage into the system and rehydrating historic wetland systems that were previously drained for flood protection purposes. This is one of many projects in the area that are being implemented outside of the water supply planning effort to address impacts from hydrologic alterations.</p>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		Comment #8 - continued elevation level of all man made drainage structures from start to end along the man made drainage systems could restore a lot of lost water storage capacity in the CFWI area and lesson damage to natural systems "	
9.1	Robert Stalnaker, Concerned Citizen	6/8/15 Why are millions spent to clean water when counties and cities stand by while millions of tons of pesticides and nutrients are poured into neighborhood lawns? We have the drought in California that could spread. We have the destruction of the Indian River right here in Florida from too many people pouring too much lawn pesticides and nutrients into gardens and lawns. This MUST stop! Right here near my home, the once former pristine Wekiva River is now polluted with runoff from the too many people and their too many homes and too much pesticides and fertilizer. Ban the use of lawn fertilizers and pesticides. Just ban it.	Water quality for springs and rivers is the focus of the Basin Management Action Plan (BMAP) and is handled by the Florida Department of Environmental Protection. A BMAP for the Wekiva area is in development.
9.2	Robert Stalnaker, Concerned Citizen	6/8/15 Florida has a new statute that allows homeowners to have "Florida Friendly lawns", thus not needing water and pesticides that Saint Augustine grass REQUIRES. Yet, there are homeowner associations still suing residents who plant beautiful landscapes of Florida NATIVE plants that do not require the water and pesticides simply because they don't have Saint Augustine grass everywhere. This is insane. Also, how can an HOA trump state statutes? Fix this. Thank you."	<i>Please refer to Volume I, RWSP comment #7 response.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
10	Karina Veaudry, NFC Design Build	<p>6/9/15</p> <p>Very weak documents -- We have a water crisis. The Floridan Aquifer is ecologically unsustainable. At what point will you MANDATE landscaping that requires NO WATER? Native plants only need establishment.</p> <p>At what point do you hold business and golf courses accountable?</p> <p>Perhaps a moratorium on golf courses within a 40 mile radius of existing ones and making all private courses public.</p> <p>Stop allowing (new) cattle ranchers and water bottling companies to remove water from Florida.</p>	<p>The Districts support Florida Friendly Landscaping (FFL) principles and water conservation. However, the Districts do not have any regulatory authority to restrict the type of grass used for landscaping. The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc.</p> <p>Chapter 373, F.S., provides for the equitable distribution of water and enables and directs the water management districts to regulate the use of water within its jurisdictional boundaries. The purpose of the water use regulatory program is to ensure that those water uses permitted by the District are reasonable-beneficial, will not interfere with any presently existing legal uses of water, and are consistent with the public interest pursuant to Section 373.223, F.S. The process requires efficient utilization of water for the intended purpose to prevent and reduce wasteful, uneconomical, impractical, or unreasonable use of water resources. In addition, all economically and technically feasible alternatives to the use of traditional sources are considered, including, but not limited to, brackish water, reclaimed water, stormwater, and aquifer storage and recovery. Each District has adopted rules for regulating the consumptive use of water.</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
11	Marc Walch, Dewberry	<p>6/26/15</p> <p>While the plan considers (Leadership in Energy and Environmental Design (LEED) Certification, as a BMP for Utilities and projects, the newest Certification more appropriate for CFWI projects is Envision™.</p> <p>As Central Florida plans to develop its water supply plan (or vision) for the future, a holistic approach including addressing the possible impacts of climate change and adaptation strategies; unique trends in application of sustainability; and best practices for achieving sustainable and resilient infrastructure associated with this initiative. Central Florida has a unique opportunity to develop a showcase process that will be emulated by others in Florida and nationally if addressed properly.</p> <p>Envision™ was developed in joint collaboration between the Zofnass Program for Sustainable Infrastructure at the Harvard University Graduate School of Design and the Institute for Sustainable Infrastructure. The Institute for Sustainable Infrastructure is a not-for-profit education and research organization founded by the American Public Works Association, the American Council of Engineering Companies and the American Society of Civil Engineers.</p> <p>The purpose of Envision™ is to foster a dramatic and necessary improvement in the performance and resiliency of our physical infrastructure across the full spectrum of sustainability. Envision provides the framework and incentives needed to initiate this systemic change. As a planning and design guidance tool, Envision™ provides industry-wide sustainability metrics for all infrastructure types. Envision™ has 60 sustainability criteria, called credits, arranged in five categories that address major impact areas.</p> <p>Please consider recommending future projects consider Envision™ in both their planning and design.</p>	<p>Thank you for your comment.</p> <p>This can be considered in future updates.</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
12	Kimberly Lawrence, Concerned Citizen	<p>6/29/15</p> <p>Reuse water while beneficial from a water supply perspective has been shown to be detrimental to surface water quality since the standards are not compatible. Stormwater facilities are not designed to accomodate the extra pollutant loading from reuse. The state and water suppliers (not the MS4s) need to acknowledge this issue and be held accountable for any additional loads. The state and water suppliers need to develop a plan of action to address the issue (more stringent criteria in impaired basins, local monitoring at a neighborhood level and mitigating impacts, etc.)</p> <p>Chapter 8, Page 142-143 states that the benefit of Kissimmee River Restoration Project will "...require water to be stored in and released from the KCOL and its tributaries as part of a management strategy balancing flood control and environmental restoration for the Kissimmee system as well as downstream waterways and Lake Okeechobee." The additional water stored in the headwaters lakes for the benefit of downstream ecosystems does not seem to relate well to water supply availability in terms of the CFWI project. In fact, the draft water reservations are proposing to reserve 95% of the current flow through S-65 for the KRR. It may be a reach to include this in Chapter 8 and seems very mis-leading.</p> <p>Page 154 states: ""The SFWMD has allocated \$106 million in FY 2013 for water resource development projects (described in Chapter 8) district-wide and anticipates spending \$515.3 million on these projects (described in Chapter 8) over the next five fiscal years (FY2013–FY2017). The FY2013 funding includes \$96 million for a portion of the Central and Southern Florida project system operation and maintenance budget that contributes to</p> <p>Comment #12 continued on next page</p>	<p>Section 403.064, F.S. establishes the promotion and encouragement of reuse and water conservation as formal state objectives, reuse is considered to be in the public interest, and concludes that reuse systems designed and operated according to FDEP rules shall be considered environmentally acceptable and not a threat to public health and safety. A number of initiatives are being implemented to minimize the potential for nutrient loading associated with the use of reclaimed water. These include reducing the nutrients in reclaimed water where feasible, providing adequate education to reclaimed water users to incorporate reclaimed water derived nutrients needs into fertilization regimes, and providing best management practices to address reclaimed water runoff after mixing with surface waters.</p> <p>The goal of water supply plans is to identify programs and projects to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources. This includes identifying projects and strategies to meet environmental water needs, including the Kissimmee River. The Kissimmee Chain of Lakes, headwaters to the Kissimmee River, are located in the CFWI Planning Area. The reservation being established for the Kissimmee River affects the availability of water for other purposes from this resource.</p> <p>Comment #12 continued on next page</p>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #12 continued. protecting and enhancing (how?) the region's (CFWI region?, define) water supply. Other projects include groundwater monitoring, groundwater modeling, resource assessments, water conservation, and water resource protection activities.</p> <p>This statement paragraph may mis-lead readers to think that \$96 million of the total \$106 million ""project"" money in FY2013 went toward CS&F operations within the CFWI area. Please clarify that the FY13 O&M money for the portion (identify) of the CS&F is in addition to the ""Project"" money. Or compare project District wide project money to project money in CFWI or District wide O&M versus CFWI area O&M."</p>	<p>Comment #12 continued. Regarding SFWMD's water resource development project funding, the leading sentence to this section states this data is District-wide. To minimize any confusion, "District-wide" has been added to the sentence "...system operation and maintenance budget district-wide..."</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
13	Sharon Bubel, Concerned Citizen	<p>7/2/15</p> <p>Please do not damage the St John's River any further by pumping out water. Intelligent plans would instead include: banning lawn watering, putting money into low flow toilets and shower - tax incentives for homeowners to change, slow the sprawl and unencumbered growth in this state by bringing back intelligent growth management that Gov Scott killed. Let us NOT be California and Atlanta, but live with nature wisely. Pumping more water from the Florida aquifer and St John's is a short sighted non-sustainable non-solution.</p>	<p>In 2012 St. Johns River WMD published the results of a four-year Water Supply Impact Study (WSIS), which provided a comprehensive and scientifically rigorous analysis of the potential environmental effects to the St. Johns River associated with annual average surface water withdrawals of 155 mgd from the middle and upper St. Johns River. The WSIS, which was peer-reviewed by the National Research Council, confirms the findings of earlier investigations indicating that the St. Johns River can be used as an alternative water supply source with minimal to negligible environmental effects. The WSIS identified alternative water supplies that protect both groundwater and surface water resources and included the development of tools to help guide future decision-making regarding the increased use of surface water from the St. Johns River (SJRWMD 2012).</p> <p>As described in the CFWI RWSP (Volume I) and 2035 Water Resources Protection and Water Supply Strategies Plan (Volume II), fresh groundwater resources alone cannot meet future water demands or current permitted allocations without resulting in unacceptable impacts to water resources and related natural systems. The sources of water potentially available to meet projected water demand in the CFWI Planning Area include fresh groundwater, brackish groundwater, surface water, seawater and reclaimed water. Improvements in water storage capacity (via Aquifer Storage and Recovery and reservoirs) and water conservation can provide significant opportunities to manage or reduce water demands. The CFWI RWSP provides an overview of the potential water source options available to water users within the CFWI Planning Area.</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
14	Christiana Daley, Concerned Citizen	7/9/15 If pipelines are going to be made to carry water from the St. John's river to central fl communities, And roughly half of water use is for lawns and landscapes, then why aren't we building pipelines from waste water treatment plants to ALL communities for landscape water use? That would save nearly 50% of water used and would cut out 50%of fertilizer use since the waste water comes with nutrients needed for lawns. Seems like a no brainer to me yet I don't hear any talk of this simple solution!! While they're piping these new neighborhoods with one set of potable water pipes just make an extra set for recycled waste water!	We agree, greater than 90% of the treated wastewater in the CFWI is beneficially reused for groundwater recharge, irrigation of residential lots, medians, golf courses, and other green space, industrial use, such as cooling water, and other uses. This is projected to continue or potentially increase through the planning horizon.
15.1	Anonymous, Unknown name	7/14/15 The documents need to describe more about the "CFWI" itself and who is making decisions for/directing the group. Water supply plans are required by Florida Statutes to be produced by the Water Management Districts. The documents suggest that the CFWI as an entity, rather than the Water Management Districts, is the one producing these documents. The CFWI as an entity does not appear to have any documentation about its formation, structure and/or purpose and how it was formed/given authority to do the things being done. Why is an undocumented, Ad Hoc group making water supply decisions for the region and under what authority? How did an effort (e.g. "initiative") become an entity?	As described in Volume I (RWSP), Chapter 1 , the Central Florida Water (CFWI) continues the work started by the Central Florida Coordination Area (CFCA) after it sunseted in 2012. The SFWMD, SJRWMD, and the SWFWMD recognized this area where a coordinated and consistent approach to addressing water supply issues needed to be developed and implemented. A Regional Water Supply Plan is these Districts' statutory tool to implement a water supply planning framework. The Districts combined and updated their RWSPs into one for the area. Stakeholder engagement is also required by those same statutes. The Solutions Strategies document (Volume II) builds upon the planning results from the CFWI RWSP.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.2	Anonymous, Unknown name	7/14/15 This planning document should discuss how the stakeholders were selected and what effect politics played on its development. The membership of the stakeholder groups seem to be under represented by the general public, small businesses and the environment and over represented by a handful of large utilities and agribusinesses.	Many opportunities have been available for stakeholder involvement over the development of these documents. Six public workshops were held for the CFWI RWSP along with numerous presentations to stakeholder groups. Please see Volume I (RWSP), Chapter 1 , section 'Preparation and Coordination with Partners'. The Solutions Strategies (Volume II) also included stakeholder volunteers on the different committees and the subteams. Please refer to Volume II (Solutions Strategies), Chapter 1, Figure 2 for the relationships of the CFWI committees and teams. Additional outreach meetings were held, please see Volume II (Solutions Strategies), Chapter 1 , for more detailed information on stakeholder engagement.
15.3	Anonymous, Unknown name	7/14/15 Some of the projects (e.g. stormwater for MFL and aquifer recharge) are for environmental demands that were not quantified in the supply plan. These project volumes appear to be presented as reducing the 250 MGD deficit assigned to the other users which is not correct. That needs to be rectified. Are those (MFL and aquifer recharge) even water supply projects? Seem to be subtracting water projects for the environment from a total that did not include environmental demands (only population demands).	Alternative water supply, MFL recovery projects and aquifer injection meet a need and provide opportunities for smaller users to utilize available groundwater as long as they do not adversely impact natural systems. Volume II (Solutions Strategies), Chapter 6 , provides only one scenario for consideration. Many different combinations of projects could ultimately be implemented.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.4	Anonymous, Unknown name	7/14/15 In the area of cost projections, some of these projects (especially reclaimed augmentation and aquifer recharge) may be necessary to make other recommended projects viable. Therefore, the costs of both projects should be added together and they are not. The costs presented are apples and oranges, making comparison of the projects difficult and the costs of any one project potentially misleading. Many of the projects don't include O & M, pumps, pipes, land purchases, etc. and are only partial project costs. Therefore, you cannot rank the projects against each other based on cost effectiveness.	These are planning level projects and costs. Most of the projects used the same Cost Estimating Tool when possible. As the evaluation process progresses more design detail and more accurate cost estimating will be possible. Some projects are further along in design than others. Please refer to Volume II (Solutions Strategies), Chapter 3 and Volume IIA, Appendix C for explanation of the cost estimating approach. A footnote has been added to Volume II (Solutions Strategies), Chapter 6, Table 17 about total and unit production costs.
15.5	Anonymous, Unknown name	7/14/15 There needs to be a crosswalk between Table 11 of the RWSP (demands by use class) against the projects. It does not appear that all of the demands by use class are going to be met, even though the projects appear to total to more than the 250 MGD deficit.	Volume II (Solutions Strategies), Chapter 6 provides only one scenario for consideration. Many different combinations of projects could ultimately be implemented possibly meeting more than the 250 mgd identified.
15.6	Anonymous, Unknown name	7/14/15 How the reclaimed water volumes presented is confusing. Those reclaimed volumes may be offsetting the PWS demands yet they appear to be doing a straight subtraction off the 250 MGD total deficit. They may be partially offsetting DSS and Land/Rec demands for irrigation but they aren't parsed out that way (crosswalk to Table 11 again). This is true with other projects as well. There appears to be some double counting and/or counting water for a project as if it is reducing demands when in fact it really isn't.	<i>Please refer to Volume I, RWSP Comment #15.5 response.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.7	Anonymous, Unknown name	7/14/15 There is not enough emphasis placed on areas where even current withdrawals are unsustainable. What specific projects are required for what specific impacted areas? In fact, no specific projects were called out for implementation to ensure the demands will be met, which is a requirement by Florida Statute of a water supply plan. How can work plans be developed when no projects have been selected or assigned to anyone to implement?	Volume I (RWSP), Chapter 7 , section on 'Water Supply Project Options' covers the entire CFWI Planning Area. The Districts combined and updated their RWSPs into one for the area. More detail on regional water supply planning in Chapter 373.709 F.S. may be helpful. For example (7) "Nothing contained in the water supply development component of a regional water supply plan shall be construed to require local governments....to select a water supply development project identified in the component merely because it is identified in the plan."
15.8	Anonymous, Unknown name	7/14/15 Nowhere do the documents discuss the regulatory mandates that seem to be warranted (like creating water use caution areas) or what happened when the CFWI (which capped withdrawals to 2013 demands due to observed harm) was sunsetted without further action in 2012. These documents do not sufficiently address the harm to existing wetlands and natural areas that has already occurred and how that harm is being mitigated.	<i>Please refer to Volume I, RWSP comment #15.1 for CFWI response. Also, refer to Volume II (Solutions Strategies), Chapter 5, section on 'Interim Regulatory Measures'. Existing and potential issues for MFL water bodies are being addressed through prevention/recovery strategies in SWFWMD and SJRWMD. SWFWMD is addressing Kissimmee River needs through development of water reservation rules. Surrounding wetlands of MFL water bodies are included in those recovery plans. The Data, Monitoring, and Investigations Team (DMIT) proposed an extensive monitoring and data collection effort in the CFWI to monitor natural systems and make adaptive management changes where appropriate.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.9	Anonymous, Unknown name	7/14/15 Minimal regulatory action is being recommended when clearly regulatory actions on the part of the Districts and/or FDEP are required for those areas where resource impacts are both expected and already being observed. Is any enforcement being done or investigations into the cause of existing harm initiated so it can be mitigated? What are the Districts doing in response to the wetland harm and MFL/springs impacts that have already been identified?	<i>Please refer to Volume I, RWSP Comment #15.8 response.</i>
15.10	Anonymous, Unknown name	7/14/15 The modeling and discussion appears to be for the UFA withdrawals alone. What about shallow SAS withdrawals which have the most immediate effect on wetlands and water bodies? These appear to need some regulatory restrictions, yet they weren't even discussed or modelled.	Water withdrawals from all aquifers are included in the model, but there are no projected increases in SAS withdrawals due to the SAS's limited transmissivity and ability to meet the magnitude of future water demands; therefore, the discussion and scenarios simulated are limited to proposed UFA and LFA withdrawals.
15.11	Anonymous, Unknown name	7/14/15 Model runs should have been done for all permits already issued at fully permitted demands (Round 1) then that plus the new projects (Round 2). The Round 1 is a combination of existing and proposed PWS only? How are other users besides PWS accounted for in the model runs?	The Draft RWSP document includes an End Of Permit (EOP) scenario, simulated using the ECFT Model, which includes all users at their fully permitted allocations. Round 1 scenarios look at the effects of proposed projects (e.g., LFA wellfields) compared to the 2015 withdrawal scenario, which is assumed to be the maximum amount of traditional groundwater withdrawal allowable from all users including PWS. All uses are accounted for in the baseline (2015) withdrawal scenario, but the proposed projects in Round 1 modeling are not formally assigned to a particular use class. Round 2 looks at project concepts, the effects of those concepts, and can be used as management measures to potentially optimize aquifer yield while minimizing effects on natural systems such as lakes, springs, and wetlands.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.12	Anonymous, Unknown name	7/14/15 How does this supply and solution plan link to actual development plans? If an area is projected to have a water deficit there shouldn't be any new development allowed there. There does not appear to be any suggestion to try to limit the growth in areas that have water resource challenges.	The CFWI RWSP identifies reasonable options for developing sources, provides planning level technical and environmental analysis, plus conceptual cost estimates. Water Management Districts do not have the authority to manage growth. Section 163.3177(6)(c) F.S. indicates within 18 months after Governing Board approval of a RWSP, local governments in the region must update their comprehensive plans to account for future growth. Please refer to Volume I (RWSP), Chapter 7 , section 'Regional and Local Planning Linkage' for additional information. Pursuant to 373.709(2) 2, F.S., water supply plans must include a list of water supply development project options, including traditional and alternative water supply project options, from which water users may choose for water supply development. The total capacity of the projects included in the plan must exceed the projected needs and take into account water conservation and other demand management measures, as well as water resources constraints, including adopted minimum flows and levels and water reservations.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.13	Anonymous, Unknown name	7/14/15 People want and are being issued longer duration (up to 50 years) when the modeling, and in fact the findings of this whole document, suggest that shorter duration water permits (less than 20 years) are more appropriate. The water use permitting requirements need to be relooked at for this area in light of the resource harm being observed and projected.	Please see specifics on permitting detailed in Chapter 373.236 F.S. on duration of permits. Also refer to Volume II (Solutions Strategies), Chapter 5 , in particular section 'Interim Regulatory Measures' for more information.
15.14	Anonymous, Unknown name	7/14/15 Demand reductions through water conservation in some cases seem to be mischaracterized by the use of source substitution (reclaimed water, tailwater for Ag, private wells for PWS). The water conservation efforts should be directly squarely at things that increase efficiency (demand reduction) and not be diluted by the belief that switching to a different water source is conservation. Water savings due to conservation are presented as if they are a source of water that can be subtracted the same as a project, when in fact conservation reduces the demand side of the supply vs. demand balance you are trying to achieve. There are a lot of conservation measures which could be done, yet only a small subset was considered in the estimates. No implementation plan was included and none of the utilities identified these conservation efforts as projects to be incorporated into their work plans to reduce their individual per capitas.	Water conservation (conservation) is defined in the Volume II (Solutions Strategies) as any activity or action, which reduces the demand for water including those that prevent or reduce wasteful or unnecessary uses and those that improve efficiency of use. Volume II (Solutions Strategies), Chapter 2 discusses long-term successful conservation programs and Best Management Practices including how the Conservation Subteam reviewed over 200 conservation BMPs and related management strategies. Funding is a critical component in implementation in the success of CFWI. Volume II (Solutions Strategies), Chapter 6 discusses but one scenario to provide decision makers with information on funding and benefits. <i>Please refer to Volume I, RWSP Comment #15.12 response for possible implementation timeline by municipalities.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.15	Anonymous, Unknown name	7/14/15 None of these projects identified as meeting the 250 MGD deficit actually have sponsors that have stepped up to implement them. So this isn't really a supply plan it's a wish list. That's not good.	Projects identified in Volume II (Solutions Strategies), Chapter 6 represent just one scenario of projects that could be developed to meet the 250 mgd deficit. A couple of the projects listed are scheduled for completion in 2015. It is up to individual water supply utilities to choose the options that meet their individual needs. <i>Also please refer to Volume I, RWSP Comment #15.12 response.</i>
16	Douglas Mikkelsen, Concerned Citizen	7/15/15 Please ensure the plan contains greater indoor/outdoor water conservation, limitations on the use of thirsty turf grass that requires more water than we use for drinking and laundry, and increased use of reclaimed water for public drinking water supply such as the 160-ac Site Indirect Potable Reuse project that will store reclaimed water for drinking water use.	We agree, the Districts support potable reuse as an option for meeting future demand. State water planners are monitoring the efforts of California, Texas, and the WaterReuse Association to help determine options for potable reuse in Florida.
17	Deborah Rodgers, Concerned Citizen	7/17/15 I live in the Ft. George Island area of Jacksonville, at the confluence of the St. Johns River, the ICW and the Atlantic ocean. I am a citizen that has done a variety of steps to conserve water for the betterment of our future. I observe the watering restrictions, have increasingly xeriscaped my gardens, collect rainwater and restrict my home usage flow. And I am on a well where I am not monitored or charged. I have simply lived long enough to see the damages of our past and want to do "my part". Could I do more? Absolutely! And not only should I, so shouldn't all of your users! Conservation isn't a new word and enforcing it isn't so strange either but when it comes to water, little is done. I have visited an outer Bahama Island that doesn't have a modern infrastructure. Homes are built with cisterns to collect the water from roofs and gutters. This is not a luxury, but a must and we need to tackle our water usage in the same unwavering manner. Comment #17 continued on next page.	We appreciate your commitment to conservation. <i>Please refer to Volume I, RWSP Comment #6 response.</i>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #17 continued</p> <p>While cisterns are certainly a big tackle, rain barrels are manageable, affordable but rarely entertained. All new construction, especially the ones in your water management district should have mandatory alternative means of watering their landscape. Water drainage has been tackled by means of "ponds and lakes", has anyone thought about using that water to irrigate public areas? Xeriscaping and mulching should be mandatory to preserve moisture. Tiered billing of water usage should be in place so the greater users pay the brunt of their damages.</p> <p>Recently Sleepy Creek Lands were approved unanimously to irrigate their pastures to raise grass-fed beef. Are you kidding me? Thoughtful meetings do little to raise efforts for conservation, one little residence at a time, when this cattle ranch will use up to 1.46 millions of water a day. You want water for tomorrow and you want grass fed beef. You want clean water for the future and you want big business. You want to elect "Foxes that protect henhouses" and ask for suggestions for improvements. here is one...DO SOMETHING! ANYTHING!</p>	
18	Mary Keim, Concerned Citizen	<p>7/20/15</p> <p>I urge you to concentrate your efforts on conservation. This is the cheapest and least damaging way to get the water we need. The suggestions such as at http://cfwiwater.com/waterconservation.html should be funded with incentives to allow wide adoption of conservation. Thank you for protecting our limited water supply.</p>	<p>We appreciate your commitment to conservation.</p> <p><i>Please refer to Volume I, RWSP Comment #6 response.</i></p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
19	Ellen Underwood, Concerned Citizen	<p>7/20/15 I only skimmed the documents, so maybe this topic is covered, but if not, here is my suggestion:</p> <p>Outreach and education are very important to the success of this long-term initiative. This is mentioned many times in the documents. However, I did not easily find a budget. (Maybe it is there and I missed it.) Once a budget is developed, I suggest that 5% to 10% of the annual budget be devoted to outreach, education, and public involvement. I also hope paid advertising can be included in this budget. I know this sounds like a lot, but it will go a long way in helping to reduce water use and conserve resources in the future. Also, in addition to state funds, the plan may consider looking into grants from both private and public sector partners, to help fund the plan. (Perhaps grants can be used for some of the public awareness and educational programs as well.) Just a thought. Hope it helps.</p>	<p>We appreciate your commitment to conservation.</p> <p><i>Please refer to Volume I, RWSP Comment #6 response.</i></p>
20	Tom Goodrich, Concerned Citizen	<p>7/22/15 Dear Mr. Powell, In regards to the draft Regional Water Supply Plan, 2035 Water Resource Protection and the Water Supplies Strategies Plan, please remove surface withdrawals from these plans and focus on conservation, reuse and more sustainable alternatives. Withdrawals are not sustainable long term as populations continue to grow. Additionally, it hurts our natural resources which are a huge revenue source from citizens and tourists alike recreating in these natural areas. It also hurts the biohydrology of various systems and can endangers our aquatic life. Thank you for your consideration.</p>	<p>No, the goal of water supply plans is to identify programs and projects to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources as required by Chapter 373 F.S. The plan provides a guide and provides options to implement future needs. Local governments are required to update their water facilities element of their Comprehensive Plan within 18 months of approval of the water supply plan to identify the programs and projects they will be implementing for at least a 10-year period.</p> <p><i>Please refer to Volume I, RWSP Comment #13 response.</i></p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
21	Anonymous, Unknown name	7/22/15 PLEASE remove surface water withdrawal projects from the water supply plans and focus on conservation, reuse, and other more sustainable alternatives. Our water supply is a precious natural commodity and we need responsible people to protect it!	<i>Please refer to Volume I, RWSP Comment #13 response.</i>
22	Ted Mikalsen, Concerned Citizen	7/26/15 Mr. Dean Powell Water Supply Bureau South Florida Water Management District 3301 Gun Club Road West Palm Beach, FL 33406 Subject: CFWI Comments Dear Mr. Powell: That a June 29, 2015 public meeting on the draft Central Florida Water Initiative (CFWI) Regional Water Supply Plan, which the St Johns Water Management District SJRWMD) endeavored to confine to conservation measures rather than downstream effects on surface water flows and quality, was the first effort to solicit input from the impacted downstream region is a major problem with this plan. This is not just a concern that competent representatives of a major downstream impacted area were not involved in the multi-year planning process that led to the preparation of the CFWI water supply plan, but that process was as stated by one of District representatives during the meeting, intended to evaluate only water supply and not surface water quality impacts. While convenient for modeling and analysis purposes, you can't responsibly simply treat your planning area as a closed system without adequate regard to exogenous downstream effects on surface water flow and quality. As one example, what would be the compound effects of withdrawing upwards of 150 MGD and Comment # 22 continued on next page.	<i>Please refer to Volume I, RWSP Comment #13 response.</i>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment # 22 continued.</p> <p>dredging the mouth of the St. Johns River on flow and salinity levels in the lower reach of the River?</p> <p>Or, the SJRWMD models of surface water runoff, calibrated with exceedingly generous 2030 population projections and associated development, estimated a 2030 increase in stormwater runoff (in a State with regulations fostering on-site retention/detention) of approximately 150 MGD. This inflated volume (also mentioned in the referenced National Academy of Science review of the models) was used in District's Hydrologic Simulation Program – Fortran (HSPF) hydrologic model (Lowe, 2012) to offset the effects of a possible Central Florida withdrawal of 155 MGD on safe flow and salinity levels in the middle reach of the St. Johns River.</p> <p>That projected increase in surface water runoff is being targeted as a potential water source in the Draft Central Florida Water Initiative Regional Water Supply Plan. While I commend your intent use this resource, you certainly realize that a substantial portion of this runoff water would not be returned to surface waters and consequently would not be available to augment the river flow the models have determined are necessary to offset the impacts of planned withdrawals on flow and salinity levels in the River. The point is you can't have it both ways, you need to coordinate your ground and surface water quantity and quality modeling and analysis, consider downstream effects, and not confine your assessment, planning, steering and technical groups, and public interest input (until after the fact) to the CFWI planning area.</p> <p>The draft plan already acknowledges that: "Although up to 455 mgd in water supply development project options (Chapter 7) have been identified, it is not necessarily ensured that projected demands would be met in all places without unacceptable impacts to water resources and related natural systems." I suggest that you conduct and report or commit to an</p> <p>Comment # 22 continued on next page.</p>	

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment # 22 continued. independent, unbiased by political pressure dictating outcomes, analysis of the compound effects of major withdrawals and downstream dredging on flow and salinity levels in the middle and lower St. Johns River system before entertaining the use of future surface water runoff or surface water withdrawals as viable future water supply sources.</p> <p>Thank you for your consideration, Ted Mikalsen. CC: St. Johns Riverkeeper Dr. Ann Shortelle Mr. Jon Steverson</p> <p>References Central Florida Water Initiative (CFWI), 2015. Draft Central Florida Water Initiative Regional Water Supply Plan. Committee to Review the St. Johns River Water Supply Impact Study Water Science and Technology Board, Division on Earth and Life Studies, 2012. Review of the St. Johns River Water Supply Impact Study: Final Report for the National Research Council of the National Academy of Sciences. The National Academies Press, Washington, D.C. St. Johns River Water Management District (SJRWMD). 2012. St. Johns River Water Supply Impact Study (SJ2012-1). St. Johns River Water Management District, Palatka, Florida. SJRWMD. June 29, 2015 Minutes from Jacksonville Feedback Session on CFWI Solutions Strategies held at the University of North Florida, Jacksonville, Florida. Lowe, Edgar, et al., 2012. "Chapter 2. Comprehensive Integrated Assessment" St. Johns River Water Supply Impact Study (WSIS). St. Johns River Water Management District Palatka, Florida.</p>	

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
23	Theodore Schneider, Concerned Citizen	8/1/15 Desalination should be a priority. Pages 115-116 of the CFWI RWSP PUBLIC DRAFT indicates seawater is essentially an unlimited resource contrary to the STJ River and aquifer system. The Reiss Environmental 2003 report provided to the SJRWMD indicates that fluoride and copper contaminants exceeded surface water standards in the applicable areas. Removal techniques such as distillation ion exchange, reverse osmosis, precipitation procedures are examples. Just as plasmification is an innovative way to deal with solid waste, desalination can be the long term answer to an adequate water supply for the future needs of our State. I recommend a moratorium on water withdrawals from the STJ River until desalination is revisited and not given a cursory mention with a dismissive conclusion. The STJ River quantity and quality is suffering from a thousand cuts with incremental withdrawals as exemptions and exceptions to well intended goals are made. As Bill Belleville stated in his book, "The Peace of Blue", in reference to the river, "Continuing to permit water withdrawals in the face of this reality is akin to writing a check without knowing the true balance remaining in the account."	As indicated in Volume I (RWSP), Chapter 6 , seawater is considered a potential water source option. Although no specific projects were identified in the CFWI RWSP, desalination projects have been included in individual District RWSPs. Specific projects could be considered in future CFWI RWSP updates. <i>Also, please see Volume I, RWSP Comment #13 response on St. Johns River concerns.</i>
24.1	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 Exec summary: need to define "unacceptable harm" and sustainable yield" (sustainable is not defined by F.S. 373).	This will be addressed by the CFWI Regulatory Team and at this time no changes have been incorporated into the CFWI RWSP.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
24.2	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 P. 10: "several major rivers including the St. Johns, Palatlahaha," Palatlahaha is a frequently dry drainage creek from Clermont chain of lakes. (corrected in WRP document)	Thank you for your comment. Text has been updated.
24.3	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 • P. 10 & P 118: treated wastewater = 193 mgd of 800 mgd used? 178 mgd reuse. "Currently, 178 mgd of the 193 mgd of treated wastewater generated is reused for beneficial purposes, including groundwater recharge, agricultural irrigation, environmental restoration, public access irrigation, and cooling water at power generation facilities." Much of this is not truly "reuse" in that it does not supplant original water supply. Orlando Wetlands Park is simply a disposal site for Iron Bridge Plant, Conserv II RIBs doesn't replace potable water use. • Of 178 mgd, 105 mgd is truly reused to supplant potable water supply, in irrigation and industrial.	Reclaimed water - Water that received at least secondary treatment and basic disinfection and is reused after flowing out of a domestic wastewater treatment facility; whereas "Reuse" means the deliberate application of reclaimed water, in compliance with Department and District rules, for a beneficial purpose (Rule 62-610.200, Florida Administrative Code).
24.4	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 P 20 Table 4: Why the huge increase in self-supply in Seminole Co.?	As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Demand Subgroup was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Comment #24.4 is continued on next page. Comment #24.4 continued. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's BEBR Medium population projections. The countywide population projections

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			<p>were spatially distributed, based on the best available data, via a GIS model that projected where in the county growth was likely to occur and applied growth rates similar to historic patterns (controlling overall to county BEBR Medium). Existing utility service areas were overlaid to determine utility specific projections. We did not project future expansion of service areas for public supply utilities. This could result in population distribution outside of service areas. In future scenarios populations would be allocated to expansions within service areas and result in decreases to self supply. Utilities will need to work together to determine which areas should be reduced/increased; if justifiable, documented & supported methodology indicates changes should be made. It should be noted that these projections were made using a snapshot in time and the projections are intended solely for regional planning purposes to determine if WSO are needed in the future. The Demand Subgroup will continue to work with utilities and engage stakeholders during the next CFWI RWSP update, to ensure that the best available information is being used to estimate regional demands. Also, the BEBR Medium Population projection control for Seminole County is correct; Volume 44, Bulletin 159 was used by the Demand Subgroup.</p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
24.5	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 <ul style="list-style-type: none"> • P 28: Landscape etc. -- huge opportunity for savings. Las Vegas effectively addressed landscape irrigation. • P 99: Estimated conservation savings is 3.8% (42.3 mgd of 1100 mgd usage, reduced in RWSP to 37 mgd). "This estimate of water conservation potential is based on voluntary consumer actions." We can do more. See WRP recommendations. 	The Districts support Florida Friendly Landscaping (FFL) principles and water conservation. However, the Districts do not have any regulatory authority to restrict the type of grass used for landscaping. The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc. <i>Also, please refer to Volume I, RWSP Comment #6 response on funding.</i>
24.6	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 <ul style="list-style-type: none"> • P 33 MFLs: We need MFLs for upper Floridan potentiometric levels. • P39 and 47: East Central Florida Transient GW model uses MODFLOW calculations, which are incorrect for Floridan aquifer "conduit" flow rather than "seepage" flow, as used by MODFLOW. This results in groundwater velocity estimates off by power of 1 or 2 magnitudes. • P 44: "Climate Change and Water Supply in Florida" addresses only water demand, except for a mention of possible increase in groundwater salt intrusion. Note that a 1-foot rise in sea level equates to an equilibrium increase of 40 feet in the fresh-salt water groundwater interface. That is, our fresh groundwater effectively floats on top of salt water due to fresh water's lower density. As salt water rises 1 foot, it raises the fresh-salt water interface 40 feet at equilibrium. Comment #24.6 is continued on next page	<ul style="list-style-type: none"> • P 33 MFLs & FS 373.042: Response: Pursuant to 373.042, F.S. Each District is required to submit an annual priority list and schedule for the establishment of MFLs to FDEP for approval as discussed in Chapter 3 of the CFWI RWSP. Within the CFWI planning area, MFLs establishment is prioritized for lakes, rivers and springs. The SWFWMD has developed a Saltwater Intrusion Minimum Aquifer Level (SWIMAL) for an area outside of the CFIWCFWI planning area that may be affected by withdrawals within the CFWI area, and has also developed water level targets for select monitor wells within the CFWI Planning area as part of its Southern Water Use Caution Area (SWUCA) MFLs Recovery Strategy. Comment #24.6 is continued on next page

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #24.6 continued</p> <ul style="list-style-type: none"> • P 54: Did the ECFT GW flow model include connate salt intrusion, or was the fresh-salt interface modeled as a boundary condition? • P 64: "25 water bodies within the CFWI Planning Area are projected to fall below adopted MFLs." • P 71: 50 mgd increase "without causing unacceptable impacts." How, when MFLs are not currently being met? How much MFL violation is acceptable? • FS 373.042: "(b) Minimum water level. The minimum water level shall be the level of groundwater in an aquifer and the level of surface water at which further withdrawals would be significantly harmful to the water resources of the area." <p><u>Therefore, potentiometric level MFLs must be set for UFA and LFA and used for permitting and conservation.</u></p>	<p>Comment #24.6 continued</p> <ul style="list-style-type: none"> • P39 and 47: Response: MODFLOW, developed by USGS, has been successfully used to simulate the Floridan Aquifer System by many investigators during the last two-plus decades. While it is true that advances in groundwater modeling are now allowing simulation of specific conduits, this is more applicable in local models and not the regional modeling effort used for the CFWI. • P 44: Response: We are aware of the static relationship between freshwater head and the associated position of the underlying saltwater interface. Since the CFWI planning area is landlocked, the effects of sea-level rise on groundwater is considered negligible at this time. The effects of climate change on evapotranspiration and rainfall require further study and analysis for use in future CFWI water supply plans. • P 54: Response: The ECFT Model does not explicitly simulate saltwater intrusion through density-dependent modeling. The eastern model boundary in the Floridan aquifer system was adjusted to match the position of the 5,000 mg/L TDS isochlor as the base of the aquifer in that case. In that way, the eastern model boundary would not inadvertently serve as a source of freshwater. • P 64 & P71: Response: Recovery and prevention strategies are being or will be developed and implemented to address recovery or prevention of MFLs within the CFWI planning area. MFLs are established to identify the limit at which further withdrawals would be significantly harmful to the water resources or ecology of the area. <p>Comment #24.6 is continued on next page</p>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #24.6 continued</p> <p>If an existing flow or level in a water body is below, or is projected within 20 years to fall below an applicable MFL, the expeditious implementation of a recovery or prevention strategy, which includes the development of additional water supplies and other actions, is required to achieve recovery to the established MFL as soon as practicable; or prevent the existing flow or level from falling below the established MFL. Based on the CFWI RWSP work, it was estimated that approximately 50 mgd of additional, traditional groundwater could be available for water supply on a regional basis through the implementation of local management activities (e.g., wellfield optimization, aquifer recharge, and augmentation) to avoid or mitigate impacts to the region's water resources. How much MFL violation is acceptable? This is water body specific and is addressed at the time the MFL adopted.</p>
25.1	Joe Bourassa, Concerned Citizen	<p>8/13/15</p> <p>For the initial Draft RWSP's Public Comments", I supplied 8 comments that are included in that Drafts Comments report--- 26 page that also includes the "CFWI RWSP Team Response". With a completely new "RWSP Team" now in place I REQUEST that my Comments included in that report be again reviewed by the "Team" and that my Comments and their responses be included in the upcoming new Public Comments report. If there is a problem with doing that, please advise ASAP, and I will resubmit those Comments again, before the Aug. 17 deadline.</p> <p>Best Regards, Joe</p>	Email response was sent to Mr. Bourassa stating that the CFWI Solutions Team would pull his previously submitted comments and include them in this Response to Comments document.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
25.2	Joe Bourassa, Concerned Citizen	8/13/15 Link (Comments #25.2, #25.3, #25.4, #25.5, & #25.6) <u>Comment 1</u> (11/29/13) - I have printed out both sections of your CFWI WSP and have to wonder what all those experts that composed those 556 pages are doing now?? Hopefully putting together the necessary "revised edition" that brings the base line statistics up to a more reasonable 2012 time frame and discarding the 2005 data basis and even the 2010 Water use "projections" rather than using the 2010 actual estimate---that surely was available well before this publication	The projections made for the RWSP are a "snap shot" in time and were developed using the best available information at the time developed. Projections had to be developed at least a year in advance (from a historic baseline) in order to perform the analyses by the technical teams. At the time the projections were developed for the RWSP, 2010 information was not available for all of the areas within the CFWI. Planning projections are updated in conjunction with water supply plan updates. These are conservative estimates and recognize the need to use the best available data. Demand projections will be updated prior to the next RWSP update.
25.3	Joe Bourassa, Concerned Citizen	8/13/15 <u>Comment 2</u> (11/29/13) - On top of that you extend the limit 25 years, rather the typically prescribed 20 years---WHY ??	Section 373.709 (2) F.S. states that a RWSP must be based on at least a 20-year planning period.
25.4	Joe Bourassa, Concerned Citizen	8/13/15 <u>Comment 3</u> (11/29/13) - Of course I am only 1/3 through the basic 225 page report but can't help notice the tiring repetition, but that is Government. I sure hope I find your CFWI presentation graph to the Steering Comm. that showed no increase in Total Water Use in 15 years in the Appendix's, and it's contrast to the new projections.	The 15-year graph was not included in Volume IA (RWSP), Appendix A.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

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25.5	Joe Bourassa, Concerned Citizen	8/13/15 Comment 4 (11/29/13) - This report sure runs contrary to the USGS's most recent [Marella 2013] report that shows that we in Fl. use 6.4 % less "Total Water" today then we did in 1975---35 years ago!! Especially interesting is the big play on MFL's when it's original Legislative direction and present Statute clearly indicates it only applies to increased "Withdrawals" when your historical 1995-2010 [15 Yrs.] water use graph indicates no Increase!! How can we have a "failure to meet a MFL" when there has been no increased "Withdrawals??	Projected demand was simulated to be withdrawn from traditional sources. The groundwater availability results indicate that not all of the 2035 projected demand can be met by traditional sources without exceeding MFLs.
25.6	Joe Bourassa, Concerned Citizen	8/13/15 Comment 5 (11/29/13) - I expect to provide extensive "Public Comment" to the report directly to you and the primary stakeholders by other than by the CFWI website manner, which is too restrictive. Sure hope to see it on the website in the future.	Thank you for your comment.
25.7	Joe Bourassa, Concerned Citizen	8/13/15 Link (Comments #25.7, #25.8, #25.9, #25.10, & #25.11) Appendix Table A-21, pages 57-137 prompts a number of COMMENTS. Comment 6 (12/2/13) - The use of such a LIGHT color at the bottom of the page's make them virtually unreadable. Why not a Std. Black font?	The document conforms to the approved format.
25.8	Joe Bourassa, Concerned Citizen	8/13/15 Comment 7 (12/2/13) - The Format used on those 80 pages contains so much WASTED white space [>50%]and the use of such a VERY SMALL font makes it extremely difficult to read by citizens, especially older ones.	The document conforms to the approved format.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

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25.9	Joe Bourassa, Concerned Citizen	8/13/15 Comment 8 (12/2/13) - The bulk of the Comments are from Utilities and Consultants that are concerned about the "Projections" and their effect on their CUP's / WUP's. Ms. Bader's constant indication that they were not connected sure raises many questions in even Citizens mind's. Please clarify why the are different, yet why the new CFWI method is superior for "Planning Purposes"??	<i>Please see Volume I (RWSP) Comment #25.2 response to your comment.</i>
25.10	Joe Bourassa, Concerned Citizen	8/13/15 Comment 9 (12/2/13) - I will address to you my COMMENTS on both the Population & Water Use issues in follow up emails but agree in general that the latest BEBR and actual estimated Water Use should be used in this ever so important CFWI report.	Thank you for your comment.
25.11	Joe Bourassa, Concerned Citizen	8/13/15 Comment 10 (12/2/13) - Note; why can't I print out this comment form??	The comment form was designed as an online tool.
25.12	Joe Bourassa, Concerned Citizen	8/13/15 Link Comment 11 (12/27/13) - It should be obvious to anyone that still thinks intelligently that one can not possibly critique 500+ pages of this CFWI DWSP in this simplistic format. Confounding that, there is no simple way to get a copy of what one presents here. With both of those points in mind, I plan on sending a copy of my relevant material by USPS to DWSP Chair Tom Bartol before the Jan. 10th deadline for inclusion in the forthcoming "Comments" section---slated for March--- and expect to see it included there in it's complete form. Please respond if that is not agreeable with the stated policy ????	As noted on the CFWI RWSP website, comments may be submitted online, by email, or mail. All comments submitted and associated responses will be made available on the CFWI RWSP website.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

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25.13	Joe Bourassa, Concerned Citizen	<p>8/13/15 Link <u>Comment 12</u> (1/16/14) - In reviewing the PS Water Use data numbers by Utilities in your CFWI report, I first come across a number of major deviation.</p> <p>1; Polk Co.--- Winter Haven and Lakeland.---where your CFWI report lists the 2010 Lakeland Utility's use as 24.43 MGD while the SWFWMD lists it as 20.27, a major discrepancy, Winter Haven you list the 2010 use as 10.75, while SWFWMD says 9.179 MGD</p> <p>2; Seminole Co.--- Seminole City use on the District's website says it was for 2010, 18.3 while your CFWI indicates 20.25 MGD. For Sanlando, CFWI indicates 10.49 while the District says 7.44 MGD. For Sanford CFWI indicates 7.10, the District says 6.87 MGD</p> <p>3; Lake Co --- Lake Util, CFWI indicates 7.47, District shows 5.21 MGD For Leesburg, CFWI says 9.121, District says 4.82 MGD</p> <p>There are more, and they all point to higher CFWI uses than even the SJRWMD's reported ones. WHY?? Of course you might have evidence that SWFWMD sent you incorrect data, or there is other possible error sources, [even mine?]]BUT as the Director of that Water Use Group, you are ultimately responsible for what the CFWI published data shows.</p> <p>Please look into why these major differences exist before I submit them to the CFWI's "Steering Group" and Media. Await hearing from you shortly!</p>	<p>The first paragraph on the second page in Volume I, RWSP, Chapter 2 addresses this.</p> <p><i>Please see Volume I (RWSP) Comment #25.2 response to your comment.</i></p>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

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25.14	Joe Bourassa, Concerned Citizen	<p>8/13/15 Link Comment 13 (1/20/14) - I sure understand what the report say's but want to know why the "2010 Planning Numbers" are so much higher than the 2009 or 2010 ACTUALS?? Since the CFWI RWSP report was not issued till 2013, It would seem to make sense that the real 2010 numbers, available by Oct. 2010 could/should not have been substituted and used by 2013??</p> <p>I have put together a report of the difference between the assumed CFWI 2010 numbers and the Actual 2010 numbers and will publish that soon. You and Tammy have so badly managed the situation, that a redo is definitely required, and ASAP. Of course the difference in trend, exhibited between the 2010 "Actuals" and my recently collected 2013 numbers for PS {Utilities} sure destroys the whole direction exhibited in the CFWI report. Of course you can just redo the report again??</p>	<i>Please see Volume I (RWSP) Comment #25.2 response to your comment.</i>
25.15	Joe Bourassa, Concerned Citizen	<p>8/13/15 Link Comment 14 (1/22/14) - I thought I would put together a list of just thr SJRWMD"s "ERRORS' that appear to be in the CFWI's data base, and give you and Tammy an opportunity to correct any inaccuracies. I have some of the comparable larger Utility data for SWF & SF but they are so much smaller percentage wise than yours. As previouslly indicated by email, I understand that you thought you covered yourself by indicating that the numbers used for PS in that report were "tentative", but to miss by 20+ %, always on the plus side sure might lead one to feel it was a very positive decision to create the need for more District attention and taxpayer money??</p> <p>A full report will be forthcoming on what the 2012 & 2013 PS data from the major CFWI Utilities actual use has been for inclusion in the Citizen Comments that have been solicited. This attachment (link to attachment) will be sent to the CFWI Steering Comm. & others. tomorrow if you do not reply today!</p>	<i>Please see Volume I (RWSP) Comment #25.2 response to your comment.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
25.16	Joe Bourassa, Concerned Citizen	8/13/15 Link Comment 15 (1/24/14) - I see that the closing date for "Public Comment" has been delayed 20 days--- hopefully so that the SJRWMD can publish the real 2010 PS Water Use numbers in place of those previously presented in the CFWI's DWSP. I attach a sample of the error [20 %] that was in the previous numbers (link), even though the CFWI DRWSP was published in Nov. 2013, at least 1 1/2 years later than the 2010 numbers were available. A more complete analysis is coming. I sure hope you Steering Committee members have enough personal integrity such that you would never sign off on a report that had that kind of error in the most basic variable that drives all the reports conclusions and direction. (<i>Same attachment submitted as shown in Comment #14.</i>)	<i>Please see Volume I (RWSP) Comment #25.2 response to your comment.</i>

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
25.17	Joe Bourassa, Concerned Citizen	<p>8/13/15</p> <p>Link Comment 16 (2/16/14) - As part of the whole CFWI project there are a number of planned projects [e.g. MFL] that are based on studies of the past rainfall pattern in setting the "withdrawal" limits and MFL violations.</p> <p>Unfortunately those studies were based on a long term "No Change" rainfall pattern that is not a realistic evaluation of what has happened rainfall wise. I want to believe that all individuals in the CFWI Study and Future Planning groups understand the overriding importance of rainfall in any hydrological condition, With that in mind and knowing that the whole MFL program was established by the Legislature to be directed at "Withdrawals" and not the multidecadal cyclical rain variations as indicated by my attached graphs (link to attachments) it is imperative that all previous MFL studies be re-evaluated taking into account what the many "Cumulative" rain patterns indicate for hydrological conditions, That is especially important for those MFL's established before the latest 2000, 2006-7 and 2000 droughts. I believe that the attached graphs are of such overall public significance that a full size copy of each should be part of the planned publication of the Public Comments", If a hard copy is required just let me know tomorrow "Monday" and I will provide it.</p>	<p>Updated information regarding modeling and MFLs can be found in Volume IIA (Solutions Strategies), Appendices E and F.</p> <p>Volume IIA (Solutions Strategies), Appendix B describes the methods associated with MFLs, including the use of varying hydrologic/climatic conditions.</p>
25.18	Joe Bourassa, Concerned Citizen	<p>8/13/15</p> <p>Link Comment 17 (2/19/14) [] - Since the District has not published it's Historic Total FW Use by County, I thought I would send my copy on for inclusion in the CFWI "Public Comment File" to put into perspective the CFWI's "Projections". A simple 3 pages (link to attachments) that let's every interested County Stakeholder or Citizen know where the latest USGS's 2013 report of FL. Total Fresh Water Use is derived from, and why it shows that we now in 2010 use 6.6% LESS FW than we did in 1975, 35 years ago! I await seeing the publication of these "Public comments" soon.</p>	Thank you for your comment.

Table 1. Comments to the RWSP with Responses from the CFWI Team (continued).

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25.19	Joe Bourassa, Concerned Citizen	8/13/15 Link Comment 18 (2/19/14) - Of course even more interesting is the Districts PS-Utility Water Use History by Utility & County. Of course this takes a few more attachments [link to attachments] but feel assured that the District really wants all Stakeholders and Citizens to know the Historical PS Water use Facts to properly assess the present CSWI's "Projections". Again await seeing these facts in the CFWI's upcoming review of it's Public Comments, expected next month.	Thank you for your comment.
26	Donald (Bob) Progulske, US Fish and Wildlife Service	8/14/15 Link to Letter	<p>Water supply planning efforts aim to protect the environment and water resources while ensuring adequate and sustainable water supplies are available to meet future water supply needs. We appreciate US Fish & Wildlife's concern for endangered and threatened species and the future availability of water within the Upper Chain of Lakes (UCOL), the Kissimmee River, Lake Okeechobee and the greater Everglades. As you are aware the SFWMD is in the process of establishing a water reservation for the Kissimmee Basin which includes the UCOLs, the Headwaters Revitalization Project and the Kissimmee River Restoration project (KRRP). As part of the reservation rule development process, SFWMD is in the process of developing tools to address the water availability concerns outlined in your letter and other similar concerns raised by multiple stakeholders. SFWMD has participated in several productive meetings with the your office and Florida Fish and Wildlife Conservation Commission to address the wildlife concerns. The dialogue with these wildlife agencies to address potential impacts to federally listed species is continuing.</p> <p>The August 14, 2015 letter stated a proposed reservoir project within the Upper Kissimmee Basin will negatively impact the KRRP and federally listed species. Any proposed storage projects must meet all of SFWMD's existing the environmental resource and water use permitting criteria (Applicant's Handbook) in order to be approved.</p> <p>The implementation of the DMIT recommendations is a critical component to future water supply planning for the CFWI region. The additional data collected as a result of the DMIT recommendations will facilitate the refinement and expansion of</p> <p>Comment #26 is continued on next page</p>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #26 continued</p> <p>models and hydrologic and environmental analyses, the further development of water supply project options, and the assurance that environmental measures are being met. Implementation of additional monitoring over the next five years is estimated to cost the three water management districts collectively more than \$30 million.</p> <p>We concur that the uncertainty of climate change challenges water providers as they plan for the future. Traditionally, water resource planning has used historical climatic and other hydrologic data to represent future water supply conditions. Temperature, precipitation, stream flow, groundwater levels, evaporation, and other related factors may be expected to vary as they have in the past. The five year water supply plan update will continue to address climate change; future water resource planning must be able to consider additional uncertainties and greater climatic and hydrologic variability.</p> <p>Improvements are planned for the ECFT Model as discussed in Volume II (Solutions Strategies), Chapter 7.</p> <p>In Volume II, Chapter 1, the historic total water use is presented and current water withdrawals remain fairly consistent since 2005; therefore, the 2005 Reference Condition still reflects current withdrawals.</p> <p>As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Population and Water Demand Subgroup (Demand Subgroup) was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area.</p> <p>Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. It should be noted that these projections were made using a snapshot in time and were developed using the best available information at the time developed for the 2035 planning horizon. Water supply plans are updated every five years to capture changing conditions.</p> <p>Significant conservation has occurred within the CFWI Planning Area to date as described in Volume II, Chapter 2.</p> <p>Comment #26 is continued on next page</p>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #26 continued</p> <p>CFWI RWSP (Volume I) and Solutions Strategies (Volume II) support increased conservation efforts. Please refer to the 'Implement Water Conservation Programs' section in Volume II (Solutions Strategies), Chapter 7 and the 'Water Conservation' section in Volume I (RWSP), Chapter 11. The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures.</p> <p>The Districts support Florida Friendly Landscaping (FFL) principles and water conservation. However, the Districts do not have any regulatory authority to restrict the type of grass used for landscaping. The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc.</p> <p>Section 373.185(3)(b) F.S., quoted below, negates HOA and community regulations that would require landscaping plants that are inappropriate for the natural conditions at the site: "A deed restriction or covenant may not prohibit or be enforced so as to prohibit any property owner from implementing Florida-friendly landscaping on his or her land or create any requirement or limitation in conflict with any provision of part II of this chapter or a water shortage order, other order, consumptive use permit, or rule adopted or issued pursuant to part II of this chapter."</p> <p>Dispersed water management is discussed in the Solutions Strategies document. Implementation of DWM in the CFWI Planning Area may not be a reliable water supply source to meet the future water supply needs, but could potentially be a conjunctive use source.</p>

Volume I: RWSP Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
27	Laurie Waldie, St. Lucie County	<p>8/17/15</p> <p>St. Lucie County has spent the past several years laying the groundwork to grow into a regional utility with the infrastructure to serve the long-term potable water needs of the unincorporated County. This plan includes the future construction of several regional water treatment plants throughout the County. Currently, St. Lucie County Utilities is focused on utilizing the Upper Floridan Aquifer (UFA) as the supply source for these projects; however, given the uncertainty of the long-term viability of this source, the County could consider constructing one or more of these regional facilities to treat a surface water supply rather than UFA water. The County is concerned that a project like the "Grove Land Reservoir and Stormwater Treatment Area – SW4" identified for funding in the Central Florida Water Initiative would " earmark" that water source for northern users and potentially adversely impact the County's ability to utilize surface water as an alternative water supply for St. Lucie County Utilities' customers. St. Lucie County would like to be considered as an interested party moving forward on discussions surrounding the interconnection of the water management districts and inter-basin transfer of surface water.</p>	<p>Like many other projects included in this CFWI RWSP, Grove Land Reservoir and STA is a water supply project option concept that has been included for further consideration. Being a project concept, it has not been fully evaluated in the RWSP. In the 2016 State of Florida budget, \$3 million in funding has been allocated to this project to address these outstanding questions. Meetings on the project will be held at appropriate points in this evaluation.</p>

COMMENTS AND RESPONSES TO VOLUME II: SOLUTIONS STRATEGIES

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Volume II: Comments to the Solutions Strategies with Responses

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team.

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
1	Marc Walch, Dewberry	5/27/15 It appears there are several locations where the FGUA is miss-identified. In the Acronyms and Abbreviations list pg. xxii, the FGUA is incorrectly identified as the Florida Governmental Utility Association. Please replace Association with Authority.	Volume II (Solutions Strategies) was updated to reflect the change noted.
2	Marc Walch, Dewberry	5/27/15 The CFWI 2035 Water Resources Protection and Water Supply Strategies Plan mentioned LEED (Leadership in Energy and Environmental Design) in describing evaluating conservation. The CFWI Report should mention the new project evaluation & ratings tool...ENVISION™. All the projects described in the RWSP could and should be planned for and designed with ENVISION™ in mind. Please consider mentioning this guidance in your document, since its focus is on sustainability & resiliency. ENVISION™ BACKGROUND Envision™ was developed in joint collaboration between the Zofnass Program for Sustainable Infrastructure at the Harvard University Graduate School of Design and the Institute for Sustainable Infrastructure. The Institute for Sustainable Infrastructure is a not-for-profit education and research organization founded by the American Public Works Association, the American Council of Engineering Companies and the American Society of Civil Engineers. PURPOSE OF ENVISION™ The purpose of Envision™ is to foster a dramatic and necessary improvement in the performance and resiliency of our physical infrastructure across the full spectrum of sustainability. Envision provides the framework and incentives needed to initiate this systemic change. As a planning and design guidance tool, Envision™ provides industry-wide sustainability metrics for all infrastructure types. Envision™ has 60 sustainability criteria, called credits, arranged in five categories that address major impact areas.	Thank you for your comment. This can be considered in future updates.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
3.1	Charles Lee, Audubon of Florida	6/1/15 [Link] (Comment #3.1 & #3.2) There is a relatively small amount of money listed for water conservation compared to projects for new water. The shortcoming of the Plan is a lack of concentrated focus and money for water conservation. Public supply is the key area to focus on. In DeKalb County, GA, there is a program to assure that old toilets (prior to 1993) are replaced when a property is sold. The new owner must demonstrate that low-flow toilets are in place. Also, during the building permitting process, low-flow toilets are required.	The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc.
3.2	Charles Lee, Audubon of Florida	6/1/15 Automatic irrigation systems have become the norm in Florida. There needs to be specific provisions in the Plan to require Florida Friendly Landscaping so irrigation is not needed. Utilities in Southern Nevada pay residents to install native vegetation requiring minimal or no irrigation.	Volume II (Solutions Strategies), Chapter 7, page 131, recommends expanding the use of SMART meters by water utilities, to allow utilities and their customers to understand their water use practices and target more effective conservation BMPs, as well as expanding the use of soil moisture sensors and SMART meters to improve landscape irrigation efficiency. Support statewide or regional licensing of irrigation professionals for installation and inspection of efficient landscape and irrigation systems to ensure the efficient use of water resources. The Districts support Florida Friendly Landscaping principles and water conservation; however, do not have any regulatory authority to restrict the type of grass that is used for landscaping. Many local governments promote and encourage Florida-friendly landscaping through incorporation of objectives in their comprehensive plan.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
4.1	Mike Britt, City of Winter Haven	6/1/15 [Link] Comment #4.1 & #4.2 Winter Haven has many problems with low lake levels to the point that some in the Chain of Lakes are not navigable and others are not meeting MFLs. Winter Haven has a 5-year plan and the CFWI Plan needs to look at future development.	One of the goals of the CFWI planning process was to identify sustainable quantities of groundwater sources that are available without causing unacceptable impacts and to develop strategies to meet future water demands. Volume II (Solutions Strategies) goes further and discusses strategies that can be implemented to address effects of both current and future development. These strategies include investigation options for improving the collection and use of stormwater to mitigate effects of withdrawals and development on water resources and natural systems in the area (Volume II, Chapter 3 , Stormwater section, also discussed in Chapters 6 and 7). Also options to meet adopted MFLs are discussed in Chapter 4 with an implementation strategy in Chapter 7 .
4.2	Mike Britt, City of Winter Haven	6/1/15 Glad to see the Peace Creek Watershed Project on the project list in the Plan. It is testament to coordination.	Thank you for your comment.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
5	David Gore, Concerned Citizen	<p>6/1/15 [Link]</p> <p>This Plan is just “kicking the can down the road” because the projects are using the same source of water that is in short supply – the water table. We don’t have enough water now to support natural systems and we are still talking about taking more water from the water table. All structures should be raised 6 inches to raise the water table level.</p>	<p>We agree that there are multiple contributing factors to wetland stress and lowered groundwater levels within the CFWI Planning Area. This fact is explicitly recognized on page 89 of Volume II (Solutions Strategies), Chapter 4, where you will find this statement:</p> <p>“It should be noted that the distribution of stressed wetlands in the updated Reference Condition includes wetland stress from all causes, not just from groundwater withdrawals. The strong correlation of wetland stress with field observations of substantial hydrological alteration, especially in urbanized plains areas, strongly suggests that factors other than groundwater withdrawals are a major contributor to wetland stress in much of the CFWI Planning Area.”</p> <p>It is also true that the measuring sticks were designed to isolate and evaluate the effects groundwater withdrawals on groundwater levels. This approach is consistent with the intent and purpose of a water supply planning initiative. However, there are numerous ongoing environmental restoration projects in this area that are intended to address impacts from hydrologic alteration. An excellent example is the ongoing Kissimmee River Restoration project that is expected to cost around \$1 billion when completed. This project is building new storage into the system and rehydrating historic wetland systems that were previously drained for flood protection purposes. This is one of many projects in the area that are being implemented outside of the water supply planning effort to address impacts from hydrologic alterations.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
6.1	Robert Zabler, Sarasota County	6/1/15 Link (Comment #6.1 & #6.2) How will the projects in this Plan affect the Myakka River and the Peace River?	Volume II (Solutions Strategies) indicates two surface water project options with an estimated combined capacity of 11.1 mgd that would affect the Peace River. Myakka River is not located within the CFWI Planning Area. The Southern Water Use Caution Area (SWUCA) Recovery Strategy encompasses both watersheds, including the City of North Port and Sarasota County. For additional discussion refer to the Southwest Florida Water Management District RWSP. For more information on the SWUCA Recovery Strategy its goals and objectives, please see watermatters.org .
6.2	Robert Zabler, Sarasota County	6/1/15 What happens in CFWI affect the areas south in Sarasota? Are there plans for that area?	Water Supply planning in Sarasota County is discussed in the Southwest Florida Water Management District RWSP the Southern Planning Region Volume. <i>Also refer to Volume II, Solutions Strategies Comment #6.1 response.</i>
7.1	Jenny Welch, Concerned Citizen	6/1/15 Irrigations systems are not needed and use too much water.	The CFWI RWSP (Volume I) and Solutions Strategies (Volume II) support increased conservation efforts including the efficient use of irrigation systems. <i>Please refer to Volume II (Solutions Strategies), Chapter 7, section 'Implement Water Conservation Programs' and to Volume I (RWSP), Chapter 11, section 'Water Conservation'.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
7.2	Jenny Welch, Concerned Citizen	6/1/15 Judge Farms, Toho Restoration effort – can’t get answers. Concerned about water levels at Mill Slough area, and the Turnpike mitigation area within Mills Slough. Why aren’t Turnpike Authority members in the loop on this Judges Farm/Toho Restoration planning effort?	The Judge Farms proposed project will be evaluated based on existing permit criteria as set forth in both the ERP and CUP permitting process at the time of permit issuance. In those permit review criteria, the existing and proposed conditions of the Mill Slough watershed (or any watershed potentially in the design considerations) will be evaluated. These evaluations would include any offsite areas which may include the Turnpike’s mitigation area. Coordination with appropriate entities will occur when the project proceeds.
7.3	Jenny Welch, Concerned Citizen	6/1/15 Will Plan be sustainable for wildlife? Would like to get environmental report for CFWI.	The goal of this planning initiative is to identify programs and projects to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources. The Environmental Evaluation was focused on MFLs and non-MFL water bodies including lakes, springs, rivers, wetlands, etc. and is discussed in Volume II (Solutions Strategies), Chapter 4 and Volume IIA, Appendix F . This plan did not specifically evaluate wildlife water supply needs.
8	Bill Braswell, Blueberry Farmer and Concerned Citizen	6/1/15 Projections for amount of acreage for blueberries and the future water needs are incorrect. (Mark Hammond responded).	Insufficient information to estimate Blueberry acreage projections resulted in no acreage being reported for Polk County. Strategies are being developed to improve projected demands for rapidly expanding crops for the next planning cycle. <i>Please refer to Volume I (RWSP), Chapter 2, page 24 for discussion of difficulty of projecting acreage and water demands for rapidly expanding crops such as blueberries. Also refer to Volume I (RWSP), Chapter 11, section ‘Demand Estimates and Projections’.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
9	Frances Howell-Coleman, Concerned Citizen	<p>6/1/15 Link The well in SE Polk is ill-advised; in time it will lower levels in our surface waters. It will lull us into delaying conservation measures we should be taking now. Measures such as seriously curbing landscape watering & requiring more efficient showerheads & low flow toilets. Real enforcement will be required. Concern that the SE Wellfield will have negative affects. Don't drill it. Conserve instead.</p>	<p>Impacts to wetlands and lakes near the wellfield are expected to be minimal due to extensive confining units above the LFA where water is being withdrawn. An environmental monitoring program, an environmental harm contingency plan, and annual project status verification reports of wetlands monitoring plan are requirements of the permit conditions for this project. The SE Polk wellfield will be implemented in phases. Initially 10 mgd is planned to be available around 2022-2023. The CFWI RWSP and Solutions Strategies support increased conservation efforts. <i>Please refer to Volume II (Solutions Strategies), Chapter 7, section 'Implement Water Conservation Programs' and to Volume I (RWSP), Chapter 11, section 'Water Conservation'.</i> The Solutions Strategies (Volume II) identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures.</p>
10	Karen Landers, Concerned Citizen	<p>6/1/15 Link Winter Haven has stepped up to solve problems. We need money for sewer and reuse projects. Amendment 1 mandate is being ignored by the legislature. Don't pipe water away from Polk County.</p>	<p>Funding source options are discussed in Volume II (Solutions Strategies), Chapter 6 and includes state, federal, and local sources.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
11.1	Sharon Garrett, Farmer and Concerned Citizen	6/1/15 What are the BMPs for agriculture? These will not work for small farming operation. Problems with providing electricity because batteries and wiring are stolen.	Agricultural BMPs are discussed in Volume II (Solutions Strategies), Chapter 2 and Volume IIA, Appendix A and include the following examples: Irrigation system retrofit, crop row covers frost freeze, and electronics such as automated valves. These BMPs have been used successfully in the SWFWMD's MiniFARMS program that specifically targets agricultural operations of 100 irrigated acres or less. MiniFARMS has been a successful cost share program at SWFWMD since 2011.
11.2	Sharon Garrett, Farmer and Concerned Citizen	6/1/15 The Blue Belt Law was passed but not implemented. Farmers would benefit from it. Keep swamp lands. Low flush toilets don't work.	Thank you for your comment. <i>Please refer to Volume II (Solutions Strategies), Chapter 2 for more information on conservation.</i>
12	Sam Pennant, Concerned Citizen	6/1/15 Link Is this a program that all cities in the county will have to sign on to? Does this mean cities that sign on will eventually have to shut down their water plants?	No, the goal of water supply plans is to identify programs and projects to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources. The plan provides a guide and provides options to implement future needs. Local governments are required to update their water facilities element of their Comprehensive Plan within 18 months of approval of the water supply plan to identify the programs and projects they will be implementing for at least a 10-year period.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
13	Julie Reynolds, Concerned Citizen	6/1/15 Link With water conservation a state issue, shouldn't we be looking at regulation across the state not just regionally for conservation?	Volume II (Solutions Strategies) recommends evaluating the current code provisions affecting water conservation and identify potential amendments to improve water conservation to the Florida Building and Plumbing Code. The Districts are in the process of submitting a proposal for recommended changes to the Florida Building and Plumbing Codes.
14	Sandy (Sandra) Webb, Concerned Citizen	6/1/15 Link I'm not seeing much about conservation-we can all do more. Why wait until we are as bad off as California before we do something and start conserving water? How much water will go toward biofuel-which we don't need?	Significant conservation has occurred within the CFWI Planning Area to date as described in Volume II (Solutions Strategies), Chapter 2, section 'Water Conservation Trends in the CFWI Planning Area' . The CFWI RWSP (Volume I) and Solutions Strategies (Volume II) support increased conservation efforts. <i>Please refer to Volume II (Solutions Strategies), Chapter 7, section 'Implement Water Conservation Programs' and Volume I (RWSP), Chapter 11, section 'Water Conservation'.</i> The Solutions Strategies (Volume II) identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
15.1	Anonymous, Unknown name	6/3/15 The emphasis needs to be on conservation of our water supply and of the lands that help protect our water supply. We use way too much water on our lawns and gardens. Mandate stricter watering usage and much more use of native plants and grasses, which require much less water.	The CFWI RWSP and Solutions Strategies support increased conservation efforts including the efficient use of irrigation systems. <i>Please refer to Volume II (Solutions Strategies), Chapter 7, section 'Implement Water Conservation Programs' and Volume I (RWSP), Chapter 11, section 'Water Conservation'.</i> The Districts support Florida Friendly Landscaping principles and water conservation; however, do not have any regulatory authority to restrict the type of grass that is used for landscaping. Many local governments promote and encourage Florida-friendly landscaping through incorporation of objectives in their comprehensive plan.
15.2	Anonymous, Unknown name	6/3/15 We don't have an unlimited supply of fresh water. Drilling deeper wells into the lower Floridan Aquifer is a short-sighted solution. What do we do after we have depleted that water supply and our freshwater springs have dried up? Now is the time to curb our short-term thinking and find sustainable long-term solutions so that our children and grandchildren won't be left to clean up our mess.	The goal of water supply plans is to identify programs and projects to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources.
16.1	David Gore, Concerned Citizen	6/4/15 Link (Comments #16.1, #16.2, #16.3, & #16.4) The Plan says the cause of the problem is the amount of water we are using. The real issue is to manage the water in the water table and add to the amount kept on the surface. What we use takes away from the natural systems and we need to protect these systems.	<i>Please refer to Volume II, Solutions Strategies Comment #5 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
16.2	David Gore, Concerned Citizen	6/4/15 We do not have to drink toilet water if more water is kept in the system.	The CFWI RWSP has identified a diverse set of WSPOs to meet future needs including conservation and use of reclaimed water. The Districts are committed to investigating potable reuse projects that are environmentally safe, provide benefits to the environment, and help meet water needs. State water planners are monitoring the efforts of California, Texas and the WaterReuse Association to help determine options for potable reuse in Florida.
16.3	David Gore, Concerned Citizen	6/4/15 We need reservoirs. If we add one inch over the whole area of the CFWI, 70 billion gallons would be available.	Storing water is a commonly used technique for optimizing use of water supplies by collecting water during times of plenty for use during dry or peak use times. Water storage infrastructure serves as an intermediate component in water supply. Adequate storage capacity is critical within the CFWI Planning Area to buffer the differences between availability of water supplies and water user needs over time.
16.4	David Gore, Concerned Citizen	6/4/15 We need to make better use of water than watering our grass.	<i>Please refer to Volume II, Solutions Strategies Comment #15.1 response.</i>
17.1	Bob Stamps, Orange and Florida Audubon	6/4/15 Link (Comments #17.1, #17.2, & #17.3) The Plan should have more emphasis on water conservation and funding for conservation. Only 6.1% of the budget in the Plan is for conservation and education. We need to front-load the spending for conservation instead of spreading it out over 20 years.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
17.2	Bob Stamps, Orange and Florida Audubon	6/4/15 The plumbing code should be changed to meet US EPA Water Sense Standards. The biggest use of water indoors is the toilet and we need to place emphasis on retrofits to low-flush toilets. In DeKalb County, GA, when a property is sold, the new owner must show that the toilet meets current standards. We need more money provided for retrofits.	<i>Refer to Solutions Strategies Comment #13 response.</i>
17.3	Bob Stamps, Orange and Florida Audubon	6/4/15 On the Conservation Team, we were limited to projects that cost \$3/1000 gallons or less while all the other projects were allowed much higher dollar costs. We need to spend more on conservation.	In areas of the CFWI Planning Area where the cost of new WSPOs is expected to be greater than \$3.00 per 1,000 gallons, implementation of conservation measures greater than \$3.00 per 1,000 gallons may result in additional water savings. <i>Please refer to Volume II, Solutions Strategies Comment #14 response for more information on conservation funding.</i>
18.1	Deborah Green, Orange Audubon Society	6/4/15 Link (Comment #18.1, #18.2 and #18.3) Concerned about the amount of water used on landscape irrigation. Since landscaping is non-essential, we need a more aggressive approach to limiting water use for this purpose. We need a new approach to thinking of water use and not continue down the same track of ensuring enough water to irrigate lawns. Plants should be required that will only need watering for establishment. There should be no irrigation beyond plant establishment, and there is no need for it if the right plants are used.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
18.2	Deborah Green, Orange Audubon Society	6/4/15 Use of reclaimed water is not conservation because it keeps the same ethic of making water available for irrigation and groundwater is used as a backup. Reclaimed water should be put in wetlands instead of subdivisions.	Agreed, however, reclaimed water offsets the use of traditional groundwater. Beneficial reuse is optimized on a project-by-project basis.
18.3	Deborah Green, Orange Audubon Society	6/4/15 We need enforcement of State law that prevents HOAs from requiring a perfect St. Augustine lawn.	Section 373.185(3)(b) F.S., quoted below, negates HOA and community regulations that would require landscaping plants that are inappropriate for the natural conditions at the site: "A deed restriction or covenant may not prohibit or be enforced so as to prohibit any property owner from implementing Florida-friendly landscaping on his or her land or create any requirement or limitation in conflict with any provision of part II of this chapter or a water shortage order, other order, consumptive use permit, or rule adopted or issued pursuant to part II of this chapter."
19.1	Marge (Marjorie) Holt, Sierra Club	6/4/15 Link (Comments #19.1, #19.2, #19.3, & #19.4) There are at least two huge developments planned in East Orange and Osceola Counties that are not accounted for in the population projections. The Deseret North Ranch Sector Plan calls for reservoirs that will harm two tributaries of the St. Johns River. They could use the Taylor Creek Reservoir for their water supply instead.	The Draft Sector Plan was reviewed by the water management districts, as part of the sector plan review process. This project is beyond the water supply planning horizon. The Taylor Creek Reservoir is an option to meet some of their water supply needs.
19.2	Marge (Marjorie) Holt, Sierra Club	6/4/15 Much more conservation indoors and outdoors is possible. New projects should be required to have Florida Friendly landscaping instead of turf.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
19.3	Marge (Marjorie) Holt, Sierra Club	6/4/15 We need to value our water more, and disposal of reclaimed water is a missed opportunity. We need to maximize use of reclaimed water and move away from surface water withdrawals.	Agreed. The CFWI Planning Area reuses over 90% of their wastewater. The plan assumes a continued use of 90% or more through the planning horizon.
19.4	Marge (Marjorie) Holt, Sierra Club	6/4/15 Asked if water pricing tiers are in place so large water users pay more per gallon.	The majority of public supply utilities within the CFWI Planning Area have implemented an inclining block rate structure. Water conservation rate structures are a common conservation tool used throughout the State.
20	Liz Felter, UF IFAS	6/4/15 Link Front-loading the funding for conservation in the planning period will have a larger impact on changing behavior. Most people have barriers to conserving water because of HOAs. We need to provide more support to citizens to help them change their landscapes. Mobile irrigation labs should be funded. People need help to understand the use of their irrigation timers to make sure they are not over-watering.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
21.1	Bobby Beagles, Orange County Farm Bureau	6/4/15 Link (Comments #21.1 & #21.2) How many gallons of fresh water go to the Gulf of Mexico? Why is fresh water sent to the Gulf?	Three rivers listed in the CFWI, the Peace, Alafia, and Withlacoochee River all ultimately outfall to the Gulf of Mexico. A vast portion of these river's watersheds are not within the CFWI boundary. The SWFWMD Draft Regional Water Supply Plan 2015 estimates approximately 742 mgd annual average flow from the Peace River, and 233 mgd annual average flow from the Alafia River located downstream close to the river's mouth. Flow to the Gulf of Mexico from the Withlacoochee River is controlled by the Inglis Dam and Bypass structures located on the west side of Lake Rousseau. Combined from USGS gauges near both structures the annual average is estimated at 641 mgd. Flow potentially available for withdrawal from these rivers is much less than flow to the Gulf because it depends on current permits and the Minimum Flows and Levels. The estuarine system where these rivers outlet to the Gulf of Mexico depend on a mix of fresh and saltwater. Estuaries are important habitats for fish and wildlife, enhance water quality, and provide extensive economic recreational benefits.
21.2	Bobby Beagles, Orange County Farm Bureau	6/4/15 Cities make too much money on reclaimed water to send it to AG even though AG needs it. AG can't afford to buy it from utilities. When state law changed making reclaimed water the property of the utilities, things became worse for the farmer.	Thank you for your comment.

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
22	Bill Marcous, City of Sanford	6/4/15 Link What is the experience of SWFWMD with partnerships of several agencies and governments for large projects? It can be a very complication process.	Agreed; however, partnerships offer the potential to deliver outcomes that a single entity cannot or to deliver outcomes more efficiently. Such partnerships will be critical in implementing many of the proposed CFWI projects.
23.1	Loretta Satterthwaite, Orange Audubon Society	6/4/15 Link (Comments #23.1, #23.2, #23.3, & #24.4) The emphasis of the Plan should be conservation. If done early, we may not need to build the expensive infrastructure project.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
23.2	Loretta Satterthwaite, Orange Audubon Society	6/4/15 We need a new statewide water ethic so when new businesses locate here; they know that conservation is mandatory. The concepts in CFWI need to be broadened to a statewide effort for conservation.	Thank you for your comment.
23.3	Loretta Satterthwaite, Orange Audubon Society	6/4/15 Instead of using reclaimed water for irrigation, we should be using it for drinking – toilet to tap. It is a waste to use if for landscape irrigation.	<i>Please refer to Volume II, Solutions Strategies Comment #16.2 response.</i>
23.4	Loretta Satterthwaite, Orange Audubon Society	6/4/15 Someone earlier mentioned we should stop sending fresh water to sea but fresh water has an environmental purpose for fisheries.	Agree. Thank you for your comment.
24	Russ Molling, Concerned Citizen	6/4/15 Link 1. Water ethic 2. Replacement of low flow fixtures 3. Irrigation issues	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
25	Karina Veaudry, NFC Design Build	<p>6/9/15</p> <p>Very weak documents -- We have a water crisis. The Floridan Aquifer is ecologically unsustainable. At what point will you MANDATE landscaping that requires NO WATER? Native plants only need establishment.</p> <p>At what point do you hold business and golf courses accountable?</p> <p>Perhaps a moratorium on golf courses within a 40 mile radius of existing ones and making all private courses public.</p> <p>Stop allowing (new) cattle ranchers and water bottling companies to remove water from Florida.</p>	<p>The Districts support Florida Friendly Landscaping (FFL) principles and water conservation. However, the Districts do not have any regulatory authority to restrict the type of grass used for landscaping. The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures which could include landscaping incentives, education, etc.</p> <p>Chapter 373, F.S., provides for the equitable distribution of water and enables and directs the water management districts to regulate the use of water within its jurisdictional boundaries. The purpose of the water use regulatory program is to ensure that those water uses permitted by the District are reasonable-beneficial, will not interfere with any presently existing legal uses of water, and are consistent with the public interest pursuant to Section 373.223, F.S. The process requires efficient utilization of water for the intended purpose to prevent and reduce wasteful, uneconomical, impractical, or unreasonable use of water resources. In addition, all economically and technically feasible alternatives to the use of traditional sources are considered, including, but not limited to, brackish water, reclaimed water, stormwater, and aquifer storage and recovery. Each District has adopted rules for regulating the consumptive use of water.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
26	Anonymous, Unknown name	6/19/15 Please do not allow any more water to be taken out of Silver Springs. The eco tourists, boaters and fisherman downstream from the springs will bring more money into county coffers than one billionaire farmer from Canada. Not only will all of these cattle require enormous amounts of water but just think of how much waste will be running into the springs from all of the manure they create.	The CFWI Regional Water Supply Plan and 2035 Water Resources Protection and Water Supply Strategies Plan identify programs, projects and strategies to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources within the CFWI Planning Area. The CFWI Planning Area is located in central Florida and consists of all of Orange, Osceola, Seminole, and Polk counties and southern Lake County. Silver Springs is not included in the CFWI Planning Area and therefore is not addressed in these documents.
27	Cheryl Rogers, Concerned Citizen	6/19/15 I feel very strongly about Central Florida taking water out of the St. John's River. It should not be done. Just because they over built their lands and did not factor in the amount of water they needed to supply these residences, does not justify them taking water from a River that is used by all the people in northern Florida. It is a beautiful river and the wildlife and eco system could be devastated if all the proposed water is drained from it. When I lived in the southern region of Florida, at one point Lake Okeechobee was extremely low and we were warned to conserve water at all costs. We did so and the Lake is finally up to what it should be. Developers need to learn that water does not grow on trees and they can't take what they want when they want it. Enough is enough. Let Central Florida find another source of water and leave the St. John's alone.	In 2012 St. Johns River WMD published the results of a four-year Water Supply Impact Study (WSIS), which provided a comprehensive and scientifically rigorous analysis of the potential environmental effects to the St. Johns River associated with annual average surface water withdrawals of 155 mgd from the middle and upper St. Johns River. The WSIS, which was peer-reviewed by the National Research Council, confirms the findings of earlier investigations indicating that the St. Johns River can be used as an alternative water supply source with minimal to negligible environmental effects. The WSIS identified alternative water supplies that protect both groundwater and surface water resources and included the development of tools to help guide future decision-making regarding the increased use of surface water from the St. Johns River (SJRWMD 2012). Comment #27 is continued on next page

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #27 continued.</p> <p>As described in the CFWI RWSP (Volume I) and 2035 Water Resources Protection and Water Supply Strategies Plan (Volume II), fresh groundwater resources alone cannot meet future water demands or current permitted allocations without resulting in unacceptable impacts to water resources and related natural systems. The sources of water potentially available to meet projected water demand in the CFWI Planning Area include fresh groundwater, brackish groundwater, surface water, seawater and reclaimed water. Improvements in water storage capacity (via Aquifer Storage and Recovery and reservoirs) and water conservation can provide significant opportunities to manage or reduce water demands. The CFWI RWSP (Volume I) provides an overview of the potential water source options available to water users within the CFWI Planning Area.</p>
28	George DeMonbreun, Concerned Citizen	<p>6/20/15</p> <p>There is no reason to do anything to disturb the beautiful Silver Springs. We must stop this ridiculous idea in order to maintain this beautiful area which has been a wonderful attraction bringing people to Florida for many years. I am 73 years old, I can remember going to Silver Springs on family vacations as a child. Please do not allow anyone to disturb this beautiful attraction. Mother Nature has provided this to been seen, not destroyed.</p>	<i>Please refer to Volume II, Solutions Strategies Comment #26 response.</i>
29	Janet Hogshead, Concerned Citizen	<p>6/20/15</p> <p>We wil not have control over water shortages until we manage wasteful use. Everyone must be conscious of how they are using this commodity. Water conservation begins with planning to save, and developing the public participation in these conservation necessities.</p> <p>Comment #29 is continued on next page</p>	Thank you for your comment.

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		Comment #29 continued. Cities all over the country have developed water conservation plans. It is time Florida cities to do the same, rather than selfishly taking and squandering the first source at hand. Eventually we will all be forced to conserve our water sources. Let's not hurry that time on us heedlessly. We must recognize the world is changing and change our methods to meet its true situations.	
30	Pauline Berkeley, Concerned Citizen	6/20/15 I very strongly object to the CFWI Water Supply Strategies Plan. It calls for massive withdrawals of water rather than focusing on water conservation. We need to protect the St. John's River as it is one of our most important natural resources. Thank you for your attention.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
31	David Gore, Concerned Citizen	6/21/15 It is important that my comments made at many CFWI meetings concerning water conservation be more accurately recorded and considered. That the action of water conservation is not just limited to an ability for the reduction or efficient use of water. It is also the prevention and loss of water by other very harmful impacts. The amount of available water is greatly effected by conserving water from loss by other impacts unrelated to water use or actions that contain and conserve more water to the land and make a greater amount and more water available. The greatest waste of freshwater is occurring from actions that cause the unnatural loss of water from or to sustain our natural systems and the amount of water available for our use. The idea that is promoted in the CFWI or WMP is that the cause of our water shortage problem or harm to our natural systems is being caused by water loss by the withdrawal and use of water that virtually ignores all the cause by other ongoing impacts.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
32	Matthew Morris, Concerned Citizen	6/21/15 Greetings, I would like to voice my stance against the CFWI's plans to withdrawal water from northeast Florida's water supply (such as the St. Johns River) to provide for residents in Central Florida. In an era where our nation is experiencing water shortages like never seen before, I cannot accept the notion to allow water withdrawals to provide water to residents that will not see the negative impacts of the water withdrawals, but only the benefits. The St. Johns River is already under severe pressure from sprawl, nutrient overload, the potential dredging of Jax Port, and even water withdrawals for Sleepy Creeks Ranch (another big mistake). Other avenues for providing water to C. Florida residents should be taken, without taking water from NE Florida waters.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
33	Helen Craig, Concerned Citizen	6/21/15 It is essential that we protect the springs which feed the St. Johns River and do not use this river's waters for unnecessary commercial or private projects. The St. Johns is a beautiful, vital and endangered resource which we are polluting and threatening by short-sighted actions. Please listen to the reasoned pleas of our St Johns Riverkeeper and join in our effort to save this legacy for ourselves and the generations of northeast Floridians which follow. Thank you!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
34	Cathleen Burns, Concerned Citizen	6/21/15 Please do not permit siphoning off water from Silver Springs, it is there for a reason and that would be extremely detrimental to more than you can even imagine.	<i>Please refer to Volume II, Solutions Strategies Comment #26 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
35	Linda Fern, Concerned Citizen	6/21/15 The St. Johns River is already struggling to become healthy. Removing vast amounts of water from the river will only cripple it further. It will not help the pollution problems in the northern part of the river to remove water from the river.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
36	Dennis Cumiskey, Concerned Citizen	6/22/15 I am strongly against the Central Florida Water Initiative (CFWI) Water Supply Strategies Plan. Your proposed water withdrawals from the St. Johns River will greatly reduce it's chance of sustainability. I will write, vote, and contribute to stop this greed.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
37	Lauretta Gaylord, Concerned Citizen	6/22/15 We are out of town for the month. Thank you for taking up this important issue for the people of Florida. Unfortunately, like so often our legislators can not be trusted- think the Florida Lottery...	Thank you for your comment.
38	Lowell Stephens, Concerned Citizen	6/22/15 Where will the human waste from the use of the withdrawal waters end up? At what point does reductions in flow call for the shut down of the discharge of pollution from the Georgia Pacific plant in Palatka?	Domestic wastewater is processed through regional water reclamation facilities and the treated water is reused for a variety of beneficial uses, such as, irrigation, groundwater recharge, power plant cooling, etc.
39	Janice Barnes, Concerned Citizen	6/22/15 SFWMD, I realize that we have a governor and a legislature who deny climate change and science but that does not change the fact that it is real. Water is a precious resource that MUST be protected. NASA has confirmed that water supplies are drying up. Instead of over developing, we should be taking measures to conserve and educate residents about water use. We certainly should not be watering lawns with potable water. We need bold actions to preserve this resource starting with rejecting any withdrawal from an already struggling and polluted St. Johns River.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response on conservation issues and Solutions Strategies Comment #27 response for St. Johns River issues.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
40	Dianne Walsh, Concerned Citizen	6/23/15 Water withdrawal from the St Johns is not sustainable for the health of the river. Please do not vote for such large withdrawals which are being considered.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
41	Ron Zamora, Concerned Citizen	6/23/15 The St Johns River is not an endless supply of water! Withdrawing millions of gallons per day will do irreparable harm to this beautiful waterway! I've lived in North Florida since 1959. I remember the hyacinth growth of the 1960's! This river cannot be taken advantage of in this manner! Do not do this!!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
42	Robert Lesko, Concerned Citizen	6/24/15 It's easy to get confused on these issues. Up here in NE FL. we draw our water from the Florida Aquifer which flows south to Central Florida. Now Central Florida want to draw water from the St. Johns river which flows north to NE Florida. So what one utility can do, the other can't? Below is pasted from the JEA website: Jacksonville's Drinking Water System JEA delivers more than 10710 million gallons of water each day to our customers. We regularly test the water we send to customers to ensure its safety, as outlined by federal and state regulatory agencies. Our state-of-the-art technology monitors our water supply grid to bring fresh, clean water to your home. What's in your water? Since your water comes from the pristine Floridan aquifer, most of the elements found in it occur naturally. H	Thank you for your comment.
43	Robert Wise, Concerned Citizen	6/25/15 I am all for the Water Resources Protection & Water Supply Strategies Plan to limit the withdrawal of water from the St. John's. Thank you.	Thank you for your comment.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
44	Davron Cardenas, Concerned Citizen	6/26/15 Conservation has to come first! Why are we being so irresponsible with our very finite resources?	<i>Please refer to Volume II, Solutions Strategies comment #14 response.</i>
45	Polly Cleveland, Concerned Citizen	6/26/15 To whom it may concern, I am writing to voice my opposition to any project which could remove up to 154 mgd of surface water from the St. Johns River I believe based on my reading of these projected surface water withdrawals they are being justified based on the findings of a flawed study by the SJRWMD. I also understand the average total water usage for central Florida will increase from 800 millions gallons a day to about 1,100 mgd by 2035. These plans seem to rely most on surface water withdrawals and not on proven cost-effective conservation strategies. According to the St. Johns Riverkeeper these proposed withdrawals could : 1. cause more pollution problems 2. cause more toxic algal blooms 3. further reduce flow and increase salinity levels farther up stream and adversely impact the fisheries, wildlife and submerged plants in and along the St. Johns and its tributaries. I therefore urge the CFWI to remove surface water withdrawals projects from the water supply plans and focus on conservation and reuse measures. Thank you so much for your time and all that you do, Polly Cleveland	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
46	Judith Hankins, Concerned Citizen	6/27/15 I object to the withdrawal of water from the St. John's River in northeast Florida, to be "given" to central Florida. The St. John's River is already polluted with algae blooms, etc., and cannot afford to make the situation worse by "giving" millions of gallons of water (daily) away.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
47	Joe Bourassa, Concerned Citizen	6/28/15 At the SC's June 26 meeting, Mark Hammond presented a 19 page PP presentation titled "Dtaft Plan Review". On pages 11 was a "CFWI Gross Per Capita 2005-2014: [GPC] Graph", on page 12 was a "CFWI County Level Gross Per Capita" 2005-2014 Graph". QUESTION; Since both graphs are GPC and are calculated knowing and using the "Total Water Use" and "Population" through 2014, why was not Page 3, "Historic Water Use vs Population in the CFWI" [CFWI's HWU/P] also updated? REQUEST: Please supply the 2013 & 2014 data for "Total" and detail "Category's" used for these GPC graphs, and when will the HWU/P graph be also updated? EXPLAIN; Why can't I highlight and copy this page for reference??	Thank you for the comment regarding a Steering Committee presentation on June 26, 2015. Data were provided to you on 6/30/15. Updated information will be included in the 5-year CFWI RWSP update.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
48	Kimberly Lawrence, Concerned Citizen	6/29/15 Reuse water while beneficial does not come close to meeting surface water quality standards. Negative impacts to surface water quality have been documented. Stormwater treatment systems are not designed to address the additional loading of reuse irrigation. This needs to be recognized, addressed and mitigated for by the state and water providers (not the MS4s) if reuse continues to be a priority. Additional surface water monitoring and base flow monitoring is necessary for reuse areas and near WWTF to ensure surface water quality is not negatively effected.	Section 403.064, F.S. establishes the promotion and encouragement of reuse and water conservation as formal state objectives, reuse is considered to be in the public interest, and concludes that reuse systems designed and operated according to DEP rules shall be considered environmentally acceptable and not a threat to public health and safety. In addition, Rule 62-610.830, F.A.C. addresses the antidegradation of storage lakes, including stormwater management systems that receive reclaimed water. A number of initiatives are being implemented to minimize the potential for nutrient loading associated with the use of reclaimed water. These include reducing the nutrients in reclaimed water where feasible, providing adequate education to reclaimed water users to incorporate reclaimed water derived nutrients needs into fertilization regimes, and providing best management practices to address reclaimed water runoff after mixing with surface waters.
49	Carolyn Cooper, Concerned Citizen	6/29/15 I am writing to encourage conservation and reduction of water removal from the St. Johns River. I feel that growth management has not occurred in Florida and the water resources are suffering as a result. Many of the springs and fresh water rivers in Northern Florida have reduced flow. The water quality has also been reduced due to increased nutrients from agricultural runoff and leaching of septic tanks. Taking more water from the St. Johns will increase these problems. Please carefully consider the long term impacts of your actions for the future. Sustainable growth and planning is a much better plan.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
50	Arthur Nussel, Concerned Citizen	7/1/15 in re your conservation plans relative to making potable water: Great idea, but I doubt the technology. I know we are good at removing many elements from previously used water. but One major concern with regard to making potable water is removing those elements dumped into the sewage from homes, hospitals, labs, etc. It is unused drugs such as antibiotics, opioids, hormones, etc. I do want to drink water with these compounds in it. I do NOT know that our removal systems can deal with drugs in the water supply.	<i>Please refer to Volume II, Solutions Strategies Comment #16.2 response.</i>
51	Jonette Boote, Concerned Citizen	7/2/15 We will not have the resources for central Florida to continue to expand its land development at the rate being proposed. Do you want to wind up with similar water shortage problems as California? In addition, the Florida panther needs large expanses of wilderness in order to survive.	<i>Please refer to Volume II, Solutions Strategies Comment #12 response.</i>
52	Harriett Jones, Concerned Citizen	7/4/15 You are stealing our heritage and polluting our lakes and aquifer. We need conservation, not more debt squandered for further urban sprawl. We taxpayers end up with the problems of pollution, noise and congestion. No using surface water and no more desalinization for unchecked growth.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
53	Mike Elliott, Concerned Citizen	<p>7/6/15</p> <p>We continue to allow more and more withdrawal from the St. Johns and also continue to allow mitigation of contiguous wetlands to the St. Johns River. As a result, we can expect poorer water quality, more salt intrusion and less wetland areas to absorb unusual flood effects. All of this will affect wildlife and human enjoyment of one of our prized resources.</p> <p>My wife and I looked for property to purchase on the river for over 12 years, found a place we could afford 16 years ago and are very concerned about the river's future.</p> <p>Respectfully, Mike and Suzie Elliott</p>	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
54	Lynn Radok, Concerned Citizen	<p>7/8/15</p> <p>Hi,</p> <p>I have worked on the Silver River, as a boat Captain, for 15yrs - both with the Silver River Museum, and the Glassbottom boats.</p> <p>It is very disturbing to hear that drawing water from the St. John's, or the Ocklawaha is even being considered. This is a bad idea for so many reasons! The very last thing we need to do is take water from bodies that have been clearly displaying distress for many years, and that will only become more stressed with a draw down.</p> <p>We have so many proactive cues from California - if we'd only pay attention to what is happening there currently. We need to mandate many more water conserving steps.</p> <p>NOW</p> <p>Such as: Mandatory moisture (as opposed to rain) sensors on ALL irrigation systems. I constantly see already soaked lawns, with sprinklers going, and water running into the street.</p> <p>Comment #54 is continued on next page</p>	<i>Please refer to Volume II, Solutions Strategies Comment #14 (conservation), #26 (Silver River), and #27 (SJR) response.</i>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #54 continued.</p> <p>Subdivisions need to allow alternatives to lawns. Vegetable gardens, xeriscaping, fake grass (it ain't what used to be!), rock gardens etc.</p> <p>Commercial areas need to be monitored much more carefully for wasted water. They should not have to water as often as they do - many of the plantings do not require much at all - yet it is done anyway.</p> <p>Remove Rodman Dam! It needs to be gone, in order to help restore migratory animals, and the health of the St.John's, Ocklawaha, and Silver rivers</p> <p>All homeowners need to be allowed to have rain barrels and cisterns, to take advantage of our wonderful summer downpours!</p> <p>Bottling companies - if they're continued to be allowed to hog our water supply - should be charged per gallon, with that money going into restoring the health of our struggling waterways. And the amount of water taken needs to be limited and monitored !!! I see tankers right across SR40, from Silver Springs entrance - coming 24/7 - even on holidays. Once a permit is pulled - no one seems to care any more!</p> <p>Stronach's cattle disaster in Ft. Mc Coy, needs to be gone. Town Commissioners in all areas, need to just say NO to endless, random development. In-fill building, sell off existing real estate, fill stores in so many partially filled shopping centers, before building more faceless, mindless strip malls, that often decimate beautiful stands of forest, take away the individuality of an area, and make everything look alike by covering it in pavement. For what ?</p> <p>If we don't take our dwindling and troubled water supplies more seriously, start imagining what Florida will be like with no water at all. California is giving glimpses into our possible future - and it's not good.</p> <p>Sincerely, Capt. Lynn Radok</p>	

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
55	Samantha G. Hoskins, Concerned Citizen	7/10/15 I'm concerned that proposed water withdrawals from the St. John's river are not realistic. They could worsen existing pollution, increase eutrophication and algal blooms, increase salinity levels, and threaten the health of our river. Please reconsider the proposed withdrawals.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
56	Carol MacDonald, Concerned Citizen	7/11/15 It is imperative that CFWI focus its efforts on water conservation and forgo any thoughts of withdrawing water from the St Johns River or any of its tributaries. Such withdrawals would cause great damage to an important American Heritage River. Carol MacDonald	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
57	Kate Gallagher, Concerned Citizen	7/12/15 Please recognize that there are healthy growth limits. Taking water from the St. John's river harms sustainability for the whole water system. Your mission is to be a good steward; conservation and limits are imperative for a sustainable future. Thank you	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
58	Alex Peaks, Concerned Citizen	7/13/15 I believe that to plan on drawing water from the St. Johns in order to meet future demand is a terrible idea and one that repeats the mistakes of the past with regard to the management of Florida's water supply. The plan should focus instead on water conservation throughout central and northern Florida, storage in constructed underground reservoirs, and treatment of runoff for use as a non-potable source. The St. Johns is already severely stressed due to pollution and drawing water from it so people can water their St. Augustine lawns is the height of folly.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
59	Barbara Dees, Concerned Citizen	<p>7/13/15</p> <p>I'm writing to oppose taking water out of the St John's River as a way of meeting water supplies. We cannot just keep sucking up the water from rivers and springs. We need to find ways to cut our water consumption and save our rivers and ground water from depletion.</p> <p>I grew up in Miami. Fresh water from the aquafer used to bubble up in Biscayne Bay. Of course, that was years ago because it was sucked dry by over consumption.</p> <p>We cannot keep thinking there will be no end to the water supply. We have to treat water sources as precious property and take care of them, keeping them clean and using them judiciously.</p>	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
60	Edward McDonald, Concerned Citizen	<p>7/16/15</p> <p>Link</p> <p>Mr. Memberg,</p> <p>I have watched a video of the presentation that you gave this past June 29th in Jacksonville. Your main topic was water conservation. I am a big believer in the efficient use of water and it's clear to me that water efficiency improvements has played a major role in the reduction in water usage that we have seen over the past decade or so. The fact that water is now receiving so much attention, it would be my opinion that this trend in ever improving water use efficiency will continue for the foreseeable future.</p> <p>Water management districts in partnering with local government growth management agencies can enhance the trend in water use efficiencies that, up until now, has occurred with little organized guidance and direction. In other words, water use efficiency improvements have occurred on a pretty much voluntary, hit and miss bases. There have been very few requirements for mandatory reductions in water use. Outdoor watering restrictions are the closest thing that has been</p> <p>Comment #60 is continued on next page</p>	<p>We concur, components of water conservation are anticipated to occur in early 2016.</p> <p>The CFWI RWSP (Volume I) and Solutions Strategies (Volume II) support increased conservation efforts. <i>Please refer to the Solutions Strategies (Volume II), Chapter 7 'Implement Water Conservation Programs section and the CFWI RWSP (Volume I), Chapter 11, Water Conservation section.</i> The Solutions Strategies identified \$170 million for increased water conservation over the next 20 years. This is one cost scenario and will be reevaluated and adjusted over time and could result in increased funding for water conservation. A 5-year work plan is being developed to detail how funding could be spent to accelerate implementation of conservation measures.</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #60 continued</p> <p>implemented that are designed to reduce overall water consumption. Again, actual enforcement of these restrictions is for the most part non-existent.</p> <p>Looking at comments that have been made to the overall CFWI effort is it very clear that water efficiency improvements is to be the primary focus of any water supply plan. I for one, will be looking at the next iteration of the CFWI RWSP with the expectation of seeing a much greater emphasis on demand side management. That's what the public has demanded and that's what we need to see happen.</p> <p>Agricultural water use is still a major component of our water demand. Because of this fact and the fact that agricultural use consists of a relatively small number permitted water users, there is a real potential for a concentrated effort to improve water efficiency in this sector of water use. I disagree with a statement that you made during your presentation that implied that the cost of pumping water will automatically encourage agricultural water users to maximize their water use efficiencies. I don't know the numbers that you use to determine the cost to agricultural users per thousand gallons of water, but my estimates are in the range of \$0.08 to \$0.16 per thousand gallons pumped. The large range is due to the cost difference between diesel and electric power.</p> <p>I have attached the commercial and industrial water rates [Link] for the City of Lakeland's Department of Water Utilities. As you can see they have a consistent rate of \$2.15 or \$2.90 per 1000 gallons. Based on my numbers, it would be my opinion that agricultural users are getting essentially free water. The incentive to improve the efficient use of agricultural irrigation water is not so much to benefit the actual agricultural users, but to free up that quantity of traditional groundwater so that it can be used to offset the need to build expensive, alternative water projects.</p> <p>Thanks for time.</p>	

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
61	Anonymous, Unknown name	7/22/15 PLEASE remove surface water withdrawal projects from the water supply plans and focus on conservation, reuse, and other more sustainable alternatives. Our water supply is a precious natural commodity and we need responsible people to protect it!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
62	Alison Marini, Concerned Citizen	7/24/15 Please remove surface water withdrawal projects from the water supply plans and focus on conservation, reuse, and other more sustainable alternatives!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
63	Joe Bourassa, Concerned Citizen	7/26/15 It appears that the DEP, SJRWMD and SWFWMD have removed from their websites all previous reports on their Regional/District Water Supply Plans [RWSP's]. ?? Why ?? The obvious disparity between their latest "Projections" and the actual Water Use History is so great they had to ?? Although hard to find in the CFWI's reports, there is at least a copy of the Historical Water Use in comparison to the Projections. In the primary Water Use growth area--Public Supply--after 4 years [2010-2014] the evidence is a 15% REDUCTION from the RWSP, and it continues to increase, With the past Conservation based reductions continuing, there is no need for the multi Billion Dollar programs as outlined in the "Solutions" report. Time for the Steering Committee to look at the historical record and cancel the CFWI's RWSP project! For the Facts please request them from me by email---address as above. Best Regards, Joe	The most current SWFWMD Regional Water Supply Plans are located at http://www.swfwmd.state.fl.us/documents/plans/RWSP/ The most current SWFMWD Estimated Water Use Reports are located at http://www.swfwmd.state.fl.us/documents/index.php#ewu The most current SJRWMD plans are located at http://www.floridaswater.com/watersupply/planning.html and http://www.floridaswater.com/watersupply/waterusedatamanagement.html The projections made for the RWSP are a "snap shot" in time and were developed using the best available information at the time developed. These are conservative estimates and recognize the need to use the best available data. Demand projections will be updated prior to the next RWSP update. Conservation is included among the options, and is given first consideration, in meeting the projected needs, versus developing more costly alternative water supplies.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
64.1	Sharon Garrett, Farmer and Concerned Citizen	7/31/15 Link – Comments 64.1, 64.2 & 64.3 General comments (acronyms or abbreviations and maps.).	A list acronyms and abbreviations has been added to the Appendices (Volumes IA and IIA).
64.2	Sharon Garrett, Farmer and Concerned Citizen	7/31/15 Ag and Urban Conservation issues	<p><u>Ag and Urban Conservation</u>: High-efficiency fixtures, which receive the EPA's WaterSense® label, use at least 20% less water than standard fixtures and have been third party tested to ensure that end user performance expectations are met (www.epa.gov/watersense).</p> <p><u>Golf Courses</u>: Chapter 373, F.S., provides for the equitable distribution of water and enables and directs the water management districts to regulate the use of water within its jurisdictional boundaries. The purpose of the water use regulatory program is to ensure that those water uses permitted by the District are reasonable-beneficial, will not interfere with any presently existing legal uses of water, and are consistent with the public interest pursuant to Section 373.223, F.S. The process requires efficient utilization of water for the intended purpose to prevent and reduce wasteful, uneconomical, impractical, or unreasonable use of water resources. In addition, all economically and technically feasible alternatives to the use of traditional sources are considered, including, but not limited to, brackish water, reclaimed water, stormwater, and aquifer storage and recovery. Each District has adopted rules for regulating the consumptive use of water. We concur of the value of natural systems in providing water retention and groundwater recharge in addition to their habitat value.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
64.3	Sharon Garrett, Farmer and Concerned Citizen	7/31/15 Blue Belt law	<i>Please refer to Volume II, Solutions Strategies Comment #11.2 response.</i>
65	Ray Hays, Concerned Citizen	8/5/15 Harming the St. Johns river should not be an option to try to stem the flow of wasted water. None of the State's WMDs have done more than pay lip service to the concept of conservation. We in North Florida will not stand idly by while Central Florida tries to suck water from our rivers to water lawns. It is time to realize that the rate of water use in Florida is unsustainable and that stealing it from one part of the state to give to another is not a solution. Florida is engaged in a suit in Federal Court over Georgia taking river water that should flow to Florida. It is the same premise that Orlando would steal river water from Palatka, Green Cove, Orange Park, and Jacksonville. Trying to have it both ways is the definition of Hypocrisy. If Florida prevails in the Supreme Court, it will provide the precedent to drag out the Central Florida water grab for years.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
66	Ray Hays, Concerned Citizen	<p>8/5/15 (submitted via email)</p> <p>What is the difference between Georgia withholding river water from Florida and Central Florida withholding river water from North Florida?</p> <p>Hypocrisy. Georgia isn't lying about the science.</p> <p>This is not a joke and North Florida will not sit quietly while the CFWI tries to further damage the St. Johns watershed by sucking 160 MGD from it. This river is the seminal feature of Jacksonville. Further deterioration of water quality and flow in it will have far greater negative economic impacts than you can afford to mitigate or the Cities of North Florida can afford to ignore.</p> <p>Hey Orlando, why don't you institute real conservation? How many millions of gallons per day do the residents of your WMD waste? And, why should the taxpayers of Florida pay 1.79 Billion dollars so you can continue to waste water and destroy the lower basin of the St. Johns? Conservation is cheaper and more effective and should be your alternative water source, not our river.</p> <p>Respectfully, Ray Hays Jacksonville</p>	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
67	Steve & Mary Hampton, Concerned Citizens	<p>8/6/15</p> <p>ATT: Mr. Dean Powell, Water Supply Bureau, CFWI</p> <p>Comments</p> <p>According to the St. Johns River Water Management District (SJRWMD), Central Florida is reaching the SUSTAINABLE LIMITS of its predominant source of water, the Florida Aquifer.</p> <p>In May, 2015 (3 months ago), CFWI released the Draft Regional Water Supply Plan and 2035 Water Resources Protection and Water Supply Strategies Plan which call for potentially withdrawing up to 160 million gallons of water PER DAY from the St. Johns at a cost of nearly 1.79 billion dollars. Massive water withdrawals will WORSEN existing pollution problems. Withdrawals are being justified based on findings of a flawed SJRWMD study.</p> <p>Oddly enough, despite the LOOMING water shortages, Florida's Water Management District continues to issue FRIVOLOUS Consumptive Use Permits (CUP) that WILL further deplete Florida's Aquifer.</p> <p>We are writing to you today to: 1. REMOVE the harmful water withdrawals from CFWI's plans. 2. REQUESTING you instead implement and enforce aggressive, CONSERVATION plans and policies effective as soon as possible. 3. WATER CONSERVATION works. WATER CONSERVATION CAN meet most, if not all, of our water supply needs. WATER CONSERVATION is much more cost effective and environmentally responsible than all alternative methods. We hope you understand our recommendations and will follow them closely when you make your collective decision that will be IN THE PUBLIC's BEST INTEREST.</p> <p>Sincerely, Steve and Mary Hampton and all of their children and grandchildren</p>	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
68	James Igler, Concerned Citizen	8/6/15 If we do not take better care of our water.... the defining area of who can live where.... we will have to live elsewhere.....	Thank you for your comment.
69	Panagiota (Pola) Godsey, Concerned Citizen	8/6/15 I respectfully ask that CFWI REMOVE this harmful plan for extreme water withdrawals (potentially withdrawing 160 million gallons of water per day from the St. Johns River at a cost of nearly \$1.79 billion dollars). Instead I request that they implement and enforce aggressive, conservation plans & policies. Water conservation DOES work.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
70	Gary J Bowers, MD, Concerned Citizen	8/11/15 Water conservation and not river water should be focus of CFWI. The CFWI seems to be suffering from the delusion that there is as yet untapped a large pool of water to divert and use to sustain Central Florida's non-sustainable growth. Our rivers, streams, lakes, springs and aquifers strongly suggest otherwise. They are already showing the results of years of over exploitation. We need growth management not further exploitation!!! As the state's water managers, the three involved water districts need to step up to the plate and serve the public rather than special interest groups which so predominate in Tallahassee starting in the governor's office. The water management boards should be advising the legislature on how best to steward this vital resource and stop rubber stamping the growth only policies being advocated by an out of touch governor!!!!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
71	Martelle Mitchell, Concerned Citizen	8/11/15 Start using water conservation as your primary plan for future water supply! Our rivers, lakes and springs should be protected for future generations, not used by greedy developers to create overdeveloped housing in central FL.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
72	Erin Handy, Concerned Citizen	8/11/15 I have serious concerns that these proposed withdrawals to supply Central Florida from the St. Johns River would: Worsen existing pollution problems, Increase the frequency of toxic algal blooms, Further reduce flow and increase salinity levels farther upstream, and Adversely impact the fisheries, wildlife and submerged vegetation in and along the St. Johns and its tributaries. I urge the CFWI to remove surface water withdrawal projects from the water supply plans and focus on conservation and reuse. Erin Handy	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
73	Daniel Dean, Concerned Citizen	8/11/15 I am a Florida resident and am not in favor of future surface water withdrawals of the St. John's River. Our aquifer is overdrawn and we need to focus on water conservation, not continuing to consume without regards to sustainability. Thank you.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
74	Cynthia Baldwin, Concerned Citizen	8/11/15 Please direct your efforts more heavily toward conservation rather than surface water withdrawal. Our waterways must be protected unless there is no alternative. Conservation is a serious alternative. I would prefer to see lawns sacrificed rather than our rivers. We could begin with rules regarding drought resistant landscaping on properties involving new construction and on re-landscaping efforts involving existing construction. I would be in favor of this and of other consumer conservation efforts. Thank you for your consideration. Cynthia Baldwin	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
75	Carroll Giocondo, Concerned Citizen	8/11/15 One can only think that you are doing this for personal benefit, as giving water away and not focusing on conservation has no long-term community and state benefit.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
76	Gina Holt, Concerned Citizen	8/11/15 This plan is shortsighted and favors development at the expense of current residents and the environment. We must conserve water, we must protect not only our waterways but our aquifer from additional pollution from runoff. We must stop issuing consumptive use permits faster than our aquifer can recharge. We must realize that our State can only support so many people, or the quality of life of all residents will suffer. Please favor water management plans that conserve, not consume. Who will be held accountable when our aquifers go dry?	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
77	Jonathan Rader, Concerned Citizen	8/11/15 I respectfully implore you all to please remove surface water withdrawals from your proposed plans and to start focusing on water conservation.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
78.1	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	<p>8/11/15</p> <p>General comments:</p> <ul style="list-style-type: none"> • Overall reaction from Seminole County League is that there is little emphasis on conservation. The projections for future water usage are overly optimistically low. • The deep wells located in Wekiva are pulling water from the lower Floridian. If there are fractures, there may be leakage. We need more data on this. (It was noted that the Villages pulls water from the upper aquifer for potable water and lower aquifer for irrigation water, so this might be a good study location. • There is an inequity between the cost to be paid by the public \$2.8B over 20 years and the cost of a CUP (\$1000). The Cost of permitting should equal the marginal cost of producing water. • Need to define acceptable harm. • There are no teeth in the conservation measures; need strong regulations. • Why is there no public representative on the Steering Committee? • What was the process to get the draft to the steering committee and did the steering committee vet the draft or have questions prior to approving it? 	<p><i>Please refer to Volume II, Solutions Strategies Comment #13 & 14 responses regarding Conservation.</i></p> <p>The implementation of the DMIT recommendations is a critical component to future water supply planning for the CFWI region. The additional data collected as a result of the DMIT recommendations will facilitate the refinement and expansion of models and hydrologic and environmental analyses, the further development of water supply project options, and the assurance that environmental measures are being met. Implementation of additional monitoring over the next five years is estimated to cost the three water management districts collectively more than \$30 million.</p> <p>Thank you for your comment, after review no changes were incorporated. For the CFWI, this will be addressed in the MOU developed by the three water management districts.</p> <p>The Solutions Planning Team had a diverse group of stakeholder representatives including business and the environment. Stakeholders were also part of the subteams who provided input throughout the process and development of the RWSP.</p> <p>The documents were made available to the Steering Committee and status updates were provided at monthly Steering Committee meetings.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
78.2	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	<p>8/11/15</p> <p>Exec summary: FAS is already over-pumped and cannot sustain additional 50 mgd withdrawal.</p> <ul style="list-style-type: none"> • MFLs currently not met. • Meeting sustainable limits should be a necessary condition for CUPs, but not sufficient. "The sustainable limits of groundwater withdrawals are used by the Districts for planning purposes only and should not be viewed as regulatory constraints for specific consumptive use permits. Consumptive use permitting decisions are made with additional information . . ." • Alternative concept: reduce FAS pumping to the rate which will restore MFLs and potentiometric levels. • Page vii: LFA withdrawals: questions exist about fracture connections between LFA and UFA, through the middle confining unit. The Villages (Marion/Sumter/Lake Counties) gets irrigation from LFA and potable supply from UFA. Transient modeling this area can provide leakage estimates on middle confining unit. Has this been done? The ECFT GW model covers most of the Villages. • P xii: Excellent proposal to develop and establish consistent rules across WMDs. • P 10: MFLs are to be established for aquifers, per F.S. and the WRP: "MFLs for water bodies, water courses, wetlands, and aquifers." • P 55: Excellent consideration of reuse water for potable source. 	<p>Based on the CFWI RWSP work, it was estimated that approximately 50 mgd of additional traditional groundwater could be available for water supply on a regional basis, through the implementation of local management activities (e.g., wellfield optimization, aquifer recharge, and augmentation) to avoid or mitigate impacts to the region's water resources.</p> <p>Improvements are planned for the ECFT Model as discussed in Chapter 7 of the Solutions Strategies (Volume II) document.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
78.3	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 Comments on conservation measures: <ul style="list-style-type: none"> • "Education, outreach, and public engagement" are insufficient incentives for implementation of BMPs. Need regulatory measures. Specific suggestions: <ul style="list-style-type: none"> • Property title transfer requires installation of water-efficient appliances. • New water use, such as CUP, requires water savings elsewhere to match new rate, such as eliminating turf grass or decorative water use, capture of stormwater for irrigation, etc. • Provide incentives for residential users to install stormwater capture for irrigation. • Provide residential incentives, such as WMD tax reduction, for removal of turf grass • Require (or incentivize) central linen service in hotel areas, like International Drive 	<i>Please refer to Volume II, Solutions Strategies Comment #13, #14, & #15.1 responses.</i>
78.4	Marty Sullivan, Natural Resources Committee League of Women Voters of Orange County	8/11/15 <ul style="list-style-type: none"> • Use more reuse water for irrigation, particularly turf grass and residential. • Replace septic tanks with municipal WWT to capture more reuse water. • All WWTP outflow goes to reuse, true reuse, not RIBs or artificial wetlands. • Reuse water must first target replacement of potable water rather than going to RIBs or wetlands. 	<p>The CFWI RWSP (Volume I) and Solutions Strategies (Volume II) supports increased conservation efforts including the efficient use of irrigation systems. <i>Please refer to Implement Water Conservation Programs section in Chapter 7 of the Solutions Strategies (Volume II) and the Water Conservation section in Chapter 11 of the RWSP (Volume I).</i></p> <p>The Districts are committed to investigating potable reuse projects that are environmentally safe, provide benefits to the environment, and help meet water needs. State water planners are monitoring the efforts of California, Texas and the WaterReuse Association to help determine options for potable reuse in Florida.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
79	Deborah Karably, Concerned Citizen	8/11/15 Our family has lived in Florida since the 1920s. We have seen the development change not only the landscape, but the springs and underground aquifer. All Floridians need to be conserving water and developers need to be paying their share in the development of recycling grey water, and xeriscaping. Unless we change our habits now, we will succeed in destroying those exact resources that bring so many to live in this beautiful state. We cannot keep pumping water out of the aquifer and from the rivers without dire consequences.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
80	Sharon Garrett, Farmer and Concerned Citizen	8/11/15 Link Injection wells/treated wastewater	<i>Please refer to Volume II, Solutions Strategies Comment #16.2 response.</i>
81	Eva Toutain, Concerned Citizen	8/11/15 Please save the St. John's River and focus on conservation. It is time to stop the reckless ways we have treated our environment and start to realize that our resources are precious and shouldn't be treated carelessly!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
82	Mary Williams, Concerned Citizen	8/11/15 Enough already! What kind of devastation will have to take place before central Florida is made to stop? This state should've cut them off long before now! There should be no pulling off the st.johns river at all for irrigation. This is utter nonsense! Don't allow these water hogs to ruin our river, destroying it's natural tributaries by starving them with such large withdrawals	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
83	Paul Mack, Concerned Citizen	8/11/15 I reject idea to pump water to south Florida, Orlando, Tampa. Leave the river water in the county it lives in. Thank you.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
84	Gina Rogers, Concerned Citizen	8/11/15 Florida's aquifer and unique bodies of water have been abused for too long and now we are already beginning to pay the price. Please lend your support to strengthening and not further destroying the St Johns.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
85	John Phinney, Concerned Citizen	8/11/15 REMOVE SURFACE WATER WITHDRAWALS from the plans and FOCUS ON WATER CONSERVATION!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
86	Shawn Eager, Concerned Citizen	8/12/15 I have lived i n Florida since 1971. I have known many with lake or river homes. over the last 20-30 years I have watched a decline in water volume as well as water quality. I have watched the public's access to waterways fall into private ownership. I have seen the gross applications of fertilizers bring about horrible consequence. Corporate entities in Florida are being given WAY too much freedom with OUR water. The volume at which they use it grows regularly. The volume of waste they return to it grows regularly. Now, you wish to pump salt water into the base of the aquifer? This can only mean tragedy for our state. If you allow this and the exploration or drilling for oil or natural gas in South Florida the Everglades will most assuredly die in my children's lifetime. PLEASE.... do not allow money to blind you to the damages that will become the death of Florida's beauty and her importance to the ecosystem on the whole. Grow a pair and make this stop	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
87	Robert Lawrason, Concerned Citizen	8/12/15 The ramifications of unnatural solutions can be far worse than existing concerns. The value of life in all its forms are more valuable than any amount of money. Long term solutions working with nature that has been around for a very long time and have the solutions aligned with their purpose and the nature of their being.	Water supply planning efforts aim to protect the environment and water resources while ensuring adequate and sustainable water supplies are available to meet future water supply needs.
88	Amanda M., Concerned Citizen	8/12/15 Pulling water from the St. Johns river sounds like a good, temporary fix, but it will damage ecosystems and entire species of plants, fish, and other animals that depend on the river to receive sustenance. If you start pulling water from the St. Johns river, it won't ever stop. You bleed the river dry. Instead, why don't we focus on conserving all the water we can? Start landscaping for low water and high sun tolerances. You can make beautiful beds from native florida plant species that would take significantly less water and maintenance. Don't water plants in the peak hot parts of the day. We are not in cooler climates, we do not need lush green grass if it takes too much water. We need to find ways to reduce water usage and conserve what we have. We want to help sustain Florida, not dry up all its resources.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
89	Dawn Hutchins, Concerned Citizen	8/12/15 Please promote water conservation practices instead of drawing off surface water from the St Johns river. Our river cannot support this type of mismanagement in the long term. Please consider the future.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
90	Liz Felter, UF IFAS	8/12/15 Conservation section, Page 21 end of the first paragraph should have site reference. Or add this reference to the list at the end of the document. Felter, E. A. (2013). An examination of community based social marketing strategies to increase water conservation practices by homeowners with automated irrigation systems in central Florida (Doctoral dissertation, UNIVERSITY OF FLORIDA). http://gradworks.umi.com/35/84/3584459.html	Thank you for your comment. Reference has been added ('...adopting new behaviors (Felter 2013).')
91	Winston Rose, Concerned Citizen	8/12/15 Watering lawns is not sufficient cause to drain a natural resource. Considering how fragile an ecosystem we have, the importance of the River to ecosystems, economic impacts, etc. Using water from another region for non essential reasons is short sighted and foolish	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
92	Roberta Thomas, Concerned Citizen	8/12/15 Please find another solution than withdrawing the water from the river or nearby lakes. Please conserve water and re-use water and try that as a pilot program to see if it cannot help first. I am opposed to the withdrawal of surface water from the St Johns River for the Central district's many projects.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
93	Patricia Wise, Concerned Citizen	8/12/15 Please do not use St. Johns River water in your plan to supply water to meed the needs of urban sprawl. To do so would be very unhealthy for our previous and beautiful river, the creatures that live in it and the people of the communities that surround it, make a living from it and use the river for recreation.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
94	Linda Byrdal, Concerned Citizen	8/12/15 Do not draft water from St. Johns River.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
95	J. Burkiewicz, Concerned Citizen	8/12/15 How about if you do the right thing and throw all the bottled water companies out of Florida! They are stealing our resources and selling them off! (This comment submitted twice.)	Thank you for your comment.
96	Sandra Martin, Concerned Citizen	8/12/15 Dear Sir or Madam, I have a great concern for our water resources in this state. Water skiing in the St. Johns River and enjoying the beauty of the water and fish at Silver Springs was part of my youth; but things have changed. At some point in the near future, we will need to choose between: <ul style="list-style-type: none"> - having water to drink OR - keeping our yards green, giving it unmetered/unpaid for to corporate and agricultural interests and using it for unsustainable development. And that point seems to be approaching. Please remove the water withdrawals from these plans. Let's be courageous and implement and enforce mandatory conservation programs and policies. Conservation does work and will give our citizens of this state an idea of what is at stake. We are required to make a sacrifice and conserve if we want to live in Florida. Better now than after all the springs and the aquifer have been depleted and the St. Johns and her tributaries are polluted beyond repair, and sink holes abound. Here's to courage, Sandra Martin	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
97	Valerie Herrmann, Concerned Citizen	8/12/15 Water shortage problems are not going to just go away... We need to REPLENISH the ground water supply- by catching, storing, and sinking the water into the landscape! (Instead of to storm drains and out to sea as fast as possible!)... Its a water management problem not a shortage...	The goal of this planning initiative is to identify programs and projects to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources. Significant emphasis was placed on options to reusing, capturing and storing water during the wet season for later use, providing recharge, and water conservation.
98	Nancy Smith, Concerned Citizen	8/12/15 Control growth where the area has insufficient water to sustain. Do not draw down St Johns River. We created enough problems. Let's not create more. (This comment submitted twice.)	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
99	Carole Johns, Concerned Citizen	8/13/15 Please increase the amount of funding to Conservation efforts, 3% is not enough. Funding conservation is the cheapest and best way to solve some of the pending water problems/shortages. Respectfully, Carole Johns	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
100	Justin Joyner, Concerned Citizen	8/13/15 I am strongly opposed to the plan to withdraw water from the St Johns River to support new and existing housing developments. There are countless examples of communities that allowed their natural resources to be depleted because they did not conserve what they had. Allowing the withdrawals to happen will not encourage conservation and will negatively impact the beautiful natural resource that we all share. Comment #100 is continued on next page	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #100 continued.</p> <p>While there is some economic benefit to allowing the withdrawals. Those benefits will impact a small number of people.</p> <p>The negative economic impact of hurting the St Johns will impact many more people. Example: increased Algal blooms hurt all of us that live near the river and use it for recreation and fishing.</p> <p>Why shouldn't the developers find a way to get water without taking water from the St Johns? If they want to develop their land and make money from it, they need to invest in the infrastructure in a way that does not hurt other people.</p> <p>There has to be a better way.</p> <p>Sincerely, Justin Joyner</p>	
101	Johnk72, Concerned Citizen	8/13/15 permethrin toxicity in cats bessant bkaecfgcagae	Thank you for your comment.
102	Johnd956, Concerned Citizen	8/13/15 Magnificent website. Lots of useful information here. Im sending it to some friends ans also sharing in delicious. And obviously, thanks for your sweat! Aaadecdbgeae	Thank you for your comment.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
103	Phyllis Hall, Concerned Citizen	8/13/15 As you approve the final budget, please reconsider increasing funding for water conservation which is currently at only 3% for conservation, less than half of the 6.1% percent in the Central Florida Water Initiative Regional Water Supply Plan. Water conservation needs higher priority and funding conservation should be given higher priority and funding in the plan. In the long run, conservation is the cheapest and most environmentally sound solution to the looming water shortage problem. Respectfully, Phyllis Hall, homeowner/taxpayer/Audubon member Altamonte Springs	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
104	Kathy Colvin, Concerned Citizen	8/14/15 Let's tighten up conservation policies and enforcement. The aquifer needs a break: stop permitting water withdrawals.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
105	Lad Hawkins, Greater Arlington Civic Council, Inc.	8/14/15 Link OPPOSITION TO THE PROPOSED WATER WITHDRAWL FROM OUR ST JOHNS RIVER	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
106	Doug Blanchard, Concerned Citizen	8/14/15 Link Conservation and surface water projects letter.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
107	Joyce Duarte, Concerned Citizen	8/14/15 This has to stop. The natural resources of our state are being destroyed for money and greed.	Water supply planning efforts aim to protect the environment and water resources while ensuring adequate and sustainable water supplies are available to meet future water supply needs.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
108	Ed Fielding, Martin County	<p>8/14/15</p> <p>While I have seen limited information about the Groveland Reservoir and STA project the documentation now being posted on-line raises questions that I believe would be most appropriately addressed in public information sessions. As a member of the Martin County Commission I am concerned that we have not had any information about this project and how it might impact Martin County. As a member of the newly formed IRL Council, the Indian River Lagoon National Estuary Program sponsor, we have not been provided any information about the Groveland project nor its potential effects on the Lagoon and its watershed. As a member of the Indian River Counties Collaborative, a regional group of Counties bordering the Indian River Lagoon, we have not been sufficiently made aware of the water quantity/quality issues emanating from the Groveland project as same would impact the citizens of our Counties. It is my understanding the Central Florida Water Initiative has been most solicitous of public input from the other regions being affected. I believe it appropriate that the citizens of Indian River, St. Lucie, Okeechobee, Martin, Brevard and Volusia be afforded similar opportunity. For me it is premature for State Agencies to enter into agreements with a private entity (Groveland/Evans) that would seem to convey certain long term supply and associated distribution rights for water (a public resource) without public concurring.</p> <p>I would be pleased to help arrange public meetings for the IRL Counties area. Many thanks, Ed Fielding 772 288 5421</p>	<p>Like many other projects included in this CFWI RWSP, Grove Land Reservoir and STA is a water supply project option concept that has been included for further consideration. Being a project concept, it has not been fully evaluated in the RWSP. In the 2016 State of Florida budget, \$3 million in funding has been allocated to this project to address these outstanding questions. Meetings on the project will be held at appropriate points in this evaluation.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
109	Alma Tyus, Concerned Citizen	8/14/15 I have watched uncontrolled growth with no regard to water conservation in St John's County for 40 years, water restrictions were implemented but never enforced. When I moved to Florida in 1975, my Dad said Florida was going to run out of water, i hear his voice today as I watch what is happening in my adopted state. I read the annual is sure of Folio Weekly of the water hogs, this wide disregard is what is causing our problem, some don't think rules apply to them, what has happened in California is next for Florida if our ways aren't changed.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
110	Redmond Jones, Groveland	<p>8/15/15</p> <p>Regarding the CFWI projections, I have great and continued concerns that CFWI has not or are not concerned with making projections that adequately consider our population growth demands. We need projections that truly reflect supply needs of south lake county's population growth. I argue that growth is at least apart of water demand and supply challenges. The city and the water district has been at an impasse primarily because the district is using numbers from CFWI and those number appears to not resemble the population growth trends or actuals.</p>	<p>As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Population and Water Demand Subgroup (Demand Subgroup) was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. It should be noted that these projections were made using a snapshot in time and were developed using the best available information at the time developed for the 2035 planning horizon. The countywide population projections were spatially distributed, based on the best available data, via a Geographic Information System (GIS) model that projected where in the county growth was likely to occur and applied growth rates similar to historic patterns (controlling overall to county BEBR Medium). Utility service areas were overlaid to determine utility specific projections. During the development and review of population and demand projections, the Population and Water Demand Subgroup (Demand Subgroup) provided projections for all of Lake County to Lake County and their consultants for distribution to all Lake County utilities/municipalities. Water supply plans are updated every five years to capture changing conditions.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
111	Rita Whalen, Concerned Citizen	8/15/15 Please do not continue to draw down the St. John's River for central Florida. The unhealthy algae blooms that occur are causing a critical impairment to the quality of the water, the natural beauty, and wildlife of the St. John's River and surrounding areas. Encroaching salinity from tributaries will only worsen the quality of the St John's as well. The river is essential to the health of it's surrounding communities!	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
112	Jonathon Addington, Concerned Citizen	8/15/15 I think that it would be best for all parties involved if a plan was drafted regarding water conservation & reuse instead of pulling directly from the river & aquifers. The stats in regard to usage--were they adjusted for use of bottled water as well? That would have a huge impact, considering the water is often imported & thus reducing local water use.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
113	Sharon Morgan, Concerned Citizen	8/15/15 The combination of water siphoning and dredging proposed to deepen the st Johns river channel for larger port traffic seems like a disaster just waiting to happen. The springs will definitely suffer and the cost will continue to climb. Why not start with conservation enforcement before we end up like India with no water for our entire country. The earth has limited resources which has been recognized in the forest industry after all the rain forests were destroyed and water is a much more precious non renewable resource which all living beings need to survive. Protect the resource by conservative measures it's the only way.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
114	Janis Cortazzo, Concerned Citizen	8/15/15 Have we not learned anything from California?!!! The state of FL needs to limit fertilizers to preserve our waterways & enforce XERISCAPING not unlimited watering! Nurseries, Lowes, Home Depot, etc. SHOULD be required to selling appropriate plants, seed, & turf for our climate! You want to manage water then MANAGE IT! Management is NOT taking additional water from our waterways!!! Protect our water & our future!	<i>Please refer to Volume II, Solutions Strategies Comment #14 & #15.1 responses.</i>
115	Linda Horne, Concerned Citizen	8/16/15 No more water from the St. Johns to anyone and leave Rodman Dam as it is and fire that crazy "riverkeeper" She is more of a threat to the St. Johns than anything else is.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
116	Anna Hamilton, Concerned Citizen	8/16/15 CFWI members, I'm writing to express my opposition to the proposed water withdrawal from the Saint Johns River to fill central Florida's deficit. As a life-long resident of St. Johns County, I cannot imagine my home without a healthy, functioning river—it is central to who we are, and how we live, as northeast Floridians. I stand with the St. Johns Riverkeeper and urge you to explore other avenues in sourcing water for central Florida. Please conserve and protect the Saint Johns River. Thank you very much for taking my comment. Sincerely, Anna	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
117	Anonymous, Unknown name	8/16/15 No withdrawals from the St. Johns River. We must learn to conserve and protect our water. Once it's gone, it's gone. We owe future generations every effort to do what's right for Florida and her citizens. The longer we wait to begin the process of making important decisions, the harder our job will become.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
118	Sharon Garrett, Farmer and Concerned Citizen	8/16/15 Link Duplicate email submittal of letter in Volume II, Solutions Strategies Comment #80	<i>Please refer to Volume II, Solutions Strategies comment #16.2 response.</i>
119	Sharon Garrett, Farmer and Concerned Citizen	8/16/15 Central Florida Water Initiative Comments 8-11-15 I think if residents have to abide by water schedules for their yards then cities should also have to abide by schedules for their landscapes. I always receive peculiar answers on this issue. Some such, as it depends on the address. However medians don't really have an address & stretch for blocks. Possibly some cities could be divided into quadrants that run on specific days. I have also been told the city does not have to abide by watering days that the rules are different for them. I think rain or soil sensors should be placed on municipal landscape watering systems. It is especially irritating to see it raining & their sprinklers going or it has rained for 10 days & the soil is saturated. Then the next day after the rain the sprinklers go on. There is the old fashioned method also turn on and off a valve. Or is there a central operations office that can temporarily over-ride the automatic program for rain & saturated soil conditions. Thanks Sharon Garrett PO Box 1332 Haines City, FL 33845	Thank you for your comment. As described in Volume II (Solutions Strategies) Chapter 2 , implementation of the mandatory year-round landscape irrigation conservation rules [SJRWMD, Ch. 40C-2; SFWMD, Ch. 40E-24; and SWFWMD, Ch. 40D-22, F.A.C.] has reduced landscape irrigation water use throughout the CFWI Planning Area. It is important to note local governments may adopt alternative landscape irrigation ordinances based on local water demands, system limitations or resource availability. Several counties, cities and utilities have exercised this option. As a result, residents should always check local ordinances for watering days and times.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
120	Paula Wehr, Concerned Citizen	8/16/15 Please consider giving water conservation a higher priority and greater funding in the plan. Dollar for dollar, conservation is the most cost-effective solution to water shortage. It is also an environmentally sound method. Thank you.	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>
121	Whitey Markle, Suwanee/ St. Johns Sierra Club Group	8/16/15 The Suwannee/St. Johns Sierra Club encompasses 16 counties of North Florida. The Central Florida Water Initiative is of grave concern for our 1985 members who will be adversely affected by the Plan if it is implemented the way it is written; The surface waters of our Group's responsibility will be further degraded and depleted as well as the groundwater. The solutions to the problem of providing sufficient water for additional growth in the central Florida region proposed in the Plan appear to be mere desperate attempts at supply when there is no supply available, and there is nearly NO water conservation in this draft. Of the projected 250 million gallon per day (mgd) water deficit in the Central Florida region, only 37 mgd is estimated to come from conservation initiatives. This is actually less than the 42 mgd that was originally projected in previous drafts. The method of "injection" of used water BACK INTO OUR DRINKING WATER is a dangerous and irresponsible attempt at conservation. We think that the people own the water under us, not the influential in Tallahassee, Palm Beach, Palatka, or Brooksville. Some of the "projects" the Water Management Districts are giving away in the form of "cost-sharing" (some are 90% to 10%) are preposterous, and they will NOT accomplish any sort of conservation, only further depletion of the good ground water, and there is not nearly Comment #121 is continued on next page	<i>Please refer to Volume II, Solutions Strategies Comment #14 and #27 responses.</i>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #121 continued</p> <p>enough funding in the budgets to accomplish sufficient project effectiveness, as well as oversight, milestones, and monitoring.</p> <p>The truth to the dilemma is that there are simply too many people in Central Florida now and a growth in human population is erroneous policy. Unless new population is carefully planned, including water use. We will be far short of adequate fresh water. At this point a pound of Nitrogen (our biggest water polluter) costs a farmer, golf course owner, gardener, or homeowner a mere 50 cents to apply, but if we keep applying fertilizers at the present rate , but when the water budget becomes deficient, it will cost the taxpayers and ratepayers \$500 per pound to remove. We believe your solutions to Central Florida’s water supply are short-term, temporary, and extremely costly in the long term.</p> <p>We realize the political nature of your position(s) in the state government, but we emphasize your responsibility regardless of politics. Entities such as Agriculture, municipalities, and development must sooner or later reach the reality that the citizens’ water is not infinite and not free (as it has been to date). There must be a plan to start paying for the water sooner or later. Citizens have to pay for it and so should farmers and developers, and. Like other businesses, they should foot the bill for monitoring water usage. It is time to get serious, not to “kick the can”.</p> <p>We believe your weighting of the citizens in the stakeholder analysis, although appearing to be few in their number of representatives (volunteer), far outweigh any of the others. It is the citizens who will eventually pay the extremely high price of reclaimed, recycled, and refined water.</p> <p>Comment #121 is continued on next page</p>	

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		<p>Comment #121 continued</p> <p>Our Suwannee/St. Johns Group takes pride in being the bastion of ecotourism which is dependent upon clean, fresh water. "Alternative Water Supply" designs, such as declaring Rodman Pool/Reservoir to be a supply source will destroy our ecotourism industry which is environmentally sensitive, economical, and educational. Conservation by agriculture, development, and the municipalities must be entered into your Central Florida Water Initiative as opposed to further draining and pumping the surface water.</p> <p>We suggest that you postpone the Central Florida Water Initiative until you can assure the citizens that their fresh water will be protected and conserved in a meaningful long-term.</p> <p>Respectfully Whitey Markle Conservation Chair, Suwannee/ St. Johns Sierra Club Group</p>	

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
122	Janet Stanko, Sierra Club, Northeast Florida	<p>8/16/15</p> <p>I am providing comments on behalf of Sierra Club of Northeast Florida.</p> <p>I attended the presentation on the plan at UNF on 6/29/15 and have reviewed the documentation related to the plans. Our members are concerned about the future of the St. Johns River and the impact that withdrawal of 154 mgd from the river. We know the river moves slowly with an already low flow level and believe the withdrawal will further slow the movement of the river and increase concentration of nutrients and other pollutants. We believe that conservation needs to be used to a greater extent than currently planned—both in Central and Northeast Florida. Please look at the big picture to see how our ground water has already been over-allocated. Some ideas could be as follows:</p> <ul style="list-style-type: none"> - It is time to go to mandatory residential watering restrictions as most folks already know that they need to cut back even if they haven't incorporated it into their practice. Perhaps announce now that in 5 years NO landscape irrigation will be allowed. This will give property owners (residential and commercial) time to plan how they will transition. - For commercial and agricultural users, announce a 20% cutback in consumptive use permits within 3-5 years, and engage in direct monitoring of water use not just self reporting. - Work with utilities to implement a tiered pricing system where water use increments above a standard amount will be charged at progressively higher rates. Those who use less will pay less. <p>The Water Management Districts need to "bite the bullet" to communicate the message that our water supply is not unlimited; but rather running out. With the influx of new residents and business growth, we will be unable to meet the water needs unless we begin conservation efforts, not business as usual.</p> <p>Thank you for the opportunity to express the Sierra Club position on the plan.</p>	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
123	Marian Ryan, Concerned Citizen	<p>8/16/15</p> <p>I am very disappointed that only 6% of the proposed budget is for water conservation measures. The lack of planning and funding for the implementation and enforcement of conservation methods is pathetic. The USGS and other studies have shown how threatened our water supply is and yet the plan emphasizes bigger and better engineering projects that will move water around the region and develop “new” supplies i.e. the brackish lower Floridan. The proposed solutions seem to be doing more of what has gotten us into our current condition - sticking more pipes in the ground and pumping out more water! These are foolhardy plans especially given that the level of threats to our water supplies doesn’t even begin to seriously consider the effects of climate change and sea level rise. There has been such a brain drain at the districts that remaining staff are unaware of valuable studies/reports that the WMD paid for. One such study presented numerous great projects located in the Peace Creek watershed where water could be stored, natural systems utilized, recharge would be enhanced, wetlands and floodplains refilled, etc., and the projects could be done with very little new money, BUT no one with the WMD seems to know about or care about these types of natural system projects.</p> <p>An addition issue that I feel important is the phosphate industry’s historic claim that mining is a “temporary use of the land”. That being said, the water allocated for the mining of said land should also be a temporary use. Case in point is the new DeSoto mine in DeSoto County. In a letter from the SWFWMD to Mosaic Fertilizer, dated October 30, 2012 re the Final Agency Transmittal Letter, Individual Water Use Permit No. 20011400.25, it states on page 3 “Quantities allocated for the DeSoto facility will be provided from withdrawal points located at the Ft. Green facility.” This water use in Polk County should have been retired – not reallocated to a county outside of the CFWI.</p>	<i>Please refer to Volume II, Solutions Strategies Comment #14 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
124	Robert J. Ulevich, Polymath Consulting Services	8/17/15 Link SW-4 Grove Land Reservoir & Stormwater Treatment Area comments (9 pages)	<i>Please refer to Volume II, Solutions Strategies Comment #107 response.</i>
125	Harriett Jones, Concerned Citizen	8/17/15 Your plan provides no real conservation and only opens the way for more development and ruin of our water resources that belong to all the people of Florida. We in North Central Florida are fighting to save our rivers and springs from the damage already done by the water management districts with unchecked growth and contamination of our waters. Our health and way of life is in danger. There is no funding for conservation. The 400,000 new toilets suggested is a farce and an insult to us. We continue to believe that Eco tourism brings more to our sustainable economy than development of our lands and waste of our resources. Only through water conservation and responsibility to the taxpayers of Florida, who overwhelmingly express their concern for our waters and natural resources, will your body be of any value to us. Do not take any more water from the St. Johns or the Ocklawaha or any other rivers. The MFL and TMDL have not been established properly or at all in many water bodies. It's time the DEP took responsibility, not setting up boards to find easy ways out that continue to damage our state.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>
126	Deborah Green, Orange Audubon Society	8/17/15 Link Water Conservation concerns.	The Districts support expanded conservation throughout their regions. <i>Please refer to Volume II, Solutions Strategies Comment #13 & #14 responses.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
127	Lenny Curry, Mayor, City of Jacksonville	8/17/15 Link St. Johns River withdrawals	<p>1. As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Population and Water Demand Subgroup (Demand Subgroup) was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. It should be noted that these projections were made using a snapshot in time and were developed using the best available information at the time developed for the 2035 planning horizon. Water supply plans are updated every five years to capture changing conditions. Implementation of larger WSPOs, such as the surface water projects, would not move forward until necessary to meet future demands.</p> <p>2. <i>Please refer to Volume II, Solutions Strategies Comment #14 response concerning conservation funding.</i></p> <p>3. The RWSP includes 150 WSPOs. The list includes 37 brackish/nontraditional water, 87 reclaimed water, 17 surface water, 6 stormwater, and 3 management strategies project options.</p> <p>Comment #127 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #127 continued</p> <p>More detail on regional water supply planning in Chapter 373.709 F.S. may be helpful.</p> <p>For example (7) "Nothing contained in the water supply development component of a regional water supply plan shall be construed to require local governments....to select a water supply development project identified in the component merely because it is identified in the plan.</p> <p><i>Also, please refer to Volume II, Solutions Strategies Comment #27 response about river withdrawals and Solutions Strategies Comment #107 regarding the Grove Land project.</i></p>
128	Anne Harvey, Save the Manatee Club	8/17/15 Link Conservation, MFLs, WSPOs	<p>The RWSP includes 150 WSPOs. The list includes 37 brackish/nontraditional water, 87 reclaimed water, 17 surface water, 6 stormwater, and 3 management strategies project options. More detail on regional water supply planning in Chapter 373.709 F.S. may be helpful. For example (7) "Nothing contained in the water supply development component of a regional water supply plan shall be construed to require local governments....to select a water supply development project identified in the component merely because it is identified in the plan."</p> <p><i>Please refer to Volume II, Solutions Strategies Comment #14 & #15.1 responses on Conservation.</i></p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
129	David Wright, Deseret Ranches of Florida on behalf of East Central Florida Services, Inc. and Farmland Reserve, Inc.	8/17/15 Link Agricultural projects and conservation	<p>Thank you for your comments. The following changes have been incorporated.</p> <p>Volume I, Chapter 7, page 131: Following sentence modified to read "For agriculture, as described in Section 373.709(2)(a)2., F.S., alternative water supply options for agricultural self-suppliers are limited. The additional water conservation, reclaimed water sources, and one of the AWS projects (Taylor Creek Reservoir) outlined in this plan will meet some of the projected future agricultural demand. For the remaining demand, this plan is not intended to preclude the development of additional groundwater so long as the propose use meets the applicable consumptive use permitting criteria."</p> <p>Volume II, Chapter 2, page 45: Text added to Regulatory Measures paragraph "The FDEP and water management districts may identify and evaluate options to provide a similar opportunity for agriculture permittees."</p> <p>Volume II, Chapter 7, page 138: Text added to bulleted list: "Identify and evaluate options to allow agricultural water use permittees the ability to extend their consumptive use permit duration when the permittee demonstrates quantifiable water savings attributable to conservation beyond that required to achieve efficient water use in the permit and demonstrates a need for the conserved water to meet projected demands for the term of the extension."</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
130	Rebecca Hammock, Seminole County	<p>8/17/15</p> <p>ISSUES AND CONCERNS FROM SEMINOLE COUNTY PLANNING & DEVELOPMENT:</p> <p>We have concerns regarding the population distribution methodology. Per the water supply plan, Seminole County's urban population (on central water) is projected to grow only 20% by 2035, and its rural, self-supplied population (presumably in the East Rural Area and the Wekiva Protection area) is projected to increase by more than 300%. This seems skewed. We just want to make sure that the population distribution and resulting potable water demand projections are consistent with the principles of 'How Shall We Grow' and our Comprehensive Plan.</p> <p>We also noted that all other counties in the Study Area are anticipated to have percentage increases in population to be served by public water supplies greatly in excess of those projected for Seminole County.</p> <p>Thank you for your attention to this matter. Any help you can give would be greatly appreciated. Thank you.</p>	<p>As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Demand Subgroup was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's BEBR Medium population projections. The countywide population projections were spatially distributed, based on the best available data, via a GIS model that projected where in the county growth was likely to occur and applied growth rates similar to historic patterns (controlling overall to county BEBR Medium). Existing utility service areas were overlaid to determine utility specific projections. We did not project future expansion of service areas for public supply utilities. This could result in population distribution outside of service areas. In future scenarios populations would be allocated to expansions within service areas and result in decreases to self-supply. Utilities will need to work together to determine which areas should be reduced/increased; if justifiable, documented & supported methodology indicates changes should be made. It should be noted that these projections were made using a snapshot in time and the</p> <p>Comment #130 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #130 continued.</p> <p>projections are intended solely for regional planning purposes to determine if WSO are needed in the future.</p> <p>The Demand Subgroup will continue to work with utilities and engage stakeholders during the next CFWI RWSP update, to ensure that the best available information is being used to estimate regional demands. Also, the BEBR Medium Population projection control for Seminole County is correct; Volume 44, Bulletin 159 was used by the Demand Subgroup.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
131	Shannon A. Estenoz, US Department of the Interior	<p>8/17/15 Resubmitted letter from 2/19/14 [Link].</p> <p>Letter to SFWMD dated 5/8/15 [Link]. Kissimmee River Restoration concerns / WSPOs</p> <p>Letter to SFWMD dated 8/17/15 [Link] Grove Land Reservoir and STA</p>	<p>We appreciate DOI's concern for endangered and threatened species and the future availability of water within the Upper Chain of Lakes (UCOL), the Kissimmee River, Lake Okeechobee and the greater Everglades. As you are aware the SFWMD is in the process of establishing a water reservation for the Kissimmee Basin which includes the UCOLs, the Headwaters Revitalization Project and the Kissimmee River Restoration project (KRRP). As part of the reservation rule development process, SFWMD is in the process of developing tools to address the water availability concerns outlined in your letter and other similar concerns raised by multiple stakeholders. SFWMD has participated in several productive meetings with the US Fish and Wildlife Service and Florida Fish and Wildlife Conservation Commission to address the wildlife concerns. The dialogue with these wildlife agencies to address potential impacts to federally listed species is continuing.</p> <p>The August 17, 2015 letter stated a proposed reservoir project within the Upper Kissimmee Basin will negatively impact the KRRP and federally listed species. Any proposed storage projects must meet all of SFWMD's existing the environmental resource and water use permitting criteria (Applicant's Handbook) in order to be approved.</p> <p>Like many other projects included in this CFWI RWSP, Grove Land Reservoir and STA is a water supply project option concept that has been included for further consideration. Being a project concept, it has not been fully evaluated in the RWSP. In the 2016 State of Florida budget, \$3 million in funding has been allocated to this project to address these outstanding questions. Meetings on the project will be held at appropriate points in this evaluation.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
132	Charles Lee, Audubon of Florida	8/17/15 Link Water Conservation concerns.	<i>Please refer to Volume II, Solutions Strategies Comment #3.1, #13, #14, & #15.1 responses.</i>
133	Ed Torres, City of Altamonte Springs	8/17/15 Link Population projects and potable reuse projects.	As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Population and Water Demand Subgroup (Demand Subgroup) was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. It should be noted that these projections were made using a snapshot in time and were developed using the best available information at the time developed for the 2035 planning horizon. The countywide population projections were spatially distributed, based on the best available data, via a Geographic Information System (GIS) model that projected where in the county growth was likely to occur and applied growth rates similar to historic patterns (controlling overall to county BEBR Medium). Utility service areas were overlaid to Comment #133 is continued on next page

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #133 continued.</p> <p>determine utility specific projections. Water supply plans are updated every five years to capture changing conditions.</p> <p>The Districts are committed to investigating potable reuse projects that are environmentally safe, provide benefits to the environment, and help meet water needs. State water planners are monitoring the efforts of California, Texas and the WaterReuse Association to help determine options for potable reuse in Florida.</p>
134	Steve Snoberger, Carter Associates, Inc.	<p>8/17/15</p> <p>I am a Registered Professional Engineer in the State of Florida, working for Carter Associates, Inc. My company contacts are provided above. Our firm represents Orange Avenue Citrus Growers Association (OACGA), a 12,000 acre agricultural development in St. Lucie County. Their existing Water Use Permit and MSSW permit are directly connected with the C-25 Canal almost adjacent to the Surface Water SW-4 project recently added to the Draft 2035 "Solutions Plan" of the Central Florida Water Initiative. OACGA stands to be significantly impacted by the proposed construction and perhaps operation of the SW-4 project. OACGA has received no Notice of the SW-4 project in the "Solutions Plan". On August 28, 2014, I specifically contacted the SFWMD requesting to be noticed of all planning and projects in the C-25 Basin and that was acknowledged on the following day by the SFWMD. No notice was provided to me of the SW_4 project included in this Draft "Solutions Plan". Furthermore, upon observation of the meetings and attendees listed on the "CFWI" web site, it would appear as though little to no Notice was provided to potential impacted Owners in the North St. Lucie County and Upper St. John's River water supply and drainage basins.</p> <p>Comment #134 is continued on next page</p>	<p><i>Please refer to Volume II, Solutions Strategies Comment #107 response.</i></p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
		Comment #134 continued. Certainly there were no attendees or comment from property Owner's from these areas. On behalf of OACGA and perhaps other nearby land Owners, we would request adequate notification, additional time to review the Draft Document and additional time to prepare adequate responses before the response time expires at 5:00 PM this afternoon. Thank you for your consideration.	
135	George Simons, Carter Associates, Inc.	8/17/15 (received this comment twice) Reference is made to Appendix C page 78. St John's Improvement District, SJID is a pumped drainage system. The pumps discharge into an on-site reservoir which over flows to the C-52. Over the years SJID has experienced crop damage due to flood conditions caused by high tailwater elevations in C-52. SJID has had to reduce pumping rates due to high tail water conditions in the C-52, even though SJRWMD has assured SJID that they have an Emergency Plan (1991) to minimize flood stages. As a byproduct of the GLRSTA project SJID is concerned that C-52 will be held at a higher elevation and kept at a higher elevation for longer periods of time associated with storm events. The SJID currently has a CUP for surface water from the C-52. How will the SJID's CUP allocation be affected as our special district's water consumption does not require treatment? How will this project affect the SJRWMD / SJID Land Purchase Agreement?	Like many other projects included in this CFWI RWSP, Grove Land Reservoir and STA is a water supply project option concept that has been included for further consideration. Being a project concept, it has not been fully evaluated in the RWSP. In the 2016 State of Florida budget, \$3 million in funding has been allocated to this project to address these outstanding questions. Stakeholder meetings on the project will be held at appropriate points in the project development. If the project moves beyond conceptual, the tailwater conditions will remain a project constraint regarding how much and when water from the GLRSTA can be discharged to the C-52 so that no negative impact to SJID is realized.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
136	Laurie Waldie, St. Lucie County	8/17/15 St. Lucie County has spent the past several years laying the groundwork to grow into a regional utility with the infrastructure to serve the long-term potable water needs of the unincorporated County. This plan includes the future construction of several regional water treatment plants throughout the County. Currently, St. Lucie County Utilities is focused on utilizing the Upper Floridan Aquifer (UFA) as the supply source for these projects; however, given the uncertainty of the long-term viability of this source, the County could consider constructing one or more of these regional facilities to treat a surface water supply rather than UFA water. The County is concerned that a project like the “Grove Land Reservoir and Stormwater Treatment Area – SW4” identified for funding in the Central Florida Water Initiative would “earmark” that water source for northern users and potentially adversely impact the County’s ability to utilize surface water as an alternative water supply for St. Lucie County Utilities’ customers. St. Lucie County would like to be considered as an interested party moving forward on discussions surrounding the interconnection of the water management districts and inter-basin transfer of surface water.	<i>Please refer to Volume II, Solutions Strategies Comment #107 response.</i>
137	David Wright, East Central Florida Services, Inc.	8/17/15 Link Taylor Creek Reservoir in CFWI to include agricultural use.	Thank you for your comments. Taylor Creek Reservoir project description has been updated including new paragraph in Solutions Strategies, Volumes II and IIA.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
138	Steve Snoberger, Carter Associates, Inc.	<p>8/17/15 (received comment 3 times)</p> <p>I am a Registered Professional Engineer in the State of Florida, working for Carter Associates, Inc. My company contacts are provided above. Our firm represents Delta Farms Water Control District (DFWCD), a 2,300 acre agricultural development in Indian River County. Their existing Water Use Permit and MSSW permit are directly connected with the C-25 Canal and "BCMWA" located just north of State Road 60 and potentially impacted by the Surface Water SW-4 project recently added to the Draft 2035 "Solutions Plan" of the Central Florida Water Initiative. DFWCD has received no Notice of the SW-4 project in the "Solutions Plan". Furthermore, upon observation of the meetings and attendees listed on the "CFWI" web site, it would appear as though little to no Notice was provided to potential impacted Owners in the Upper St. John's River water supply and drainage basins. Certainly there were no attendees or comment from property Owner's from these areas. On behalf of DFWCD and perhaps other nearby land Owners, we would request adequate notification, additional time to review the Draft Document and additional time to prepare adequate responses before the response time expires at 5:00 PM this afternoon. Thank you for your consideration.</p> <p>Screen captures of this comment sent via email.</p>	<i>Please refer to Volume II, Solutions Strategies Comment #107 response.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
139.1	Lisa Rinaman, St. Johns Riverkeeper	<p>8/17/15 (rec'd at 7:22 PM) Link (Comments #139.1, #139.2, #139.3, #139.4, #139.5, #139.6, #139.7, #139.8, #139.9, & #139.10)</p> <p>St. Johns Riverkeeper Recommendations. The CFWI fails the public and fails to protect Florida's natural resources. Adoption of the CFWI Plans is premature and potentially damaging to the very natural resources they are intended to protect and appears to drive unbridled and unsustainable growth at all costs.</p> <p>The inherent flaws in the process, plans and justification must be corrected and the constitutional and statutory obligations must be met.</p> <p>The St Johns River, the Ocklawaha and other Florida waterways must be fully protected by removing surface water withdrawal projects for the CFWI Plans.</p>	<p>In 2012 St. Johns River WMD published the results of a four-year Water Supply Impact Study (WSIS), which provided a comprehensive and scientifically rigorous analysis of the potential environmental effects to the St. Johns River associated with annual average surface water withdrawals of 155 mgd from the middle and upper St. Johns River. The WSIS, which was peer-reviewed by the National Research Council, confirms the findings of earlier investigations indicating that the St. Johns River can be used as an alternative water supply source with minimal to negligible environmental effects. The WSIS identified alternative water supplies that protect both groundwater and surface water resources and included the development of tools to help guide future decision-making regarding the increased use of surface water from the St. Johns River (SJRWMD 2012).</p> <p>The CFWI RWSP provides an overview of the potential water source options available to water users within the CFWI Planning Area. The sources of water potentially available to meet projected water demand in the CFWI Planning Area include fresh groundwater, brackish groundwater, surface water, seawater and reclaimed water. Improvements in water storage capacity (via Aquifer Storage and Recovery and reservoirs) and water conservation can provide significant opportunities to manage or reduce water demands.</p> <p>Comment #139.1 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.1 continued.</p> <p>Among the five regional surface water projects discussed in the Solution Strategies are three projects that propose to utilize the St. Johns River. These projects are the St. Johns River/Taylor Creek Reservoir, the St. Johns River near SR 46, and the St. Johns River near Yankee Lake. Based on demand projections and water supply project options included within the RWSP it is not envisioned that all three river projects would be needed. Furthermore, if a river project advances it will likely not be needed until near the end of the planning horizon. As noted in Chapter 6 “Financial Assessment,” significant funds for surface water withdrawals are not anticipated until approximately year 10 of the plan.</p> <p>The projects included in the RWSP are options from which local governments, utilities, and others may choose. There is no requirement that the St. Johns River project options be implemented. Section 373.709(7), provides that “[n]othing contained in the water supply development component of a regional water supply plan shall be construed to require local governments, government-owned or privately owned water utilities, special districts, self-suppliers, regional water supply authorities, multijurisdictional water supply entities, or other water suppliers to select a water supply development project identified in the component merely because it is identified in the plan.”</p> <p>Comment #139.1 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			Comment #139.1 continued. Additionally, St. Johns River projects would need to obtain, among other permits, a consumptive use permit prior to the withdrawal of water from the river. Before such a permit could be issued, all details of the project's design and operation would be prepared by a permit applicant and submitted to SJRWMD in a permit application. The application would then be reviewed for consistency with all of the SJRWMD's consumptive use permitting criteria applicable to the project, including established MFLs and other environmental protection criteria.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
139.2	Lisa Rinaman, St. Johns Riverkeeper	8/17/15 Full analysis of WSIS shortcomings and recommendations cited within the NRC's Peer Review must be conducted prior to the inclusion of surface water projects within the CFWI Plans.	<p>The WSIS involved the combined efforts of more than 70 scientists and engineers working over several years. It was, and still is, the most comprehensive and rigorous scientific study of the hydroecology of the St. Johns River ever conducted. It significantly increased our scientific understanding of the river system. The peer review by the National Research Council (NRC) concluded that in the WSIS "the District did a competent job relating the predicted environmental responses ... to the proposed range of withdrawals." They further stated that "the overall strategy of the study and the way it was implemented were appropriate and adequate to address the goals that the District established for the WSIS."</p> <p>The District purposely limited the scope of the WSIS in recognition of the fact that no single study could feasibly address all aspects of the management of a system as complex as the St. Johns River. We recognized, however, that there was a vast amount of other research and that there were regulatory and management programs of the District, the state, and the nation to address aspects of the river's ecology that were not included in the WSIS. In the panoply of research, regulation, and management programs, the WSIS did not stand alone and its merits should be considered in this context.</p> <p>When the WSIS was initiated, many years of research had already established the linkages between pollutant sources and water quality but</p> <p>Comment #139.2 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.2 continued</p> <p>little work had been done to link changes in hydrology to ecological effects. The WSIS filled this void. It did not, however, weaken the requirements for water quality protection and improvement already established by state and national water quality standards and by Total Maximum Daily Loads. If water withdrawals would lead to violation of water quality standards or TMDLs, then reductions in withdrawals or in pollutant loads would be required.</p> <p>The WSIS also did not weaken the consumptive use permitting program. Specific withdrawal applications will still need to meet all the tests required for permit approval. It is the rigor of these tests that has led to conclusion that continued reliance on the Upper Floridan Aquifer is unsustainable. Similar rigor applies to water withdrawals from the St. Johns River and the Ocklawaha River. As with withdrawals from the Floridan aquifer, withdrawals from surface water sources that exceed sustainable limits are not permissible. The District's commitment to sustainable use has already been demonstrated in its recognition of limits to groundwater withdrawals. The same commitment applies to the St. Johns River.</p> <p>One of the critical tests for sustainability of water use is that Minimum Flows and Levels (MFLs) not be violated. MFLs are already established for the St. Johns River at several locations and MFLs for the Ocklawaha River are in development. These MFLs will limit water use to sustainable levels.</p> <p>Comment #139.2 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.2 continued. You expressed concerns about the baseline used for the WSIS (1995-2005). This was the earliest period for which all the data needed for development and calibration of hydroecological models were available. We agree that it cannot be considered the pristine condition. Consequently, the WSIS used all data available to assess the level of ecological degradation, if any, in the baseline condition. These assessments are in the final report of the WSIS.</p> <p>Responsible management of any large and complex ecosystem employs monitoring to confirm that responses to management actions occur as expected. If responses do not meet expectations then management actions are adjusted. This is the cycle of adaptive management and it is described and recommended by the WSIS (see Chapter 2, section 4.7, Adaptive Management and the Precautionary Principle).</p> <p>Thank you for your continuing involvement in the state's efforts to ensure the sustainable use of Florida's water resources, including the St. Johns River. The Riverkeeper plays a vital and valued role in this important work. We look forward to working with you to ensure that we protect the health of our St. Johns River.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
139.3	Lisa Rinaman, St. Johns Riverkeeper	<p>8/17/15</p> <p>Water conservation must be made a priority. The focus should be on living within our water means. As a result, we must develop a statewide water policy that prioritizes water conservation; mandates sustainable building, landscaping and planning practices; incentivizes the efficient use of water; establishes regulations that protect our water resources and mandate efficiency where needed; and implements market solutions, such as aggressive tiered conservation rates and CUP pricing strategies.</p> <ul style="list-style-type: none"> • Please provide background of CFWI’s decision to focus on a “starting point” for Water Conservation as opposed to a goal as used for AWS. • Please provide a 15-year history of SJRWMD, SFWMD and SWFWMD funding and descriptions for the following critical activities to encourage water conservation. <ul style="list-style-type: none"> ○ Water Conservation Education Programs ○ Water Conservation Incentive Programs <p>Please provide detailed minutes to the Regulatory Subcommittee Meetings that focused on legislative actions needed for more productive water conservation.</p>	<p>Thank you for your comment.</p> <p>Your request for information was handled through the public requests process and the information emailed to you on September 14, 2015.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
139.4	Lisa Rinaman, St. Johns Riverkeeper	<p>8/17/15</p> <p>Establish rules and regulations necessary to mandate and incentivize efficiency and protect our water resources. First and foremost, reinstate the rulemaking process to implement the following nine water conservation “rule enhancements” to the Consumptive Use Permit (CUP) and Environmental Resource Permit (ERP) application processes proposed by SRJWMD staff in 2010 to require: 1) landscape irrigation ordinance, 2) informative billing, 3) stormwater reuse, 4) water use reporting for per capita calculations, 5) updated regulatory approach for public supply water conservation, 6) ERP water conservation provisions, 7) concurrent ERP/CUP application processing, 8) water conservation rate structure, and 9) landscape irrigation system design/installation constraints.</p>	<p>Your request to reinstate the rulemaking process to implement the listed nine “rule enhancements” are addressed in the order below.</p> <p>1. <u>Landscape irrigation ordinance</u></p> <p>Pursuant to Chapter 373.185, F.S., FDEP, with input and assistance of the water management districts, has developed a statewide manual entitled Florida-Friendly Landscape Guidance Models for Ordinances, Covenants, and Restrictions (January 2009). This manual is designed to assist local governments in implementing measures that will result in increased water conservation through the use of Florida-Friendly landscaping and landscape irrigation systems.</p> <p>On a related note, for years SJRWMD staff have provided, and continue to provide, water conservation technical guidance and assistance to local governments as those local governments develop or amend their ordinance codes regarding landscaping and landscape irrigation systems. Examples of past staff recommendations include installation of more efficient irrigation systems, regular system (including rain sensors) inspection and maintenance, installation of plantings that require less water, and reduction in the amount of irrigated areas.</p> <p>Additionally, in 2009, SJRWMD adopted sweeping amendments to its landscape irrigation general permit by rule. These amendments were developed based on the science (e.g., information from the University of Florida’s Institute of Food</p> <p>Comment #139.4 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.4 continued and Agricultural Science) and on the input received from both the public and private sectors and through the various public workshops the SJRWMD conducted. The 2009 changes to SJRWMD's landscape irrigation general permit by rule included allowing local governments to adopt a model landscape ordinance. SJRWMD is not aware of any other landscape irrigation ordinance that was being considered back in 2010. Additionally, part of the 2009 changes to SJRWMD's landscape irrigation general permit by rule included limiting landscape irrigation to one day per week during Eastern Standard Time and two days per week during Daylight Savings Time, with specific water quantity limits.</p> <p>2. Informative billing The SJRWMD encourages the use of informative billing through cost-share funding. As an example, the SJRWMD is currently funding a cooperative study with the City of Ocala using the informative billing system used in the Florida WaterSmartSM program. Additionally, utilities such as JEA and GRU are providing informative billing on their respective websites so that their water customers can see and compare their own water use with that of other users.</p> <p>Also, SJRWMD's CUP rules (section 2.2.2.5 of the CUP Applicant's Handbook) require that public supply utilities implement a water conservation public education program (see section 2.2.2.5.1.A.1.) as part of their water conservation plan. One of the listed program elements is for the utility to provide water conservation</p> <p>Comment #139.4 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.4 continued information in customer bills or via the utility's website.</p> <p>3. Stormwater reuse SJRWMD's CUP rules already require that permittees use the lowest quality source of water, which includes stormwater. In 2010, SJRWMD began rulemaking for ERP water conservation and consolidated ERP/CUP application processing. The ERP water conservation rulemaking included requiring an applicant to use a lower quality water source when feasible (which would include stormwater and reclaimed water, among other lower quality sources). There was never an intent to simply require stormwater reuse as Item 3 of your letter suggests. (See Notice of Rule Development for Chapter 40C-4 published on August 20, 2010 in Vol. 36 No. 33). As explained in the response to Item 6 below, SJRWMD is no longer in a position to require ERP water conservation on its own without a statewide process. However, as explained below, some of SJRWMD's original proposed water conservation measures are already being implemented through local government ordinances.</p> <p>4. <u>Water use reporting for per capita calculations</u> As part of their CUP conditions, CUP permittees regularly submit water use data to the SJRWMD. For public supply utilities, this information, coupled with the population figures for the area they serve, allows the determination of per capita water use.</p> <p>5. <u>Updated regulatory approach for public supply water conservation</u></p> <p>Comment #139.4 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.4 continued</p> <p>As a result of the recent statewide CUP consistency (CUPcon) rulemaking effort, the SJRWMD's CUP Applicant's Handbook (August 14, 2014) includes both new and revised public supply water conservation requirements. These new rules provide both a standard and a goal-based water conservation plan. (See also response to Item 2 above.).</p> <p>6. ERP water conservation provisions</p> <p>In 2010, SJRWMD began rulemaking for ERP water conservation. In 2010, SJRWMD had intended to create a new ERP criterion (in proposed new 40C-4.301(1)(l)), that a proposed system that will contain irrigated landscape, golf course, or recreational areas "will not adversely impact the availability of water for reasonable-beneficial uses." (See Notice of Rule Development for Chapter 40 C-4 published on August 20, 2010 in Vol. 36 No. 33). Using that proposed new ERP criterion, SJRWMD had planned to require two main categories of ERP water conservation: (1) requiring an applicant to use a lower quality water source when feasible, and (2) requiring an applicant to limit its landscape irrigation. However, with the adoption of section 373.4131, F.S., in 2012, and the later adoption of the SWERP rules in Chapter 62-330, F.A.C., control over the ERP permitting criteria has largely passed to the Florida Department of Environmental Protection (FDEP). Thus, SJRWMD is no longer in a position to amend its ERP rules to include either of the requested ERP water conservation provisions.</p> <p>Comment #139.4 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.4 continued</p> <p>Such a rulemaking effort would need to be coordinated through a statewide process.</p> <p>It should be noted that local governments in SJRWMD have adopted ordinances limiting the amount of landscape that can be irrigated. Furthermore, FDEP and the five water management districts are engaged in the development of proposed amendments to the Florida Building Code. The purpose of the proposed changes is to provide increased water conservation. These changes to the Florida Building Code, if adopted, would become effective in 2019.</p> <p>7. <u>Concurrent ERP/CUP application processing</u></p> <p>In 2010, SJRWMD began rulemaking for consolidated ERP/CUP application processing. SJRWMD will be requesting that the CFWI Regulatory Team add this topic to the list of items to be considered for potential future rulemaking. Notably, the other two water management districts within CFWI already have rules regarding concurrent ERP/CUP application reviews.</p> <p>8. <u>Water conservation rate structure</u></p> <p>In accordance with section 373.227, F.S., and pursuant to the SJRWMD's CUP rules adopted in 2014, public supply utilities must select a water conserving rate structure (e.g., inclined block rate, quantity-based surcharges) unless the applicant chooses a goal-based plan that will achieve water conservation that is at least as effective as that of the standard plan.</p> <p>9. <u>Landscape irrigation system design/installation constraints</u></p> <p>Comment #139.4 is continued on next page</p>

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.4 continued</p> <p>See second paragraph in Item 1 above. Additionally, the SJRWMD has developed the Florida Water StarSM program that allows builders to certify residential and commercial projects as having met a higher standard for water use efficiency indoors and outdoors. In addition to building certification, the program offers an accreditation training and exam to landscape and irrigation professionals so that they are better equipped to design and install sustainable landscapes. The SJRWMD has partnered with the FNGLA to implement the training portion of this program.</p>
139.5	Lisa Rinaman, St. Johns Riverkeeper	<p>8/17/15</p> <p>Genuine participation with stakeholders and local governmental officials must occur throughout the 48 counties that will be potentially affected by these plans.</p>	<p>The CFWI RWSP was developed in an open, public process, in coordination and cooperation with the Districts, FDEP, FDACS, water supply authorities, local government utilities, agricultural and industrial communities, environmental organizations, and other interested parties. Coordination and public participation is critical to ensuring the plan reflects the issues and concerns of stakeholders and a variety of methods and forums were used to notify and solicit input from stakeholders. Communication will continue and be expanded to ensure stakeholders outside of the CFWI Planning area are engaged and contribute the implementation of the plans recommendation as well as the development of future updates the CFWI RWSP.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
139.6	Lisa Rinaman, St. Johns Riverkeeper	8/17/15 Complete and approve the North Florida Regional Water Supply Partnership RWSP prior to CFWI adoption.	It is anticipated that the North Florida Regional Water Supply Plan (NFRWSP) will be completed in 2016. No reason is given as to why the CFWI RWSP should be delayed while the NFRWSP is completed. At this point in time in the development of the NFRWSP, SJRWMD staff does not foresee that the CFWI RWSP will limit the project options for the NFRWSP. The WMDs believe it is prudent to stay on course with the scheduled approval of the CFWI RWSP.
139.7	Lisa Rinaman, St. Johns Riverkeeper	8/17/15 All legal challenges, including the active PCEC/FLWAC case, are resolved.	With regard to the PCEC Request for Review to the Florida Land and Water Adjudicatory Commission (FLWAC), SJRWMD's designation of water supply development project options in the Fourth Addendum to its Water Supply Plan that involve potential surface water withdrawals from the St. Johns River or lower Ocklawaha River, and its interpretation of the term "alternative water supplies" in section 373.019(1), F.S., are consistent with the provisions and purposes of Chapter 373, F.S. This position is also supported by the South Florida Water Management District, Southwest Florida Water Management District, Suwannee River Water Management District, and Northwest Florida Water Management District. Therefore, it is unnecessary to delay approval of the CFWI RWSP and Solutions Strategy until completion of the PCEC case.
139.8	Lisa Rinaman, St. Johns Riverkeeper	8/17/15 The flawed groundwater model must be corrected before adoption of either plan.	The ECFT model served as a tool to simulate groundwater conditions, evaluate the effects of proposed groundwater projects and associated water use changes, and evaluate the conceptual Comment #139.8 is continued on next page

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			<p>Comment #139.8 continued</p> <p>management options of the area's water resources. During the Solutions Planning Phase, a series of updates were implemented to the ECFT model to incorporate new information or improve model estimates. Changes included updates to specific water uses, and modifications to improve the representation of agricultural reuse, rapid infiltration basins (RIBs), agricultural irrigation, and residential landscape irrigation. These changes were applied to the CFWI RWSP 2005 Reference Condition and 2015 withdrawal scenarios. In the Solutions Planning Phase, these updated scenarios are referred to as the Updated 2005 Reference Condition and the Baseline Condition. These are not an exhaustive list of improvements to the model identified by the HAT; however, they were sufficiently important to undertake to improve water use estimates and could be implemented within the time available for the Solutions Planning Phase. Additional improvements are planned for future versions of the model. Refer to Volume IIA, Appendix E for detailed information on the Solutions Planning Phase updates to the ECFT model.</p>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
139.9	Lisa Rinaman, St. Johns Riverkeeper	8/17/15 River, springs, lakes and wetlands throughout all three water management districts must be prioritized for protection and restoration with comprehensive MFLs, recovery and prevention strategies, and a prohibition from using surface water or groundwater as supplementation for reclaimed water.	With regard to the supplementation of reclaimed water systems, there is currently no prohibition from using surface water or groundwater. As stated in rule 62-40.416(9), F.A.C., supplementation of reclaimed water systems is “a strategy that can benefit Florida’s water resources by reducing reliance on traditional water supplies and maximizing the use of reclaimed water.” In addition to meeting a water management district’s consumptive use permitting criteria, including established MFLs and other environmental protection criteria, an applicant applying to use water for supplementation must provide reasonable assurance that 1) the use of water for supplementation will increase the amount of reuse, thereby resulting in a reduction in the overall use of higher quality sources for non-potable purposes, and, if applicable, reduce the amount of reclaimed water disposal to the extent practicable; and 2) the quantity of water requested for supplementation has been minimized to the extent environmentally, technically, and economically feasible. In addition, the applicant must submit a plan for the use of supplemental water in the reclaimed water system. The required elements of the plan can be found in rule 62-40.416(9)(b), F.A.C.
139.10	Lisa Rinaman, St. Johns Riverkeeper	8/17/15 WMDs must increase water quality monitoring to acquire the most current data for decision making. <ul style="list-style-type: none"> Please provide a detailed 15-year history of SJRWMD Water Quality Monitoring funding and monitoring stations. 	Thank you for your comment. Your request for information was handled through the public requests process and the information emailed to you on September 14, 2015.

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
140	Mark E. Johnson, City of Minneola	8/17/15 (rec'd at 11:48 PM - received this letter 3 times) Link Demand projection concerns.	As part of the efforts to prepare a single RWSP and to achieve consistency for the CFWI Planning Area, a Population and Water Demand Subgroup (Demand Subgroup) was formed to review and update population and water demand projections for the CFWI Planning Area. The Demand Subgroup review began in late 2011 and was completed in early 2013. The Demand Subgroup consisted of SFWMD, SJRWMD, SWFWMD, FDEP, and FDACS staff, as well as utility and agricultural industry representatives from the CFWI Planning Area. Pursuant to Chapter 373 F.S., population projections for each county were controlled to the University of Florida's Bureau of Economic and Business Research (BEBR) Medium population projections. It should be noted that these projections were made using a snapshot in time and were developed using the best available information at the time developed for the 2035 planning horizon. The countywide population projections were spatially distributed, based on the best available data, via a Geographic Information System (GIS) model that projected where in the county growth was likely to occur and applied growth rates similar to historic patterns (controlling overall to county BEBR Medium). Utility service areas were overlaid to determine utility specific projections. During the development and review of population and demand projections, the Population and Water Demand Subgroup (Demand Subgroup) provided projections for all of Lake County to Lake County Comment #140 is continued on next page

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
			Comment #140 continued and their consultants for distribution to all Lake County utilities/municipalities. Water supply plans are updated every five years to capture changing conditions.
141	Rosemarie Stein, Concerned Citizen	8/17/15 (sent 8:19 email to John/Jason/Dean rec'd 7:30 8/18/15) Dear Committee Members: I am contacting you about my concern about the proposed water supply plan. I urge you to eliminate the water removal proposals from the plan due to the harmful consequences. Instead implement and enforce aggressive conservation plans and policies. Water conservation works and is much more cost effective and environmentally responsible. Thank you for your attention. Yours truly, Rosemarie and Peter Stein	<i>Please refer to Volume II, Solutions Strategies Comments #14 and #27 responses.</i>

Table 2. Comments to Volume II: Solutions Strategies with Responses from the CFWI Team (continued).

Solutions Strategies Comment #	Commenter/ Entity Represented	Comment and Date Received	CFWI Response
142	Eleanor C. Foerste, UF IFAS	8/18/15 (rec'd at 7:59 am) Suggestions for Solutions Strategies improvements. Link	Thank you for your comments. District staff are aware of the value of greywater reuse but find a low level of use of these systems in part due to local health department requirements and cost. The Districts continue to offer advice to HOA boards when requested and refer to the UF Florida Friendly Landscaping recommendations for Florida-Friendly Covenants, Conditions, and Restrictions language. All five Districts are working to submit proposals to the Florida Building Commission to address irrigation design and installation and agree that efficient systems should also reduce runoff to local waterbodies. The Districts appreciate the value of education as it relates to behavior change. SWFWMD shares significant research in this area on their website http://www.swfwmd.state.fl.us/projects/social_research/ . UF IFAS already contributes greatly to local homeowner outreach and education and is certainly a valuable component to future conservation initiatives.
143	Michelle M. Tappouni, Chair Jacksonville Environmental Protection Board	8/17/15 Link Since 2008, the JEPB has sustained a public policy position opposing water withdrawals from the St. Johns River to support increased water demand in other areas of the State. We maintain that position today.	<i>Please refer to Volume II, Solutions Strategies Comment #27 response.</i>

STOPR+2 COMMENTS

STOPR+2 Volume I: RWSP Comments and Responses

STOPR+2 RWSP Editorial Comments

Table 3. STOPR+2 (City of St. Cloud, Tohopekaliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission) Editorial Comments to Volume I: RWSP (May 2015 Draft) submitted by Brian Wheeler on 7/17/15 with Responses from the CFWI Team. [[Link to STOPR+2 Editorial Comments to Volume I: RWSP](#)]

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
46	Global Change: Replace the word "historic" with the word "historical."	Thank you for your comment, text has been updated.
47	Preface, Page i, Second Bullet: Suggest adding " <u>expanding water conservation</u> " to list of strategies provided in second sentence.	No change, this language is from the CFWI Guiding Document.
48	Executive Summary, Page viii, Second Full Paragraph: Suggest changing last half of this sentence to read, "...have documented that the development of traditional water sources is near, has already reached, or, in some areas, has exceeded the sustainable limits" for consistency with how this concept was written in the Solutions Plan document.	Thank you for your comment; however, after review no changes were made.
49	Chapter 3, Page 38, Fourth Paragraph, Last Sentence: The text should be modified to indicate that rulemaking has been initiated and that the draft water reservation has been published regarding the Kissimmee River Basin. Suggest changing this sentence as follows, " Contingent upon future Governing Board approval , Rulemaking may be was initiated in 2014 to develop a water reservation rule for the Kissimmee Basin in the CFWI Planning Area."	Thank you for your comment, text has been updated.

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
50	<p>Chapter 3, Page 39, Last Paragraph: This paragraph indicates that "freeboard" and "remaining freeboard" are the same thing, which is not accurate. In addition, only adopted MFLs were used as measuring sticks. Suggest using text from Solutions Strategies document that distinguishes between the terms "freeboard" and "remaining freeboard" as follows, "Additionally, the adopted or currently proposed MFL sites were used as measuring sticks for evaluations of regional groundwater availability. <u>The allowable changes in UFA potentiometric surface in the vicinity of lakes and wetlands or spring flow at MFL measuring stick locations were based on the differences between adopted MFLs and recent conditions determined through field observation and site specific and regional modeling and statistical evaluations. This allowable change is referred to as "freeboard" and is the magnitude of change that can occur without causing exceedance of an adopted or proposed MFL. Based on the ECFT groundwater model predicted changes in Upper Floridan aquifer (UFA) water levels, spring flows, or groundwater flows, the magnitude of drawdowns of the potentiometric surface of the UFA in the vicinities of the MFL lakes, wetlands, or springs that could occur without causing exceedance of adopted (or proposed) MFLs was estimated. This allowable UFA drawdown is referred to as the MFLs measuring stick "freeboard" or "remaining freeboard". For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface or spring flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body, in spring flow, or in groundwater flow that can occur in association with future increases in water withdrawals.</u>"</p>	<p><i>For updated information on 'freeboard', please refer to Volume II (Solutions Strategies), Chapter 4.</i></p>
51	<p>Chapter 3, Page 41, SJRWMD Section, Third Paragraph, Second Sentence: This paragraph indicates MFL Prevention and Recovery will resume in 2014, which is no longer accurate. Suggest deleting this sentence or updating as appropriate.</p>	<p>Thank you for your comment, text has been updated to state '...upon completion of the CFWI RWSP.'</p>

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
52	Chapter 3, Page 45, Effects of Climate Change on Water Supply, Second Paragraph: Suggest deleting first four sentences regarding sea-level rise potentially resulting in the migration of population from coastal to inland communities. This RWSP has a 20-year planning horizon. A significant change in the location of Florida's population due to sea-level rise is unlikely to occur in the current 20-year planning horizon.	Thank you for your comment.
53	Chapter 4, Page 51, Minimum Flows and Levels Water Bodies, First Paragraph: This paragraph indicates "freeboard" and "remaining freeboard" are the same this, which is not accurate. Suggest updating the text for accuracy and consistency with the Solutions Plan document as follows, "For evaluation of lake, wetland, or spring MFL measuring sticks, the magnitude of estimated drawdown (in feet) of the Upper Floridan aquifer (UFA) potentiometric surface in the vicinity of the MFL sites <u>or springflow (in cfs)</u> that could occur without contributing to exceedance of adopted MFLs was identified for a Reference Condition (2005) and other simulated withdrawal scenarios. This <u>The model-</u> <u>predicted change in UFA potentiometric surface or springflow was used to calculate the drawdown variable, referred to as "freeboard" or "remaining freeboard", was expressed as the</u> <u>which is the potential or allowable drawdown in the UFA, in feet, for lake or wetland MFLs or springflow, in cfs, for spring MFLs.</u> In cases where current MFLs are not being achieved, the <u>remaining freeboard</u> would be a negative value."	Thank you for your comment; however, after review no changes were made.
54	Chapter 4, Page 56, Third Paragraph: Suggest rewording sentence as, "The 2005 scenario also corresponds with the most recent land use condition incorporated in the ECFT groundwater model, and <u>is consistent</u> was contemporary with the time period when time environmental data were collected at wetland and lake sites in central Florida associated with the CFWI planning effort."	Thank you for your comment; text has been updated.
55	Chapter 5, Page 99, Second Paragraph, Second Sentence: The comma is misplaced. This sentence should read, "Opportunities for additional water conservation remain, but, achieving further improvement will become more challenging."	Thank you for your comment, text has been updated.

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
56	Chapter 6, Page 108, Surface Water Section, Second Paragraph, Second Sentence: There are several references to surface water supporting conjunctive use projects, but there is no definition of what constitutes a conjunctive use project. Suggest changing this sentence to incorporate a definition for conjunctive use as follows, "Capturing available flows from these surface water bodies for water supply, particularly to support conjunctive use projects <u>that integrate the use of other sources with surface water in a manner that minimizes any potential harmful effects to the sources</u> , may be effective but can be expected to have varying levels of certainty, depending on climatic conditions."	Thank you for your comment; however, after review no changes were made.
57	Chapter 6, Page 112, Partial Paragraph at Top of Page, Second Full Sentence: Suggest modifying this sentence as follows, " Contingent upon future Governing Board approval, <u>In 2014,</u> rulemaking will be <u>was</u> initiated to develop a water reservation rule for the river system, 19 lakes, and the associated floodplain in the CFWI Planning Area." In addition, the follow-on sentence refers to an estimated 25 mgd being currently permitted from the Kissimmee River and KCOL. The technical document released in support of the reservation indicates this is closer to 34 mgd. Suggest updating as appropriate.	Thank you for your comment, text has been updated.
58	Chapter 6, Page 114, Second Paragraph: There is a misplaced comma. Suggest changing the sentence as follows, "The WSIS included withdrawal scenarios that ; simulated the effects of future land use conditions (estimated 2030 land use), future sea levels, and completion of the Upper St. Johns River Basin restoration projects."	Thank you for your comment, text has been updated.
59	Chapter 6, Page 118, Second Paragraph, First Sentence: This text should read, "In 2010, there were 80 wastewater treatment plants <u>in</u> the CFWI Planning Area..."	Thank you for your comment, text has been updated.
60	Chapter 7, Page 126, Partial Paragraph at Top of Page, Second Full Sentence: Suggest modifying this sentence as follows, "By using reclaimed water to replace all or a portion of an existing permitted use, a different user or use could initiate and increase to its FAS withdrawal."	Thank you for your comment, text has been updated.

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
61	Chapter 7, Page 131, Table 21: Suggest confirming that the table accurately reflects changes made to WSPOs as part of the Solutions Plan.	Table 21 reflects the preliminary project list in Volume IA, Appendix F; however, clarification has been added to refer to Volume IIA, Appendix D, Table D-1 of the Solutions Strategies. No change was needed.
62	Chapter 8, Page 139, First Paragraph: Suggest updating this text to reflect the postponement of KBMOS as follows, "Additional modeling efforts ongoing within the CFWI Planning Area include SWFWMD's District-wide Regulation Model Simulation; the Kissimmee River Modeling and Operations Study ; the SJRWMD East Central Florida (ECFT) groundwater model; and the Agricultural Irrigation Requirement Simulation model (AFSIRS)."	Thank you for your comment, text has been updated.
63	Chapter 8, Page 143, Second paragraph: Suggest mentioning the draft rule and technical document availability. Suggest changing this paragraph as follows, " Contingent upon future Governing Board approval In 2014, rulemaking will be was initiated to develop a water reservation rule for 19 lakes and the Kissimmee River system and its associated floodplain in the CFWI Planning Area. <u>The draft rule and technical document for the proposed reservation were published in 2015.</u> As part of this rulemaking effort, the SFWMD will identify the location, timing and amount of water <u>lake stage</u> necessary to best manage the system and lakes in order to achieve the approved restoration goals. The modeling tools used to develop the water reservation are currently available to the public to identify and design cooperative projects to store and withdraw surface water."	Updated text now states 'In 2014, rulemaking was initiated to develop a water reservation rule for 19 lakes, the Kissimmee River system and its associated floodplain in the CFWI Planning Area. The draft rule and technical document for the proposed reservation were published in 2015. As part of this rulemaking effort, the SFWMD will identify the water needed for the protection of fish and wildlife while achieving the approved restoration goals for the Kissimmee River and Headwater Revitalization Projects.'
64	Chapter 10, Page 161, Blue Underlined Text in Middle of Page: Modify text as follows, "As described in this CFWI RWSP, fresh groundwater resources alone cannot meet <u>projected</u> future water demands or current permitted allocations without resulting in unacceptable impacts to water resources and related natural systems."	Thank you for your comment, text has been updated.
65	Chapter 10, Page 163, Last Paragraph: The first sentence of "Next Steps" is not a complete sentence. Please correct accordingly.	Thank you for your comment, text has been updated.

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
66	Chapter 11, Page 166, Second Bullet: Replace the text with the following, "Determine the water conservation potential of public supply utilities and assist utilities with analytical work contributing to the development of effective standard or goal-based water conservation plans."	Thank you for your comment; however, after review no changes were made.
67	Chapter 11, Page 167: The bullet list is not presented in a parallel manner (e.g. the 3rd bullet should read, "Coordination of monitoring...") Suggest modifying text accordingly.	Thank you for your comment; however, after review no changes were made.
68	Chapter 11, Page 168, Groundwater Subsection: Add the following bullet to the bullet list, "Support continuing efforts to refine and update the ECFT model so that it may be used as a permitting tool in the future."	Please refer to the Consumptive Use Permitting section In Volume I, Chapter 11.
69	Appendix B, Page B-3, Executive Summary, First Full Paragraph, First Three Sentences: Suggest using text consistent with the Solutions Planning Document similar to the following, "For evaluation of the MFL measuring sticks, the magnitude of drawdown of the potentiometric surface of the UFA in the vicinity of lakes <u>and</u> ; wetlands; or spring <u>flow-MFL site</u> , that can occur without causing violation of established MFLs was characterized as the "freeboard- or <u>"remaining freeboard."</u> Freeboard- or remaining freeboard was expressed as the potential or allowable drawdown in the UFA; <u>(in feet)</u> for those lake or wetland MFL sites classified as MFL constraints or other considerations. Similarly, freeboard or remaining freeboard for spring MFL sites was expressed as a flow rate (in cubic feet per second or cfs) and a percentage of the flow associated with the Miminum Flow Regime adopted for MFL springs. For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface or spring flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body or in spring flow that can occur in association with future increases in water withdrawals."	Thank you for your comment; however, after review no changes were made.

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
70	Appendix B, Page B-23, Table B-5: Lake Searcy has been removed from the priority list and should be removed from this table and all other references (such as Figure B-1). Lake Hiawassee should be omitted from this table as it is no longer scheduled for MFL adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.
71	Appendix B, Page B-28, Section 3, First Full Paragraph: Suggest using text from Solutions Plan document that distinguishes between the terms "freeboard" and "remaining freeboard" as follows, "The magnitude of drawdown of the potentiometric surface of the UFA in the vicinity of lakes and wetlands or change in springflow at MFLs sites that can occur without causing violation of established MFLs is referred to in this appendix as the "freeboard." or "remaining freeboard." Freeboard or remaining freeboard is expressed as the potential or allowable drawdown in the UFA, in feet, for lake or wetland MFL sites classified as MFL constraints or other considerations. Similarly, freeboard or remaining freeboard for spring MFL sites is expressed as a flow rate (in cubic feet per second or cfs) and percentage of the flow rate associated with the <u>Minimum Flow Regime adopted for MFL springs. For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface, spring flow, or groundwater flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body, in springflow, or in groundwater flow that can occur in association with future increases in water withdrawals."</u>	Thank you for your comment; however, after review no changes were made.
72	Appendix B, Page B-30, Table B-8: Lake Hiawassee should be omitted as it is no longer proposed for adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.
73	Appendix B, Page B-68, Table B-11: Lake Hiawassee should be omitted as it is no longer proposed for adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.
74	Appendix B, Page B-72, Table B-12: Lake Hiawassee should be omitted as it is no longer proposed for adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.

Table 3. STOPR+2 Editorial Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Editorial Comment #	Comment	CFWI Response
75	Appendix B, Page B-82, First and Third Paragraphs: Lake Hiawassee should be omitted as it is no longer proposed for adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.
76	Appendix B, Page B-90, First and Third Paragraphs: Lake Hiawassee should be omitted as it is no longer proposed for adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.
77	Appendix B, Page B-98, Third Paragraph: Lake Hiawassee should be omitted as it is no longer proposed for adoption.	Proposed MFLs are subject to change and this table represents proposed MFLs at the time of evaluation.

STOPR+2 RWSP Substantive Comments

Table 4. STOPR+2 (City of St. Cloud, Tohopekalgia Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission) Substantive Comments to the RWSP (May 2015 Draft) submitted by Brian Wheeler on 7/17/15 with Responses from the CFWI Team. [[Link to STOPR+2 Substantive Comments: Volume I: RWSP, Attachment 2](#)]

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
1	General Comment: Remove Hiawassee, Searcy, and other non-applicable lakes from the MFL discussions and figures. After removing references to Hiawassee, Searcy, etc. from proposed MFL references, tables, and diagrams, check to make sure the counts of MFLs, constraints, etc. are current throughout the RWSP, the Solutions Plan, appendices, text, tables, and graphics.	Thank you for your comment; however, after review no changes were made. A note has been added to Figure 2 'Proposed MFLs are subject to change and this figure represents proposed MFLs at the time of evaluation.'
2	General Comment, Preface and Executive Summary: Some information presented in the draft RWSP does not precisely match information in the draft Solutions Plan. This is not necessarily a problem, but it warrants explanation in the RWSP. Some of the analyses supporting the two documents were performed at different times, for different purposes. For example, some information presented in the Solutions Plan Appendices is the result of different, refined, or updated evaluations. In some cases, sections of the RWSP were updated with such Solutions Plan results (e.g., the Water Supply Project Options). In other cases (e.g., potential future conservation projections), the RWSP was not updated to reflect the results of the Solutions Plan, making the various sections of the overall series of documents appear inconsistent—though they are not. Consistent with the June 24, 2015 letter from Silvia Alderman (see link to Attachment 1), it is recommended that the Solutions Plan be more clearly identified as an integral component of the RWSP. STOPR+2 RWSP Substantive Comment #2 is continued on next page	The CFWI Cover Page Titles will be updated as follows: Regional Water Supply Plan (Volume I) Regional Water Supply Plan: 2035 Water Resources Protection and Water Supply Strategies (Volume II) Regional Water Supply Plan Appendices to Volume I (Volume IA) Regional Water Supply Plan Appendices to Volume II (Volume IIA) A global search and replace was completed to change Solutions Plan to Solutions Strategies. Requested paragraph has been added on page xi second to last paragraph.

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
	<p>STOPR+2 RWSP Substantive Comment #2 continued</p> <p>Furthermore, to address any apparent inconsistency of information in the different document volumes, it is suggested that supplemental text be added as the last paragraph of the RWSP Preface and the second to last paragraph on Page xi of the RWSP Executive Summary to better explain the linkage between the RWSP and the Solutions Plan Appendices. The following paragraph is suggested: <u>"Some of the evaluations described in the Solutions Strategies Plan Appendices represent different, refined, or expanded evaluations of certain aspects of the Regional Water Supply Plan. These evaluations were based on specific assumptions developed by the water management districts and CFWI stakeholders to generate a potential implementation and funding plan for a specific set of Water Supply Project Options identified for the region. As a result, some of the results presented in the Solutions Strategies Plan Appendices (e.g., projections for future potential conservation) are not the same as the results presented in other sections of the RWSP. These results are not inconsistent, but rather represent the results of two different evaluations performed for varying purposes. Only updates to the Water Supply Project Options were integrated into other sections of the RWSP."</u> A similar text addition may also be appropriate for other sections of the RWSP.</p>	
3	<p>Preface, Page i, Third Bullet: Change bullet text as follows, "Establish <u>consistency among consistent rules and regulations for the three water management districts, including but not limited to developing consistent rules and regulations, to meet the collaborative process goals that meet their collective goals</u>, and implement the results of the Central Florida Water Initiative."</p>	<p>No change, this language comes from the CFWI Guiding Document.</p>

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
4	<p>Preface, Page i: Suggest adding the following text after the bullet list:</p> <p><u>"CENTRAL FLORIDA WATER INITIATIVE GOALS</u></p> <p><u>1. One model.</u></p> <p><u>2. One uniform definition of harm.</u></p> <p><u>3. One reference condition.</u></p> <p><u>4. One process for permit reviews.</u></p> <p><u>5. One consistent process, where appropriate, to set MFLs and reservations.</u></p> <p><u>6. One coordinated regional water supply plan, including any needed recovery and prevention strategies."</u></p>	The CFWI goals have been added to the Preface.
5	<p>Executive Summary, Page viii, First Full Paragraph, First Sentence: The regulatory definition of "brackish" groundwater is not consistent among the three water management districts. For this reason, throughout the RWSP document, we suggest making reference to "traditional" and "non-traditional" sources of groundwater in lieu of distinguishing groundwater sources by water quality. Suggest changing this first sentence as follows, "The CFWI Planning Area traditionally has relied on fresh groundwater from the SAS, IAS, UFA, and some areas of the LFA Floridan aquifer system (FAS) as a primary water source for urban, agricultural, and industrial uses."</p>	<p>Paragraph has been updated 'Current water sources in the CFWI Planning Area include groundwater (fresh and brackish), reclaimed water, surface water, and stormwater. Fresh groundwater sources (i.e., surficial, intermediate, and Floridan aquifers) are considered traditional water sources whereas nontraditional or alternative water sources include brackish groundwater, surface water, seawater, reclaimed water, and water stored in ASRs and reservoirs. The CFWI Planning Area traditionally has relied on fresh traditional groundwater from the Floridan aquifer system (FAS) as a primary water source for urban, agricultural, and industrial uses. In addition, over 90 percent of the treated wastewater in the region is reused (178 million gallons per day [mgd]) for landscape irrigation, industrial uses, groundwater recharge, and environmental enhancement'</p>

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
6	Executive Summary, Page viii, Fourth Paragraph, First Sentence: Suggest changing this sentence as follows, "Based on modeling results and the assessment of groundwater availability, it was concluded that fresh-traditional groundwater resources alone cannot meet future water demands in the CFWI Planning Area without resulting in unacceptable impacts to water resources and related natural systems."	The use of traditional has been utilized where appropriate.
7	Executive Summary, Page x, First Paragraph, First through Fourth Sentences: Suggest changing these sentences as follows, "There are several sources of water and storage options that were considered to address future water needs. <u>Historically utilized groundwater from the SAS, IAS, UFA, and some portions of the LFA</u> Fresh groundwater sources (i.e., surficial, intermediate, and Floridan aquifers) are considered traditional sources of water while <u>portions of the LFA that have not been historically utilized</u> brackish groundwater , surface water, seawater, reclaimed water, reservoirs and aquifer storage and recovery are considered nontraditional or alternative water sources. The CFWI RWSP identifies 142 potential water supply development project options, consisting of 37 brackish non-traditional LFA groundwater, 15 surface water, 87 reclaimed water, and three management strategy projects that could produce up to a total of 455 mgd in additional water supply by 2035. The 37 brackish non-traditional LFA groundwater projects and 15 surface water projects have an estimated capital cost of up to 2.5 billion dollars, and could generate an estimated potential of up to 284 mgd of water.	Reference to the 37 groundwater projects options has been changed to "brackish / nontraditional".

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
8	Executive Summary, Page xi, Last Paragraph: Change this sentence as follows, "In addition, a Regulatory Team will <u>promote consistency amongst the water management districts, including but not limited to</u> establishing consistent rules and regulations for the three Districts, that meet the collaborative process goals and implement the results of this CFWI planning effort."	No change, this language comes from the CFWI Guiding Document.
9	Introduction, Page 7, South Florida Water Management District Paragraph, Fourth through Sixth Sentences: Suggest changing sentences as follows, " Fresh <u>g</u> Groundwater from the <u>SAS, UFA and portions of the LFA</u> Floridan aquifer system and groundwater from the surficial aquifer system served the Kissimmee Basin (KB) Planning Area as traditional water sources (SFWMD 2006a). The 2005-2006 KB Plan Update concluded that increased conservation and the development of <u>non-traditional sources or</u> alternative water supplies were needed to meet water needs, as further development of traditional supplies becomes increasingly limited. The <u>non-traditional or</u> alternative water supply source options identified for the KB Planning Area included brackish <u>groundwater from some portions of the LFA</u> ; fresh surface water from the Kissimmee River and Chain of Lakes and associated tributaries; stormwater runoff collection and storage; and reclaimed water."	No change, this language comes directly from the 2005-2006 Kissimmee Basin Water Supply Plan.
10	Introduction, Page 7, St. Johns River Water Management District Section, Second Paragraph, Second Sentence: Not all the AWS surface water projects identified in the SJRWMD plan include surface water storage in reservoirs. Suggest changing this sentence as follows, "These included increased use of reclaimed water, development of brackish <u>non-traditional LFA</u> groundwater sources, surface water, storage through reservoirs, and conservation (SJRWMD 2006a)."	No change, the edited text is referenced from another document.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
11	Introduction, Page 8, Southwest Florida Water Management District Section, First paragraph, Last Sentence: Because this section discusses projects identified in the 2010 Heartland Plan, there' should be some reference to additional non-traditional AWS sources identified in that plan—such as the Polk Southeast Wellfield, Northeast LFA Wellfield, and Kissimmee River Reservoir projects. Please modify the final sentence as follows, "Polk County may also be able to <u>meet future demands from non-traditional sources such as surface water and LFA groundwater supplies within Polk County, or from importation of water from supplies developed in cooperation with other regional entities outside of Polk County by Tampa Bay Water in the Tampa Bay Planning Region and/or from surface and groundwater supplies in the SWFWMD portion of Polk County.</u>	Thank you for your comment, text has been updated.
12	Introduction, Page 9, Groundwater Subsection, First Paragraph, Last Sentence: Suggest changing this sentence as follows, "The SAS, IAS, UFA, and portions of the LFA upper portion of the Floridan aquifer has <u>have</u> historically been the primary traditional source of water supply throughout the region."	Thank you for your comment. Text changed to "The FAS has historically been the primary source of water supply throughout the region." This is consistent with the Executive Summary, Page viii, First Full Paragraph, First Sentence.
13	Introduction, Page 10, First Full Paragraph, Second and Third Sentences: Suggest changing these sentences as follows, "Therefore, alternatives to fresh traditional <u>groundwater sources</u> need to be developed and implemented to meet the region's growing demands. AWS sources are presented and described in Chapter 6. AWS sources include reclaimed water, brackish non-traditional groundwater such as groundwater from some portions of the LFA within the CFWI region, surface water, seawater, and stormwater."	Thank you for your comment. The use of traditional has been utilized where appropriate.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
14	Introduction, Page 10, Second Paragraph, Second Sentence: Suggest changing this sentence as follows, "However, limited water quality data exists within the LFA and our understanding of the potential local and regional impacts that could result from LFA pumping <u>in areas of the region that have not historically utilized this source</u> other areas such as southern Osceola County is limited as well. "	Thank you for your comment, text has been updated.
15	Chapter 2, Page 29, Summary Second Paragraph, Last Sentence (continued on Page 30): The CFWI RWSP is intended to be the current or in-progress regional water supply plan for all three Districts. As such, suggest changing this sentence as follows, "These changes make it inappropriate to compare the planning demand projections in this CFWI RWSP with current or in-progress District RWSPs, DWSPs, or projections produced by individual Districts for use in <u>other planning efforts or</u> consumptive use permitting."	Thank you for your comment; however, after review no changes were made.
16	Chapter 3, Page 32, Second paragraph: The statement referring to the use of Rule 62-40, FAC, is only true for SFWMD, which specifically references 62-40 in terms of considering what constitutes a reasonable-beneficial use. The other two Districts have established their own standards without reference to 62-40 in determining reasonable-beneficial use. This either needs to be clarified or the sentence should be deleted.	Thank you for your comment, text has been updated.
17	Chapter 3, Page 32, Last Bullet under CUP Issues: "Restricted allocation areas" is a term that is only used in SFWMD's rules. This implies that all the Districts have rules relating to restricted allocation areas, which is incorrect. Suggest deleting this bullet or adjusting the text accordingly.	Thank you for your comment. Last bullet has been updated to "Restricted allocation areas within SFWMD."

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
18	Chapter 3, Page 33, First Paragraph, Last Sentence: This sentence is incorrect. SWFWMD and SJRWMD have only established the 2-in-10-year drought condition requirement for irrigation type uses. Public water supply permits are evaluated based on average rainfall or drought conditions. Suggest changing this sentence as follows, "Permit applicants <u>for irrigation uses</u> in SWFWMD and SJRWMD must demonstrate the conditions for permit issuance are satisfied during a 2-in-10 year drought condition, except within the SWFWMD's Southern Water Use Caution Area (which includes most of Polk County) where a 5-in-10 year drought condition is used for crops that receive effective rainfall. <u>Permit applicants for PWS uses in the SWFWMD are based on a 5-in-20 year drought condition.</u> "	Thank you for your comment. Some text has been updated.
19	Chapter 3, Page 34, First Paragraph, First and Second Sentences: Based on the latest amendment to Rule 62-40, FAC, WMDs are required to "simultaneously" prepare a Recovery and Prevention Strategy, when adopting an MFL that will not be met within 20 years. This language does not reflect this requirement. Please update this sentence accordingly. "If the water body is below or projected to fall below the existing MFL criteria, the District shall expeditiously <u>develop and implement</u> a recovery or prevention strategy. <u>If the water body is below or projected to fall below proposed MFL criteria, the District shall simultaneously develop and adopt a recovery or prevention strategy with the MFL. A recovery strategy must be developed and implemented when the water body currently fails to meet MFL criteria.</u> "	Thank you for your comment. The text has been updated as follows 'If the water body is below or projected to fall below-the existing MFL criteria, the District shall expeditiously develop and implement a recovery or prevention strategy. At the time the minimum flow or level is initially adopted, if the water body is below or projected to fall below the initial minimum flow or level, the District shall simultaneously develop and approve a recovery or prevention strategy with the MFL.'

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
20	Chapter 3, Page 34, Second Paragraph, First Sentence: According to Rule 62-40, a prevention strategy must be implemented concurrently with the adoption of an MFL, where the water body is not projected to meet the MFL within 20 years. Please update this sentence as follows, "A prevention strategy is developed concurrently with the adoption of the MFL or subsequent to adoption when the MFL's criteria are currently met, but are projected not to be met within the next 20 years."	Thank you for your comment; however, after review no changes were made.
21	Chapter 3, Page 35, First Paragraph, Second Sentence: This statement is inconsistent with Rule 62-40.473(2), FAC. Please update this text as follows, "However, a minimum flow or level need not be expressed as multiple flows or levels if other resource protection tools, such as reservations, are implemented in coordination with the MFLs to protect fish and wildlife or public health and safety, <u>which and provide equivalent or greater protection of the hydrologic regime of the water body, are developed and adopted in coordination with the minimum flow or level.</u> "	Thank you for your comment. Sentence has been updated as follows (sentence from the rule): However, a minimum flow or level need not be expressed as multiple flows or levels if other resource protection tools, such as reservations implemented to protect fish and wildlife or public health and safety, that provide equivalent or greater protection of the hydrologic regime of the water body, are developed and adopted in coordination with the minimum flow or level.
22	Chapter 3, Page 35, Second Paragraph, First Sentence: Reference should be made to the fact that SWFWMD Rule 40D-80 contains the regulatory portion of MFL Recovery and Prevention Strategies for certain MFLs. Suggest changing this sentence as 'follows, "Chapters 40C-8, 40D-8, and 40E-8, F.A.C., contain the adopted MFLs as well as definitions and the policy and purpose considerations used in the establishment of MFLs, <u>and Chapter 40D-80 contains the regulatory portion of MFL Recovery and Prevention Strategies for certain MFLs.</u> "	Thank you for your comment, text has been updated.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
23	Chapter 3, Page 40, Second Paragraph, Last Sentence: New Rule 62-40 requires Recovery and Prevention Strategies to be implemented simultaneously with adoption of MFLs. Suggest updating this sentence as follows, "An important part of the water supply planning process is the assessment of MFL water bodies to determine if existing flows and levels are below the MFL or projected to fall below, the MFL within 20 years. <u>For existing MFLs in such cases, the Districts shall expeditiously develop and implement a recovery or prevention strategy. For proposed MFLs, the District shall simultaneously develop and adopt a recovery or prevention strategy with the MFL.</u> "	Thank you for your comment. The new (last) sentence has been updated as follows (mirror rule): At the time the minimum flow or level is initially adopted, if the water body is below or is projected to fall within 20 years below, the initial minimum flow or level, the District shall simultaneously approve the recovery or prevention strategy required by Section 373.0421(2), F.S.
24	Chapter 4, Page 51, Second Paragraph, First Bullet: Proposed MFLs should not be used as a measuring stick, unless they are re-evaluations of existing MFLs. Change this bullet as follows, "Adopted and proposed MFL water bodies within the CFWI Planning Area."	Thank you for your comment; however, after review no changes were made.
25	Chapter 6, Page 101, First Paragraph, First and Second Sentences: Suggest modifying these sentences as follows, "The CFWI Planning Area has primarily relied on water derived from the Floridan Aquifer System (FAS) SAS, IAS and UFA, and the LFA in some areas of the CFWI (e.g., traditional sources) with minor uses from the Surficial aquifer system (SAS) and intermediate water supply needs, as well as non-traditional sources such as reclaimed water and some minor surface water uses. As demands increase, and withdrawals approach sustainable limits of traditional water supply resources, it is important to identify options for diversifying water supply sources. The sources of water potentially available to meet projected water demand in the CFWI Planning Area include <u>fresh traditional groundwater sources brackish non-traditional groundwater sources such as groundwater from the LFA in some areas of the CFWI where this source has not been historically used,</u> surface water, seawater, and <u>additional</u> reclaimed water."	Thank you for your comment. The use of traditional has been utilized where appropriate.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
26	Chapter 6, Page 101, Third Paragraph, First Sentence: Suggest changing this sentence as follows, "Fresh groundwater sources (i.e., surficial, intermediate, and Floridan aquifers <u>SAS, IAS, UFA, and the LFA in some areas of the CFWI region</u>) are considered traditional water sources whereas nontraditional or alternative water sources include brackish <u>LFA groundwater from some areas of the CFWI region</u> , surface water, seawater, reclaimed water, and water stored in ASRs and reservoirs."	Thank you for your comment; however, after review no changes were made.
27	Chapter 6, Page 102, Second Paragraph, Second Sentence: Suggest modifying the text as follows, " fresh Groundwater from the Upper Floridan Aquifer (UFA) and some select zones in the Lower Floridan aquifer (LFA) is the principal traditional source of water supply for all water use categories in the CFWI Planning Area."	Thank you for your comment. The use of traditional has been utilized where appropriate.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
28	<p>Chapter 6, Page 106, Brackish Groundwater Section, First Paragraph: The final two sentences of this paragraph reference different definitions for brackish groundwater depending on the WMD. In addition, from a practical perspective these definitions are not adequately encompassing. For example, a source of water may have sulfate concentrations above drinking water standards that require a utility to use advanced treatment. In this example, that source would be considered a brackish AWS source for that utility. We suggest these two sentences be modified as follows to adequately capture a practical definition of brackish water for planning purposes, "Brackish water, for alternative water supply planning purposes in the CFWI Planning Area-for SJRWMD and SWFWMD, is generally defined as water <u>requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use.</u>with a total dissolved solids (TDS)-concentration of greater than 500 mg/L. SWFWMD defines saline water, which includes brackish water, as water with chloride concentrations greater than 250 mg/L."</p>	<p>The current definition captures each of the Districts' brackish water criteria for water supply planning purposes. No other proposed changes were incorporated.</p>

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
29	Chapter 6, Page 106, Brackish Groundwater Section, Fourth Paragraph: Please modify the beginning of this paragraph as follows, "Currently, the Water Cooperative of Central Florida (WCCF) (a cooperative that includes Orange County Utilities, TWA, City of St. Cloud, and Polk County Utilities) and Reedy Creek Improvement District (RCID) are implementing the development of a <u>non-traditional groundwater</u> brackish wellfield to withdraw water from sections of the LFA. The WCCF and RCID (as co-permittees) were recently granted a water use permit to withdraw 37.5 mgd (30 mgd finished and 7.5 mgd treatment process reject) in central Osceola County from the brackish LFA. <u>In addition, Polk County Utilities is implementing the Southeast Wellfield Project and was recently granted a water use permit to withdraw 37.5 mgd (30 mgd finished and 7.5 mgd treatment process reject) of non-traditional LFA groundwater in southeast Polk County.</u> "	The use of nontraditional has been utilized where appropriate. Other text was incorporated.
30	Chapter 6, Page 116, Seawater Section, Second Paragraph on page: Modify paragraph as follows to more accurately represent the concepts discussed between Polk County and Tampa Bay Water: "Polk County Utilities and TBW have previously discussed the potential for the county to partner in an expansion of the 25 mgd Tampa Bay Desalination Facility. In exchange for a funding commitment, TBW could also supply a quantity of water <u>to Polk County</u> through a future interconnect from the Lithia area of Hillsborough County to utilities in western Polk County- <u>or by a net-benefit relocation of groundwater withdrawals within the Most Impacted Area of the SWUCA.</u>	Thank you for your comment; however, after review no changes were made.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
31	Chapter 7, Page 125, Last Paragraph, First and Second Sentences: Suggest changing these sentences as follows, "The majority of the 2010 public supply water demand was met by fresh groundwater from the FAS. The UFA and portions of the LFA freshwater portions of the upper and lower Floridan aquifer are considered the traditional sources for most water users within the CFWI Planning Area. Where the water quality in the upper and lower portions of the FAS is brackish, the source Some portions of the LFA within the CFWI region are considered non-traditional. "	The use of traditional has been utilized where appropriate. The second and third sentences have been deleted. Please refer to Volume I, Chapter 6, Introduction for the definitions of traditional and nontraditional sources.
32	Chapter 7, Page 126, Last Paragraph, Title: Change "Brackish Groundwater Projects" to " <u>Non-Traditional</u> Groundwater Projects".	Title has been changed to "Brackish / Nontraditional" . . .

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
33	<p>Chapter 7, Page 126, Last Paragraph: Brackish groundwater, for alternative water supply planning purposes in the CFWI Planning Area for SJRWMD and SWFWMD, is generally defined as <u>water requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use.</u> With total dissolved solids (TDS) concentration greater than 500 mg/L. SWFWMD defines saline water, which includes brackish water, as water with chloride concentrations greater than 250 mg/L can be found in the Lower Floridan aquifer (LFA) within portions of the CFWI Planning Area. Additionally, brackish groundwater has been identified at depths below the FAS in most areas of the CFWI Planning Area. <u>Brackish groundwater is a non-traditional supply source for the CFWI area. However, some portions of the LFA within the CFWI area are also non-traditional regardless of the quality of the groundwater.</u> Thirty-seven potential brackish-non-traditional groundwater supply projects, mostly in Polk County, have been identified to generate water within portions of the CFWI Planning Area. As currently described, these alternative water supply (AWS) projects could generate an estimated 45 mgd of new groundwater. Projects are still being evaluated and could increase the amount of potential new brackish-non-traditional groundwater by an additional 30 mgd.</p>	<p><i>Please refer to STOPR+2 RWSP Substantive comment #7 (brackish/nontraditional) and STOPR+2 RWSP Substantive comment #28 (definition) responses.</i></p>

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
34	Chapter 7, Page 127, Brackish <u>Non-traditional</u> Groundwater Projects, Second Paragraph: Modify this paragraph as follows, "The Cypress Lake Wellfield project and proposed Southeast Polk County Wellfield projects (included in the AWS estimates above) <u>have both been permitted by the SFWMD and</u> are anticipated to provide new potable supply by tapping the LFA <u>in areas not traditionally used for water supply</u> . The Cypress Lake Wellfield project in central Osceola County is being developed by the Water Cooperative of Central Florida (WCCF) and the Reedy Creek Improvement District (ROD). This project was permitted for construction in 2012. The Southeast Polk County Wellfield project is being pursued (including water quality analysis) <u>developed by Polk County Utilities and is,</u> which proposes development of a LFA wellfield at a facility located west of the Kissimmee River near SR 27 and SR 60. A number of additional brackish non-traditional groundwater projects are relatively small in size and are designed as blending projects with existing fresh groundwater sources."	The use of nontraditional has been utilized where appropriate. Other text was incorporated.
35	Chapter 7, Page 127, Surface Water Subsection, Second Paragraph, First Sentence: Suggest modifying this sentence as follows, "Fifteen potential <u>non-traditional</u> surface water supply projects have been identified to generate new water within the CFWI Planning Area and are shown in Table F-1 in Appendix F."	Thank you for your comment; however, after review no changes were made.
36	Chapter 7, Page 128, Seawater Section, First Paragraph, First Sentence: Suggest changing this sentence as follows, "Seawater is defined by the SJRWMD and SFWMD as water with a chloride concentration at or above 19,000 mg/L and by the SWFWMD as water with a chloride concentration at or above 10,000 mg/L." This suggestion is based on review of SJRWMD AH §1.1(r), SFWMD AH §1.1, and SWFWMD AH §1.1(00).	Text has been updated. The SWFWMD definition in the Applicants Handbook is ". .TDS concentration greater than or equal to 10,000 mg/L" Accept glossary definition comment with revision of "with a TDS concentration". Projects in the Solutions Strategies still need to consult the appropriate permitting agencies for successful implementation.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
37	Chapter 7, Page 131, Second Paragraph, Third Sentence: This sentence Indicates that a CUP may be required if a withdrawal is within three miles of the coastline. This follows a sentence regarding the withdrawal of seawater and use of reclaimed water. This criterion is not included in SJRWMD's rules regarding withdrawals of seawater. Rule 40C-2.051 indicates that seawater withdrawals are exempt from permitting, except for withdrawals from estuaries, lagoons, rivers, streams and intracoastal waters. Also, SJRWMD exempt projects that use 100% reclaimed water. Regardless of whether it has a rule to that effect, Section 373.019(17), Florida Statutes states that reclaimed water "is not subject to regulation pursuant to s. 373.175 or part II of this chapter, until it has been discharged into waters as defined in s. 403.031(13)." Suggest changing this text as follows, "In SJRWMD, a consumptive use permit may be required <u>for withdrawals from estuaries, lagoons, rivers, streams, and intracoastal waters if the withdrawal is within three miles of the coastline. A consumptive use permit is not required for the use of reclaimed water in the SJRWMD.</u> "	Thank you for your comment, text has been updated.
38	Chapter 7, Page 135, Impact of Political Boundaries on Water Supply Planning Subsection: This section only discusses transfers of groundwater across District boundaries and transfers of water across county boundaries. However, there is a third set of water transfers that should be mentioned. Suggest adding a brief section regarding surface water across District boundaries, which is governed by Rule 62-40.422(1) and (2), FAC.	Heading has been modified to 'Transfers of Water Across District Boundaries' and another paragraph has been added as follows 'In addition surface water and groundwater transfers across District boundaries are governed by Rule 62-40.422(1) and (2), FAC. which states the transfer or use of surface water across District boundaries shall require approval of each involved District. The transfer or use of groundwater across District boundaries shall require approval of the District where the withdrawal of groundwater occurs.'
39	Chapter 11, Page 161, Blue Text in Box after Second Paragraph: Change this sentence as follows, "As described in this CFWI RWSP, fresh <u>traditional</u> groundwater resources alone cannot meet..."	The use of traditional has been utilized where appropriate.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
40	Chapter 11, Page 161, Last Full Paragraph, First Sentence: Change this sentence as follows, "In some areas, utilization of fresh-traditional groundwater has already reached, exceeded, or is near the sustainable limits."	The use of traditional has been utilized where appropriate.
41	Chapter 11, Page 168, Groundwater Subsection: Add the following bullet to the bullet list, "Support continuing efforts to refine and update the ECFT model so that it may be used as a permitting tool in the future."	This is captured under the Consumptive Use Permitting section of Volume I, Chapter 11 on page 174.
42	Chapter 11, Page 169, First Paragraph, First Three Sentences: This sentence would benefit from including a definition of conjunctive use. Suggest changing this text as follows, "There are opportunities for the development of surface water supplies from the lakes and rivers in or near the CFWI Planning Area <u>as non-traditional water supply sources</u> . Smaller, local lakes are generally considered a limited resource and often provide the local landowners with water for irrigation purposes. <u>However, the capture and storage of water from river/creek systems during times of high flow can supply significant quantities of water and could be a conjunctive use component of many multi-source water supply development projects that integrate the use of other sources with surface water in a manner that minimizes any potential harmful effects to the sources (e.g., conjunctive use).</u> "	Thank you for your comment; however, after review no changes were made.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
43	Chapter 11, Page 170, Minimum Flows and Levels Last Bulleted Item: Suggest rewriting this bullet as follows, "Expediently develop and implement the recovery and prevention strategies identified in Chapter 3 and others for <u>adopted MFLs projected to fall below their MFL criteria within the next 20 years, develop and adopt recovery and prevention strategies simultaneous to the adoption of new MFLs when the MFL is projected to fall below their MFL criteria within the next 20 year, as additional MFLs are developed</u> , and continue to implement the strategies identified in the Southern Water Use Caution Area (SWUCA) Recovery Strategy."	Thank you for your comment; however, after review no changes were made.
44	Glossary, Page 180, Definition of "Brackish water": As no consistent regulatory definition exists among the water management districts, suggest a practical definition instead, as follows: " <u>Brackish water, for alternative water supply planning purposes in the CFWI, is generally defined as water that requires advanced treatment technologies such as membranes to meet regulatory drinking water standards.</u> "	<i>Please refer to STOPR+2 RWSP Substantive comment #28 response.</i>
45	Glossary, Page 183, Definition of "Fresh water": This definition is not representative of the existing rules for the three water management districts. SWFWMD is the only District with a definition of fresh water. It is defined in AH §1.1(p) as "water that contains less than 3,000 mg/L of TDS." Suggest using the following practical definition, " <u>For alternative water supply planning purposes in the CFWI Planning Area, fresh water is generally defined as water not requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use.</u> "	The following "For water supply planning purposes" has been added to the existing definition.

Table 4. STOPR+2 Substantive Comments to Volume I: RWSP (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 RWSP Substantive Comment #	Comment	CFWI Response
46	Glossary, Page 184, Definition of "Harm": Suggest deleting this definition as there currently isn't any common definition of "harm" among the three Districts.	Agreed, definition has been deleted.
47	Glossary, Page 188, Definition of "Seawater or salt water": Suggest changing this definition as follows, " <u>Seawater is defined by the SJRWMD and SFWMD as water with a chloride concentration at or above 19,000 mg/L and by the SWFWMD as water with a chloride concentration at or above 10,000 mg/L.</u> " This suggestion is based on review of SJRWMD AH §1.1(r), SFWMD AH §1.1, and SWFWMD AH §1.1(00).	Text has been updated. The SWFWMD definition in the Applicants Handbook is "...TDS concentration greater than or equal to 10,000 mg/L" Accept glossary definition comment with revision of "with a TDS concentration". Projects in the Solutions Strategies still need to consult the appropriate permitting agencies for successful implementation.
48	Appendix F: The details provided in Appendix F should be updated to match the details provided in Appendix D of the Solutions Plan document. For example, in Appendix D of the Solutions Plan document, the costs and phasing details of the three sub-projects associated with the overall Cypress Lake Project were removed and summarized as part of the overall cost and phasing for the combined project.	Volume IA, Appendix F includes the following statement 'The Water Supply Project Options (WSPOs) were updated during the Solutions Planning Phase. Refer to Solutions Strategies, Volume IIA, Appendix D, Table D-1 for the updated list of WSPOs.' Also on the top of each Table F-1 page is the statement 'Refer to Solutions Strategies Appendix D, Table D-1 for the updated WSPOs.'
49	Appendix F, Page F-12, Table F-1, Embedded Title "Brackish/Non-traditional": Suggest deleting the last two sentences.	Thank you for your comment, text has been updated.
50	Appendix F, Page F-13, Table F-1, Projects 4 and 5: Change "Cypress Lake Brackish Groundwater Wellfield" to "Cypress Lake Wellfield" everywhere in these two project names and descriptions.	Thank you for your comment, text has been updated.
51	Appendix F, Page F-38, Table F-1, Project 126, Project Description: The source water for the St. Johns River/TCR Project is not "brackish". The 2009 PDR did not propose advanced treatment such as membranes. Suggest changing this text as follows, "Regional AWS project withdrawing <u>a non-traditional</u> surface water from the Taylor Creek Reservoir and the St. Johns River. Major components include intake structure, reservoir, treatment, storage and transmission facilities. brackish. "	Brackish has been deleted.

STOPR+2 Volume II: Solutions Strategies Comments and Responses

STOPR+2 Solutions Strategies Editorial Comments

Table 5. STOPR+2 (City of St. Cloud, Tohopekalgia Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission) Editorial Comments to the WRP (Solutions Strategies) submitted by Brian Wheeler on 7/17/15 with Responses from the CFWI Team. [[Link to STOPR+2 Volume II: Solutions Strategies Editorial Comments, Attachment A](#)]

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
1	Global Change: Replace the word "historic" with the word "historical."	Thank you for your comment, text has been updated.
2	Preface, Page i, Second Bullet: Suggest adding "expanding water conservation" to list of strategies provided in second sentence	No change, this language is from the CFWI Guiding Document.
3	Executive Summary, Page vii, Projects Section, Second Paragraph, Last Sentence: Change the text to state "The 16 WSPOs are estimated to potentially produce up to 256 mgd of finished water and <u>potentially up to</u> an additional 122 mgd in raw surface water."	Thank you for your comment, text has been updated.
4	Executive Summary, Page x, Implementation Costs Section, First Sentence: Change "implemented" to "developed".	Thank you for your comment, text has been updated.
5	Executive Summary, Page xii, Conclusions and Summary of Key Findings, Fourth Bullet on Page, First Sentence: Change text as follows: "Project costs were estimated, potential cost scenarios were identified, and strategies that address data collection needs and environmental recovery projects were developed <u>implemented</u> to provide a balanced approach for a sustainable water, supply."	Thank you for your comment, text has been updated.
6	Chapter 1, Page 1, First Paragraph, Third Sentence: Add " <u>adoption of the</u> " after "...delaying final agency action on the...."	No change, this language is from the District Governing Board resolutions.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
7	Chapter 1, Page 1, Second Paragraph, Sixth Sentence: Change "demand deficit" to " <u>supply deficit</u> ".	Thank you for your comment. The text now reads...the resulting future deficit is...
8	Chapter 2, Page 19, First Full Paragraph, First Sentence: Delete the parenthesis at the end of the sentence.	Thank you for your comment. Text has been updated.
9	Chapter 1, Page 3, First Paragraph after Bullet List: Change the text "...optimizing the use of existing groundwater" to " <u>evaluating projects to potentially increase the use of existing groundwater sources</u> ..." No optimization was performed as part of the CFWI process; therefore, the current text is accurate.	Thank you for your comment; however, after review no changes were made.
10	Chapter 2, Page 20, Water Conservation Project and Program Options Subsection, Last Paragraph, Last Sentence: Change the text in this sentence as follows: "Targeted education, public information, and social marketing provide opportunities for building a conservation culture, a stewardship ethic, and to permanently reducing individual, agricultural, industrial, and commercial water use."	Thank you for your comment. Text has been updated.
11	Chapter 3, Page 50, Table 10: Footnote "a" is not applicable to RWSP Projects 1 and 2.	Thank you for your comment. This was updated per corrections received from the GW Subteam.
12	Chapter 3, Page 66, Grove Land Reservoir and Stormwater Treatment Area, First Paragraph, Last Sentence: The benefits at the end should include more detail for increased reader understanding. Add " <u>...of the St. Johns River</u> " after surface water augmentation, indicate which aquifer is being recharged (most readers from central Florida will think UFA recharge—however, recharge to the UFA is minimal in the area of this project), and indicate what surface water systems will receive a nutrient reduction benefit.	Thank you for your comment. The text has been updated to include 'of the St. Johns River' and the following '...recharge of the surficial aquifer system within the project boundaries, and nutrient reduction in the St. Lucie Basin.'

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
13	Chapter 3, Page 71, Table 14: RWSP Project 145 includes note "b"; however, there is no note "b" for Table 14. Suggest correcting as applicable.	Thank you for your comment. Text has been updated.
14	Chapter 4, Page 79, Figure 6: Lakes Apopka (and associated chain), Searcy, Hodge, and East Crystal were not used in CFWI analysis and should be removed from Figure 6. This also applies to Figure F-1 in Appendix F.	Thank you for your comment. The caption of Figure 6 says, "locations of adopted and proposed MFLs and reservations in the CFWI Planning Area and ECFT groundwater model domain." That is an accurate description of the figure. The next page also goes into significant detail explaining why some of these locations were not used in the analysis.
15	Chapter 4, Page 80, First Paragraph, Second to Last Sentence: Suggest changing sentence to say, "The remaining freeboard represents the approximate amount of allowable change in UFA potentiometric surface, springflow, or groundwater flow associated with remaining once a specific withdrawal condition or WSPO is considered."	Thank you for your comment. Text has been updated.
16	Chapter 4, Page 81, Last Paragraph: There may be 46 adopted MFLs within CFWI, but according to Table F-9 only 31 were used as constraints. Please add text or modify the current text to clarify this issue.	Thank you for your comment. "MFLs have been adopted for 46 water bodies within the CFWI Planning Area." has been added to the second paragraph for further clarification.
17	Chapter 4, Page 81, Second to Last Sentence: Add a period to the end of the sentence.	Thank you for your comment. Text has been updated.
18	Chapter 4, Page 85, Last Paragraph: Throughout the report, it is indicated that the RWSP identified 142 WSPOs, and that 8 additional WSPOs were added during the Solutions Planning Phase for a total of 150 WSPOs. This paragraph notes the 142 WSPOs identified during the RWSP, but does not mention the 8 WSPOs identified as part of the Solutions Planning Phase. In addition, the disaggregated list (surface water, reclaimed water, etc.) included in this paragraph adds up to 151 WSPOs. Suggest correcting this paragraph as appropriate.	Thank you for your comment. The total now adds up to 150.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
19	Chapter 4, Page 87, Environmental Evaluation Process Subsection, Paragraph between Bullet Lists: Modify this paragraph as follows, "Based on these measuring sticks, a variety of methods <u>and assumptions</u> were used to determine the magnitude of hydrologic change predicted by the ECFT groundwater model that could occur without:"	Thank you for your comment. Text has been updated.
20	Chapter 4, Page 88, Non-MFL Water Bodies Subsection, Second Sentence: Change this sentence as follows, "It is not possible to assess the condition of every wetland, partly because of time and budget constraints and partly because many of them are located in remote locations and/or on private property where access is difficult or cannot be obtained, <u>but such assessment will be essential for data gathering in future CFWI phases.</u> "	Thank you for your comment. Text now reads "...but a concerted effort must be made to gather more of this data in future CFWI phases."
21	Chapter 4, Page 90, Second Paragraph, Third and Fourth Sentence: This sentence indicates five additional constraints were not met. However, Table F-9 appears to indicate the four additional constraints were not met. Please confirm the correct number. In addition, we suggest noting if the water level changes shown are changes in SAS or UFA water levels. In summary, we suggest these sentences be updated as follows, "Figures 10 and 11 show the Baseline Condition status of MFL <u>and non-MFL water bodies evaluated as part of the CFWI process, and the simulated change in UFA potentiometric surface elevation at these water bodies compared to Reference Condition elevations-wetland water levels, and characterization of stressed condition of non-MFL lakes and wetlands.</u> The status counts of MFL constraints and other considerations evaluated for the Baseline Condition indicate that five four additional constraints were not met with the increased groundwater withdrawal under this condition compared to the updated 2005 Reference Condition (CFWI, 2015b Appendix F, Table F-3)."	Thank you for your comment. Some text has been updated.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
22	Chapter 4, Page 92, Figure 11: The title of this figure is "Baseline Condition status of wetland water levels and characterization of stressed condition of non-MFL lakes and wetlands." This does not appear accurate. The change in head values shown in the figure are either model-simulated SAS or UFA groundwater elevations. Suggest changing the title of this figure to "Baseline Condition status of non-MFL lakes and wetlands", and adding a note to the figure indicating that the " <u>Change in water level shown is the ECFT model simulation change in [SAS or UFA] groundwater elevation compared to Reference Condition elevations.</u> "	Figure has been updated as requested.
23	Chapter 4, Page 94, South Lake County Wellfield - Centralized and Distributed Project: Change the first sentence as follows: "This project is proposed to provide up to 12.7 mgd of finished water to meet projected demands in South Lake County over the 2035 planning horizon."	Thank you for your comment. Text has been updated.
24	Chapter 4, Table 15: Chapter 4 discusses the environmental evaluations performed in support of the Solutions Planning Phase process. Table 15 includes discussion of results regarding the general range of change in surficial aquifer and Floridan aquifer groundwater levels observed for each modeled scenario. However, the range of fluctuation in groundwater levels does not relate to the environmental constraints. A 1-foot change in surficial aquifer water table does not have relevance to this chapter if that change wasn't simulated as one of the environmental constraints evaluated as part of this process. The discussion of changes in groundwater levels in this table is not necessary and makes the table cumbersome to the reader. This table should focus on just the environmental evaluation. Other changes in groundwater levels are discussed in the groundwater flow modeling sections of the report.	Thank you for your comment; however, after review no changes were made.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
25	Chapter 6, Page 112 (121), Environmental Recovery Projects Section, Second Paragraph, First Sentence: Remove "or flows" after "MFL recovery".	Thank you for your comment. Text has been updated.
26	Chapter 6, Page 120, Last Sentence: Change this sentence as follows, "Public supply BMPs ranging from irrigation controllers to water audits, would cost approximately \$122 million and result in about 28 mgd in savings. OSS practices would cost an estimated \$18 million to achieve approximately 4.6 mgd in savings."	The Conservation Subteam provided updates to this section to coincide with the latest DRAFT SPT Financial Scenario.
27	Chapter 6, Page 122, Data, Monitoring, and Investigations Section, First Paragraph, Sixth Sentence: "Based on deficiencies and redundancies in data collection identified in the Solutions Planning Phase..." to "Based on deficiencies and redundancies in <u>current</u> data collection efforts identified as part of the Solutions Planning Phase..."	Thank you for your comment. Text has been updated.
28	Chapter 6, Page 122, Other Investigations Section: Direct Potable Reuse, Fourth Sentence: Suggest starting sentence as follows, " <u>A project to further investigate...</u> "	Thank you for your comment; however, after review no changes were made.
29	Chapter 6, Page 124, Table 17, Reclaimed Water Projects: The quantity listed for Project RENEW, West Ditch Stormwater for Reuse Augmentation, and 160-ac Site Indirect Potable Reuse projects do not match the quantities listed elsewhere in the Solutions Plan document. The quantities for these projects should be 9.2 mgd, 1.5 mgd, and 5.0 mgd, respectively.	Text has been updated to reflect finished water amounts as follows: Project RENEW is 9.2 mgd West Ditch is 0.9 mgd 160-ac Site is 4.5 mgd
30	Chapter 7, Pages 128 and 129, List of Key Findings: Multiple comments: <ul style="list-style-type: none"> • The first bullet should be split into two bullets. The second bullet should start at "Sixteen regional..." • In the current second bullet, change the comma after "(Appendix D)" to a period. • Add "Conceptual" to the beginning of the current fifth bullet. 	Thank you for our comment. Text has been updated.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
31	Chapter 7, Page 132, First Paragraph, Third Sentence: Change the text as follows, "These strategies will identify and may include the development of water supply and water resource <u>plans and</u> projects in addition to those included in this plan, when needed to achieve recovery to the established minimum flow or level as soon as practicable, or prevent the existing flow or level from falling below the established minimum flow or level."	Thank you for your comment; however, after review no changes were made.
32	Chapter 7, Page 133, Support Development & Implementation of Regional Project Solutions Section, First Paragraph of this Subsection: Add " <u>The status of these projects should be included in the annual status report to the Steering Committee.</u> " to this paragraph.	Thank you for our comment. Annual reporting is discussed on page 140.
33	Chapter 7, Page 134, Surface Water Section: Change the last bullet to read "Create opportunities for conjunctive use of surface water <u>with other water sources.</u> "	Text now reads '...water with other water sources such as stormwater or reclaimed water.'
34	Appendix C, Page C-2, Table C-1: First line of the table (Solutions Project ID GW1), change the project capacity from 12.7 to 12.5 MGD if appropriate to be consistent with the project description that says Montverde will be self-supplied.	For the purposes of this plan the project capacity is 12.7 mgd.
35	Appendix C, Page C-75, Grove Land Reservoir & Stormwater Treatment Area, Project Description, Groundwater Recharge Bullet Number 2: Please indicate which aquifer is being recharged for clarity.	The text has been updated as follows 'Water users and other water use permittees in the SJRWMD and the SFWMD within the project boundary would benefit as the Project's water is used for groundwater recharge of the surficial aquifer system allowing these entities to withdraw additional freshwater from the aquifer.'
36	Appendix C, Page C-76, Grove Land Reservoir & Stormwater Treatment Area, Project Description, Nutrient Reduction Bullet: Please indicate which watershed(s) are receiving a nutrient reduction benefit for clarity.	No change, the St. Lucie Basin is included in the text currently.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
37	Appendix D, Page D-1, Introduction, Third Paragraph, First Sentence: Suggest changing the sentence as follows, "A project identified for inclusion in the Solutions Plan may not necessarily be selected for development by the <u>listed</u> water supplier(s)."	Thank you for our comment. Text has been updated.
38	Appendix D, Page D-4, Table D-1, Project 3 — Cypress Lake Wellfield: Change estimated completion date from "2017" to " <u>N/A</u> ".	Thank you for our comment. Text has been updated.
39	Appendix E, Page E-24, Scenario 3C, Second Paragraph: Chapter 3 of the Solutions Plan document indicates that 3.4 mgd of groundwater from the UFA will be blended with 6.4 mgd of groundwater from the LFA. The Appendix indicates 3.4 mgd and 6.5 mgd. Suggest correcting these values as appropriate.	Thank you for our comment. Text has been updated.
40	Appendix E, Page E-26, Round 2 Conceptual Management Option Scenarios, Overview, Third Paragraph, First Sentence: Suggest changing "...the potential issue of excessive irrigation rates." to "...any potential issues associated with the assumed spatial distribution of irrigation."	Thank you for your comment; however, after review no changes were made.
41	Appendix E, Page E-27, Scenario 4b, Fourth Sentence: Text says, "...adding one hypothetical 2 mgd UFA well (10 mgd finished supply)." Should this be "...adding five hypothetical 2 mgd UFA wells (10 mgd finished supply)."?	Thank you for our comment. Text has been updated.
42	Appendix E, Page E-29, Scenario 2, Second to Last Sentence: Suggest changing as follows, "While significant drawdowns are simulated for the LFA layer within some portions of the LFA, these drawdowns do not extend to the simulated UFA or the simulated SAS layers of the model result in significant drawdowns in the UFA or SAS due to confinement between the UFA and LFA."	Thank you for our comment. Text has been updated.

Table 5. STOPR+2 Editorial Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Editorial Comment #	Comment	CFWI Response
43	Appendix E, Page E-29, Scenario 2, Last Sentence: This sentence indicates LFA figures will not be repeated through the remainder of this section; however, all the panel figures appear to include the LFA. Suggest correcting this sentence as appropriate.	Thank you for your comment; however, after review no changes were made.
44	Appendices E-1 and E-2, Pages E-49 through E-63, Footer: Footer text on odd pages incorrectly labeled. Correct footer text to read, " Appendix F Appendix E: Water Resource Assessment".	Text has been updated.
45	Appendix F, Page F-5, Figure F-1: Incorrect figure title of "Figure E-19" should be changed to "Figure F-1". Lakes Apopka (and associated chain), Searcy, Hodge, and East Crystal were not used in CFWI analysis and should be removed from Figure F-1.	Figure has been changed to Figure F-1.

STOPR+2 Solutions Strategies Substantive Comments

Table 6. STOPR+2 (City of St. Cloud, Tohopekaliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission) Substantive Comments to the WRP (May 2015 Draft Solutions Strategies) submitted by Brian Wheeler on 7/17/15 with Responses from the CFWI Team.

[\[Link to STOPR+2 Volume II: Solutions Strategies Substantive Comments: Attachment 3\]](#)

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
1	General Comment: The significance and importance of implementing the recommendations of the Data, Monitoring and Investigations Team (DMIT) are not given the high level of priority due such recommendations. For example, in the Solutions Plan discussions regarding future modifications and improvements to the ECFT model, there is no discussion of the significance that obtaining additional data from the implementation of the recommended DMIT plan could have on model outcomes and future assessment of the status of the Floridan aquifer relative to the withdrawals. The importance of implementing the DMIT recommendations needs to receive more emphasis throughout the Solutions Plan. Specific comments related to this general comment have been provided below.	Thank you for your comment, text has been added to Volume II (Solutions Strategies) Chapter 6 and Chapter 7.
2	Executive Summary, Page viii, Assessment Section, First Bullet: Suggest changing "brackish" to "non-traditional" as follows, " brackish <u>Non-traditional</u> groundwater project options from the LFA..."	This has been changed to 'brackish/nontraditional' to be consistent with Volume IIA, Appendix D, Table D-1.
3	Executive Summary, Page viii, Assessment Section, Second Bullet: Change the text of this bullet as follows: "A conceptual new LFA Centralized Wellfield (62.5 mgd withdrawal capacity; 50 mgd of finished water capacity) could be strategically located <u>away from the areas susceptible to impacts in Osceola County</u> such that <u>there is</u> little or no change in stressed non-MFL isolated wetlands acres, and no change in MFL considerations or constraints relative to the Baseline Condition."	Thank you for your comment, text has been updated.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
4	Executive Summary, Page viii, Groundwater Section: Suggest changing this paragraph as follows, " Brackish-Non-traditional groundwater project options have the potential to meet some of the future demand while reducing the impact to water resource constraints when compared to the use of traditional groundwater sources. The <u>non-traditional groundwater</u> projects evaluated as <u>AWS sources</u> were all LFA projects, some of which are known to be in areas of brackish groundwater. For long-term management of the withdrawals, it will be necessary to expand current data collection and testing to ensure these quantities can be developed in a manner that minimizes environmental impacts and changes in aquifer water quality."	<i>Refer to Solutions Strategies STOPR+2 Substantive Comment #2 response.</i> Additional text was updated.
5	Executive Summary Page x: Change paragraph title to "Implementation <u>Costs and Categories of Funding</u> ".	New paragraph title is "Implementation Costs and Funding".
6	Executive Summary, Page xi, Reporting Section, First Paragraph: Add an additional sentence: " <u>CFWI RWSP updates should result in an iterative process that increases the certainty of environmental protection over time.</u> "	Thank you for your comment; however, after review no changes were made.
7	Executive Summary, Page xii, Conclusions and Summary of Key Findings, Second Bullet on page: Change the text in this bullet as follows; "Conceptual management strategies evaluated during the Solutions Planning Phase can be developed into specific projects <u>strategies</u> to address protection and recovery of the regions environmental systems. The results of this evaluation <u>and future plans</u> provide information needed to manage existing withdrawals and to develop new water supply options or other mitigation strategies (Chapter 4). Implementation of these strategies will continue to provide for the protection and recovery of the water resources."	Thank you for your comment, text has been updated.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
8	Executive Summary, Page xiii, Bullet List, Second Bullet: Change the second bullet to, "Develop specific prevention and recovery projects <u>strategies</u> "; and add the following bullet to the bullet list: " <u>Evaluate environmental risks through iteration and robust data gathering</u> ".	Thank you for your comment; however, after review no changes were made.
9	Executive Summary, Page xiii, Final Bullet List, Sixth Bullet: Change as follows: "Develop options for <u>consistency amongst the water management districts, including but not limited to</u> consistent rules and regulations."	No change, this language comes directly from the CFWI Guiding Document.
10	Chapter 1, Page 5, Third Bullet: The third bullet should not specify the quantity of groundwater potentially to be developed, as the quantity is currently a preliminary estimate. Suggest the bullet point be changed as follows, "Identify alternatives for potentially developing additional available groundwater projects up to 925 mgd (with appropriate regional management and operational controls)."	No change, this language comes directly from the CFWI Guiding Document.
11	Chapter 1, Page 6, Regulatory Team Goals and Objectives, Regulatory Team Goal Box: Suggest changing this text as follows, "...to establish <u>consistency amongst the water management districts, including but not limited to</u> consistent rules and regulations for the three water management districts that meet the Collaborative Process Goals and implement the results of this Central Florida Water Initiative. CFWI Guiding Document (CFWI 2014) "	No change, this language comes directly from the CFWI Guiding Document.
12	Chapter 1, Page 6, Regulatory Team Goals and Objectives, Bullet: Suggest changing this text as follows, "Develop options for <u>consistency amongst the water management districts, including but not limited to developing</u> consistent regulations, as well as identify legislative changes, as needed, to implement the solution strategies identified in the CFWI process, to assist with resource recovery strategies, and to provide for equitable and predictable review of consumptive use permit applications among the Districts."	No change, this language comes directly from the CFWI Guiding Document.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
13	<p>Chapter 1, Page 14, Groundwater Section: Suggest modifying these two paragraphs as follows, "The primary source of water supply in the region is fresh traditional groundwater. Groundwater is supplied from the surficial, intermediate, and Floridan aquifer systems. The surficial aquifer system (SAS) is a shallow, unconfined aquifer that generally yields low quantities of water. The intermediate aquifer system (IAS) does not produce large quantities of water and acts as a semi-confining unit in most areas separating the overlying surficial aquifer from the underlying Floridan aquifer system (FAS). The FAS is subdivided into the Upper and Lower Floridan aquifers. The Upper Floridan aquifer (UFA) is a semi-confined aquifer, portions of which are capable of producing large amounts of water. The UFA has historically been the primary source of water supply throughout the region, though the Lower Floridan aquifer (LFA) <u>in some areas of the CFWI</u> has also been used <u>as a traditional source</u>.</p> <p>The LFA has the potential to provide additional water in the CFWI Planning Area, <u>particularly in areas where the LFA has not historically been utilized as a traditional supply source</u>, and a number of studies are in progress to evaluate this potential water source. However, there is limited hydrogeologic information available for the LFA, so the potential local and regional effects of pumping from the LFA are not as well understood in some areas of the CFWI."</p>	<p>The use of traditional has been utilized where appropriate.</p> <p>The following text has been added where appropriate 'Fresh groundwater sources (i.e., surficial, intermediate, and Floridan aquifers) are considered traditional water sources whereas nontraditional or alternative water sources include brackish groundwater, surface water, seawater, reclaimed water, and water stored in ASRs and reservoirs.'</p>
14	<p>Chapter 1, Page 14, Surface Water Section: Suggest adding the following text after the second sentence, "<u>Thus, surface water is considered a non-traditional supply source in this planning region.</u>"</p>	<p>The definition has been added 'Fresh groundwater sources (i.e., surficial, intermediate, and Floridan aquifers) are considered traditional water sources whereas nontraditional or alternative water sources include brackish groundwater, surface water, seawater, reclaimed water, and water stored in ASRs and reservoirs.'</p>

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
15	Chapter 2, Page 17, First Sentence: The first sentence of this section sets a poor tone regarding water conservation. Suggesting changing this sentence as follows, "Water conservation (conservation) is the <u>efficient use of water as well as the prevention and reduction or elimination of wasteful or unnecessary uses of water to improve efficiency of use.</u> "	Revised opening sentence reads "Water conservation (conservation) is the prevention and reduction of wasteful or unnecessary uses of water to includes any activity or action which reduces the demand for water including those that prevent or reduce wasteful or unnecessary uses and those that improve efficiency of use."
16	Chapter 2, Page 17, Second Paragraph: Change the text of this paragraph as follows: "Conservation opportunities exist across all water use sectors in the CFWI Planning Area. Individuals, businesses, the agricultural industry, water providers, and the natural environment will all benefit greatly from <u>additional</u> conservation. Implementing effective conservation throughout the CFWI Planning Area will <u>be challenging given the conservation already achieved and will require coordinated efforts among stakeholder groups.</u> As the cost of developing new water supplies increases, more costly water conservation projects will become more appealing."	Thank you for your comment, additional text was added.
17	Chapter 2, Page 17, Third Paragraph, First sentence: Change the text of this sentence as follows: "Many studies show that implementation of conservation programs is <u>initially</u> often among the lowest cost solutions <u>compared to Alternative Water Supplies</u> to meet future water needs...."	Thank you for your comment; however, after review no changes were made.
18	Chapter 2, Page 18, First Paragraph, Last Sentence: The data do not support the assertion in this sentence that the "recent economic downturn" contributed to the decrease of per capita water use. The economic downturn began in 2007 and lasted till about 2012. Observing the graph in Figure 4 shows that per capita water use for residential declined prior to 2007 and remained level from 2007 to 2012. Suggest modifying this sentence as follows: "The installation of private irrigation wells, the recent economic downturn , and other external factors may also contribute to this decrease."	Thank you for your comment, text has been updated.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
19	Chapter 2, Page 23, Identifying Conservation BMPs and Programs Subsection: The BMPs discussed should be prefaced as " <u>potential</u> ", as there were not data to establish which potential BMP is cost effective and provides significant water conservation.	Thank you for your comment, text has been updated.
20	Chapter 2, Page 25, Bullet 5: Provide more explanation on how greenroofs increase indoor efficiency, or remove this bullet.	Language has been added to the Introduction that the indoor BMPs are further defined in Appendix A.
21	Chapter 2 Page 36, Table 5: Add footnote 'f' for Advanced Irrigation ET Controllers as follows: " <u>f) Savings are for the modeled service life. BMP replacements at additional costs will be required to sustain savings.</u> "	Footnote 'e' has been modified as follows: The modeled service life refers to the minimum length of time it is expected to perform as designed. BMP replacements at additional costs will be required to sustain savings.
22	Chapter 2 Page 39, Third Paragraph, Agricultural Programmatic Approach Section: Modify this paragraph as follows; "The Conservation Subteam concluded that historical data from the FARMS Program and other existing cost-share BMP programs, as well as what is known about agriculture within the CFWI Planning Area, should be used to estimate potential water savings. This methodology is referred to as the agricultural programmatic approach. This approach considers several factors in the development of a conservation estimate including participation rate, water savings, BMPs, and project costs."	Thank you for your comment, text has been updated.
23	Chapter 2, Page 41, Last Paragraph: Change this paragraph as follows, "Adoption of conservation BMPs and actual water savings can be greatly enhanced with increased levels of education, outreach efforts and funding. Furthermore, there are many additional BMPs, not quantified during these analyses that could be implemented to yield additional savings. <u>Funding of the Conserve Florida Water Clearinghouse and</u> subsequent planning updates may be able to quantify some of these BMPs as well as estimate passive savings known to occur in the absence of program efforts."	At the end of the Implementing BMPs section the following phrase has been added '..., including a statewide clearinghouse for PS and Agriculture.'

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
24	<p>Chapter 2, Page 43, Funding Subsection: Change this paragraph as follows, "Reducing current water demands using conservation BMPs is often less expensive than developing alternative water supplies, but can also require capital expenditures. Many water users have limited discretionary income that can be used for efficiency upgrades. <u>Furthermore</u>, Unlike costs associated with alternative water supply projects, the costs to implement conservation projects are not generally financed by bonds and must be assumed by the party implementing the project. making some types of conservation BMPs more costly to attain, Financial incentives and assistance for end users are often necessary with a variety of funding mechanisms available, such as rebates, grants, and credits. Cost share programs at the state and water management districts; often provide annual reoccurring funding assistance to aid local partners with implementation. Continued <u>significant and recurring</u> funding of these programs will help ensure that these water use reductions are achieved."</p>	Thank you for your comment, some text has been updated.
25	<p>Chapter 2, Page 43, Implementing BMPs Subsection, Partial Paragraph at Top of Page, Last Sentence: Change this sentence as follows, "Additional data and advances in tools <u>such as the Conserve Florida Water Clearinghouse</u> would be beneficial to improve these evaluations."</p>	<i>Please refer to STOPR+2 Solutions Strategies Substantive Comment #23 response.</i>

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
26	<p>Chapter 3, Page 49, Groundwater Section, First Paragraph: Suggest this paragraph be rewritten as follows, "The traditional primary source of water supply in the CFWI Planning Area is fresh traditional groundwater from the SAS, IAS, UFA, and LFA in some portions of the CFWI. Non-traditional groundwater sources, such as groundwater from the LFA in portions of the CFWI area where the LFA has not been used as a traditional groundwater supply source, Brackish groundwater project options-have the potential to meet some of the future demand while reducing the impact to water resource constraints when compared to traditional fresh groundwater sources. The non-traditional water supply projects evaluated by the Groundwater (GW) Subteam were all Lower-Floridan-aquifer-(LFA) projects, some of which are known to be in areas with brackish groundwater. Brackish groundwater exists in the lower portion of some areas of the Floridan aquifer system in the CFWI Planning Area and adjacent areas. The location of brackish water within the LFA is not well defined in the CFWI Planning Area. In some areas, targeted withdrawals from the LFA may result in less distinctive, and possibly delayed, impacts to surface features such as lakes and wetlands compared to withdrawals from the Upper Floridan aquifer (UFA). However, this deeper groundwater source has a higher unit cost of production than traditional groundwater sources due primarily to cost to treat the water for consumption. For alternative or nontraditional water supply planning purposes in the CFWI Planning Area, <u>groundwater from the LFA in some areas of the CFWI is considered a non-traditional or AWS source.</u> For SJRWMD and SWFWMD, brackish water with a total dissolved solids (TDS) concentration of greater than 500 mg/L. The SFWMD defines saline water as water with chloride concentrations greater than 250-mg/L. <u>Also for planning purposes in the CFWI Planning Area, brackish</u> STOPR+2 Solutions Strategies Substantive Comment #26 is continued on next page</p>	<p>The paragraph has been changed to 'The primary source of water supply in the CFWI Planning Area is traditional groundwater. In some areas, Lower Florida aquifer (LFA) groundwater project options have the potential to meet some of the future demand while reducing the impact to water resource constraints when compared to the Upper Floridan aquifer (UFA). The projects evaluated by the Groundwater (GW) Subteam were primarily Lower Floridan aquifer (LFA) projects, some of which are known to be in areas with brackish groundwater; however, the location of brackish water within the LFA is not well defined in the CFWI Planning Area. Brackish groundwater exists in the lower portion of some areas of the Floridan aquifer system in the CFWI Planning Area and adjacent areas. For alternative or nontraditional water supply planning purposes in the CFWI Planning Area for SJRWMD and SWFWMD, brackish water is generally defined as water with a total dissolved solids (TDS) concentration of greater than 500 mg/L. The SFWMD defines saline water as water with chloride concentrations greater than 250 mg/L. This deeper groundwater source has a higher unit cost of production than traditional groundwater sources due primarily to the cost to treat the water for consumption. The treatment of brackish groundwater typically may be accomplished by using low pressure reverse osmosis (RO) or electrodialysis reversal (EDR): STOPR+2 Solutions Strategies Substantive Comment #26 is continued on next page</p>

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
	<p>STOPR+2 Solutions Strategies Substantive Comment #26 continued <u>groundwater is defined as water requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use. The treatment of brackish groundwater typically may be accomplished by using low pressure reverse osmosis (RO) or electrodialysis reversal (EDR): each method requires disposal of concentrate or reject water. Other technologies available to treat brackish water are typically more costly (e.g. ion exchange and distillation)."</u></p>	<p>STOPR+2 Solutions Strategies Substantive Comment #26 continued each method requires disposal of concentrate or reject water. Other technologies available to treat brackish water are typically more costly (e.g., ion exchange and distillation).' The current definition captures each of the Districts' brackish water criteria for water supply planning purposes. No other proposed changes were incorporated.</p>
27	<p>Chapter 3, Page 50, Groundwater Project Options Subsection, First Sentence: Suggest changing this sentence as follows, "The GW Subteam began by reviewing the 35 brackish <u>non-traditional</u> groundwater projects identified in the CFWI RWSP that have a total estimated water supply capacity of approximately 75 mgd (Appendix F, CFWI RWSP, 2014d)."</p>	<p><i>Refer to Solutions Strategies STOPR+2 Substantive Comment #2 response.</i></p>
28	<p>Chapter 3, Page 51, Cypress Lake Wellfield, Second Paragraph, First Sentence: Change this sentence as follows, "The project is the development of a <u>non-traditional</u> LFA brackish groundwater wellfield in central Osceola County.</p>	<p>Thank you for your comment, text has been updated.</p>
29	<p>Chapter 3, Page 52, Polk County Southeast Wellfield, Second Paragraph, First Sentence: Change this sentence as follows, "The project is the development of a centralized <u>non-traditional</u> LFA brackish groundwater wellfield in southeast Polk County.</p>	<p>Thank you for your comment, text has been updated.</p>

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
30	Chapter 3, Page 52, Polk County Southeast Wellfield, Fourth Paragraph: Add the following text at the end of this paragraph, " <u>The cost developed by the CE Tool does not include all aspects of the Polk County Southeast Wellfield Project, including all finished water distributions system infrastructure. In addition, the CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given these considerations, the results of the CFWI CE Tool provide a conceptual level estimate of cost that will need to be refined as each project progresses. In the case of the Polk County Southeast Wellfield project, Polk County Utilities independently estimates the capital cost of the project to be \$359 million.</u> "	Thank you for your comment; however, after review no changes were made.
31	Chapter 3, Page 53, Polk County Blended LFA Distributed Wellfield, Third Paragraph: Delete the second sentence as follows, " Although the model does show impacts, producing a portion of the water from the LFA should reduce the potential impacts when compared to traditional Upper Floridan sources. "	Thank you for your comment; however, after review no changes were made.
32	Chapter 3, Page 53, Polk County Blended LFA Distributed Wellfield, Fourth Paragraph: Add the following text at the end of this paragraph, " <u>The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses.</u> "	Thank you for your comment; however, after review no changes were made.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
33	Chapter 3, Page 53, Challenges Section, First Sentence: Suggest modifying this sentence as follows, "The Solutions Planning Phase <u>non-traditional</u> groundwater project options presented above have the potential to supply up to 63.2 mgd (GW1, GW2, and GW3) of alternative water supply to the CFWI Planning Area."	Thank you for your comment; however, after review no changes were made.
34	Chapter 3, Page 67, Polk County Regional Alafia River Basin, Second Paragraph: Add the following text at the end of this paragraph, " <u>The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the Polk County Regional Alafia River Basin project, Polk County Utilities independently estimates the capital costs of the project to be \$399.7 million with a unit production cost of \$6.42 per 1,000 gallons.</u> "	Thank you for your comment; however, after review no changes were made.
35	Chapter 3, Page 59, 160-Acre Site Indirect Potable Reuse, Third Paragraph: Please add the following text after the second sentence, " <u>The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the 160-Acre Indirect Potable Reuse project, TWA independently estimates the capital cost of the project to be \$14.3 million.</u> "	Thank you for your comment; however, after review no changes were made.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
36	Chapter 4, Page 82, Figure 7: This figure appears to present all existing MFLs in lieu of the MFLs considered as part of the RWSP and Solutions Planning Phase. Please update this figure to only present MFLs used as part of the analyses performed in support of the RWSP and Solutions Planning Phase.	The Figure title is consistent with what is shown. The MFLs-related measuring sticks not used for the modeling analyses were included in Figure 7 because it is essential in a regional planning effort that the status of all regional MFLs water bodies be reviewed and presented. The recent status figure also includes information regarding environmental "stress" conditions at a number of non-MFLs lake and wetland sites.
37	Chapter 6, Page 121, Environmental Recovery Projects, First Paragraph, End of Second Sentence: Change as follows, "... <u>most technically, environmentally, and economically effective options.</u> "	Conceptual management strategies evaluated during the Solutions Strategies Phase can be developed into specific projects to address protection and recovery of the regions environmental systems (Table 17). The process to achieve prevention and/or recovery in the CFWI Planning Area will incorporate three basic steps: 1) Use a science based approach to <u>establish and assess</u> MFLs; 2) Identify sufficient project options for evaluation and consideration in the prevention or recovery strategy; and 3) Implement the <u>most technically, environmentally, and cost effective</u> options.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
38	<p>Chapter 6, Page 121, First Two Paragraphs: Change these two paragraphs as follows:</p> <p>"These costs are based on the initial implementation of the BMP. Additional costs may be required depending on service life and date of implementation. Refer to Chapter 2, Table 5 for more information on BMP service lives. Potential Agricultural BMPs, based on past performance and implementation of various cost-shared FARMS Program BMPs. These would cost an estimated \$10.1 to \$19.9 million to achieve approximately 4.35 to 6.40 mgd reduction in groundwater use. Public education for conservation will be aligned annually with PS and OSS projects and activities. Activities may include: media outreach, including traditional and social media techniques; exhibits, demonstrations and events; support for schools and county extension efforts; and training for irrigation professionals."</p> <p>"Research is needed to Continued development of a statewide clearinghouse, <u>such as the Conserve Florida Water Clearinghouse developed by the University of Florida,</u> that will serve as a repository for conservation data, publications and goal-based planning tools (e.g., EZ Guide, FAWCET) <u>will benefit for</u> PS entities."</p> <p>In general, there should be a greater emphasis and promotion of the Clearinghouse throughout the document. This strategy is not a project that generates a specific quantity of water; however, it is a fundamental piece to, a comprehensive Conservation Strategy. Gathering data and evaluating various proposed BMPs to provide a basis for selecting appropriate BMPs for a conservation program should be key to developing future conservation plans.</p>	<p>Paragraph now reads 'In addition, options for a statewide clearinghouse that will serve as a repository for conservation data, publications, and goal-based planning tools for PS entities need to be identified and evaluated. The estimated cost for a PS statewide clearinghouse (year 1-5) is \$1.4 million. Options for the agricultural sector statewide clearinghouse for effective agricultural conservation practices and planning tools need to be identified and evaluated'</p>

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
39	Chapter 6, Page 121, Environmental Recovery Projects Subsection: Change subsection title to "Environmental Recovery <u>Plans and</u> Projects".	Subsection title now reads 'Environmental Recovery Strategies and Projects.'
40	Chapter 6; Page 121, Environmental Recovery Projects Subsection, Second Paragraph, First Sentence: Change this sentence as follows, "Once these analyses are complete, recovery <u>strategies and</u> projects can be developed and implemented to achieve MFL recovery or flows, where necessary."	Thank you for your comment, text has been updated.
41	Chapter 6, Page 122, Data, Monitoring, and Investigations Subsection: At the end of this section add text that emphasizes the importance of implementing the DMIT recommendations. Suggested text is as follows, " <u>The implementation of the DMIT recommendations is a critical component to future water supply planning for the CFWI region. The additional data collected as a result of the DMIT recommendations will facilitate the refinement and expansion of models and hydrologic and environmental analyses, the further development of water supply project options, and the assurance that environmental measures are being met.</u> "	Thank you for your comment, text has been updated.
42	Chapter 6, Page 123: After the last sentence add the following text, " <u>The funding plan should be amended as updated project specific costs are developed.</u> "	Thank you for your comment, text has been updated.
43	Chapter 6, Page 124, Table 17: Add footnote 'e' as follows, " <u>e) The CFWI cost-estimating tool is considered a "Conceptual Screening" tool and was designed to produce Class 5 cost estimates, with an expected accuracy of -50% to +100%.</u> "	This text was included under the Alternative Water Supply subsection.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
44	Chapter 6, Page 124, Table 17: Table should include funding for the Conserve Florida Water Clearinghouse to put forth the need and funding requirement. If it is not on the funding lists, it is unlikely to receive funding. In addition, change the Potential Benefits for the DMIT as follows, "Provides necessary information for the region to better assess the environmental systems for the protection and the recovery of those systems <u>and to improve models and the associated future assessment of environmental system relative to withdrawals.</u> "	DMIT Potential Benefits now reads 'Provides necessary information for the region to improve models and better assess the environmental systems for the protection and the recovery of those systems.'
45	Chapter 6, Page 125, Table 18: Add footnote 'e' as follows, " <u>e) The CFWI cost-estimating tool is considered a "Conceptual Screening" tool and was designed to produce Class 5 cost estimates, with an expected accuracy of -50% to +100%.</u> "	The requested footnote was added to the text before Table 17 and as a footnote to Table 18.
46	Chapter 7, General Comment: The significance and potential benefits from the implementation of the DMIT recommendations does not really come out in this chapter. There are several implementation strategies discussed in the chapter where DM IT could and should play a role and could have an impact; under the titles Support Development & Implementation of Regional Project Solutions subtitle Groundwater, Water Resource Development Priorities, and Improve Water Resource Assessment Tools and Supporting Data subtitle Update the ECFT Model. Add a bullet that says, " <u>Implement the recommendations of the DMIT to increase the data available for analyses and modeling related to characterizing the water resources of the region and in support of the development of Water Supply Project Options.</u> " to each of these sections.	Text has been added as a bullet under CFWI Key Findings.
47	Chapter 7, Page 129, Implementation Strategy Subsection, Second Bullet: Change this bullet as follows, "Develop Specific Prevention and Recovery <u>Strategies and Projects</u> "	Thank you for your comment, text has been updated.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
48	<p>Chapter 7, Pages 130 and 131, Implement Conservation Programs Subsection, Bullet List:</p> <ul style="list-style-type: none"> • First Bullet: Change text as follows, "Identify and secure <u>significant and recurring</u> funding to implement Conservation Programs." • Sixth Bullet, Sub-bullet: Change text as follows, "Determine the appropriate means to participate in the Florida Building/<u>Plumbing</u> Code modification process to improve water conservation statewide by evaluating the current code provisions and Florida Statutes affecting water conservation and identify potential amendments to improve water conservation including:..." • Eleventh Bullet: Change text as follows, "Expand water use accounting for Agriculture to improve water use efficiency and provide improved data <u>and metering</u> for groundwater modeling." • Last bullet: Move this bullet up as it gets lost in the surrounding subject matter. 	Thank you for your comments. Some text has been updated.
49	Chapter 7, Page 132, Develop Specific Prevention and Recovery Projects Subsection: Change title as follows, "Develop Specific Prevention and Recovery <u>Strategies and</u> Projects".	Thank you for your comment, text has been updated.
50	Chapter 7, Page 132, Second to Last Bullet: Change the text as follows, "Before moving forward in implementing any specific WSPO or management strategy, it should be confirmed that it would not conflict with any MFL prevention or recovery strategy, <u>it will produce the desired CFWI benefit, and the timing is appropriate.</u> "	Thank you for your comment, text has been updated.
51	Chapter 7, Page 134, Bullet List: Add bullet after third bullet that states the following, " <u>Funding dollars should reflect updated project specific costs rather than planning level costs as they become available.</u> "	The following has been added under the Regional Cost Scenarios section 'Cost estimates for funding assistance should reflect updated project specific costs.'

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
52	Glossary, Page 142, Definition of "Brackish water": As no consistent regulatory definition exists among the water management districts, suggest a practical definition instead, as follows: <u>"Brackish water, for alternative water supply planning purposes in the CFWI, is generally defined as water that requires advanced treatment technologies such as membranes to meet regulatory drinking water standards."</u>	<i>Please refer to Solutions Strategies Substantive Comment #26 response.</i>
53	Glossary, Page 144, Definition of "Fresh water": This definition is not representative of the existing rules for the three water management districts. SWFWMD is the only district with a definition of fresh water. It is defined in AH §1.1(p) as "water that contains less than 3,000 mg/L of TDS." Suggest using the following practical definition instead, <u>"For alternative water supply planning purposes in the CFWI Planning Area, fresh water is generally defined as water not requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use."</u>	Text has been updated. Glossary definition will be revised to "For water supply planning purposes, an aqueous solution with total dissolved solids concentration less than or equal to 500 mg/L." Projects in the Solutions Strategies still need to consult the appropriate permitting agencies for successful implementation.
54	Glossary, Page 149, Definition of "Seawater or salt water": Suggest changing this definition as follows, <u>"Seawater is defined by the SJRWMD and SFWMD as water with a chloride concentration at or above 19,000 mg/L and by the SWFWMD as water with a chloride concentration at or above 10,000 mg/L."</u> This suggestion is based on review of SJRWMD AH §1.1(r), SFWMD AH §1.1, and SWFWMD AH §1.1(00).	Text has been updated. The SWFWMD definition in the Applicants Handbook is "...TDS concentration greater than or equal to 10,000 mg/L." Accept glossary definition comment with revision of "with a TDS concentration." Projects in the Solutions Strategies still need to consult the appropriate permitting agencies for successful implementation.
55	Appendix C, Page C-15, Cypress Lake Wellfield Project, Second Paragraph, First Sentence: Change this sentence as follows, "This proposed project will develop a <u>non-traditional</u> LFA brackish -groundwater wellfield in central Osceola County."	Thank you for your comment, text has been updated.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
56	Appendix C, Page C-20, Southeast Polk County Wellfield Project, Second Paragraph, First Sentence: Change this sentence as follows, "The proposed project will develop a <u>non-traditional</u> LFA brackish -water public supply wellfield in southeast Polk County."	Thank you for your comment, text has been updated.
57	Appendix C, Page C-22, Southeast Polk County Wellfield Project, Estimated Planning-level Costs: Add the following text at the end of this section, " <u>The cost developed by the CE Tool does not include all aspects of the Polk County Southeast Wellfield Project, including all finished water distributions system infrastructure. In addition, the CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given these considerations, the results of the CFWI CE Tool provide a conceptual level estimate of cost that will need to be refined as each project progresses. In the case of the Polk County Southeast Wellfield project, Polk County Utilities estimates the capital cost of the project to be \$359 million.</u> "	Thank you for your comment, text has been incorporated into Volume IIA, Appendix C .
58	Appendix C, Page C-29, Polk County Blended LFA Distributed Wellfield Project, Estimated Planning-level Costs: Add the following text at the end of this section, " <u>The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses.</u> "	Thank you for your comment, this text has been included at the beginning of Volume IIA, Appendix C (page C-1) .

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
59	<p>Appendix C, Page C-29, Polk County Blended LFA Distributed Wellfield Project, Estimated Implementation Schedule: Please make the following changes to the Implementation Schedule for this project:</p> <ul style="list-style-type: none"> • Change the title of Phase 2 as follows, "Phase 2: 10 mgd Finished Water from this the <u>Southeast Polk County Wellfield</u> project (2023-2032)" • Change the title of Phase 3 as follows, "Phase 3: 2010 mgd Finished Water from this the <u>Southeast Polk County Wellfield</u> project (2023-2032)" • Change the last bullet under Phase 3 as follows, "Construct additional treatment facilities, expanding <u>production</u> capacity to 20 mgd <u>total</u> finished water from Southeast Polk County Wellfield". 	Thank you for your comment, text has been updated.
60	Appendix C, Page C-37, Project RENEW, Estimated Implementation Schedule: "Change Orlando Utility Commission" to "Orlando Utilities Commission".	Thank you for your comment, text has been updated.
61	Appendix C, Page C-38, Project RENEW, Potential Partners and Governance Options: Please delete the reference to Orange County. Though it is true that Orange County and the City of Orlando have a contract with the City of Winter Garden through the Water Conserv II project, Orange County is not a partner in OUC's Project RENEW.	Thank you for your comment, text has been updated.
62	Appendix C, Page C-48, 160-Acre Site Indirect Potable Reuse, Estimated Planning-level Costs: Add the following text at the end of this section, <u>"The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the 160-Acre Indirect Potable Reuse project, TWA estimates the capital cost of the project to be \$14.3 million."</u>	Thank you for your comment, text has been incorporated into Volume IIA, Appendix C.

Table 6. STOPR+2 Substantive Comments to Volume II: Solutions Strategies (May 2015 Draft) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Substantive Comment #	Comment	CFWI Response
63	Appendix C, Page C-87, Polk County Regional Alafia River Basin Project, Estimated Planning-level Costs: Add the following text at the end of this paragraph, " <u>The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the Polk County Regional Alafia River Basin project, Polk County Utilities estimates the capital cost of the project to be \$399.7 million.</u> "	Thank you for your comment, text has been incorporated into Volume IIA, Appendix C.

STOPR+2 Solutions Strategies Resubmitted Substantive Comments

Table 7. STOPR+2 (City of St. Cloud, Tohopekaliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission) Resubmitted Substantive Comments to the WRP (early Drafts Solutions Strategies) submitted by Brian Wheeler on 7/17/15 with Responses from the CFWI Team.

[\[Link to STOPR+2 Volume II: Solutions Strategies, Resubmitted Substantive Comments: Attachment 4\]](#)

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
1	Preface, Page i, Third Bullet: Suggest changing bullet to state "Establish consistency among consistent rules and regulations for the three water management districts, including but not limited to developing consistent rules and regulations, to meet the collaborative process goals that meet their collective goals, and implement the results of the Central Florida Water Initiative."	No change, this language comes from the CFWI Guiding Document.
2	Preface, Page i: Suggest adding the following text after the bullet list: <u>"CENTRAL FLORIDA WATER INITIATIVE GOALS</u> <u>1. One model.</u> <u>2. One uniform definition of harm.</u> <u>3. One reference condition.</u> <u>4. One process for permit reviews.</u> <u>5. One consistent process, where appropriate, to set MFLs and reservations.</u> <u>6. One coordinated regional water supply plan, including any needed recovery and prevention strategies."</u>	The CFWI Goals have been added to the Preface.
3	Executive Summary, Page vi, Solutions Planning Phase Section, Last Sentence: Delete the last sentence of this paragraph, as follows: "The estimated 850 mgd total water use condition was used as a starting point or Baseline Condition for the Solutions Planning Phase, which evaluated projects and conceptual management strategies to meet the estimated 250 mgd future demand deficit.	No change. This is an important explanation to clarify the starting point of the Solutions Planning Phase evaluation.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
4	Executive Summary, Page viii, Assessment Section, Third and Fourth Bullets: Remove the specifics regarding the number of acres discussed in these bullets. Those acreages were a function of the specific conditions simulated under a hypothetical simulation and should not be misconstrued as representing an "answer".	3rd bullet now reads 'A conceptual shifting of withdrawals of 50 mgd...' 4th bullet now reads 'A conceptual targeted recharge of 28 mgd at locations adjacent to specific MFL...'
5	Executive Summary, Page ix, Reclaimed Water Section, Last Sentence: This sentence says, "Going forward, it is recommended an integrated approach between wastewater management and water supply...." This could be misconstrued to mean that integrated water resource planning is currently not occurring in central Florida, which is not the case. Suggest modifying this sentence as follows: "Going forward, it is recommended an integrated approach between wastewater management and water supply <u>continues to be implemented....</u> "	Thank you for your comment, text has been updated.
6	Executive Summary, Page x, Water Conservation Section, First Paragraph, Fourth Sentence: As written, this sentence does not accurately reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. Therefore, we request modification as follows, "Based on Solutions Planning Phase analysis, the CFWI RWSP water savings goal estimate was reduced from 42 mgd to 37 mgd and is considered a starting point for potential savings through implementing a select implementation of a number of conservation BMPs in the CFWI Planning Area. Additional savings could be available <u>might be possible</u> through higher participation rates of BMPs or the implementation of other conservation measures."	This sentence now reads 'Initial evaluations estimated an additional 42 mgd could be saved with increased conservation efforts. During the Solutions Strategies phase, potential water savings through the implementation of public supply and agricultural best management practices was further evaluated; the water savings estimate was revised to meet or exceed 37 mgd to reflect the current levels of agricultural conservation.' Other text has been updated.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
7	Executive Summary, Page xi, Conclusion and Summary of Key Findings, First Bullet: As written, this bullet does not accurately reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, "Water conservation is an important element in meeting future water needs. The conservation estimate of 37 mgd, determined during the Solutions Planning Phase, represents a starting point of savings that could be achieved by implementing a limited set <u>implementation</u> of the PS and OSS conservation BMPs and the agricultural programmatic efforts evaluated in this Plan (Chapter 2). Of this 37 mgd, it was estimated that 76 percent could be conserved by PS utilities, 12 percent by OSS users, and 12 percent by agricultural operations. Additional savings could be available <u>might be possible</u> through higher participation rates of BMPs or the implementation of other conservation measures."	<i>Refer to Solutions Strategies Resubmitted Substantive Comment #6 response.</i>
8	Chapter 1, Page 10, Updates to Minimum Flows and Levels, First Paragraph, Fifth Sentence: This section is about changes made to the MFL analyses performed in support of the RWSP process as part of the Solutions Planning Phase process. The MFLs listed in this sentence were not included in either the RWSP or Solutions Planning Phase processes, and therefore do not constitute a change in the analysis. Reference to these lakes should be removed. Delete the fifth sentence as follows, " The following water bodies located inside the CFWI Planning Area are on SJRWMD's and SWFWMD's priority lists are scheduled for rule development in 2015: Lake Apopka, Lake Hancock, and St. Johns River at State Road 520 — Lake Poinsett. "	No change. This sentence represents discussions at the Steering Committee meetings during the development of the Solutions Strategies document.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
9	Chapter 2, Page 18, Last Complete Sentence: To better reflect the actual gpcd rate trends and for consistency with the recommended language from the Water Conservation Subteam, we recommend modification as follows, "However, as can be seen in Figure 4, the gross gpcd rate appears to be declining while the residential gpcd rate reduction remained relatively level <u>has moderated over</u> the past decade."	Thank you for your comment, text has been updated.
10	Chapter 2, Page 19, Starting with the Last Complete Sentence: As written, this section does not accurately reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, "Based on the subteam's preliminary findings and SC guidance the original water savings goal estimate <u>was reduced to 37 mgd (Table 3). This is considered a starting point an estimate of the potential savings possible through conservation BMPs with additional savings available possible through higher participation rates of evaluated BMPs and/or the implementation of other measures not evaluated but recognized as being applicable within the CFWI Planning Area (Table 3).</u> "	<i>Please refer to Solutions Strategies Resubmitted Substantive Comment #6 response.</i>

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
11	Chapter 2, Page 35, Penultimate Sentence: To clarify the fact that different BMPs have different service lives, we request modification as follows, "The amounts shown in Table 5 include the entire cost of the BMP for its estimated life <u>(though some service lives are less than 20 years)</u> and; which includes costs potentially borne by third parties that would include non-rebate portions." In addition, the indication that portions of the costs will be paid by others could be said for the costs of any of the water supply strategies. Suggest indicating this as a general statement applicable to all water supply strategies.	Thank you for your comment, some text has been updated.
12	Chapter 2, Page 36, Table 5: To provide for an additional cost effectiveness metric, please add a column showing cost in dollars per gallon per day of water conserved (e.g., "Total Cost" for each BMP divided by the estimated savings to generate a cost per gallon conserved). A copy of the revised Table 5 is provided below. The proposed additional column of data is presented in red. (Link to STOPR+2 Table)	No change. This metric was not discussed during the Solutions Planning effort and is not one typically used in cost/benefit analysis.
13	Chapter 2, Page 37, Participation Rates Section: Because of the importance of the term "Participation Rates", we suggest the addition of a sentence that defines participation rate as it was used in this study. Please add the following text, " <u>The participation rate of a conservation BMP is defined as the percentage of users who adopt a conservation measure from the total pool of potential adopters.</u> "	Thank you for your comment, text has been updated.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
14	Chapter 2, Page 38, Participation Rates Section: We suggest the addition of a penultimate sentence that provides additional context on participation rates. Please add the following text, <u>"In practice, however, the relationship is not linear and increases in participation rates will require increased expenditures."</u>	Text now reads 'In practice, this relationship may not be linear and increases in participation rates may require increased expenditures.'
15	Chapter 2, Page 41, Summary of Potential Water Savings Subsection, 5th, 6th and 7th Sentences: As written, this section is inaccurate and does not reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, "The savings <u>estimates</u> are based on historic-assumed participation rates, which <u>were based on historical participation rates of actual conservation projects</u> are the result of past levels of education, outreach, and incentive funding . The conservation estimates determined during the Solutions Planning Phase represent savings a starting point of savings that could be achieved using best available information on BMPs, modeling tools, and current levels of agricultural program implementation. Adoption of conservation BMPs and actual water savings can be greatly <u>could possibly be</u> enhanced with increased levels of education, outreach efforts and funding."	The starting point language was added based on Steering Committee direction. Other text has been updated. The 5th sentence has added the requested text to the original sentence.
16	Chapter 3, Page 51, South Lake County Wellfield, Second Paragraph: Add "However, the projected increases in groundwater use represented by this project are currently not permitted to utilize either the Upper or Lower Floridan aquifers" as the third sentence in this paragraph.	Thank you for your comment; however, after review no changes were made.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
17	Chapter 3, Page 51, Cypress Lake Wellfield, Last Paragraph: Replace the second and third sentence with "The water use permit issued by the SFWMD includes an environmental monitoring program."	The revisions to the second sentence were not included in that it communicates the results of the technical work (Chapter 4 and Appendices E & F) conducted as part of the Solutions Planning Phase. The sentence recognizes the benefits of this project option but also captures the potential, with uncertainty, for impacts beyond the Baseline Condition. The third sentence was replaced as requested.
18	Chapter 3, Page 52, Polk County Southeast Wellfield, Third Paragraph: Please change the third paragraph of this section to read as follows, "Impacts to wetlands and lakes near the wellfield are expected to be minimal due to extensive confining units above the LFA where water is being withdrawn. Producing water from the LFA should minimize the potential for impacts along the ridges within Polk County. The water use permit issued by the SFWMD includes an environmental monitoring program, an environmental harm contingency plan, and annual project status verification reports of wetlands monitoring plan. Chapter 4 discusses the environmental evaluations for this project in more detail. "	The revisions to the second sentence were not included in that it communicates the results of the technical work (Chapter 4 and Appendices E & F) conducted as part of the Solutions Planning Phase. The sentence recognizes the benefits of this project option but also captures the potential, with uncertainty, for impacts beyond the Baseline Condition. The third sentence was replaced as requested.
19	Chapter 3, Page 52, Polk County Southeast Wellfield, Fourth Paragraph: Delete the first sentence as follows: " The Southeast Polk County Wellfield Project has a water use permit and has conducted exploratory drilling, testing, and permitting activities. "	Thank you for your comment, text has been updated.
20	Chapter 3, Page 53, Polk County Blended LFA Distributed Wellfield, Third Paragraph: Delete the second sentence.	No revisions were made. This sentence is consistent with results of the environmental evaluations for this project in Chapter 4 and communicates the concept that although there are potential impacts from this project option, they [have less impact] are less than the traditional, Upper Floridan supply option.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
21	Chapter 3, Page 67, Polk County Regional Alafia River Basin, Second Paragraph: Change "one or more raw water" to "two river water" and delete the "treatment" between "preliminary treatment of raw water" and "storage".	Thank you for your comment, text has been updated.
22	Chapter 3, Page 73, Reedy Creek Stormwater Mitigation/Recharge comments – [Link to STOPR+2 proposed changes] - these are the previously requested changes that were reviewed by the Stormwater Subteam and not incorporated for various reasons.	The intent of most of the proposed revisions have been included in the text.
23	Chapter 4, Page 108, Targeted Recharge for MFL Water Bodies Conceptual Scenario, First Paragraph: Add a sentence after the first sentence that says, <u>"An alternate targeted recharge scenario estimated that 22 mgd of recharge could be needed if RIBs are used to. recharge MFL lakes in lieu of direct injection."</u>	Text now reads 'An alternate targeted recharge scenario (Scenario 6A; Table E-2-1) estimated that approximately 22 mgd of recharge through a combination of RIBs, a horizontal well, and direct UFA recharge wells could be needed to maintain the subject lakes and springs at their MFL levels.'
24	Chapter 6, Page 123, Other Investigations Section: ECFT. Model Improvements: Add <u>"In addition, modifications to the model may be required for the model to be suitable for a permitting process"</u> as the second sentence in this paragraph.	Thank you for your comment, after review no changes were incorporated. For the CFWI, this will be addressed in the MOU developed by the three water management districts.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
25	<p>Chapter 7, Pages 128 and 129, List of Key Findings: Multiple comments:</p> <ul style="list-style-type: none"> • First Bullet: As written, this section is inaccurate and does not reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, "Water conservation is an important element in meeting future water needs. The conservation estimate of 37 mgd, determined during the Solutions Planning Phase, represents a starting point of savings that could be achieved by implementing the PS and OSS conservation I3MPs and the agricultural programmatic efforts evaluated (Chapter 2). If achieved, tThe 37 mgd <u>would</u> reduces the projected 250 mgd deficit to 213 mgd. Of this 37 mgd, 76 percent could be conserved by public supply utilities, 12 percent from other self-supply users, and 12 percent by agricultural operations. Additional savings could be available <u>might be possible</u> through higher participation rates of evaluated BMPs and/or the implementation of other measures not evaluated but recognized as being applicable in the CFWI. • The sentence before the text "Sixteen regional..." should be deleted as it is unknown if higher participation rates can be achieved. • In the current second bullet suggest adding, "However, some of these projects have not been fully evaluated or developed to know which ones will actually be constructed. Based on past experience with regional water supply plans a <p>STOPR+2 Solutions Strategies Resubmitted Substantive Comment #25 is continued on next page</p>	<p>1st & 2nd bullet - <i>Please refer to Solutions Strategies Resubmitted Substantive Comment #6 response.</i></p> <p>3rd bullet - text now reads 'However, many of these projects have not been fully evaluated to determine which ones may be implemented. It is the intent of RWSPs to identify more options than are needed; therefore, it is anticipated that not all proposed projects will be constructed'</p> <p>4th bullet - No change, the language is from the CFWI Guiding Document.</p>

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
	<p>STOPR+2 Solutions Strategies Resubmitted Substantive Comment #25 continued</p> <p>portion of the proposed projects will not be constructed for a variety of reasons." as a sentence in this bullet.</p> <ul style="list-style-type: none"> • Change the current sixth bullet to, "The establishment of consistency among the water management districts, including but not limited to the development of consistent rules and regulations, will continue to be needed to meet the collaborative process goals and implement the results of the CFWI Planning effort (Chapter 5)." 	
26	<p>Chapter 7, Page 133, Develop Specific Prevention and Recovery Projects Section, First Bullet at Top of Page: This bullet says to complete an evaluation of wetland systems identified as having existing stress and those deemed to be at risk from future withdrawals. However, the statistical method developed to evaluate non-MFL wetlands cannot be used to evaluate individual wetlands. This bullet should be modified to accurately reflect this. Suggest changing the text as follows, "Formulate a process to complete an evaluation of wetland systems identified as having existing stress..."</p>	<p>The bullet has been updated as follows 'Complete an evaluation of areas where there is a high probability of existing stressed wetland systems caused by groundwater withdrawals and those areas deemed to be at risk from stress caused by future groundwater withdrawals. Identify management strategies and water resource development projects to mitigate the potential for wetlands to be stressed by groundwater withdrawals.'</p>
27	<p>Chapter 7, Page 137, Update the ECFT Model Section, Second and Third Bullets: Suggest indicating that these two potential updates will be implemented as a later phase of the model improvements due to the time and cost associated with making these changes.</p>	<p>Thank you for your comment.</p> <p>The HAT believes that resources and time are available to extend the model boundaries to the west, east, and south within the project schedule.</p>
28	<p>Chapter 7, Page 137/138, Update the ECFT Model Section, Updated Water Use Bullet: Add "<u>Expanded metering for agricultural water uses will provide improved data for groundwater flow modeling.</u>"</p>	<p>We support expanded metering of all uses. It is understood improved metering will improve groundwater flow modeling.</p>

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
29	Chapter 7, Page 138, Update the ECFT Model Section, Overall Approach Bullet: Change the text of this bullet as follows, "Overall Approach - Although the model has been and will be used for planning purposes, it is envisioned and desired to have the model available for the regulated community to apply for specific consumptive use permit applications. It is important to note that the above list of model improvements is a significant undertaking with regard to both cost and level of effort <u>and tasks should be prioritized. Some tasks may not be achieved in the near future. It is also desired to have a model that is accessible to and easy to utilize for a wide-range of potential model users. Though some of the improvements listed above serve to achieve these goals, others (such as expanding the model boundaries), could serve to make the model more difficult to use to some potential users.</u> "	Thank you for your comment, after review no changes were incorporated. For the CFWI, this will be addressed in the MOU developed by the three water management districts.
30	Chapter 7, Page 138, Develop Options for Consistent Rules and Regulations Section: Change the title of this subsection to "Develop Options for Consistency".	We concur, the Districts strive for consistency as demonstrated through the MOU but no change to the RWSP is required.
31	Chapter 7, Page 138, Develop Options for Consistent Rules and Regulations Section, First Paragraph, First Sentence: Change this sentence as follows, "Now that the Solutions Planning Phase has identified strategies to achieve water resource sustainability in the CFWI Planning Area, the Regulatory Team (RT) is better positioned to continue, its work to develop <u>consistency among options for consistent rules and regulations</u> for the Districts, <u>including but not limited to the development of consistent rules and regulations</u> , that meet CFWI collaborative process goals and implement the results of the CFWI. "	<i>Please refer to STOPR+2 Solutions Strategies Resubmitted Substantive Comments #1 & #30 responses.</i>

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).

STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
32	Chapter 7, Page 140, Develop Options for Consistent Rules and Regulations Section, Last Sentence: Change this sentence as follows, "As options for consistency rules and regulations <u>among the Districts, including but not limited to developing consistent rules and regulations</u> , are developed, it is anticipated to be presented to the Steering Committee for consideration.	<i>Please refer to STOPR+2 Solutions Strategies Resubmitted Substantive Comments #1 & #30 responses.</i>
33	Appendix C, Page C-11, South Lake County Wellfield Project, Water Resource Constraints, First Paragraph: Delete the fifth sentence as follows, " Although the model does show impacts, producing water from the LFA should minimize the potential for impacts when compared to traditional UFA sources. "	Thank you for your comment; however, after review no changes were made.
34	Appendix C, Page C-11, South Lake County Wellfield Project, Cost-benefit Analysis of Yield: Add the following sentence to the end of the paragraph, " <u>However, given uncertainties regarding the permissibility of the project and the ultimate yield of the wellfield, the project may prove to be less cost-effective than other potential projects under consideration.</u> "	Thank you for your comment; however, after review no changes were made.
35	Appendix C, Page C-11, South Lake County Wellfield Project, Other Considerations: Replace "None" with " <u>Given uncertainties regarding the permissibility of the project and the ultimate yield of the wellfield, the project may prove to be less cost-effective than other potential projects under consideration.</u> "	Thank you for your comment; however, after review no changes were made.
36	Appendix C, Page C-13, South Lake County Wellfield Project, Regulatory Review, Fifth Paragraph: Delete third sentence as follows, " Although the model does show impacts, producing water from the LFA should minimize the potential for impacts when compared to traditional UFA sources. "	Thank you for your comment; however, after review no changes were made.

Table 7. STOPR+2 Resubmitted Substantive Comments to Volume II: Solutions Strategies (early drafts) with Responses from the CFWI Team (continued).


STOPR+2 Solutions Strategies Resubmitted Comment #	Comment	CFWI Response
37	Appendix C, Page C-59, St. Johns River/Taylor Creek Reservoir, Other Considerations: Delete the second paragraph regarding water quality considerations. The paragraph discusses a straightforward design issue that does not warrant being discussed in this section.	Thank you for your comment, text has been updated.
38	Appendix C, Page C-61, St. Johns River/Taylor Creek Reservoir, Figure C-4: Please delete the figure, as it is outdated. In addition, most project descriptions do not include a figure.	Thank you for your comment, text has been updated.
39	Appendix C, Page C-86, Polk County Regional Alafia River Basin Project, Description of Project, Second Paragraph, Third Sentence: Modify start of sentence as follows, "The project components include one or more water intakes <u>two river water intakes</u> , raw water transmission mains...."	Thank you for your comment, text has been updated.
40	Appendix C, Pages C-102 through 106, Reedy Creek Stormwater Mitigation/Recharge Project – [Link to STOPR+2 proposed changes] - these are the previously requested changes that were reviewed by the Stormwater Subteam and not incorporated for various reasons.	The intent of most of the proposed revisions have been included in the text.
41	Appendix D, Page D-1, Introduction, Last Sentence: This sentence indicates that District assumes the projects listed in the Appendix have a likelihood of being permissible; however, the individual project descriptions do not always indicate this. Suggest rewording as follows, "However, the WSPOs included in this Appendix have been screened for feasibility and the Districts have <u>indicated if projects assume</u> that they have a likelihood of being permissible."	Thank you for your comment, text has been updated.

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PUBLIC MEETING COMMENT CARDS

June 1, 2015 Public Meeting Comment Cards

Commenter: Charles Lee, Audubon Florida

	
<p>Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!</p>	
<p>Name <u>CHARLES LEE / Audubon Florida</u></p>	<p>Date <u>6/1/15</u></p>
<p>Email Address or Phone Number <u>(407) 625-5178</u></p>	
<p>Questions/Comments <u>RE: WATER COASTAL VADO</u> <u>Comments on separate sheet</u></p>	
<p><small>This information is a public record and may be disclosed to anyone requesting a copy for any purpose pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact a CFWI representative listed at www.cfwiwater.com, by phone or in writing.</small></p>	

Charles Lee comments continued on next page

Commenter: Charles Lee, Audubon Florida (continued)

COMMENTS OF CHARLES LEE
AUDUBON FLORIDA

**WE HAVE NOT DONE AS MUCH AS OTHER JURISDICTIONS TO IMPLEMENT
WATER CONSERVATION**

If we are **really serious** about doing more than giving lip service to water conservation in Florida, we would begin by taking this one positive step.

See below. Please approach this with the understanding that doing JUST this one thing will reduce water consumption by about 50% inside the homes and other buildings it would apply to. Given the huge inventory of buildings constructed prior to 1993 (For example, Orange County alone has over 207,000 such structures), That is MILLIONS of currently occupied structures throughout Florida. Doing this uniformly in Florida would be the SINGLE GREATEST increase in water conservation possible.

<http://dekalbwatershed.com/PDF/plumbingFixturesReplacement.pdf>

http://www.dekalbwatershed.com/PDF/low_flow_faqs.pdf

<http://www.garealtor.com/PoliticalAdvocacy/LegislativeResources/IssuesResources/DeKalbPlumbingFixturesRetrofitPlan/tabid/225/Default.aspx>

Note 1: The Dekalb County ordinance requires a certificate that all toilets and showerheads and faucet aerators be low-flow. This is good, but my view is that toilets alone are the "big lift" in terms of long term actual water savings. Low flow faucet aerators and showerheads are too easy to change out by homeowners and therefore may not endure. Toilets, on the other hand, will never be changed back to "high flow" models, because there are none available on the market.

Note 2: There is a significant linkage between installing low-flow toilets in older homes and other structures and the reduction of nutrient loading to aquifers and springs due to septic tanks. If a home or other building is served by a septic tank, installation of low-flow toilets will reduce the inflow to the septic tank by about 50% in fluid volume. Fluid volume reduction on the inflow side of a septic tank means less liquid will flow out into the drain field, and the liquid wastes in the septic tank will have a longer residence time in the chamber for biological activity to take place before being flushed into the drain field. Simply reducing the rate of flow through the tank and into the drainfield will reduce the volume of effluent reaching the aquifer. It is unclear how much additional treatment efficiency in the tank chamber would be gained, but even if the impact were drainfield release volume reductions alone, the results would be significant.

Note 3: The Dekalb ordinance requires certification of low-flow fixtures in order to obtain a "turn on" of water and sewer service. However, in rural Florida, many homes and even some business and commercial structures are served by private wells. In order to reach these structures, a mandatory retrofit approach would need to rely on a "trigger" other than utility service "turn on". The Florida Building Code requires low-flow toilets in all new structures, and at least in the portion of a remodeled structure where a new bathroom is added. It is unclear, however whether the FBC currently requires retrofit of toilets in an entire structure if only a portion of the structure is undergoing remodeling, or an addition. I am told by builders that some jurisdictions interpret the FBC this way, but others do not. Some portions of the FBC do require structure-wide retrofit compliance (for example, upgrade of electric panels if service is sub-standard in an older structure). A legislative amendment clarifying that the current FBC requirements for low-flow toilets will be imposed throughout entire structures upon application for a building permit for any remodel or addition would help resolve this issue for structures not on a public water supply system.

Commenter: David Gore, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>David GORE</u>	Date <u>6/11/15</u>
Email Address or Phone Number _____	
Questions/Comments	
<small>This information is a public record and may be disclosed to anyone requesting a copy for any purpose pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact a CFWI representative listed at www.cfwewater.com, by phone or in writing.</small>	

Commenter: Mike Britt, City of Winter Haven

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>Mike Britt</u>	Date <u>6/11/15</u>
Email Address or Phone Number <u>863/291-5881</u>	
Questions/Comments	
<u>Need for long range planning for recovery/prevention in Winter Haven Area.</u>	
<small>This information is a public record and may be disclosed to anyone requesting a copy for any purpose pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact a CFWI representative listed at www.cfwewater.com, by phone or in writing.</small>	

Commenter: Frances Howell-Coleman, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>Frances H Howell-Coleman</u>	Date <u>6/11/15</u>
Email Address or Phone Number <u>fcoleman@gmail.com</u>	
Questions/Comments The well in SE Polk is ill-advised; in time it will lower levels in our surface waters. It will lull us into delaying conservation measures we should be taking now. Measures such as seriously curbing landscape watering & requiring more efficient shower heads & low flow toilets. Real enforcement will be required.	
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Commenter: Karen Landers, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>KAREN LANDERS</u>	Date <u>06/01/15</u>
Email Address or Phone Number <u>813-299-7474</u>	
Questions/Comments Re USE WATER projects	
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Commenter: Sam Pennant, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>SAM PENNANT</u>	Date <u>6/1/15</u>
Email Address or Phone Number _____	
Questions/Comments 1 IS THIS A PROGRAM THAT ALL CITIES IN THE COUNTY WILL HAVE TO SIGN ON TO? 2 DOES THIS MEAN CITIES THAT SIGN ON WILL EVENTUALLY HAVE TO SHUT DOWN THEIR WATER PLANTS	
<small>This information is a public record and may be disclosed to anyone requesting a copy for any purpose pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact a CFWI representative listed at www.cfwewater.com, by phone or in writing.</small>	

Commenter: Robert Zabler, Sarasota County

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>ROBERT ZABLER</u>	Date <u>06/01/15</u>
Email Address or Phone Number <u>RZABLER@HOTMAIL.COM</u>	
Questions/Comments How Your Plan and Policies Will effect Sarasota County's Water Peace River Manatee River	
<small>This information is a public record and may be disclosed to anyone requesting a copy for any purpose pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact a CFWI representative listed at www.cfwewater.com, by phone or in writing.</small>	

Commenter: Julie Reynolds, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>Julie Reynolds</u>	Date <u>6/11/15</u>
Email Address or Phone Number <u>jlr6415@earthlink.net</u>	
Questions/Comments WITH WATER CONSERVATION A STATE ISSUE, SHOULDN'T WE BE LOOKING AT <u>REGULATION ACROSS THE STATE, NOT JUST REGIONALLY FOR CONSERVATION.</u>	

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Commenter: Sandy (Sandra) Webb, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>SANDY (SANDRA) WEBB</u>	Date <u>06/10/15</u>
Email Address or Phone Number <u>SLWEBBZEIT@gmail.com</u>	
Questions/Comments I'm not seeing much about conservation - we can all do more. Why wait until we are as bad off as California before we DO something and start conserving water? <u>HOW MUCH WATER WILL GO TOWARD BIOFUEL - WHICH WE DON'T NEED?</u>	

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June 4, 2015 Public Meeting Comment Cards

Commenter: Sarah Whitaker, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name Sarah Whitaker

Date

Email Address or Phone Number swhitaker@smwgeosciences.com

6/14/15

Questions/Comments

- concerned that population projections are too low for Cleveland and Milledgeville new developments Villa City and Sugarloaf Mountain ~~Properties~~
- LFA uncertainties
- Need additional recharge in recharge area

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Commenter: Bill Marcous, City of Sanford

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name Bill MARCOUS

Date

Email Address or Phone Number _____

6/14/15

Questions/Comments

Utility Project
Partnering Experience
IN SFWMD

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Commenter: Marjorie Holt, Sierra Club

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>Marjorie Holt</u>	Date <u>06/04/2015</u>
Email Address or Phone Number <u>marjorieholt@earthlink.net</u>	
Questions/Comments <u>Suggest greater Conservation</u> <u>look at more reclaimed back into potable system</u>	

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Commenter: Loretta Satterthwaite, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD	
Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!	
Name <u>LORETTA SATTERTHWAITE</u>	Date <u>6/4/15</u>
Email Address or Phone Number <u>LNS-OAS@att.net</u>	
Questions/Comments <u>PLAN NEEDS MORE EMPHASIS ON CONSERVATION.</u> <u>EDUCATION & PROJECTS TO ACCOMPLISH CONSERVATION NEEDS TO</u> <u>BE FUNDED EARLY IN THE PLAN YEARS. EARLY CONSERVATION</u> <u>MIGHT ELIMINATE OR FORESTALL NEED FOR VERY COSTLY</u> <u>INFRASTRUCTURE.</u> <u>FLORIDA NEEDS TO HAVE A CONSERVATION WATER ETHIC - STATEWIDE!!</u>	

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Commenter: David Gore, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name

DAVID GORE

Date

6/4/15

Email Address or Phone Number

Questions/Comments

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Commenter: Russ Molling, Concerned Citizen

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name

Russ Molling

Date

6/4/15

Email Address or Phone Number 352-223-7381

Questions/Comments

- 1) WATER ETHIC
- 2) Replacement of Low flow fixtures
- 3) Sanitation Day

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Commenter: Bobby Beagles, Concerned Citizen

Central Florida Water Initiative

PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name Bobby BEAGLES

Date

/ /

Email Address or Phone Number _____

Questions/Comments

Bobby Beagles Surface Water

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Commenter: Liz Felter, Concerned Citizen

Central Florida Water Initiative

PUBLIC MEETING COMMENT CARD

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Name Liz Felter

Date

6/14/15

Email Address or Phone Number lfelter@ufl.edu

Questions/Comments

- Funding for Mobile Irrigation Labs to help homeowners with irrigation system audits - clock adjustments, efficiency of heads, direction of heads, uniformity of the heads
- Florida Friendly Landscapes accepted by HOA's

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Commenter: Deborah Green, Orange Audubon Society

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name Deborah Green

Date

Email Address or Phone Number sabapress@mac.com

6/4/15

Questions/Comments

*Need far greater emphasis on outdoor water use efficiency
irrigation is nonessential use - should be for establishment only.*

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Commenter: Bob Stamps, Orange & Florida Audubon

Central Florida Water Initiative PUBLIC MEETING COMMENT CARD

Your questions or comments will be addressed as soon as possible. Please make sure to clearly print your name and email address or phone number. Thank you for your questions and/or comments. We look forward to communicating with you!

Name BOB STAMPS

Date

Email Address or Phone Number rhs-oas@att.net

6/4/15

Questions/Comments

Conservation needs more emphasis and funding.

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WORKSHOP MEETING MINUTES

Focus on the Environment – May 18, 2015

Meeting Minutes from CFWI Workshop Focus on the Environment May 18, 2015

1:30pm - Shelley Lauten, Principal of triSect, welcomed 52 attendees to the workshop and asked each to introduce themselves. Following that, she discussed contents of the packet that each attendee received including the agenda, copy of the Power Point presentation, copy of the CFWI boundary map, copy of the CFWI Regional Project Solutions, snapshot of the new CFWI website, and an executive summary of the CFWI Regional Solutions Plan.

Greg Knecht, Director of Protection for The Nature Conservancy, then spoke on the importance of the CFWI and how organizations need to be part of the solution.

Mark Hammond, Director of Resource Management, Southwest Florida Water Management District then provided an overview of the history of the CFWI. Points of emphasis included:

- There were many people involved in the solutions planning phase including those from government, business, FDEP, consultants, environment representatives, and agriculture representatives
- The issues we are facing with water resources did not happen over the past 12 months and, therefore, will not be solved in the next 12 months. Implementation of the proposed solutions plan will take time.
- Review of what happens when we overuse the aquifer
- It is important to understand what are the issues and options for our region

Further, Mark discussed that we would focus input today on three of the eight solution identified by CFWI:

- Implementing Water Conservation
- Developing Specific Prevention and Recovery Programs
- Supporting Development and Implementation of Regional Projects

Mark also mentioned the following work that has been ongoing:

- CFWI identifies sustainable quantities of groundwater – completed 2 years ago
- Develop strategies to meet water demands – the draft Regional Water Supply Plan is the beginning of this work (a higher level, big picture look at the region); he noted that there is sufficient water to meet our needs, but many need multi-jurisdictional cooperation
- Establish consistent rules – working on that in the next year

Finally, Mark noted the Key Findings of the CFWI Solutions Phase. They include:

- Water conservation is an important element
- Sufficient options to meet the regions' needs through 2035
 - 150 options – more than 334 mgd

- Conceptual management strategies can be developed into specific projects
- Stakeholder engagement has and will continue to be important
- Project cost estimates scenario
 - \$2.8 billion for 225 mgd
- Establishment of consistent rules and regulations to be developed to implement the results of CFWI Planning effort
- Implementing results of CFWI is critical to long-term sustainability

Mark closed by reminding the attendees that the comment period on the draft Regional Water Supply Plan is open until July 31st.

QUESTIONS FROM ATTENDEES following Mark Hammond presentation:

Greg Knecht: Are you looking forward toward prevention & recovery? Would you say that the majority are looking at minimum flows and levels? RESPONSE FROM MARK: Yes, the steering committee is also looking at wetlands where there is not an adopted minimum level.

Len Lindahl, Assistant Executive Director of the South Florida Water Management District, reviewed the Water Conservation Plan. He noted the following in his presentation:

- The Regional Water Supply Plan is a 20-year plan which will be updated every 5 years
- The CFWI has looked at best practices from around the state and nation
- The best management practices are found in the detailed Solutions Plan report
- Additional items noted in the Water Conservation section are:
 - Public Supply & Other Self Supply
 - 10 BMPs
 - Adopt High-Efficiency Standards
 - Landscape and Irrigation Systems
 - Plumbing Fixtures and Appliances
 - Public Education
 - Clearinghouse/Conservation Planning Tools/Research
 - Agriculture (Programmatic Approach)
 - 7 BMP categories
 - Includes training workshops, on-site demonstrations, mobile labs and support for Extension Services

QUESTIONS FROM ATTENDEES following Len's presentation:

- David Gore: How are we addressing irrigation (evaporation)? RESPONSE from Len: Irrigation is addressed in the best management practices
- David Gore: We also need to think about conservation and how to manage and protect water.
- Chuck O'Neill: How do we deal with new development if all the water is already permitted? RESPONSE from Mark: Big developments have already been factored into what's been permitted. Len reminded the attendees that the plan is updated every 5 years so additional new development can be reviewed then. Mike Register, Acting Executive Director of the St. Johns River Water Management District also

noted that at the time many permits were issued development was at its peak, so much of what has been allocated has not been used yet.

- Unknown: How are you going to take back water permits that have issued and give them to others; RESPONSE from Mark: Data and models are developed and the WMDs are comfortable with groundwater availability; they will continue to review data to see where they need to move in the future
- Eric Rolling: Has the study considered future water usage in places like California; Agriculture business may move to Florida since there is not enough water in CA to sustain their business. Additionally, how does fracking and tourism impact water usage? RESPONSE from Mark: The WMDs recognize that market factors can impact agriculture, which is why the plan is reviewed every 5 years. This allows them to evaluate any significant changes in how we need to move forward. Tourism is considered in demand piece.
- Unknown: Why does conservation only get 6% of the budget? RESPONSE from Mike: Conservation is very cost effective and doesn't need as much of the budget.
- Charles Lee: Audubon has some suggestions including when someone buys new house they must install energy efficient appliances and low-flow toilets to get their utilities turned on; this needs to become routine. He suggested looking at what DeKalb County GA is doing. RESPONSE from Len: There has been considerable conversation on conservation and changing codes in the districts, etc. The next part of the draft report talks about implementing some of the items Charles mentioned.
- Jean Reed: Expressed concerned about cost of some projects; is cost factor considered? RESPONSE from Mark: The solutions strategy doesn't layout what communities have to implement and in what order. They have latitude.
- Sandy Webb: Can we get away from lawn turf? RESPONSE from Len: Florida friendly landscaping is part of the conservation solutions plan
- Unknown: How do we regulate groundwater being used for irrigation? Shelley Lauten followed up with: Who is responsible for enforcement? RESPONSE from Judith Benson: Each municipality is responsible for their own enforcement.
- Unknown: We need to have a plan for coordinating/streamlining governance from local to regional to state. Who's responsible for what and how are these efforts coordinated?
- Bob Stamps: Noted that water use declined from 1998 to 2001 when water conservation measures were first put in place. Then from 2001 to 2012 residential water use is up to 101mgd. He questioned if conservation is so important why don't we put more money in on the front end? Shelley Lauten noted that she is hearing that everyone wants more money up front and for the life of the program; Charles Lee noted that Audubon feels it is a mistake to say conservation is the only response.
- Shelley Lauten noted that she hears three themes from the comments of the audience: 1) Spend more money incrementally, 2) Look for regulatory solutions that will manage conservation over time and 3) More enforcement of conservation

- John Ryan: Water law and land use law correlation has to be fixed
- Lisa Rinaman: Noted that conservation, public education, & enforceable regulation are key; RESPONSE from Len: The third principal is to get consistent regulation; there are things that can be looked at to be more consistent in rule making; Mike Register noted that there is a new staffer that is working on this issue.
- Chris Lewis: Can you break down the percentage of what public vs. tourists vs. industry uses our water; RESPONSE from Joanne Chamberlain: 80% is public supply

Unknown: Did you contemplate agriculture water usage in 5 year projections?
RESPONSE from Mark: Yes

Michael Register, Acting Executive Director of the St. Johns River Water Management District then provided an overview of the Prevention and Recovery section of the Solutions Plan. Items of note included:

- \$2 million in 2016 and \$1.5 million in 2017
 - Evaluate recovery options for 3 waterbodies
 - Options include
 - Conservation
 - Recharge
 - Relocation of withdrawals
 - Development of AWS

QUESTIONS FROM ATTENDEES following Michael's presentation:

- Marty Sullivan: Noted that he disputes that any more water can be removed from the Floridian aquifer without significant impacts. We need to monitor at protection metric levels; RESPONSE from Mark: We do have aquifer levels set as well as goals
- Nyla Pipes: Noted that One Florida attended this meeting to learn what everyone is doing regarding water in Central Florida. Shelley Lauten noted that CFWI is working to link CFWI solutions with what is occurring in other regions Nyla noted that they want to know how they can help.

Mark Hammond walked through the Regional Projects Solutions List. He noted that not all of this projects will actually be completed immediately; they will be brought online as demand increases.

FINAL COMMENTS FROM ATTENDEES:

- Unknown: It is important to educate our youth
- Unknown: Statewide adoption of new fixtures is imperative
- Unknown: We need much more on-going public engagement on why this issue is important to everyone. We need to build a “water ethic”.
- Unknown: Noted that a new well is being financed in the southeast part of Polk County and feels that the money could be better used toward restoring wetlands in the area.
- Carolyn Cooper: Noted that she would like to see more coordination amongst jurisdictions; mandate to pervious space
- Unknown: The total cost to consumer is going to be high; need to look more at restoring wetlands
- Unknown: There were only three water bodies mentioned in regional projects solution slide; are there more? RESPONSE: This is only the start.
- Unknown: We need to get to a place where every new development is having a positive influence on water development; today is not sustainable.
- John Ryan: Suggested a school of law have CFWI be a participant and get some legal solutions
- Unknown: We need an on-going regional summit (applause from audience)
- Chuck O’Neil: Referred to a senate bill proposed by Senator Soto. Perhaps having users over 10,000mgd pay more.
- Charles Lee: Really need to look at cutting off pulling out of St. Johns River and putting into reclaimed; collaboration should be a higher priority than selling off as surplus.
- Lisa Rinaman: St. Johns Riverkeeper does not believe that rules are strong enough. What are you doing in the solutions phase to protect natural resources; RESPONSE from Mark: We need to recover places that are impacted and make sure new supplies are done so they are not impacted; revaluating to make sure it is consistent and accurate and will include St. Johns
- Marge Holt: Would like to see a shift from a financial focus of reclaimed and reuse water to potable water; RESPONSE from Mark: Many jurisdictions looking at this option.
- Unknown: Is there any opportunity for public comment between July 31st and when the document goes back to the Steering Committee; RESPONSE from John Shearer: It will be posted on the website. RESPONSE from Mark: That’s a good point and we need to incorporate that. People will want to see whether we have adjusted the solutions plan based on the input we receive.

Mark Hammond reminded everyone that this is a living document, so things will be reviewed annually and updated every five years.

Shelley Lauten reviewed the upcoming workshops and public meetings and encouraged attendees to invite others to provide input during the open comment period. She then reviewed the updated CFWI website with attendees.

Shelley Lauten thanked everyone from attending the meeting. The meeting concluded at 4:00pm.

Focus on Agriculture - May 20, 2015

Meeting Minutes from CFWI Workshop Focus on Agriculture May 20, 2015

2:00pm – Glenda Hood, Principal of triSect, welcomed 58 attendees to the workshop and asked each to introduce themselves. Following that, she discussed contents of the packet that each attendee received including the agenda, copy of the Power Point presentation, copy of the CFWI boundary map, copy of the CFWI Regional Project Solutions, snapshot of the new CFWI website, and an executive summary of the CFWI Regional Solutions Plan.

Jim Fletcher, Extension Director, UF IFAS Osceola County, then shared his journey with CFWI. He shared that as part of the CFWI Solutions Team, representing agriculture, he was able to help suggest solutions that were important to the industry and that had a programmatic approach. He added that it was important for the attendees to be at the workshop today because “if you are not at the table, you are on the menu.” He closed by encouraging the attendees to stay engaged in the process and to be there to offer solutions.

Next, Michael Minton, Shareholder with Dean Mead, shared four take-away messages with the group: 1) Get your message out about all that you have already done, 2) Don't punish efficient users, but reward them, 3) Agriculture is part of the solution (the sooner we realize this is part of our business model) and 4) Conservation is important. He also added that, unlike California, our state gets plenty of water so we just need to find a wiser way to use our surface water.

Mark Hammond, Director of Resource Management, Southwest Florida Water Management District then provided an overview of the history of the CFWI. Points of emphasis included:

- There were many people involved in the solutions planning phase including those from government, business, FDEP, consultants, environment representatives, and agriculture representatives
- The issues we are facing with water resources did not happen over the past 12 months and, therefore, will not be solved in the next 12 months. Implementation of the proposed solutions plan will take time.
- Review of what happens when we overuse the aquifer
- It is important to understand what are the issues and options for our region

Further, Mark discussed that we would focus input today on three of the eight solution identified by CFWI:

- Implementing Water Conservation
- Developing Specific Prevention and Recovery Programs

- Supporting Development and Implementation of Regional Projects

Mark also mentioned the following work that has been ongoing:

- CFWI identifies sustainable quantities of groundwater – completed 2 years ago
- Develop strategies to meet water demands – the draft Regional Water Supply Plan is the beginning of this work (a higher level, big picture look at the region); he noted that there is sufficient water to meet our needs, but many need multi-jurisdictional cooperation
- Establish consistent rules – working on that in the next year

Finally, Mark noted the Key Findings of the CFWI Solutions Phase. They include:

- Water conservation is an important element
- Sufficient options to meet the regions' needs through 2035
 - 150 options – more than 334 mgd
- Conceptual management strategies can be developed into specific projects
- Stakeholder engagement has and will continue to be important
- Project cost estimates scenario
 - \$2.8 billion for 225 mgd
- Establishment of consistent rules and regulations to be developed to implement the results of CFWI Planning effort
- Implementing results of CFWI is critical to long-term sustainability

Steven Memberg, Chief Scientist of the South Florida Water Management District, then reviewed the Water Conservation Plan. He noted the following in his presentation:

- Conservation is the least expensive option we have, although he recognized that those in the agriculture business would incur costs to install conservation measures in their businesses
- Water equals money in the agriculture industry
- It is important to look at mobile irrigation labs, maintenance of systems, sensors, etc. when looking at projections
- Only four of the 37 recommendations focus on agriculture water conservation
- The Regional Water Supply Plan is a 20-year plan which will be updated every 5 years
- The CFWI has looked at best practices from around the state and nation
- The best management practices are found in the detailed Solutions Plan report
- Additional items noted in the Water Conservation section are:
 - Public Supply & Other Self Supply
 - 10 BMPs
 - Adopt High-Efficiency Standards
 - Landscape and Irrigation Systems
 - Plumbing Fixtures and Appliances
 - Public Education
 - Clearinghouse/Conservation Planning Tools/Research
 - Agriculture (Programmatic Approach)
 - 7 BMP categories
 - Includes training workshops, on-site demonstrations, mobile labs and support for Extension Services

Michael Register, Acting Executive Director of the St. Johns River Water Management District then provided an overview of the Prevention and Recovery section of the Solutions Plan. Items of note included:

- \$2 million in 2016 and \$1.5 million in 2017
 - Evaluate recovery options for 3 waterbodies
 - Options include
 - Conservation
 - Recharge
 - Relocation of withdrawals – looking at the lower Floridian aquifer
 - Development of AWS

Mark Hammond walked through the Regional Projects Solutions List. He noted that not all of this projects will actually be completed immediately; they will be brought online as demand increases.

Mark then opened the floor for questions and comments.

Mark opened the floor for questions and comments:

- Billy Kempfer: South Florida WMD and St. Johns WMD have language that current permits will not be impacted. He indicated that he hoped that would not change. Further, he noted that from the third week of February to end of June last year they didn't use as much irrigation as in past due to the rainfall the area received and they were scolded for not using all the water in their permit. Finally, he asked if there was a plan to build any more wells?
RESPONSE FROM MIKE: Each of the districts recognizes importance of agriculture in our society and the industry's specific restraints like being tied to the weather. There are no plans to reduce permits due to extra rainfall, etc. The water management districts understand different the economics of agriculture and that they cannot pass along costs of updates like they can to other businesses.
- David Gore: Noted that he feels like the solutions still take water from the system.
- Michael Minton: Noted that a significant part of these projects is to keep freshwater here instead of letting it drain and go to coast.
- Jim Fletcher: How are we going to deal with enhancing water permits that they have been issued already or the issuance of new agriculture permits?
RESPONSE FROM MIKE: The purpose of the CFWI is to make sure there is enough water to meet future demands. It is hard to say what the future of agriculture looks like. The WMDs are seeing an increase in people moving here to grow crops. He noted that there is no one who is going to know better than agriculture growers what the need is and asked for the attendees help in planning future needs. RESPONSE FROM MARK: The Solutions Plan and

the Regional Water Supply Plan address anticipating need and how to plan for that.

- Unknown: Noted that they want to be sure there is someone at the table representing agriculture so that they can get consumptive use permits within 45 days like utilities instead of it taking a year like it currently does. He noted that they could lose business (ie. if someone wants to use their acreage for growing crops, but it is contingent on a permit and that permit takes too long to get, the business will go elsewhere). Further, the attendee noted that those in the agriculture business are individuals and they would like to have an allocation process like other businesses. RESPONSE FROM MARK: Great points and this is clearly the reason we need to have more discussions like this so we can discuss the options. He didn't have an answer for some of the points right now, but we can't solve the problems without understanding what they are. RESPONSE FROM MIKE: Each of the WMD are trying to address having agriculture representation by creating core staff groups that understanding the specifics of the industry. He also noted that the St. Johns River WMD just hit a turn-around time of 22 days for Consumptive Use Permits. UNKNOWN RESPONSE BACK: They just need a level of certainty that they can get a permit so they can do business.
- Michael Minton: There is a mechanism that most districts follow that if you already have a permit, you can adjust it to change the commodity.
- Unknown: Has the CFWI thought about adjusting the water level projections? RESPONSE FROM STEVEN: Yes, those projections will be reviewed in the next round of the plan. RESPONSE FROM MIKE: The process that we've been through will hopefully provide a united way to update projections an ongoing basis. We want to look at projections all along and ensure we are using most current information. RESPONSE FROM STEVEN: The plan is not a permanent application, it's just a plan.
- Unknown: Surface water projects are very costly. There have been some projects done down south that have been put on private land. Is that something you have thought about doing here? RESPONSE FROM JEFF SUMMERS: These types of projects have a very limited benefit. During the wet season they allow for limited flow. It is very hard to quantify in water planning, but there may be some localized opportunities.
- Billy Kempfer: A lot of areas that are currently in pasture will end up in crops which will increase water demand, so the districts need to keep that in mind. RESPONSE FROM MARK: The districts will continue to work with FDACS to continue to monitor that and how quickly the market can change.
- Unknown: Where does cost share fall into the plan? RESPONSE FROM MARK: Staff will work with the groups to see how they can create better methods for conservation and work with IFAS to research technologies and methods. He noted that they need to find incentives to make technology attractive in conservation measures.

- Unknown: The districts are forcing growers to use reclaimed water if it's available and they are at a disadvantage because it's more expensive than surface water and some competitors don't have to use it; that need to be taken into consideration. RESPONSE FROM MARK: That is a great point; perhaps grants can be provided to local governments so they can then bring reclaimed water out at a cost that is viable. RESPONSE FROM MIKE: If you demonstrate it is not an economically viable option for your business, you do not have to use reclaimed water.
- Unknown: How can the agriculture industry better work with and inform the public? We are providing them with food, green space, space for habitats, a place for recharge and need to show that value? RESPONSE FROM MARK: This is critically important and something the WMDs need to work on. RESPONSE FROM GLENDA: Noted that they need to make sure their colleagues come to meetings and the CFWI can be the collaborator.
- Billy Kempfer: What provisions are there within CFWI for cost share measures? RESPONSE FROM MIKE: There is nothing specific to CFWI but the WMDs have cost share measure provisions their own in projects. Additionally, they are looking for ways to boost those programs in the future. RESPONSE FROM MARK: The districts are looking for more participants along the ridge for those programs.
- Jim Fletcher: There is a big push for funding and outreach. 88% of people say water is important but only 8% say they are willing to fund water conservation measures. RESPONSE FROM MICHAEL MINTON: When the Central Florida Partnership looked back at the How Shall We Grow process, water was a big issue, but that was during a drought. Now the interest is less. The lesson learned is that we need to embrace not just a water supply issue for agriculture, but that water drives water recreation and tourism. RESPONSE FROM GLENDA: We are connecting the dots – water connects economy, and quality of life.
- Unknown: Initially all WMDs started as flood control districts. As things now get dry, everyone's concerned about hanging on to water. RESPONSE FROM GLENDA: That's part of the water story. We need to make the story personal.
- Unknown: What is the total cost for Regional Project Solutions? RESPONSE FROM MARK: They utilized a cost estimation pool (some projects are permitted and therefore have real costs and some are not).
- Unknown: Do you think these Regional Project Solutions will increase the ad valorem? RESPONSE FROM MARK: Not right now.
- Unknown: Looking at local conservation, how did we get to the number associated: it seems low? RESPONSE FROM MARK: We looked at what BMPs that could be employed and a percentage of participation. We looked at 200BMPs and focused on 20BMPs for conservation estimates and what the reasonable expectation was over time. Follow up from Unknown: Before the plan is revised, is there the opportunity for those numbers to change?

RESPONSE FROM MARK: Yes, we want to add more capital intensive projects. NOTE FROM JIM FLETCHER: The Committee set a threshold of 3BMG in order for them to get to something that was manageable.

Questions on additional 5 on Implementation Strategies:

- Unknown: We need to have consistent rules and regulations. Additionally, we need to have someone at the table who had agriculture interests in mind and that's hard for people in the industry to do as they are busy on their farms, ranches, etc. RESPONSE FROM GLENDA: We are going to look to those that are here to get others to the table. RESPONSE FROM CHARLES Warren: Rich Buddell has been sitting on the Steering Committee and representing the agriculture industry. RESPONSE FROM STEVEN: FDACS is also represented on the Steering Committee.
- Unknown: When an agriculture person passes an allocation on from one entity to another, it shouldn't be a painful or expensive process.
- Unknown: Do you think existing law allows for reallocation? RESPONSE FROM STEVEN: There is nothing that prevents it. He added that he didn't see any reason why a district wouldn't support it. RESPONSE FROM MIKE: The districts need to craft permits that allow for the most flexibility.
- Unknown: You really need to live stream and record these forums in the future so farmers can view afterward if they can't get away from their farms or ranches.
- Unknown: How do you treat agriculture wells that are potentially affected by municipal wells? Municipal wells are pumping every day, all day while ag wells are used only when needed? RESPONSE FROM STEVE: The model accounts for the timing issue of use.
- Rob Teegarden: He agreed that agriculture is underrepresented in the water debate. There are still others that are under-represented in solutions planning including the Florida Irrigation Society, DOT (stormwater issues), and agriculture industries (looks downstream and upstream but doesn't care what goes on three counties away). Governments are arguing whose growth is more sacred instead of creating awareness of those around you in the watershed. RESPONSE FROM GLENDA: So who is the convener of these other groups? That is where the CFWI and DEP are so important – they can continually push and change.
- Unknown: There are commonalities between agriculture and utilities; you want certainty when trying to get a water use permit and if you don't use your permit, you are at risk of losing it. Further, if you become more efficient, are you at risk of being penalize. It is important that we solve this problem together and not fight each other.
- Billy Kempfer: Small wells are not regulated.

Glenda asked each of the WMD representatives to provide closing comments. Mark thanked everyone for coming out and encouraged the attendees to continue to be engaged so that solutions could be identified that would work for the agriculture industry. Steven remarked that he thought it was great these meetings were happening during the open comment process. Mike thanked everyone for their interest and encouraged continued participation as well.

Michael Minton advised the attendees that an additional opportunity to hear from the CFWI would be held at the Cattlemen's Association annual meeting in June.

Glenda Hood reviewed the upcoming workshops and public meetings and encouraged attendees to invite others to provide input during the open comment period. She then reviewed the updated CFWI website with attendees.

Glenda Hood thanked everyone for attending the meeting. The meeting concluded at 4:20pm.

Focus on Business & Government - May 21, 2015

Meeting Minutes from CFWI Workshop Focus on Business & Government May 21, 2015

9:05am – Shelley Lauten, Principal of triSect, welcomed 76 attendees to the workshop and asked each to introduce themselves. Following that, she discussed contents of the packet that each attendee received including the agenda, copy of the Power Point presentation, copy of the CFWI boundary map, copy of the CFWI Regional Project Solutions, snapshot of the new CFWI website, and an executive summary of the CFWI Regional Solutions Plan.

Shelley introduced Mayor Joe Kilsheimer, City of Apopka, and James Burks, Senninger Irrigation.

Mayor Kilsheimer talked about his work with Niagara Bottling before becoming elected and how efficient their water use is versus water use for irrigation. He noted that the bottling company's model is a more efficient use of water to create jobs and a tax base and that there needs to be continued public education about water and its uses.

Shelley then asked James Burks to the stage. He opened by asking “why should we be proactive” and remarked that his was a rhetorical question as being proactive pushes us to plan. He noted corporate stewardship of water is important. He asked the attendees to think about water as they think about other items in their businesses like finances. Mr. Burks shared that there are three key categories of impact of water on a business:

1. Physical, operational, and image. He closed by noting that businesses needed to find a way to continue to be collaborative and work together.

Mark Hammond, Director of Resource Management, Southwest Florida Water Management District then provided an overview of the history of the CFWI. Points of emphasis included:

- There were over 100 people involved in the solutions planning phase including those from government, business, FDEP, consultants, environment representatives, and agriculture representatives
- Now we need to know where did we get it right and where do we still need to work on?
- 20 years ago we have 2 million people living in the region, today we have 3 million. In 20 years we will have 4 million. Because of this, we need to come up with 250mgd of options. The solutions plan identified 350mgd in options.

- The issues we are facing with water resources did not happen over the past 12 months and, therefore, will not be solved in the next 12 months. Implementation of the proposed solutions plan will take time.
- Review of what happens when we overuse the aquifer
- It is important to understand what are the issues and options for our region

Further, Mark discussed that we would focus input today on three of the eight solution identified by CFWI:

- Implementing Water Conservation
- Developing Specific Prevention and Recovery Programs
- Supporting Development and Implementation of Regional Projects

Mark also mentioned the following work that has been ongoing:

- CFWI identifies sustainable quantities of groundwater – completed 2 years ago
- Develop strategies to meet water demands – the draft Regional Water Supply Plan is the beginning of this work (a higher level, big picture look at the region); he noted that there is sufficient water to meet our needs, but many need multi-jurisdictional cooperation
- Establish consistent rules – working on that in the next year

Finally, Mark noted the Key Findings of the CFWI Solutions Phase. They include:

- Water conservation is an important element
- Sufficient options to meet the regions' needs through 2035
 - 150 options – more than 334 mgd
- Conceptual management strategies can be developed into specific projects
- Stakeholder engagement has and will continue to be important
- Project cost estimates scenario
 - \$2.8 billion for 225 mgd
- Establishment of consistent rules and regulations to be developed to implement the results of CFWI Planning effort
- Implementing results of CFWI is critical to long-term sustainability

Shelley noted that this collaborative is a national model. No one told the WMDs they had to do this; they saw it as a necessity.

Questions about CFWI

- Rick Baird: Do the WMDs have a water supply plan in place and does the CFWI have a plan to implement what we will hear today? **RESPONSE FROM MARK:** As we update the regional water supply plan, CFWI plan will be incorporated. Individual WMDs will follow the RWSP. This plan helps us be consistent across boundaries.

Shelley noted that collaboration is important to seeing the value of the cost associated with the solutions because there is a benefit to the region.

Mark then noted that they will focus on top three implementation strategies in today's meeting because there are still concerns that there is still not enough focus on conservation and addressing surface water

Steven Memberg, Chief Scientist of the South Florida Water Management District, then reviewed the Water Conservation Plan. He noted the following in his presentation:

- The plan addresses a minimum of 37mgd for conservation; there is a minimum because not everyone is going to participate right away and we need to be realistic.
- The CFWI looked at best practices for acute situations like droughts and freezes.
- The Regional Water Supply Plan is a 20-year plan which will be updated every 5 years
- The CFWI has looked at best practices from around the state and nation
- The best management practices are found in the detailed Solutions Plan report
- Additional items noted in the Water Conservation section are:
 - Public Supply & Other Self Supply
 - 10 BMPs
 - Adopt High-Efficiency Standards
 - Landscape and Irrigation Systems
 - Plumbing Fixtures and Appliances
 - Public Education
 - Clearinghouse/Conservation Planning Tools/Research
 - Agriculture (Programmatic Approach)
 - 7 BMP categories
 - Includes training workshops, on-site demonstrations, mobile labs and support for Extension Services

QUESTIONS following Steven's presentation:

- Kimberly Lawrence: Has any work been done or will work be done to address water quality standards in water reuse? Also, when applying is there any thought to having reclaimed and stormwater reuse in the same Consumptive Use Permit? RESPONSE FROM STEVEN: You will not be forced to a higher CUP unless you are in a mandatory reuse area. RESPONSE FROM JOANNE: SB536 is looking at addressing stormwater integration into reclaimed. This recommendation should come out in August.
- Unknown: Each municipality has its own residential and commercial landscape designs standards. How does a regional, state, or national developer work with each municipality? Are there going to be a unified landscape regulations for everyone? RESPONSE FROM STEVEN: This is a question that has been asked through the Solutions Team. It would have to be a statewide effort. Do local governments want to hand that authority over? RESPONSE FROM SHELLEY: We need to be thinking about recommendations on how we can help facilitate coordination between cities, counties, and developers.

- Mayor Bradley: It would be great if we had one regulation for the lot size for developers to keep from overbuilding. This would help conserve water.
- Unknown: SWFWMD raised the City of Davenport's rates because they weren't using enough water. How are you going to enforce all this and preserve this 5 county area? RESPONSE FROM MARK: We need to look at this as a region. It will have to be implemented appropriately due to revenue. RESPONSE FROM SHELLEY: Water knows no boundaries so we need to figure out ways to connect the work of CFWI to other communities. This the first step, not the last.

Joanne Chamberlain, CFWI Initiative Leader of the St. Johns River Water Management District then provided an overview of the Prevention and Recovery section of the Solutions Plan. Items of note included:

- \$2 million in 2016 and \$1.5 million in 2017
 - Evaluate recovery options for 3 waterbodies
 - Lake Wales
 - Spring in the St. Johns
 - Unidentified
 - These are in the conceptual phase and they are looking at a lot of options
 - Options include
 - Conservation
 - Recharge
 - Relocation of withdrawals – looking at the lower Floridian aquifer
 - Development of AWS

QUESTION after Joann's presentation:

- Rick Baird: Is this all related to water quality or just wanted quantities? RESPONSE FROM JOANNE: This is based primarily on quantities, however we will be looking at multi-objective projects.

Mark Hammond walked through the Regional Projects Solutions List. He noted that not all of this projects will actually be completed immediately; they will be brought online as demand increases. If demand stays flat, he noted that we don't need to invest in all of these project solutions and the CFWI will continue to monitor that.

Mark then opened the floor for questions and comments.

- Unknown: Aquifer Storage Wells seem beneficial to what we're trying to do in CFWI, but there are issues with arsenic and the letter has been delayed. Are the WMDs pushing to get the letter out? RESPONSE FROM MARK: Yes. There is an expense in evaluating wells, but it is a great option for the future. Unknown response: They have waived the criteria for arsenic, but haven't

waived it for reclaimed water; it is being hindered because letter won't come out.

- Unknown: Public water supply is the only business for enterprise funds. The business model is to sell less than you use. The utilities have to raise rates and the public sees this as a tax. Is it possible on a regional level to start a type of education program for the public? RESPONSE FROM SHELLEY: The Central Florida Partnerships study recently showed that only one percent of the public said water was an important issue to them. What recommendations would you make to make a water public relations effort? Mayor Kilsheimer responded that it has to hurt. Unknown responded that there needs to be cooperative between citizens, business, agriculture, etc. to be fair. Unknown responded that there is no research on cost savings in sharing with the public you will save XXXX if you take a 5 minute shower vs. a 20 minute shower; Shelley noted that a coordinated marketing campaign should include all levels of government. Judith Benson noted that the Florida Water Star program is a voluntary program and perhaps could be made mandatory. Shelley asked what other coordinated "it's gotta hurt" campaigns have been successful and the attendees responded with cigarettes and seatbelts.
- Unknown: What prevents anyone in this room from drilling a well into the aquifer? RESPOND FROM STEVEN: Water is not a right in the state of Florida.
- Mike Britt: We ought to be talking about conservation in the landscape in general. We need a partnership between business/government. Every home that is developed should have a positive impact on the environment and have a positive benefit on the water budget. Each developer that comes in should have a responsibility to work with builders / governments.
- Mayor Kilsheimer: We need to look at California. There, the wealthy pay higher rates. 7 in 10 support conservation in theory, but don't think they can personally participate.
- Brian Shearer: A great campaign is needed for water. He further asked is there anything going to be done for well construction and regulation of them? RESPONSE FROM STEVE: That is something the regulatory team continues to work on.
- John Shearer: Provided an update on where we are in statewide regulatory issues. The third bullet in the presentation is to get consistent regulations amongst CFWI. One complication is to memorialize some recommendations in the water bill that now looks like it might not pass. RESPONSE FROM SHELLEY: How do we implement some of these solutions equitably? RESPONSE FROM STEVEN: The rules that are in place in WMDs have evolved over time. We can try to get consistent, but have to have government's latitude to get there.

- Unknown: We need to encourage developers to modify landscapes so they are more water friendly. RESPONSE FROM SHELLEY: Are there any communities that have ordinances that regulate that? Unknown: A few years ago, the City of Winter Park created an ordinance that required the installation of Florida friendly landscape if you were building or renovating. RESPONSE FROM JOANNE: The water conservation team came up with some of the same recommendations. She further noted that they need to expand the toolbox and make sure we reduce demand on upper Floridian aquifer. RESPONSE FROM MARK: The clearinghouse is an option for what works well, and what doesn't, for community best practices.
- Unknown: Are there any opportunities for stormwater or aquifer recharge with I4 Ultimate project? RESPONSE FROM CHUCK WALTER: The CFWI is working very closely with FDOT and there are places that will have retrofits in the current project. They are having conversations about doing more in the next section (Orange/Osceola).
- Mike Britt: Are there any conversations about the Central Polk Parkway project? RESPONSE FROM MARK: Yes, they are discussion options and opportunities with DOT. FDOT is excited because they might be able to manage some of their costs by partnering with the WMDs.
- Unknown: Has there been any consideration about leasing wells? RESPONSE FROM MARK: Some of these options are going to be on the table as we move forward; RESPONSE FROM JOHN SHEARER: In 1989 there was a water resource commission that discussed this. It was recommendation 19 - to create a well head pass – and it would have generated over \$100M year that could have been used for AWS. Eighteen of the recommendations have made their way into rule; this one has not.
- Unknown: I think there should be a bottled water tax
- Bill Marcous: It would be helpful for businesses to learn more about utilities in the area (capacity, education, exchange). There needs to be a foundation built before we can go further in getting public support. RESPONSE FROM SHELLEY: We hope utilities would reach out to Chambers and say “we have a program for you.”
- Unknown: There is significant concern by a number of utilities that if they do a great job of conserving, their CUP would be lowered. RESPONSE FROM STEVEN: DEP and WMDs agree and they have put in place rules that keep this from happening. The districts will allow you to extend the life of your permits up to 10 years.
- Brian Sheahan: Some of the Lake County cities have fallen victim to that; will it be retroactive? RESPONSE FROM STEVEN: No.
- Unknown: In Polk County they have a water initiative that is trying to bring cities together. Does CFWI work with that? RESPONSE FROM MARK: Yes. The WMDs offer 50% cost share funding to develop equitable and fair developments. It's on on the solutions projects list.

- Rick Baird: Does the CFWI think Florida friendly landscape is a good way to conserve water? RESPONSE FROM ALL: Yes. Unknown: That is all great, but you have to have some way to enforce the landscape code to ensure it stays that way.

Shelley asked each table to come up with one key question or recommendation:

- Table 1: When a development comes in and negotiates a CUP, the WMD needs to hold them to the original number allowed per household.
- Table 2: Have sea level rise impacts been considered in the Solutions Plan? RESPONSE FROM STEVE: The impacts to growth have been considered. RESPONSE FROM SHELLEY: That is why the plan is constantly monitored and updated.
- Table 3: We need a transition to go from us vs. them to we to get into a collaborative process. RESPONSE FROM SHELLEY: Any recommendations on how to get there? RESPONSE: Continue to talk. RESPONSE FROM JOANNE: We develop more trust and also understand we have more common toward the end goal with more conversations.
- Table 4: 1) Short-term recommendation: Move landscape planning of development to the front end. 2) Long-term recommendation: Look toward the future; instead of trying to modify our habits, invest in our youth.
- Table 5: We have to look at this as an integrated, long-term approach. RESPONSE FROM SHELLEY: This means alignment at all levels of government.
- Table 6: The WMDs should create a pilot program on reclaimed water
- Table 7: We would like to see more Florida friendly plants; stay away from zoizia
- Table 8: Target middle-aged people with a conservation message

Mark reviewed CFWI plan schedule. Joanne noted that this is an extended comment period, but encouraged everyone to comment early.

Shelley reviewed the upcoming public meetings and encouraged attendees to invite others to provide input during the open comment period. She then reviewed the updated CFWI website with attendees.

Shelley thanked everyone for attending the meeting. The meeting concluded at 11:35am.

Business/Agriculture Focus Group, Jacksonville - June 17, 2015



Focus Group Meeting – Business / Agriculture Jacksonville, FL June 17, 2015

Attendees: Alan Mosley, Jacksonville Chamber; Brian Teeple, Northeast Florida Regional Council; Celia Glassman, Jacksonville Chamber; Rachel Lockhart, Jacksonville Chamber; Chris Quinn, Jacksonville Chamber; Hershel Vinyard, Foley & Lardner; Mickey White, The PARC Group, Inc.; David Dinkins, UF IFAS Tri-County Area; Darryl Register, Baker County Chamber; Paul Steinbrecher, JEA

Shelley Lauten opened the meeting at 2:40pm by asking each of the attendees to introduce themselves and share what they know about the CFWI.

What is the CFWI?

- Overall, general business leaders don't know much about the CFWI, except for when an issue is raised regarding taking water from the St. Johns
- Those who had more knowledge would like to see linkage between CFWI and the Northeast Florida Regional Supply Partnership

How Important are Water Issues to Business?

- In Baker County, there is an organization called the Baker County Justice Coalition that closely monitors water there; they tend to only tell one side of the issue rather than using data to educate others on long term water needs. It would be helpful to have the data to educate others on the facts
- Dairy farmers try to use limited water so they didn't have to dispose of as much. It's a cost of doing business, and so water usage affects a farmer's "bottom line".
- There are 35,000 acres of crop land in the tri-county area; water is a major issue. There is a regional Basin Management Action Plan.
- Residential developers pay attention, but only after the fact, oftentimes
- Don't think the business community has any idea about water issues unless they have a CUP. There is zero visibility. The only visibility is: *Central Florida keep your hands out of our river.*
- The Chamber's perspective is that they tend to follow water issues at an arms-length. Unless they actively put something about water on their issues document, they won't pay much of attention to it. Businesses aren't paying attention to what it means to them if there is a lack of water.
- Businesses tend to pay more attention to quality of life; that's what will get them involved. The river IS so connected to Jacksonville's quality of life.
- The Jacksonville Alliance monitors issues transportation and infrastructure; water is an issue that can be added



- Per capita the registration of boats is the highest in the state; people don't pay attention to the river unless they cross it
- People think we have plenty of water
- Water quantity and quality are equally important

Questions/Concerns/Issues:

- Need to focus on future plans for conservation; only then can you have the conversation about alternative water sources.
- Not all projects are equal; need to start with conservation
- 75% of the population doesn't think about conservation because it's inexpensive
- Because the CFWI plan comes out first, Central Florida will be first in the marketplace with a plan and strategies and therefore will tend to dictate policies in other regions
 - Central Florida has 1/2M in projects and will get to legislators first with their projects
- Because Central Florida is over allocated, for them to grow, they have to go to more expensive alternatives. The north Florida region hasn't exceeded its limits.
- How do we avoid the next water wars?
- In the past, decisions were made in Central Florida that impacted Northeast Florida, but there was no engagement with the northeast representatives

Other Issues:

- If you are on a public supply system there is a tiered rate structure (some may think this is a delivery charge); we are seeing the conservation signal from the rates, usage is down.
- We have had better rainfall in last 3 years; there was a terrible drought before that which is why the springs were down.
- Water use down due to an aggressive use of reclaimed water systems and tiered rates
- Need a fact-based approach to water issues

How Can CFWI Build a Better Relationship with Jacksonville?

- As previously uninformed people come into the conversation, they need to understand what has been done in the past
 - Conservation is a key part of the mix; i.e. Per capita water usage in Orlando has decreased, so the conservation methods have paid dividends.
 - Ag consumption has decreased. There has been cost share with the ag community to reduce nutrients.
 - In last 3 years, 2/3 fewer CUPs were issued.
 - We are the #1 state in the country for water re-use



Critical Issues to Address during June 29th Workshop:

- It is important to have a good representation of the efforts that the ag community has done; newspapers only report the bad
 - Seeing agriculture use trending down.
- When there were 7 districts, they over allocated. Now it is correcting itself. Jacksonville only has 2 districts and they are collaborating.
- From 1985 – 2010 the water usage has remained flat or declined. Need to use data in arguments. This can be the start of building trust
- Need to be clear about what science is being used
 - The US Geological Survey was hired was to take politics out of science
- Need to be clear that water use trends in Jacksonville is different than that in Central Florida
- In the St Johns WMD area, there have been an additional 1.5M people added and consumption has not gone up
- Applaud efforts i.e. collaborating to ensure a sustainable supply and work in Central Florida is now translating to the north
- Northeast Florida Regional Supply Partnership is working on the largest, most comprehensive model the district has ever undertaken. They have been having stakeholder meetings for 2 years now hosted by 2 WMD (Suwanee and St. Johns)
- Because this is a 20-year plan there may be opportunity to retrofit the CFWI plan into Northeast Florida plan
- Important to tell the story that the CFWI is using science to make decisions
- Communicate what impact attendees can have on the process
- Show a 20-year timeline and the consequence of doing nothing
- JEA's reclaimed system just won an award and serves area of new growth
- Show how do we build collaboration as NFRSP builds its plan
- Potential of getting someone to sponsor an award for water conservation
- Important for everyone to understand how each plan benefits the other community/region
- Need to be fact-based; don't make issues political



Big Take-Aways:

- Provide a baseline education (trends comparing North Florida and Central Florida)
- Need to tell stories of past issues / successes
- Use facts/science to show how decisions are being made and plans implemented
- Need to compare the CFWI and NFRSP plans

Environment Focus Group, Jacksonville - June 17, 2015



Focus Group Meeting – Environment Jacksonville, FL June 17, 2015

Attendees: Karen Chadwick, Putnam County Environmental Council; Brian Teeple, Northeast Florida Regional Council; Tom Larson, Sierra Club; Gary Bower, St. Johns Riverkeeper Board Member and former Duval County Environmental Protection Board Chairman; Lisa Rinaman, St. Johns Riverkeeper; Dr. Quinton White, Jacksonville University Marine Science Research Center; Janet Stanko, Sierra Club / CrisisForAll.com; Brian Paradise, member of various environmental groups; Elizabeth Guthrie, North Florida Land Trust; Blair Woolverton, supporting St. Johns Riverkeeper; Barbara Ketchum, interested citizen

Shelley Lauten opened the meeting at 1:10pm by asking each of the attendees to introduce themselves and share what they know about the CFWI.

What is the CFWI?

- Effort at collaboration trying to find ways to prepare for their water needs as they see them; noted that the traditional approach that is worthy of scrutiny (growth is good, more water is better)
- Find new sources of water to sustain the growth
- Collaboration that is looking at water resources in an unsustainable way; also creating policy that will impact a large area
- Plan isn't cumulative
- Method by which Central Florida will continue to grow water-wise at the expense of the rest of the state
- Compilation of ideas for addressing water needs for an exclusive water population
- Enemy of the St. Johns River

Shelley noted that the CFWI is a collaboration between the three water management districts and the Florida Department of Environmental Protection, and stakeholders from business, government, the environmental community, and the agriculture industry.

Biggest Concerns/Questions/Issues:

- This sounds like a done deal
- What is the schedule after the comment period is closed? Need to be able to document "here is where we started and here are the adjustments that were made"
- Who created the plan?



- Environment has had a small voice in this discussion so far.
- Environment leaders have been concerned about the lack of response to their concerns
- How is triSect going to evaluate whether the feedback is actually being implemented
- Who appoints representatives to the water management district boards; there is not any environmental community representation
- There is a lack of trust and it permeates the environmental community; this lack of trust is earned by water management district staff's treatment of concerned groups and the state slashing budgets
- Conservation is not being developed in any substantive way. The solution is not coming up with more water – there is no more water.
- Political elite are dedicated to growth and making money and environment concerns are not being attended to. Shelley asked the group to identify what the top 3 environmental concerns that are not being attended to:
 - Conservation neglected
 - Presumption that growth is good
 - Water quantity vs water quality; this work has focused on quantity and not quality. You cannot disconnect the two.
- 75% of the electorate voted for conservation in the Amendment 1 vote
- There is a disconnect between science and the decisions the water management district makes in regard to issuance of CUPs. Science indicates there is not enough water. Implications are more drastic than politicians want. Example: In the Ocala area Adena Ranch is trying to get more CUPs; the area is hurting for water, but this project is still going on.
- The water management districts need to figure out how to make the 800mgd available now work for future development instead of focusing on money earned from future development.
- 50% of potable water is going to lawns, golf courses, etc. and there is nothing in this plan to address this
- Many people in Putnam County do not want to eat what is caught in the river or touch the water in the St. Johns River. Karen from Putnam County produced a letter from the president of the Putnam County Environmental Council expressing their concerns about the CFWI and the legal action that is being taken because water is being withdrawn even when it is not times of wet weather flow (FLS 373.019(1)). Water can be withdrawn during wet weather flow so the proposed pumping is not legal.
- Concerns about current water pollution and that runoff from new development will cause even more pollution.
- Noted that if politicians don't like the current laws, they change them.



- Conservation is based only voluntary participation; there is no regulation. Incentives, regulation, and education are key pieces of conservation success, but the budget has been cut in these areas. Only 6% of budget is focused on conservation.
- The plan originally started at 46M gallons to be conserved, now it is at 36M.
- If you go back 10 years, the water management district had a whole different philosophy – education and regulation was emphasized and was not thought to be bad; there is this whole idea that spending money is bad unless you are promoting growth
- There is a trust issue; feel that all the water management district cares about it growth.
- The Governor doesn't know/care what they are feeling. Conservation methods that were put in place 10 years ago were erased when Governor Scott got elected. 80% of electorate says they want conservation.
- Need to limit the population; don't allow people to move here.
- The agriculture industry does not have to pay for their water and have 90% of their retrofits paid for by the state.
- The water management district has no clue how much water is being pumped on any given day. Having a healthy environment is critical to a healthy economy.
- Desalinization has grave environmental impacts
- Agriculture contributes 8% of the gross state product and doesn't pay for water; there are a lot of costs they don't pay for that others end up paying for
- When you read the plan, it minimizes the impacts
- In addition to ignoring science, the water management district is monitoring the river less (mapping grasses). Monitoring has been cut 66% - this adds to the distrust.

Other Thoughts:

- If CFWI or St. Johns River WMD would say we are going to cut CUP permits by 20% in three years, it would give people time to prepare.
- No one pays for water. Residential bills are for the handling/delivery of water and sewage management.
- Energy and water intersect in a number of ways; the agriculture industry pays energy companies to pump water; we pay to clean water.
- The water management districts should initiate impact fees for new development just like we do for roads and schools.



How Can CFWI Build a Better Relationship with Jacksonville?

- Put true conservation plans together with regulation
- Build trust
- They need to care what people say
- Needs to be environment representation on the board

Critical Issues to Address during June 29th Workshop:

- Conservation
- A plan for true implementation of regulation

Big Take-Aways:

- Major focus is conservation and the regulation to enforce it
- Trust issues

CFWI Workshop, Northeast Florida - June 29, 2015



Meeting Minutes from CFWI Workshop in Northeast Florida June 29, 2015

Glenda Hood, Principal, triSect opened the meeting at 4:10pm and welcomed 54 attendees. Shelley Lauten, Principal, triSect noted that a series of Focus Group meetings were held with members of the environmental community, business & agriculture leaders, and government leaders in northeast Florida the week prior to the workshop in an effort to identify issues and concerns of importance to the leaders of the region as it relates to the Central Florida Water Initiative (CFWI). She noted that, resoundingly, the concern focused around conservation efforts and, therefore, the topic of today's conversation would be focused on what CFWI is and the conservation efforts of the CFWI solutions plan. Shelley then walked through the packet at each person's seat which included the agenda, a copy of the Power Point Presentation, a map of the CFWI area, extending into northeast Florida, a worksheet, and an evaluation sheet.

The attendees were then asked to introduce themselves and the organizations they represent, if applicable.

Dr. Ann Shortelle, Executive Director, St. Johns River Water Management District introduced herself and acknowledged that the two regions – Central Florida and Northeast Florida – shared concerns on the issue of water. She noted that she has been participating in the North Florida Regional Water Supply Partnership (NFRWSP) who has begun the same type of work as the CFWI. Dr. Shortelle noted that it is very important to protect our freshwater resources and our aquifer. She closed by noting that our regions need to come together to find solutions as we all care about water.

Michael Register, Director, Division of Regulatory, Engineering and Environmental, St. Johns River Water Management District discussed the similarities between CFWI and NFRWSP. He noted that they are both gathering stakeholders to understand everyone's concerns. He then reviewed the organizational structure for NFRWSP and the principles for CFWI, noting that the goals of both collaborations are similar.

Mark Hammond, Director, Resource Management, Southwest Florida Water Management District then took the podium to announce that the solutions plan had been released and that the CFWI is currently looking for feedback on it. He then discussed the current amount of water being used and what would be needed in the future. Mark then noted that it is important to remember that water issues did not develop overnight and the solutions will take some time to implement. He then noted that the solutions plan would be evaluated every five years for any course-correction measures that would need to take place. Mark noted that CFWI understands that more collaboration and coordination between regions is required to address water issues and solutions, which is why they have come to northeast Florida today. He noted that the CFWI solutions document focuses on regional projects; there are 150 projects listed in the RWSP that cities and counties can implement on their own, but there are 16 projects

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that will require multiple jurisdictions to collaborate to maintain water supply. They also looked at the agriculture industry to determine need

Mark noted that CFWI used research to understand how much groundwater is currently available, to determine future water supply, and to develop a regional water supply plan. Mark noted that conservation is heavily focused-upon in the solutions document.

Mark closed by noting that the next steps for CFWI are to begin phased-in implementation of the solutions plan as well as begin looking at consistent rules and regulations within the three water management districts. He asked the attendees to look specifically at the solutions plan executive summary and Chapter 7 on Conservation and provide feedback by July 31st.

Shelley asked if anyone needed clarification on any information that had been shared thus far:

- What were the names of the documents? RESPONSE: Regional Water Supply Plan and Solutions Plan; they can both be found at cfwiwater.com
- What type of assumptions have you made on the sustainable yield? Are you assuming same amount of rainfall? How are you addressing these uncertainties? RESPONSE: These issues have been factored in, but that is why the plan will be updated every five years so we can make adjustments as necessary
- How does the next generation model compare to the NFRWSP? The CFWI plan is not a conduit model but is a course management model; conduit flow is one of the things they are investigating
- Will the plan really be updated every 5 years? RESPONSE: Yes; it will have ongoing collaboration.

Steven Memberg, Chief Scientist, South Florida Water Management District reviewed the specific conservation data including:

- Historic water use v population 1.9M to 3M to 4M in 20 years
- GPCDD - gallons of capital per day divided by number of people to get at the mgd
- 180mgd to 144mgd over time
- 165 to 97mgd over time
 - We are seeing a decrease in this number without much regulation
 - The cheapest gallon is the gallon that is not used
 - Leaky pipes, etc are built into these numbers
 - Shows aggressive conservation is already going on
 - 15% reduction of use with irrigation regulations
 - 92% of water gets re-used
- Noted that there is funding of \$170M for conservation, some of which will be frontloaded to kick off efforts

Shelley asked the attendees if there were any questions of clarification:



- You show in your presentation that Central Florida is at 92% reuse, how is the water recharge being addressed? RESPONSE: Use of Rapid Infiltration Basins (RIBS)
- What is GPCD? RESPONSE: Looking at all water use per capita. However, there are special situations like Reedy Creek that serves few residential users but many tourists. There are few conservation programs Reedy Creek can offer residential users in this area.
- Where did the numbers come from on the historic water use v population? CUPs are not metered so WMDs don't have a handle on how much water is used per day? RESPONSE: While we don't have every piece of data from every user, the plan does its best efforts to estimate this. A group through UF – BEBR – tracks population by county and we can use this information for how we must plan. Prior to 2003, the data was purely estimate, now there is actual data on what is metered; were are able to look at trends and they are very consistent.
- There needs to be a public relations / public announcements that will help with conservation measures; is there something at the state that would communicate to the tourists; who can promote that? RESPONSE: That will come in the next phase of outreach.

It was then noted by some in the audience that the presentation was not detailed enough in actual conservation solutions and they wanted to hear more specifics. Glenda and Shelley asked Mark to come back to the stage to offer more specific information about the conservation solutions in the plan.

Mark noted that the Conservation Plan was broken into six sections including:

- Public Supply Conservation Measures
 - Residential Indoor
 - Replacement of toilets
 - Replacement of showerheads
 - Replacement of faucets
 - Residential Outdoor
 - Irrigation system audits
 - Irrigation system improvements
 - Soil moisture sensors
 - CII (Commercial/Industrial/Institutional) BMPs
 - Replacement of pre-rinse spray valves
 - Replacement of toilets and urinals
 - Replacement of showerheads
 - Replacement of faucets
 - Site specific water audits
- Domestic Self-Supply Measures
 - Agriculture
 - Limited to crop irrigation
 - Estimates based on mobile irrigation laboratory evaluations

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- Landscape / Recreational / Aesthetic
- Commercial / Industrial / Institutional
 - Directly proportional to that of CII uses served by public supply systems
 - Assumed that the CUP process and business economics already drive commercial and industrial establishments to minimize their use of process water
- Power Generation

Mark noted that if demands remain relatively flat, there will be more water because of conservation measures that are already in place. Further, he noted that the Solutions Group recommended additional studies as they felt there was not enough data available for assessment and there more opportunities for stormwater.

Shelley opened the floor for additional questions:

- There is a Florida Anti Fracking Coalition. The Legislature was ready to pass regulations on fracking. Has CFWI addressed fracking in the plan over the next 5 years? RESPONSE: No, there are no specific projections based on fracking. Industrial and agricultural use include projections on fracking. If it becomes more prominent, we will look at the issue more closely.
- The Naval Air Station in Jacksonville is implementing low-impact development. What are the districts doing to implement the same? RESPONSE: Low impact development is a great concept. Winter Haven is working to retrofit their system with grass swales instead of curbs and gutters. Shelley asked: If Winter Haven is a best management practice, is there a part of CFWI that can share those practices across boundaries. RESPONSE: The stormwater portion of the plan has looked at water supply, so increase recharge.
- David Dinkins noted that Dr. Jones from UF will work with any community that calls on him to plan for low impact development. UF is a leading education organization on this topic.
- The Park Service is looking at including charges for consumptive use. Are there ideas in the plan that will help us capture recreational use ie. meter tourists, rvs, etc.? RESPONSE: It is critical to evaluate what you are using to help make decisions in the future. Recreational use is an important piece and working more closely with the hotel and tourism industry on the education piece may be an opportunity.
- A lot of work has been put into the plan, but the bottom line is quality of water is as important as the quantity. RESPONSE: This plan does focus on water supply, but then it also focuses on protecting the systems so withdrawal does not impact quality.
- There are concerns about arsenic levels in the water. What if growth is curbed just a little bit to keep us in a sustainable level so we don't have to go to extreme measures? RESPONSE: There are opportunities for the individual



municipalities to look at their growth plans. Glenda noted that it is important to have local governments at table along with other stakeholders for this reason. Shelley noted that this is an excellent point and there needs to be more consensus on a growth management plan.

- The plan seems to be robbing Peter to pay Paul. RESPONSE: The Water Management Districts' job is to evaluate where the water can be withdrawn and ensuring that there are regional plans so we are not addressing issues in one area at the expense of another area. Glenda noted that that is why CFWI is holding the meeting in Northeast Florida and why it's important to have more people at the table.
- It was noted that there are alternative uses of existing water supply via stormwater run-off and collection. There are case study projects that the City of Daytona Beach is using now in conjunction with the SJRWMD. It is an opportunity for conservation and improved water quality.
- Residential irrigation is about 50% of the water used. More xeriscaping is suggested. RESPONSE: That is one of the solutions in the plan. We need more public support since this requires legislation for a statewide approach. Local governments can modify their landscape ordinance requirements. The current process is not working;
- Education is the key to citizen engagement. We have got to do a better job. We have got to set goals for individual consumption like the my river campaign.
- We need more public pressure on politicians to do the right thing
- We need tiered pricing to encourage conservation. Make it impossible to put a well at your home if you have access to a public water supply. RESPONSE: This runs into statutory issues so we need legislative help.
- On a state level we need to change the building codes like they did for hurricanes. Over time this will make a huge difference.
- Need to educate people on what the agriculture industry looks like today
- It is time to get aggressive and live within our water means. We need incentives, education, and mandatory regulation.

Michael reminded the attendees that the open comment period would run through July 31st and encourage them to make additional comments online.

Glenda thanked everyone for attending. The meeting adjourned at 6:31pm.

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LETTERS, EMAILS, AND OTHER CORRESPONDENCE

Edward McDonald

From: Edward Mc Donald [<mailto:emcdotomb@yahoo.com>]
Sent: Thursday, July 16, 2015 1:41 PM
To: Memberg, Steven
Cc: John Shearer
Subject: CFWI Water Conservation

Mr. Memberg,

I have watched a video of the presentation that you gave this past June 29th in Jacksonville. Your main topic was water conservation. I am a big believer in the efficient use of water and it's clear to me that water efficiency improvements has played a major role in the reduction in water usage that we have seen over the past decade or so. The fact that water is now receiving so much attention, it would be my opinion that this trend in ever improving water use efficiency will continue for the foreseeable future.

Water management districts in partnering with local government growth management agencies can enhance the trend in water use efficiencies that, up until now, has occurred with little organized guidance and direction. In other words, water use efficiency improvements have occurred on a pretty much voluntary, hit and miss bases. There have been very few requirements for mandatory reductions in water use. Outdoor watering restrictions are the closest thing that has been implemented that are designed to reduce overall water consumption. Again, actual enforcement of these restrictions is for the most part non-existent.

Looking at comments that have been made to the overall CFWI effort is it very clear that water efficiency improvements is to be the primary focus of any water supply plan. I for one, will be looking at the next iteration of the CFWI RWSP with the expectation of seeing a much greater emphasis on demand side management. That's what the public has demanded and that's what we need to see happen.

Agricultural water use is still a major component of our water demand. Because of this fact and the fact that agricultural use consists of a relatively small number permitted water users, there is a real potential for a concentrated effort to improve water efficiency in this sector of water use. I disagree with a statement that you made during your presentation that implied that the cost of pumping water will automatically encourage agricultural water users to maximize their water use efficiencies. I don't know the numbers that you use to determine the cost to agricultural users per thousand gallons of water, but my estimates are in the range of \$0.08 to \$0.16 per thousand gallons pumped. The large range is due to the cost difference between diesel and electric power.

I have attached the commercial and industrial water rates for the City of Lakeland's Department of Water Utilities. As you can see they have a consistent rate of \$2.15 or \$2.90 per 1000 gallons. Based on my numbers, it would be my opinion that agricultural users are getting essentially free water. The incentive to improve the efficient use of agricultural irrigation water is not so much to benefit the actual agricultural users, but to free up that quantity of traditional groundwater so that it can be used to offset the need to build expensive, alternative water projects.

Thanks for time.

Edward McDonald
Auburndale, FL

Edward McDonald Attachment

Department of Water Utilities

WATER RATES

RATES EFFECTIVE OCTOBER 1, 2013

FOR COMMERCIAL, INDUSTRIAL, AND FRANCHISED ACCOUNTS:

<u>METER SIZE</u>	<u>FIXED METER CHARGE</u>		<u>CHARGE PER 1,000 GALLONS</u>	
	<u>INSIDE CITY LIMITS</u>	<u>OUTSIDE CITY LIMITS</u>	<u>INSIDE CITY LIMITS</u>	<u>OUTSIDE CITY LIMITS</u>
5/8" - 3/4"	\$ 7.99	\$ 10.79	\$ 2.15	\$ 2.90
1"	\$ 21.54	\$ 29.08	\$ 2.15	\$ 2.90
1 1/2"	\$ 38.92	\$ 52.54	\$ 2.15	\$ 2.90
2"	\$ 67.26	\$ 90.80	\$ 2.15	\$ 2.90
3"	\$ 146.22	\$ 197.40	\$ 2.15	\$ 2.90
4"	\$ 283.18	\$ 382.29	\$ 2.15	\$ 2.90
6"	\$ 597.14	\$ 806.14	\$ 2.15	\$ 2.90
8"	\$ 1,011.12	\$ 1,365.01	\$ 2.15	\$ 2.90

US Fish and Wildlife Service Letter



United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Florida Ecological Services Office
1339 20th Street
Vero Beach, Florida 32960



August 14, 2015

Dean Powell
South Florida Water Management District
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, Florida 33406

Service CPA Code: 04EF2000-2014-CPA-0193
Date Received: July 1, 2015
Project: Central Florida Water
Initiative
Counties: Orange, Osceola, Seminole,
Polk and southern Lake

Dear Mr. Powell:

The U.S. Fish and Wildlife Service (Service) has reviewed the Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) by the South Florida Water Management District (District) dated May 2015 and received July 1, 2015. The Service appreciates the opportunity to comment on the CFWI RWSP and is submitting this letter to the District during the public comment period ending August 17, 2015.

PROJECT DESCRIPTION

Through the CFWI, the St. Johns River, South Florida, and Southwest Florida Water Management Districts have worked to develop the area's first multi-district Regional Water Supply Plan to identify sustainable water source options and potential projects to meet projected demands while protecting, conserving and restoring water resources. The CFWI Planning Area is located in central Florida and consists of all of Orange, Osceola, Seminole, and Polk counties and southern Lake County, covering approximately 5,300 square miles. The CFWI Planning Area is currently home to approximately 2.7 million people and supports a large tourist industry, significant agricultural industry, and a growing industrial and commercial sector. The area's population is projected to reach approximately 4.1 million by 2035, which is a 49 percent increase from the 2010 estimate. The CFWI Planning Area also encompasses extensive natural systems such as Green Swamp, Reedy Creek Swamp, Boggy Creek Swamp, Shingle Creek Swamp, the Kissimmee Chain of Lakes (KCOL) (the headwaters to the Kissimmee River), 16 springs, and numerous wetland and surface water bodies. Based on modeling results and the assessment of groundwater availability, it was concluded that fresh groundwater resources alone cannot meet future water demands in the CFWI Planning Area without resulting in unacceptable impacts to water resources and related natural systems. This CFWI RWSP identified water

Dean Powell

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conservation efforts, groundwater withdrawal optimization, prevention and recovery strategies for targeted minimum flow level (MFL) water bodies, water supply development project options, water resource development project options, and water conservation by all water use categories as an important element in meeting future water needs.

THREATENED AND ENDANGERED SPECIES

The Kissimmee Basin is home to many species of concern (see attached list) including Federal endangered and threatened species and State species of special concern and threatened species. Some of these species are also found throughout the CFWI Planning Area. The Service is concerned CFWI projects could further negatively impact these species located in the Upper Chain of Lakes and the Kissimmee River and floodplain. Any project which could negatively impact, or “take”, a federally listed species would require an incidental take permit from the Service. The Endangered Species Act (Act) defines “take” as “. . . to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” “Harm” includes significant habitat modification that actually kills or injures a listed species through impairing essential behavior such as breeding, feeding, or sheltering. The Service helps other Federal agencies and non-Federal entities or individuals determine whether specific proposed projects or actions are likely to result in “take.” The following comments highlight only two species, and do not address all potential impacts to these species or all potentially impacted species for which future consultation may be required.

Manatee

The CFWI Planning Area touches marginally on waterbodies of importance to manatees. These include the Peace River, the Alafia River, the Ocklawaha River, and the St. Johns River. Of these systems, the Ocklawaha River springs are likely the most significant if connectivity with the St. Johns River is improved. Manatee sightings are known from Lithia Springs, Wekiva Springs, and the Ocklawaha River springs. Unfortunately, springs used by manatees within the CFWI region have been reduced, although the springs may have been significant in the past. Springs used by manatees must be accessible, have adequate depths and flows, and provide nearby sources of forage. Over time, spring runs have become inaccessible to manatees due to damming and to sediment build up. Thus, flows have diminished such that there is little remaining thermal benefit for manatees. CFWI activities that restore connectivity to springs, spring runs to usable depths, and flows that provide adequate warm water to manatees will provide a significant benefit to this endangered species. MFLs are relied on for springs and their spring runs to protect and enhance these sites for manatees. The Service supports adequate and meaningful MFLs to protect waterbodies, including springs, to support the manatee.

Snail kite

Snail kites forage, nest and roost in marsh and lakeshore habitats within the CFWI region. In recent years, the majority of snail kite nesting within this region has occurred in East Lake Tohopekaliga (Toho), Lake Toho, Lake Hatchineha, and Lake Kissimmee; however snail kites

Dean Powell

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have been observed nesting and foraging on numerous smaller water bodies throughout the region as well. The Kissimmee Basin represents an important portion of the kite's breeding range every year, and especially during times of drought or when habitat in South Florida becomes unsuitable or unavailable. For example, the relatively low reproductive output from Lake Okeechobee (1997-2010) and Water Conservation Area 3A (2001- 2012) left the snail kite population heavily concentrated in and dependent upon the Kissimmee Basin region, particularly Lake Toho, which accounted for 41 percent of all successful nests and 57 percent of all fledged young that were documented on a range-wide basis from 2005-2010 (Fletcher 2015). To support successful snail kite nesting and foraging, sufficient water levels are needed, including appropriate timing and rates of change (*e.g.*, transitions between high and low water levels). Apple snails, which are the kite's primary food, also require suitable water levels to survive and reproduce. Thus, any projects which could potentially lower water levels, increase recession or ascension rates, or alter the natural seasonality of water levels could potentially adversely impact snail kites, and may require consultation under the Act.

Everglades Headwaters National Wildlife Refuge (EHNWR)

In addition to threatened and endangered species, the Kissimmee Basin also includes the Service's EHNWR. The EHNWR encompasses 150,000 acres and addresses landscape-scale land protection efforts north of Lake Okeechobee with conservation of land, water, and wildlife resources of the Kissimmee and Greater Everglades landscape. The Service recommends the District work closely with EHNWR on any potential withdrawals or surface water project to ensure resources within the EHNWR are not negatively impacted.

DETAILED COMMENTS TO THE RWSP DOCUMENT**Water reservations and MFLs**

The Service supports the development of a water reservation for the Kissimmee basin for the protection of species, habitats, and ecosystems. As a part of the CFWI (page 33, paragraph 3), MFLs and water reservations are recommended for all water bodies of certain significance to the ecosystem. However, the planned Kissimmee water reservation thus far has neglected to provide reservations or protection for Boggy Creek (inflows for East Lake Toho), Shingle Creek (inflows for Lake Toho), Reedy Creek (inflows for Lake Cypress), Buck Lake, Fish Lake, Mill Slough, Lake Russell, Lake Marion, Lake Pierce, Lake Jackson, Lake Marian, Lake Rosalie, Lake Weoyakapka, and the No Name Slough. (The list of recommended protections is not limited to the above waterbodies or flow-ways but is an example of water bodies in need of protection).

Surface water projects

The Service is concerned CFWI projects, including a proposed reservoir project in the Upper Kissimmee Basin, will erode the considerable federal and state investment in the Kissimmee River Restoration and further negatively affect the State and federally endangered and threatened species located in the Upper Chain of Lakes and the Kissimmee River and floodplain. Also of concern are potential negative impacts to downstream systems, such as Lake Okeechobee and the Everglades.

Dean Powell

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Monitoring

The importance of monitoring is discussed on page B-114. The Service recommends a plan be devised and included in the RWSP. Details on variables to be monitored along with locations, costs, and timelines should be discussed with stakeholders and developed as a part of the CFWI.

Weather, climate, and climate change

In the RWSP, climate and climate change are discussed and heavily used in planning and modeling. On page 33, in the first paragraph, it states the Florida legislature established a 1-in-10 year drought event level of certainty planning goal for CFWI. However, a couple of climatic variables were not discussed. The current warm phase of the Atlantic Multi-Decadal Oscillation (AMO) provides generally more rainfall to Florida due to warmer ocean waters and a more northern fluctuation of the Inter-Tropical Convergence Zone (ITCZ) from the equator. However, the warm phase is expected to transition to a cool phase likely within the next 10 to 15 years. During the transition, the ITCZ will move further south and the State will generally receive less rainfall. So near the 2025-2035 time frame, rainfall could lessen, leaving less surface water for water supply and the environment. Thus, a 1-in-10 year drought is not conservative enough for planning. The eventual transition into a drier weather regime should be considered in the RWSP.

Beyond 2035, according to the 2014 National Climate Assessment (NCA 2014), climate change is expected to decrease rainfall in Florida by 20-30%. The decrease is expected primarily during the spring and summer months. Thus, the Service recommends that the District utilize the climate change modeling scenarios (Vargas-Moreno 2010) developed by the Massachusetts Institute of Technology (MIT), the Service, and the United States Geological Survey (USGS). These scenarios incorporate expected changes in land use, the economy, and in climate variables for Florida, including the CFWI planning area.

Modeling

Also of concern with climate, is that the East Central Florida Transient (ECFT) groundwater model that was developed and used to estimate changes of water levels as a result of changes in groundwater withdrawals and projected water demands with factors such as rainfall, runoff, and evapotranspiration used a modeling period of record (POR) of 1995 through 2006. This POR is only within the wetter warm phase of the AMO. Thus, modeling will indicate that more rain water will be available than will likely be. In the 12-year POR, 10 out of 12 years were average or above average with 5 of those years above average. There were only two droughts. One drought was in 2000 and the other was in 2006. The 2006 drought eventually led to a multiple 3-year drought, the majority of which was not included in the POR.

On page B-33 it states "Water-withdrawal conditions for 2005 have been designated as the Reference Condition (RC) for CFWI Planning Area analyses." This study is already 10 years behind and will not reflect real-world withdrawals and ensuing complications and conditions. If it is necessary to use 2005 as a baseline, then the Service recommends that the District research and calculate a general percentage that water withdrawals have increased since 2005. This percentage should be added to the 2005 conditions to better reflect current day withdrawals.

Dean Powell

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The Service also recommends using conservative water withdrawal estimates due to the high level of errors in groundwater modeling. The District reports potential errors of 1-2 feet in modeling. These errors are rather large errors and could result in under-estimating large volumes of water either being withdrawn or not accounted for (missing) in the model.

On page B-55 it states "Based on the potential for withdrawals in the CFWI Planning Area to affect flows in the Peace River and possibly adversely affect recovery within the SWUCA, the effect of simulated withdrawal scenarios on the exchange of groundwater between the groundwater system and the upper Peace River was evaluated." Were these same evaluations performed on the KCOL, Kissimmee River and especially the effects on discharges to Lake Okeechobee?

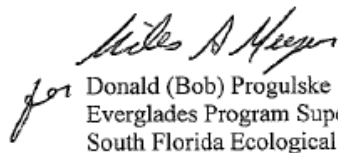
Water conservation, restrictions and other options

The Upper Floridan Aquifer (UFA) is expected to drop up to 10 feet by 2035 according to Figure 8 on page 63. It is quite evident the aquifer is not a sustainable drinking water resource for the existing population much less for the expected population growth by 2035. This is supported on page B-80, where details are shown on the water availability decreases expected for lakes, wetlands, and springs. The report indicates the remaining UFA freeboard values for the lake and wetland MFL constraints ranged from 1.8 ft. to -7.8 ft. for the 2035 withdrawal scenario. Spring constraint freeboard values ranged from 0.2 to -5.4 cfs for the 2035 withdrawal scenario. Expressed as a percentage of remaining freeboard based on the adopted minimum flow regimes, the remaining freeboard for the spring constraints ranged from 5 percent to -43 percent.

The Service recommends the water management districts consider putting more emphasis on conservation, more proactive water restrictions, water farming, and dispersed water storage not only for the protection of drinking water but also for the species, habitats, and ecosystems that depend on the water budget. It is understood the District is involved in water farming and dispersed water storage. These projects will likely be a source of water and water storage in the future. However, they were not discussed in the RWSP. The Service recommends these projects be incorporated into water resource planning.

Thank you for the opportunity to review the Central Florida Water Initiative Regional Water Supply Plan and provide comments. If you have any questions regarding this letter, please contact Lori Miller at 772-469-4231, or Heather Tipton at 772-469-4296.

Sincerely yours,


for Donald (Bob) Progulske
Everglades Program Supervisor
South Florida Ecological Services Office

Dean Powell

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cc: electronic only
District, West Palm Beach, Florida (Dean Powell)

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- U.S. Global Change Research Program. (2014). *National Climate Assessment*. Washington D.C.:National Oceanic and Atmospheric Administration (NOAA).
- Vargas-Moreno, J.C and M. Flaxman. 2010. Addressing the challenges of climate change in the Greater Everglades landscape. Project Sheet, November 2010. Massachusetts Institute of Technology, Department of Urban Studies and Planning; Cambridge, Massachusetts.

Species of Concern within the Kissimmee Basin

Common Name	Scientific Name	Status ¹	Agency
Amphibians			
Striped newt	<i>Notophthalmus perstriatus</i>	C	Federal
Gopher frog	<i>Lithobates capito</i>	SC	State
Birds			
Black skimmer	<i>Rynchops niger</i>	SC	State
Burrowing owl	<i>Athene cunicularia</i>	SC	State
Florida grasshopper sparrow	<i>Ammodramus savannarum floridanus</i>	E	Federal
Florida sandhill crane	<i>Grus canadensis pratensis</i>	ST	
Florida scrub-jay	<i>Aphelocoma coerulescens</i>	T	Federal
Everglade snail kite	<i>Rostrhamus sociabilis plumbeus</i>	E	Federal
Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	T	Federal
Limpkin	<i>Aramus guarauna</i>	SC	State
Little blue heron	<i>Egretta caerulea</i>	SC	State
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Federal
Snowy egret	<i>Egretta thula</i>	SC	State
Southeastern American kestrel	<i>Falco sparverius paulus</i>	ST	State
Tricolored heron	<i>Egretta tricolor</i>	SC	State
White ibis	<i>Eudocimus albus</i>	SC	State
Whooping crane	<i>Grus americana</i>	Experimental Population non-essential	Federal, State
Wood stork	<i>Mycteria americana</i>	T	Federal
Fish			
Lake Eustis pupfish	<i>Cyprinodon hubbsi</i>	SC	State
Insects			
Highlands tiger beetle	<i>Cicindela highlandensis</i>	C	Federal
Lichens			
Florida perforate cladonia	<i>Cladonia perforata</i>	E	Federal
Mammals			
Florida panther	<i>Puma concolor coryi</i>	E	Federal
Florida manatee	<i>Trichechus manatus</i>	E	Federal
Puma	(=mountain lion) (Puma (=Felis) concolor (all subsp. except coryi))	T (SA)	Federal
Florida bonneted bat	<i>Eumops floridanus</i>	E, ST	Federal, State
Florida mouse	<i>Peromyscus floridanus</i>	ST	State
Homosassa shrew	<i>Sorex longirostris eonis</i>	SC	State
Sherman's fox squirrel	<i>Sciurus niger shermani</i>	SC	State
Reptiles			
American alligator	<i>Alligator mississippiensis</i>	T (SA)	Federal
Bluetail mole skink	<i>Eumeces egregius lividus</i>	T	Federal
Eastern indigo snake	<i>Drymarchon corais couperi</i>	T	Federal
Florida pine snake	<i>Pituophis melanoleucus mugitus</i>	SC	State

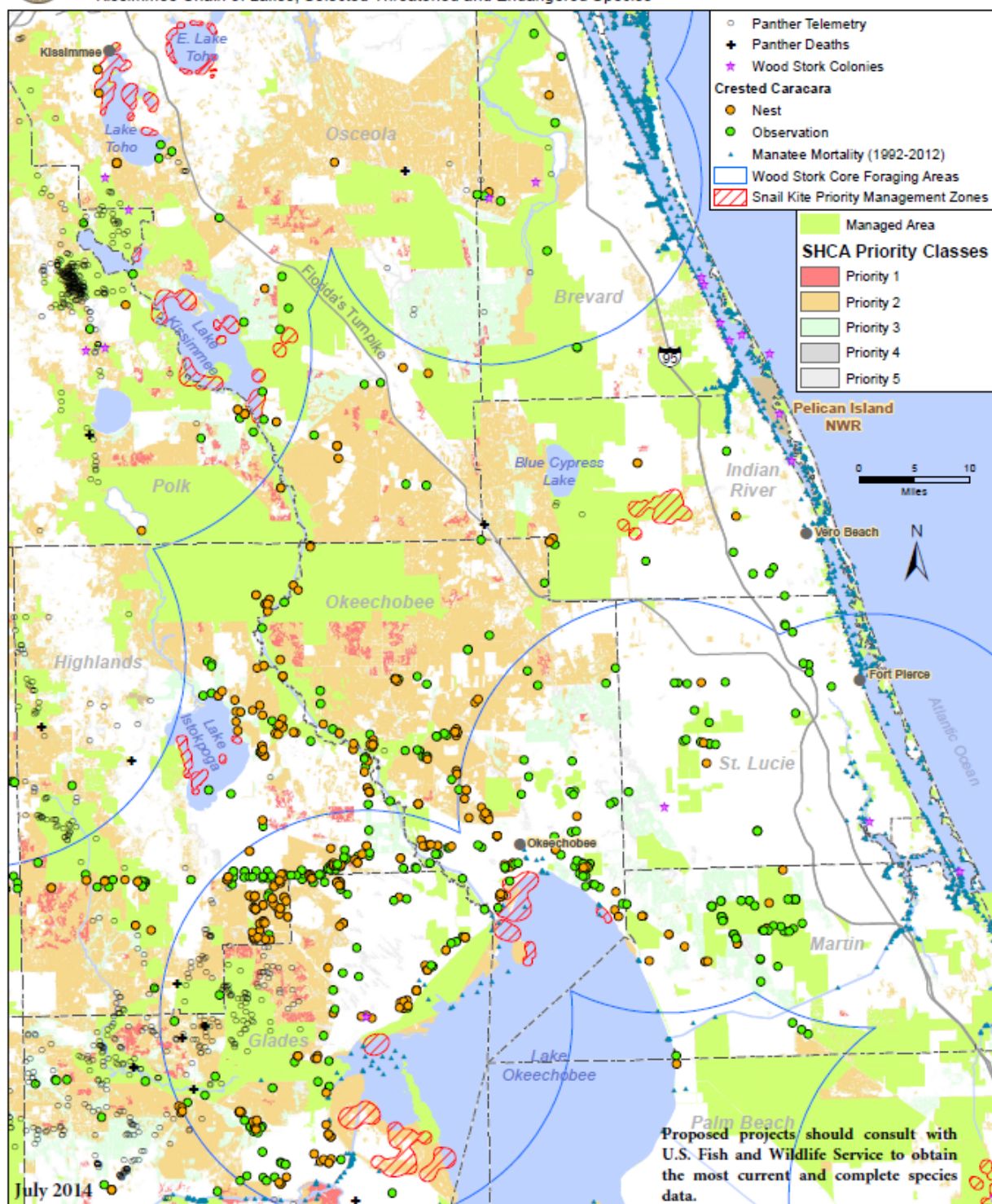
Gopher tortoise	<i>Gopherus polyphemus</i>	C, ST	Federal, State
Sand skink	<i>Neoseps reynoldsi</i>	T	Federal
Short-tailed snake	<i>Stilosoma extenuatum</i>	ST	State
Plants			
Short-leaved rosemary	<i>Conradina brevifolia</i>	E	Federal
Scrub mint	<i>Dicerandra frutescens</i>	E	Federal
Highlands scrub hypericum	<i>Hypericum cumulicola</i>	E	Federal
Scrub blazingstar	<i>Liatris ohlingerae</i>	E	
Papery whitlow-wort	<i>Paronychia chartacea</i>	T	Federal
Lewton's polygala	<i>Polygala lewtonii</i>	E	Federal
Wireweed	<i>Polygonella basiramia</i>	E	Federal
Sandlace	<i>Polygonella myriophylla</i>	E	Federal
Scrub plum	<i>Prunus geniculata</i>	E	Federal
Florida bonamia	<i>Bonamia grandiflora</i>	T	Federal
Pygmy fringe-tree	<i>Chionanthus pygmaeus</i>	E	Federal
Pigeon wings	<i>Clitoria fragrans</i>	T	Federal
Beautiful pawpaw	<i>Deeringothamnus pulchellus</i>	E	Federal
Scrub buckwheat	<i>Eriogonum longifolium</i> var. <i>gnaphalifolium</i>	T	Federal
Snakeroot	<i>Eryngium cuneifolium</i>	E	Federal
Britton's beargrass	<i>Nolina brittoniana</i>	E	Federal
Wide-leaf warea	<i>Warea amplexifolia</i>	E	Federal
Carter's mustard	<i>Warea carteri</i>	E	Federal
Scrub lupine	<i>Lupinus aridorum</i>	E	Federal
Garrett's mint	<i>Dicerandra christmanii</i>	E	Federal
Florida ziziphus	<i>Ziziphus celata</i>	E	Federal
Avon Park harebells	<i>Crotalaria avonensis</i>	E	Federal

¹ E – Endangered; T – Threatened; C – Candidate; SA – Similarity of Appearance; ST – State Threatened; SC – State Species of Special Concern



U.S. Fish and Wildlife

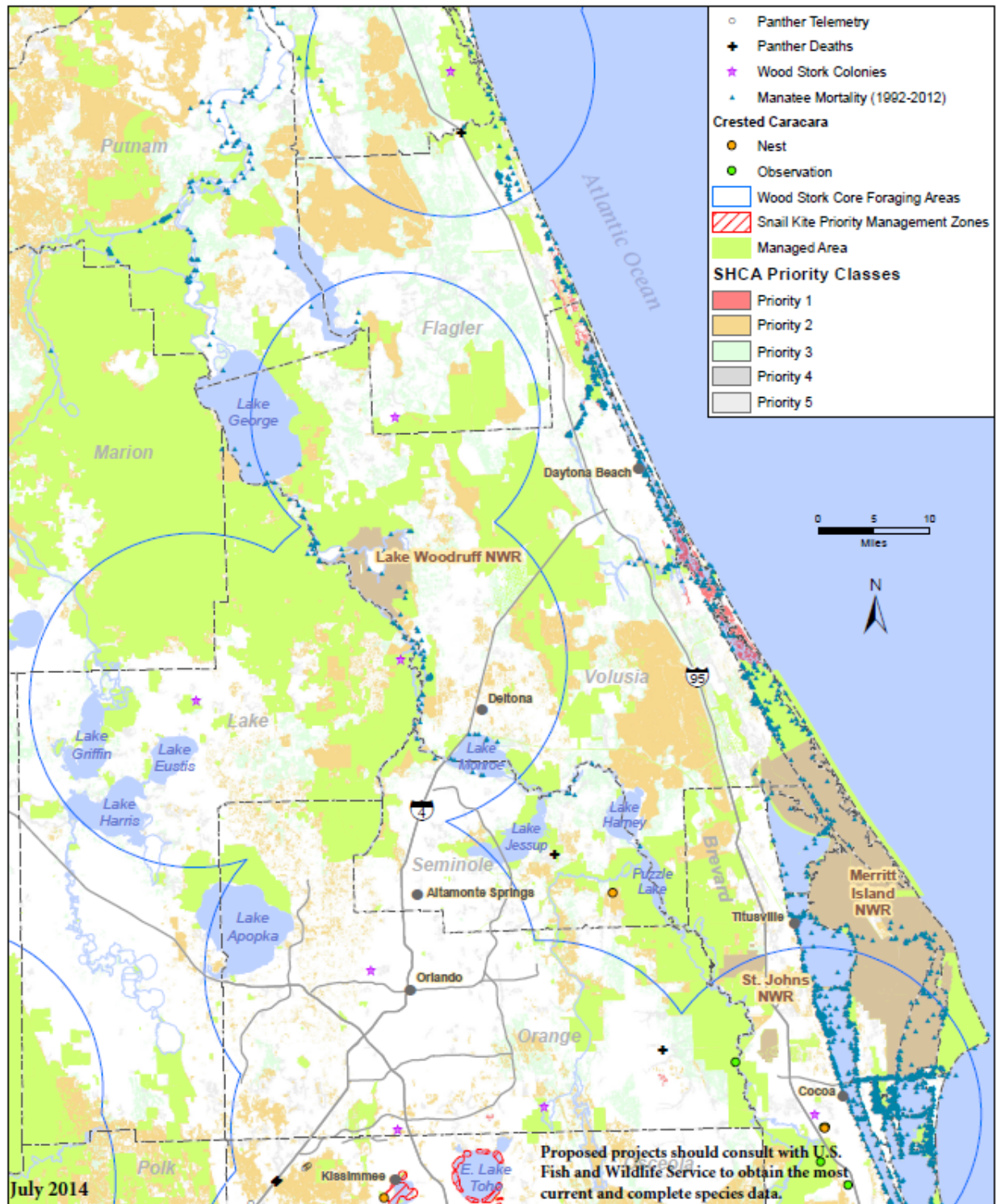
Kissimmee Chain of Lakes, Selected Threatened and Endangered Species





U.S. Fish and Wildlife

St. Johns River Basin, Selected Threatened and Endangered Species



Bob Ulevich, Grove Land Reservoir & STA Letter

August 15, 2015

South Florida Water Management District

CFWI Comments

HAND DELIVERED MONDAY AUGUST 17, 2015

ATTN: Dean Powell

Water Supply Bureau

3301 Gun Club Road

West Palm Beach, FL 33406

SUBJECT: CFWI Project- Grove Land Reservoir & Stormwater Treatment Area

Solutions Project ID: SW4

RWSP Project #: 144 (b-Newly Developed CFWIWSPs during Solutions Planning Phase)

Dear Mr. Powell;

The following comments are being provided relative to the subject CFWI project and in accordance with solicited public responses for the CFWI Planning Documents comment period ending August 17, 2015 at 5:00 PM. Reference CFWI documents for this public response are Solutions Plan Public Draft- Appendix C: Solution Plan Projects and Solutions Plan Public Draft- Chapter 3: Solutions Plan Projects "Surface Water".

In a review of the CFWI document information, one could presume that any current permitted water user, or future /planned water user within the SFWMD's Upper East Coast Region (Martin & St. Lucie County); Eastern Okeechobee County and Western Indian River County and perhaps a broader area in Indian River County, may be influenced by the subject project. This project's potential influence may include, but not be limited to, Cities; Counties; Towns; Special Districts; Water Control Districts; Landowners; Utilities; Agricultural Co-ops; etc. The project's effect, if any, to regional stakeholders, now and in the future, whether it be through design, management, operations, letters of intent or similar agreements with Water Management Districts and State Agencies, is not discernable at this time due to the lack of specific and complete project details.

Project's WMD Re-Connection Requirement

As noted in the CFWI-Solutions Plan, the subject project will require the hydraulic reconnection between the SFWMD and the SJRWMD. As most know, I have been involved in this reconnection consideration since the late 1970's, and in the 1990's pioneered this reconnection concept as a means to better manage stormwater runoff within the Lagoon/SLE system while conserving a natural resource (water). As I acknowledged repeatedly, the foundation for the reconnection, lies within the congressionally approved 1954 Flood Control Act. The 1954 Flood Control Act provided for a series of inter-connected reservoirs in western Indian River and St. Lucie Counties. Throughout these past decades, I have made several presentations to the WMD's which identified this regional reconnection corridor, in an attempt to salvage what we could from the intent and spirit of the 1954 Flood Control Act. Previously I had provided comments to the CFWI which encouraged the CFWI to look regionally at the potential value associated with this reconnection relative to water quality; quantity and in the context of restoring the historic exchange of surface water which existed prior to the creation of the WMD's and the resultant hydraulic severing of the Central and South Florida Flood Control Project along the present day St. Lucie and Indian River County lines.

In conceptualizing the regional reconnection corridor, several regional areas were identified as being potentially beneficial for this larger regional vision and public purpose. A regional reconnection corridor comprised of an assembly of regional properties, as opposed to a singular property such as the subject project area, would have the potential to be better positioned for both local, as well as regional benefits, to more effectively address key regional matters such as Water Supply; Flood Control; Ground Water Re-Charge and Water Quality (Environmental). While the subject project does lie within that envisioned corridor, the subject property in itself is not the reconnection –but merely represents one area that could be assembled with others for the purpose of the regional reconnection of the two water management districts. In fact, in 1994, other properties in the vicinity of the subject project property and within the regional reconnection corridor, were highlighted in the local news for their potential regional water storage and treatment values.

This specific response is not against the concept of evaluating the potential regional benefits associated with hydraulically re-connecting the two water management districts.

This specific response does however question, a public investment of \$3-6 million dollars as noted in the CFWI documents, for a study of only a singular project. Additionally, as presented in the CFWI Solutions, this singular project shall require a reconnection of the two water management districts with the expectations the water management districts and perhaps the State will fund these reconnection activities.

This rather myopic, singular project view, discounts the potential values associated with a more regional look. This single project, myopic view disregards totally the potential benefits that may be associated with a constellation of public and private regional/local projects and more importantly, the input of those potential solution contributors/stakeholders.

Project Requirements (Grove Land Reservoir & STA/ Grove Land Utilities, LLC)

Agreements; Partnerships; Operations/Management; Supply & Demand

The CFWI documents make repeated references that project partnerships and project governance will need to be developed, and operated and maintained by Grove Land Utilities, LLC through a private public partnership with the SFWMD and/or the SJRWMD. The CFWI documents state the partnership has yet to be defined as the related Groveland Reservoir and Stormwater Treatment Area is still in the conceptual design.

While there is continual references to the Grove Land Reservoir and STA as the CFWI funded project, there is also repeated references to Grove Land Utilities, LLC as the operating entity, (Utility Authority?) It does add to the question as to who will be, or who is, the ultimate responsible project party, be it Grove Land Reservoir & STA or Grove Land Utilities, LLC, or some parent organization.

A review of the CFWI documents and project requirements implies the necessity for the project owners and the WMD's and State agencies to enter into some type of formal agreement/arrangements for the purpose of accomplishing and identifying the project intents and provide the project not only sufficient water supply, but delegated authority to manage that resource in the intent of their stated goal of not selling, but providing storage and treatment. From a business perspective, it would appear the project must have a guaranteed level of SUPPLY (Water) and a guaranteed Service area (Customer Base) DEMAND for Storage and Treatment. As a result, It would appear the WMD's; FDEP and FDACs will be required by the project's ownership to enter into some formal type of authoritative mechanism or delegation for an extended period of time (50 years?) to satisfy the project's sustainability.

While it is understood from a business investment position the need to have finite details and assurances of those Supply/Demands numbers, one would also expect that water users, now and in the future in these earmarked WMD's basins, would also need to have that same level of information to allow them the opportunity to assess in as objective a manner as practical, what effects, if any, the subject project and all its associated conditions will have on them. Without an informed position, one can only speculate based on what they may know or experienced in the past as to an outcome.

Therefore, based on a review of the CFWI project information, it would appear this project/ownership will put forth an agreement/understanding/ intent document, etc., comprised of their project conditions/demands, which will be required to be met by the State and WMDs, for which the State, as represented by FDEP & FDAC, and the SFWMD and SJRWMD, will be required to assure the project ownership the following will occur through those collective endorsements;

1. The project will be the designated choice (preferred) for regional alternative water supply; management and protection through the provisions of benefits to water users in the SJRWMD and the SFWMD.
2. The project will be assured (guaranteed) by the WMD's that there is and will be an adequate water supply to meet project objectives for water supply to ultimate water supply destinations- consumptive uses. (Water Reservation?)
3. The project will be the beneficiary/recipient of an agreement between WMD's as to each WMD's role and water allocation to those who participate in the projects' stated storage and treatment opportunities.

4. The project will be provided some form of use permit authorization (delegation) to participating parties who enter into allocation agreements with the project's ownership. Given the project is requiring a 50 year permit and associated water reservation, it would appear this resultant private/public agreement will provide the capacity for the project, through authorization or delegation granted by the State/WMD's, to provide similar long term permits/authorizations to the project's storage and treatment customers and project beneficiaries.
5. The applicable State and/or WMD's will identify/assign to the project, an enforceable jurisdictional service area based on their (Project Ownership/State/WMDs) collective determination of regional needs; water supply planning documents and client (customer) needs for storage; treatment; re-charge.

An agreement through these aforementioned actions would appear to reinforce the State and WMD's understanding of the project's values to the project ownership as well as the general public. The projects standing with the State and the WMD's would be further enhanced by the subject project ownership's requirements to be granted the following conditions applicable to its assigned and recognized authority as granted by the State and WMD's. These conditions are highlighted in the CFWI documents as project/ownership requirements which will need to be granted for project sustainability. To that end the Project ownership will require they;

1. Are assured a water supply from all excess stormwater from the SFWMD's C-23; C-24 & C-25 *Basins* as well as the SJRWMD C-52 *Basin*.
2. Are given a 50 Year permit with water reservations.
3. Are assured a customer base (Participants), to be served by some form of agreement
4. Have a range of revenue opportunities to include
 - a. Water Utilities located near the project as well as in SJRWMD
 - b. Existing and Future water Users located near the project
 - c. Local Agencies
 - d. Agricultural Landowners
 - e. Federal Government
 - f. State of Florida

SOME GENERAL QUESTIONS

Project Design/Conveyance Routing

1. Most property in the regional and immediate area to the project is permitted to utilize the WMD's primary canal systems for water supply and discharge/flood control. Given these same primary WMD's canal systems are integral to the project's design to sustain the project's goals, what assurances will be provided to current permit holders now and through any subsequent permit modification, that their permit conditions and on-site water management, will not be impacted by the project.

2. The project proposes a second south outflow component as stated in the CFWI documents. "...an existing flow-way (C-52E) in the St. Johns Improvement District (SJID) would convey the water east to a SJID canal at 122nd Ave. SW, which would then convey it south to the C-25 Canal. No improvements to the SJID canals are expected to be needed."

Given the existing permitted uses of the WMD's canal systems, such as the C-52 system, what impact will be placed on neighboring properties given this designed conveyance routing? As stated in the CFWI documents, as noted above, the conveyance routing will utilize the SJID system south to C-25. There is no SJID canal system which flows currently south to C-25 through St. Lucie County. The SJID lies wholly within Indian River County and has no jurisdiction nor jurisdictional areas within St. Lucie County.

3. There are several Special Districts; Water Control Districts; Agricultural Co-ops; Cities; Towns, Counties, Utilities; etc., located within the Grove Land Reservoir and Stormwater Treatment Area as depicted on Figure C-5 in the CFWI Project documents. One could presume these entities have a vested interest in the state of affairs governing water in this region now and in the future.

In general, with these new proposed project structural connections; system modifications; and conveyance routes planned as part of the project design, what assurances have been provided/communicated to these stakeholders that their land ; ground water; surface water; utilities; plans; etc., will not be influenced by the projects design and associated operations

FLOOD CONTROL/STORMWATER DISCHARGE

The CFWI project narrative refers to potential local concerns relative to the timing of pumping/discharges from the project in conjunction with severe weather events. The project's documentation provides that any potential and resultant associated surface water /conveyance conditions relative to these weather events, will be managed through an operational agreement between the Project ownership and the SFWMD and/or the SJRWMD.

Should not those entities whose discharge /flood control capacity may be influenced by pumping/discharges also have a voice in these operational matters?

- A. What specific operational protocol / communication chain will be implemented by both SFWMD & SJRWMD to insure regional flood control/discharge capacity will not be impacted negatively by this project? Who regulates compliance?

UTILITY WITHIN AREA & LOCAL AGENCIES

1. Given many local utilities within the SFWMD and the SJRWMD presently uses groundwater (well systems) and not surface water supply for their utility customers, will their utility's capacity/capability to meet current and future public water supply needs be hindered or diminished in any way by this project's long term water use requirements and project's overall influence?
2. The project's documentation notes that water utilities located near the project in both the SJRWMD and SFWMD areas represent a revenue stream. What specific financial charges would be levied against utilities near the project to constitute this revenue source?
3. Local Agencies as noted in the reviewed project documentation is an all-encompassing terms applicable to Cities? Counties; Special Districts; Towns? etc. etc.

Same question as # 1 & 2 above;
 - a. Will the capacity to meet current & future agency needs be impacted?
 - b. What specific financial charges will be applied?
4. What's the Service Area – jurisdictional area of this project not only relative to surface water but also ground water influence and any and all projected project influences as to Storage/Treatment; and potential future position relative to BMAPs-Water Quality Credit Trading; TMDLs?

ADDITIONAL CONSIDERATIONS

By design and supporting project document narrative, the project appears to monopolize all surplus water throughout the SFWMD (Upper East Coast System –C-23; C-24 & C-25) as well as the SJRWMD C-52/L-79 System.

Given this apparent monopoly of regional water resources for this singular project, what effects or resultant actions will be experienced by current and future uses within the regional area in consideration of the projects anticipated agreement relative to;

- a. CUP Impacts
What priority ranking will be given to other's future water supply / consumptive use needs as compared to the projects?
What specific impact will this project as a preferred water source have on any current and future permits?
- b. Does the SFWMD Upper East Coast water supply plan incorporate this projects' water use needs in their 50 year projection? If so, what per cent/volume of the UEC water supply capacity is earmarked for this project through the next 50 years?

- c. What impacts will the application of a 50 year permit and associated water reservation for the Project have on future water needs within the region? Both within the SFWMD as well as the SJRWMD?
- d. What effects will the State and WMD's project endorsement as solidified through a letter of agreement/intent designating the project as the regional supply/storage and treatment source have on future water users in the regional area?
- e. Who will ultimately determine/govern the project's customers? Customer Agreements? Costs-Fees etc. (Presumption is that given this is a Utility –the PSC will somehow be involved??)
- f. Who will determine the regional Service area served by Project? Water planning areas?
- g. The project identifies specific WMD canal systems that will need to be modified at WMD expense as a project requirement. While the project's documentation stipulates the WMD's will pay for any design, modification, construction costs, permitting, etc., who will be responsible for the upkeep of these modified systems? Recall these primary canal systems are part of a federal project and were designed to the specifics associated with that federal design criteria. Who determines if the dynamics of the projects or associated project activities which utilize the public conveyance system provided by the WMD and other canal systems, degrade as a result—who pays to maintain; who decides as to cause; responsibility.

Wetlands & Endangered/Protected Species

Some of the project's conveyance corridors as noted in the design nomenclature, have established wetlands areas and a Wood stork nesting areas.

Who is responsible for any associated mitigation matters regarding these matters?

Given the physical relationship of the project's designed conveyance corridor to the St. Lucie County Wetland's Preserve—

Who is ultimately responsible for overall operational management and the responsible party for any resolutions and/or mitigation which may result of damages to wetlands; wetland habitat or endangered/ protected species?

SUMMARY

The CFWI Website-Executive Summary notes that over the past few years 122 public workshops, presentations, and meetings were conducted to explain the CFWI RWSP, collect input on the major components of the CFWI RWSP, and develop water resource and water supply development project options. The Involved parties should be applauded for these efforts to reach out to the communities in such a progressive manner. Recognizing the needs for a diverse stakeholder input , Agricultural leaders; Cattlemen; Chamber Leaders; Environmental Leaders, Government , State ; Local; Regional were

solicited and actively participated in these developmental proceedings as evidenced by the attendee lists.

By design, the CFWI planning area excluded the Martin; St. Lucie; Okeechobee and Indian River County areas.

With the inclusion of CFWI project consideration and funding for the Grove Land Reservoir and STA project now incorporated in the CFWI Solutions Plans, the door, which was closed previously to those excluded counties of Martin; St. Lucie; Okeechobee; and Indian River, as well as the regional cities; towns; special districts; water control districts; Co-ops etc. was cracked open to allow for this singular projects' inclusion for solutions consideration and funding as noted in the CFWI documents. That door needs to be opened all the way, NOW. All the regional stakeholders must be given the opportunity to receive and digest all applicable project information and formulate and voice their own opinion regarding what influences, if any, this project may have on them and the folks they represent. They also must have the continual opportunity to be heard, not only for this project, but for any project, and for any and all matters proposed or under evaluation by the CFWI which has the potential to influence this regional area.

SUGGESTION

1. Similar to the series of Public meetings which have been conducted in the past and as noted on the CFWI website to a diverse group of Stakeholders, no such detailed public discussions appears to have been held with the wide range of stakeholders in the basins identified with the Project as highlighted with the project's document Figure C-5. Namely those stakeholders with public and private interest in Martin; St. Lucie; Okeechobee and Indian River Counties. A review of CFWI meeting attendee lists supports the lack of this regions participation.

Perhaps, given the project in question may have been added recently to the solutions team list, and given the CFWI acknowledges this Solutions Plan project is not actually located within the CFWI Planning Area, may have contributed to this lack of public/private awareness within the aforementioned County areas.

Therefore, the suggestion is that the funding remain, or worst case scenario be pushed into future years in the funding/planning schedule and that any subsequent CFWI actions not be myopically focused on a singular project, but take into consideration a total regional view and solicit input from a diverse range of regional stakeholders as part of the process to determine the most optimal public purpose benefit now and in the future.

2. Given this particular project's stated goals of storage and treatment and the suggested associated benefits for the Lagoon and the St. Lucie Estuary, applicable Local; State; and Federal Programs/Parties, such as the National Estuary Program, should be involved in an assessment of this project's potential contributions toward that goal, as well as actively involved in a detailed assessment of any project that purports to have a design and purpose beneficial to this objective or requests CFWI funding for that proposed deliverable.

Respectfully submitted,

Robert J. "Bob" Ulevich

President/ Project Manager Polymath Consulting Services, L.L.C.

Joe Bourassa, Concerned Citizen - Comments Received 11/29/2013

Comment 1 (11/29/13) - I have printed out both sections of your CFWI WSP and have to wonder what all those experts that composed those 556 pages are doing now ?? Hopefully putting together the necessary "revised edition" that brings the base line statistics up to a more reasonable 2012 time frame and discarding the 2005 data basis and even the 2010 Water use "projections" rather than using the 2010 actual estimate---that surely was available well before this publication.

Comment 2 (11/29/13) - On top of that you extend the limit 25 years, rather the the typically prescribed 20 years---WHY ??

Comment 3 (11/29/13) - Of course I am only 1/3 through the basic 225 page report but can't help notice the tiring repetition, but that is Government. I sure hope I find your CFWI presentation graph to the Steering Comm. that showed **no increase** in Total Water Use in 15 years in the Appendix's, and it's contrast to the new projections.

Comment 4 (11/29/13) - This report sure runs contrary to the USGS's most recent [Marella 2013] report that shows that we in Fl. use 6.4 % **less** "Total Water" today then we did in 1975---35 years ago !! Especially interesting is the big play on MFL's when it's original Legislative direction and present Statute clearly indicates it only applies to **increased** "Withdrawals" when your historical 1995-2010 [15 Yrs.] water use graph indicates **no** Increase !! How can we have a "failure to meet a MFL" when there has been no increased "Withdrawals" ??

Comment 5 (11/29/13) - I expect to provide extensive "Public Comment" to the report directly to you and the primary stakeholders by other than by the CFWI website manner, which is too restrictive. Sure hope to see it on the website in the future.

Joe Bourassa, Concerned Citizen - Comments Received 12/02/2013

Appendix Table A-21, pages 57-137 prompts a number of COMMENTS.

Comment 6 (12/02/13) - The use of such a LIGHT color at the bottom of the page's make them virtually unreadable. Why not a Std. Black font ?

Comment 7 (12/02/13) - The Format used on those 80 pages contains so much WASTED white space [>50%]and the use of such a VERY SMALL font makes it extremely difficult to read by citizens, especially older ones.

Comment 8 (12/02/13) - The bulk of the Comments are from Utilities and Consultants that are concerned about the "Projections" and their effect on their CUP's / WUP's. Ms. Bader"s constant indication that they were not connected sure raises many questions in even Citizens mind's. Please clarify why the are different, yet why the new CFWI method is superior for "Planning Purposes" ??

Comment 9 (12/02/13) - I will address to you my COMMENTS on both the Population & Water Use issues in follow up emails but agree in general that the latest BEBR and actual estimated Water Use should be used in this ever so important CFWI report.

Comment 10 (12/02/13) - Note; why can't I print out this comment form ??

Joe Bourassa, Concerned Citizen - Comments Received 12/27/2013

Comment 11 (12/27/13) - It should be obvious to anyone that still thinks intelligently that one can not possibly critique 500+ pages of this CFWI DWSP in this simplistic format.

Confounding that, there is no simple way to get a copy of what one presents here.

With both of those points in mind, I plan on sending a copy of my relevant material by USPS to DWSP Chair Tom Bartol before the Jan. 10th deadline for inclusion in the forthcoming "Comments" section---slated for March--- and expect to see it included there in it's complete form.

Please respond if that is not agreeable with the stated policy ??

Joe Bourassa, Concerned Citizen - Comments Received 1/16/2014

Comment 12 (01/16/14) - In reviewing the PS Water Use data numbers by Utilities in your CFWI report, I first come across a number of major deviation.

1; Polk Co.---Winter Haven and Lakeland.---where your CFWI report lists the 2010 Lakeland Utility's use as 24.43 MGD while the SWFWMD lists it as 20.27, a major discrepancy,

Winter Haven you list the 2010 use as 10.75, while SWFWMD says 9.179 MGD

2; Seminole Co.---Seminole City use on the District's website says it was for 2010, 18.3 while your CFWI indicates 20.25 MGD.

For Sanlando, CFWI indicates 10.49 while the District says 7.44 MGD.

For Sanford CFWI indicates 7.10, the District says 6.87 MGD

3; Lake Co---Lake Util, CFWI indicates 7.47, District shows 5.21 MGD

For Leesburg, CFWI says 9.121, District says 4.82 MGD

There are more, and they all point to higher CFWI uses than even the SJRWMD's reported ones. WHY ?? Of course you might have evidence that SWFWMD sent you incorrect data, or there is other possible error sources, [even mine?]]BUT as the Director of that Water Use Group, you are ultimately responsible for what the CFWI published data shows.

Please look into why these major differences exist before I submit them to the CFWI's "Steering Group" and Media. Await hearing from you shortly !

Joe Bourassa, Concerned Citizen - Comments Received 1/20/2014

Comment 13 (01/20/14) - I sure understand what the report say's but want to know why the "2010 Planning Numbers" are so much higher than the 2009 or 2010 ACTUALS ??

Since the CFWI RWSP report was not issued till 2013, It would seem to make sense that the real 2010 numbers, available by Oct. 2010 could/should not have been substituted and used by 2013 ??

I have put together a report of the difference between the assumed CFWI 2010 numbers and the Actual 2010 numbers and will publish that soon. You and Tammy have so badly managed the situation, that a redo is definitely required, and ASAP.

Of course the difference in trend, exhibited between the 2010 "Actuals" and my recently collected 2013 numbers for PS {Utilities} sure destroys the whole direction exhibited in the CFWI report. Of course you can just redo the report again ??

Joe Bourassa, Concerned Citizen - Comments Received 1/22/2014

Comment 14 (01/22/14) - I thought I would put together a list of just thr SJRWMD"s "ERRORS" that appear to be in the CFWI's data base, and give you and Tammy an opportunity to correct any inaccuracies.

I have some of the comparable larger Utility data for SWF & SF but they are so much smaller percentage wise than yours. As previously indicated by email, I understand that you thought you covered yourself by indicating that the numbers used for PS in that report were "tentative", but to miss by 20+ %, always on the plus side sure might lead one to feel it was a very positive decision to create the need for more District attention and taxpayer money ??

A full report will be forthcoming on what the 2012 & 2013 PS data from the major CFWI Utilities actual use has been for inclusion in the Citizen Comments that have been solicited.

This attachment will be sent to the CFWI Steering Comm. & others. tomorrow if you do not reply today !

Joe Bourassa, Concerned Citizen - Comments Received 1/22/2014

Joe Bourassa (1/22/2014) Comment 14 Attachment

CFWI RWSP PS-- SJR's USED vs ACTUAL

	2010 CFWI REPORT	SJR 2010 ACTUAL	DIFF.
COCOA, SJRWMD	23.76	23.43	0.33
LEESBURG, SJRWMD	9.12	4.82	4.3
LAKE UTILITY, SJRWMD	7.47	5.21	2.26
APOPKA, SJRWMD	8.77	7.53	1.24
WINTER PARK, SJRWMD	10.09	9.68	0.41
LEESBURG, SJRWMD	9.12	4.82	4.3
LAKE UTILITY, SJRWMD	7.47	5.21	2.26
SANLANDO, SJRWMD	10.49	7.44	3.05
SANFORD, SJRWMD	7.1	6.87	0.23
SEMINOLE CO., SJRWMD	20.25	18.3	1.95
ALTAMONTE SPR'G's SJR	5.02	5.02	0
GRAND TOTAL	118.66	98.33	20.33

20.7 % ERROR
 XXXXXXXXXXXXXXXXXXXX
 JB JAN. 2014

Joe Bourassa, Concerned Citizen - Comments Received 1/24/2014

Comment 15 (01/24/14) - I see that the closing date for "Public Comment" has been delayed 20 days--- hopefully so that the SJRWMD can publish the real 2010 PS Water Use numbers in place of those previously presented in the CFWI's DWSP.

I attach a sample of the error [20 %] that was in the previous numbers, even though the CFWI DRWSP was published in Nov. 2013, at least 1 1/2 years later than the 2010 numbers were available.. A more complete analysis is coming.

I sure hope you Steering Committee members have enough personal integrity such that you would never sign off on a report that had that kind of error in the most basic variable that drives all the reports conclusions and direction. *(Same attachment submitted as shown in Comment 14.)*

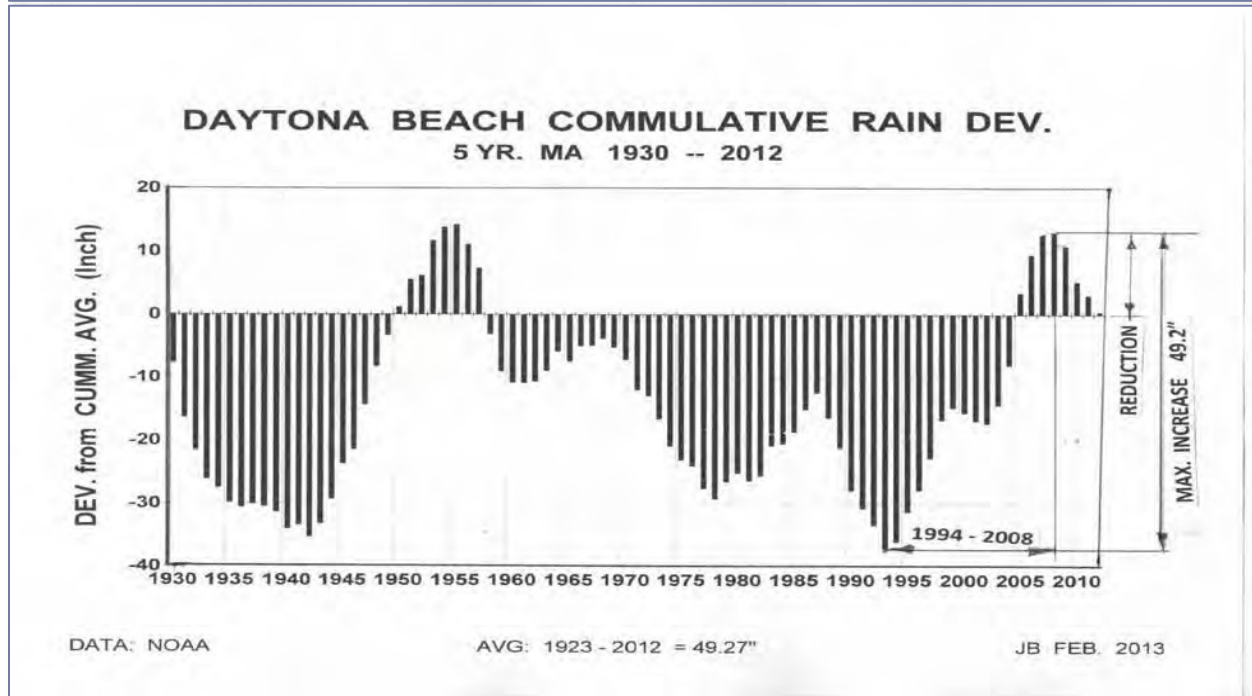
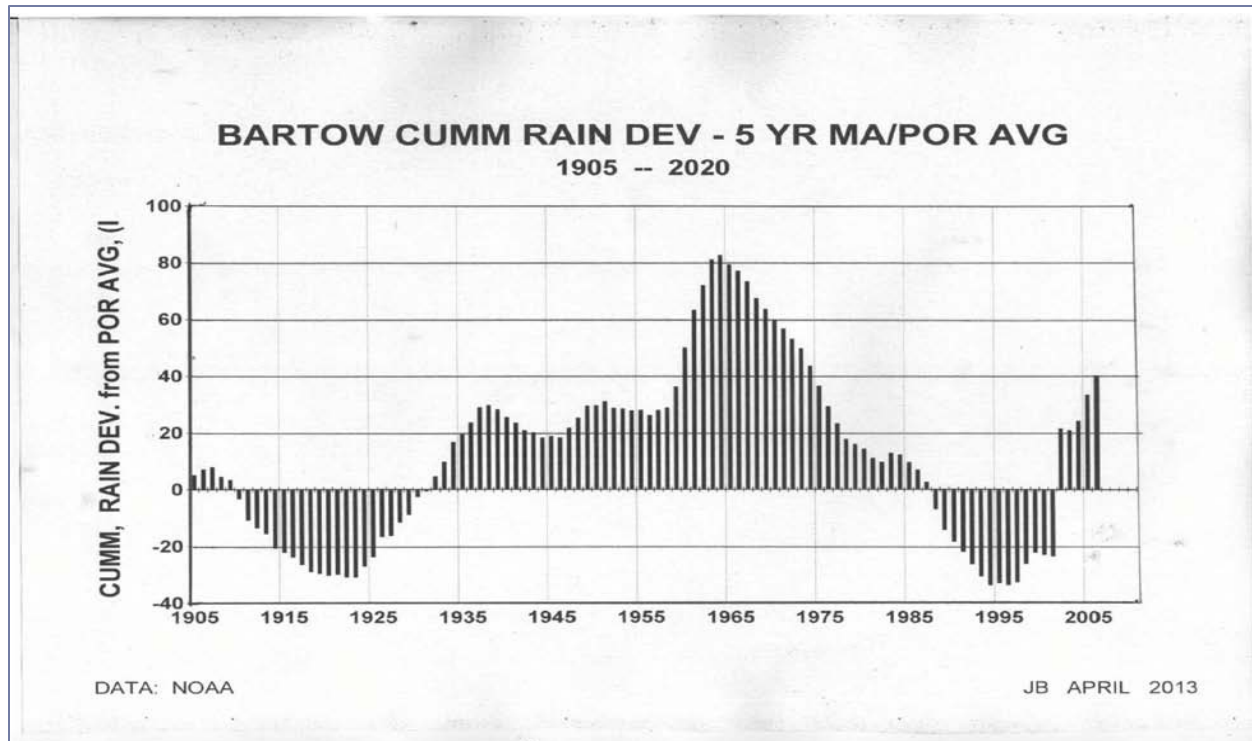
Joe Bourassa, Concerned Citizen - Comments Received 2/16/14

Comment 16 (02/16/14) - As part of the whole CFWI project there are a number of planned projects [e.g. MFL] that are based on studies of the past rainfall pattern in setting the "withdrawal" limits and MFL violations.

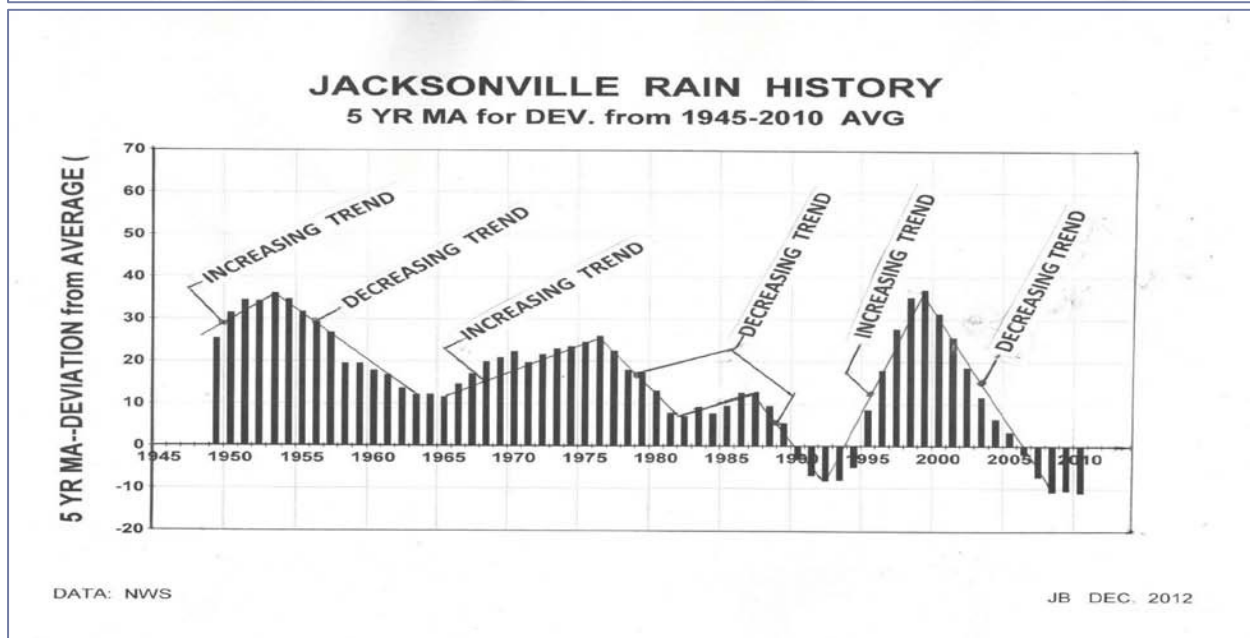
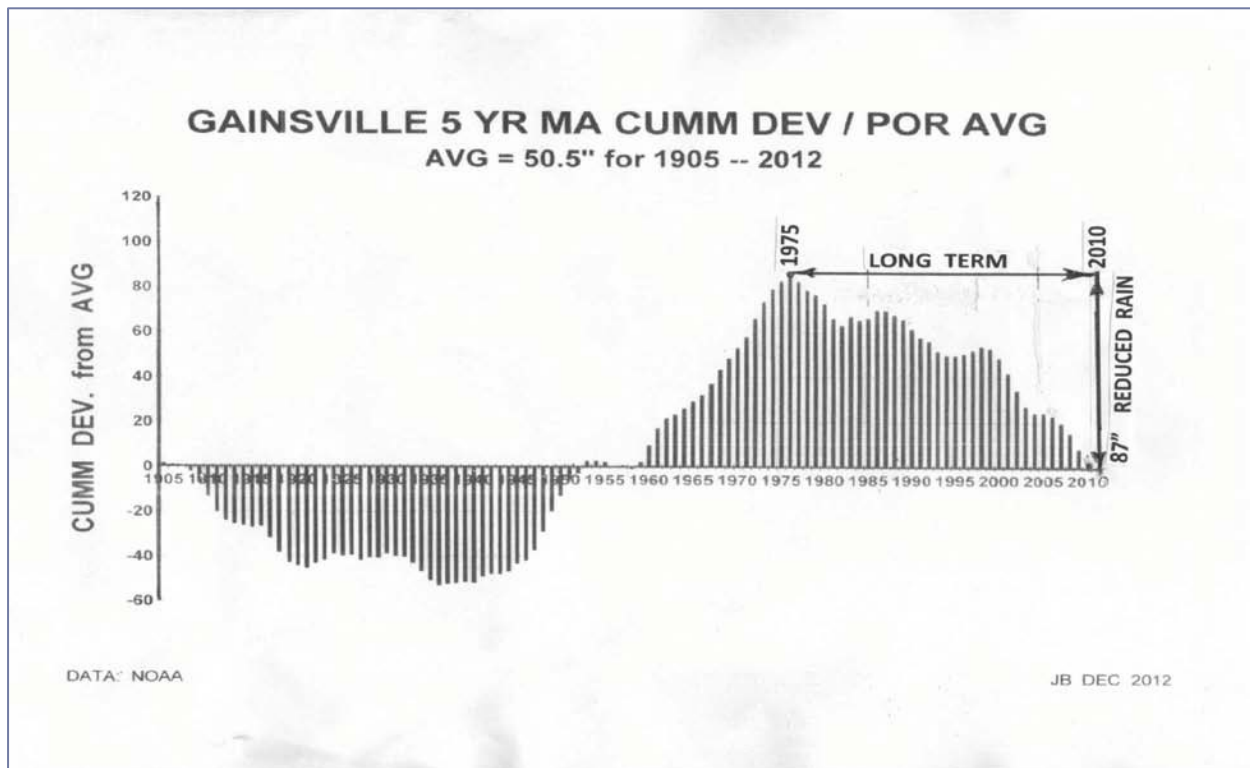
Unfortunately those studies were based on a long term "No Change" rainfall pattern that is not a realistic evaluation of what has happened rainfall wise. I want to believe that all individuals in the CFWI Study and Future Planning groups understand the overriding importance of rainfall in any hydrological condition,

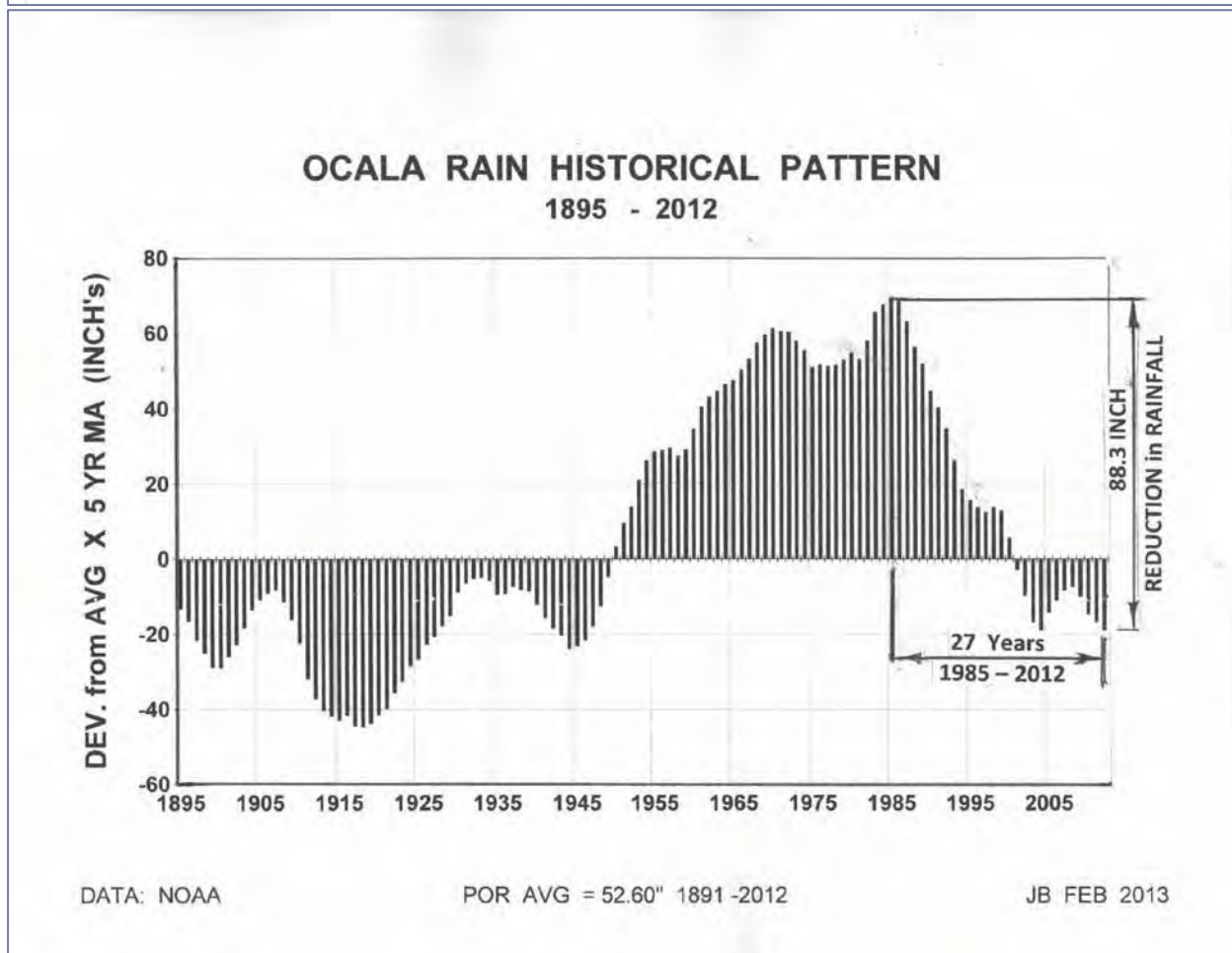
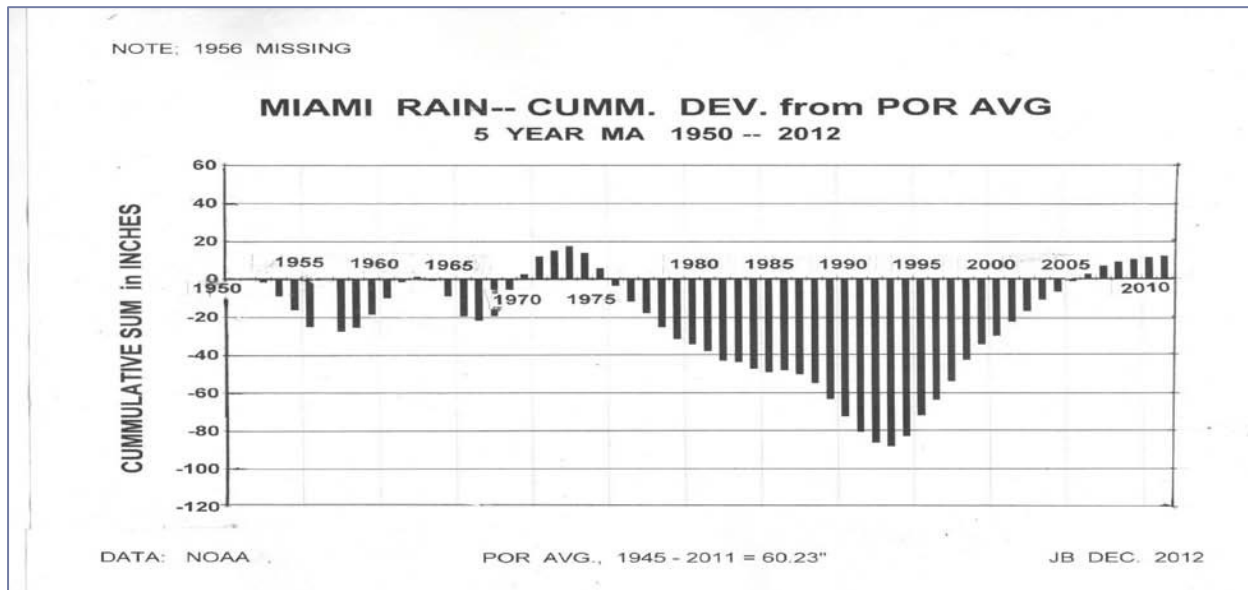
With that in mind and knowing that the whole MFL program was established by the Legislature to be directed at "Withdrawals" and not the multidecadal cyclical rain [variations.as](#) indicated by my attached graphs, it is imperative that all previous MFL studies be re-evaluated taking into account what the many "Cumulative" rain patterns indicate for hydrological conditions, That is especially important for those MFL's established before the latest 2000, 2006-7 and 2000 droughts.

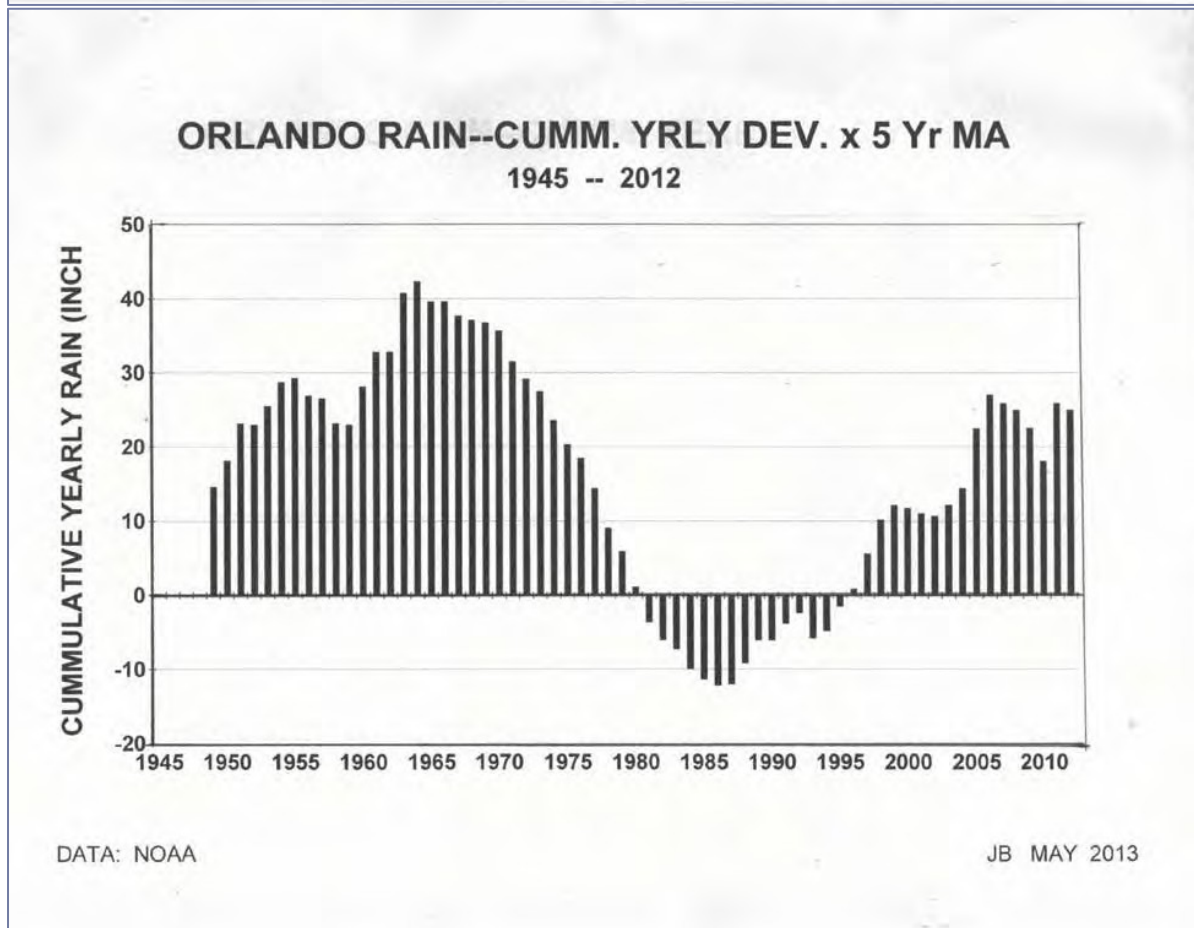
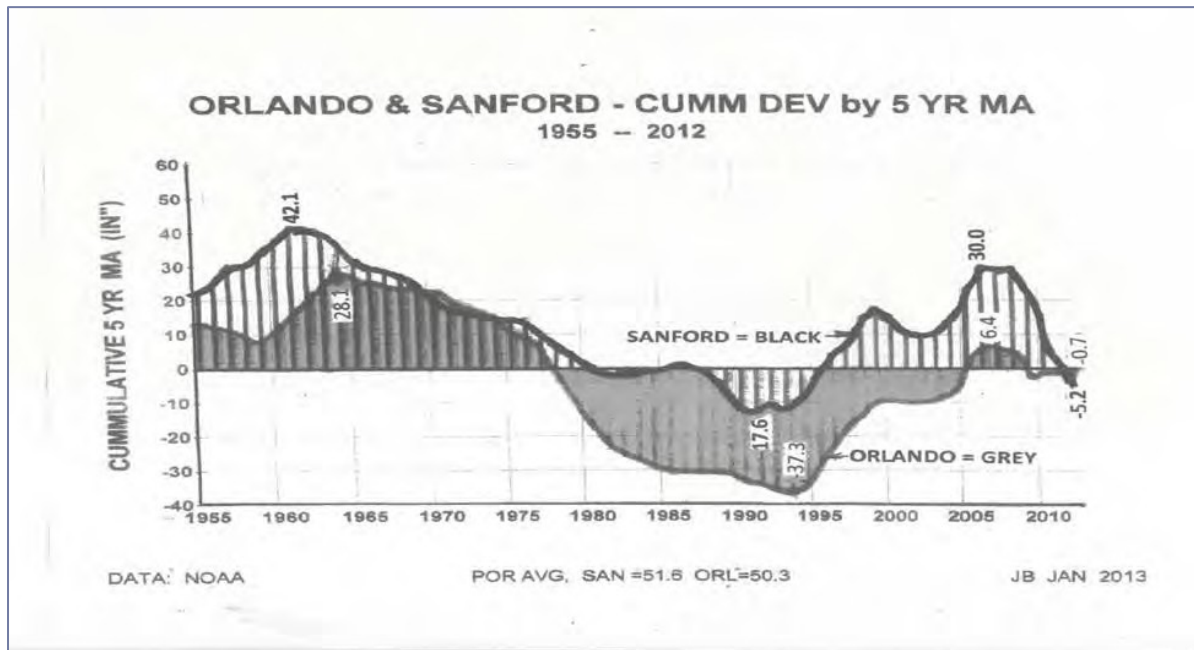
I believe that the attached graphs are of such overall public significance that a full size copy of each should be part of the planned publication of the Public Comments", If a hard copy is required just let me know tomorrow "Monday" and I will provide it.

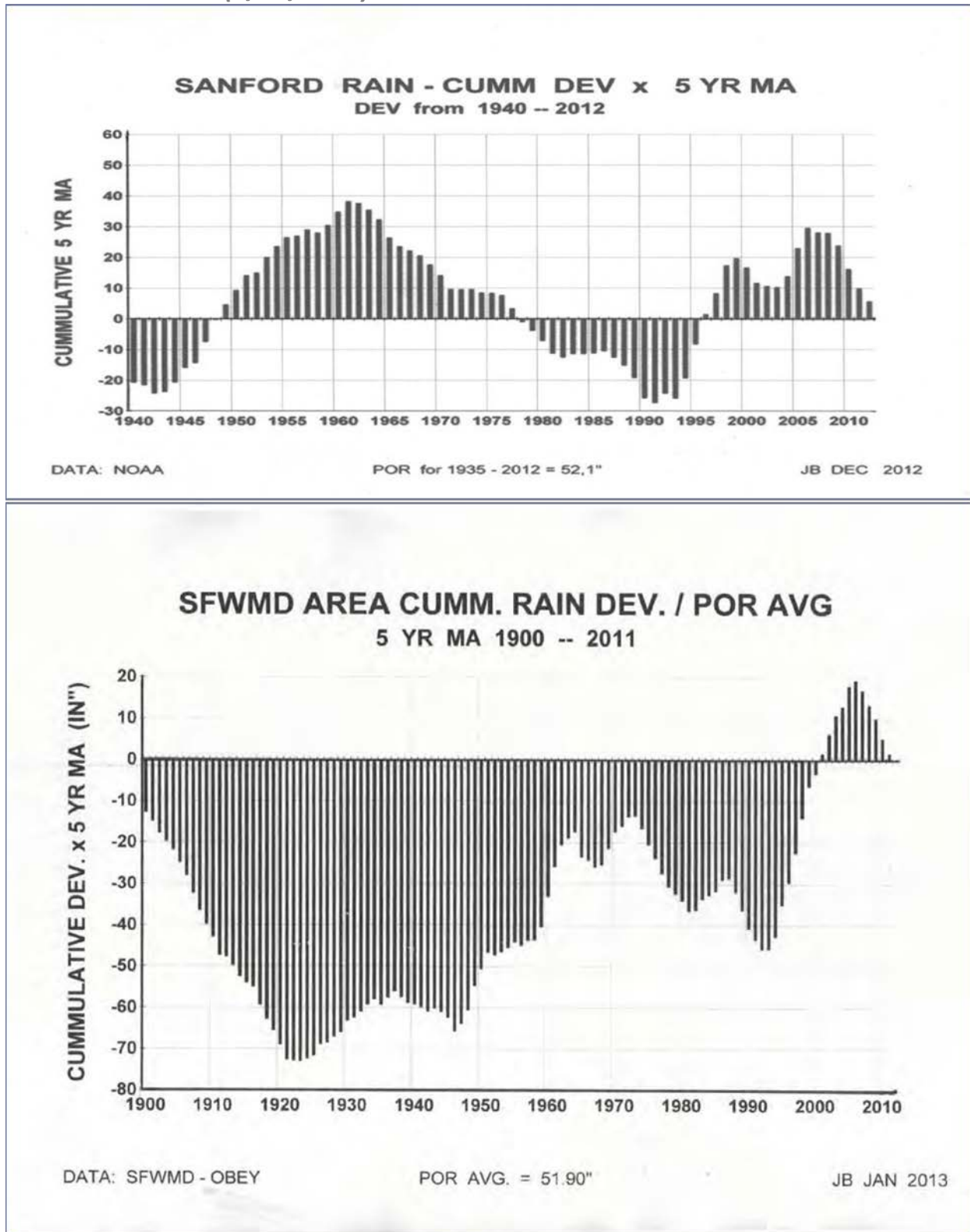
Joe Bourassa (2/16/2014) – Comment 16 Attachments

Joe Bourassa (2/16/2014) – Comment 16 Attachments



Joe Bourassa (2/16/2014) – Comment 16 Attachments

Joe Bourassa (2/16/2014) – Comment 16 Attachments

Joe Bourassa (2/16/2014) – Comment 16 Attachments

Joe Bourassa, Concerned Citizen Comments Received (2/19/2014)

Comment 17 (02/19/14) - Since the District has not published it's Historic Total FW Use by County, I thought I would send my copy on for inclusion in the CFWI "Public Comment File" to put into perspective the CFWI's "Projections". A simple 3 pages that let's every interested County Stakeholder or Citizen know where the latest USGS's 2013 report of FL. Total Fresh Water Use is derived from, and why it shows that we now in 2010 use 6.6% LESS FW than we did in 1975, 35 years ago !

I await seeing the publication of these "Public comments" soon..

Joe Bourassa (2/19/2014) – Comment 17 Attachments

SJRWMD TOTAL GW & SW USE -- By County 1980-2012 Page 1

	ALACHUA				BAKER				BRADFORD				BREVARD				CLAY				DUVAL				
YEAR	Grnd.Surf	Total	5 Yr MA		Grnd.Surf	Total	5 Yr MA		Grnd.Surf	Total	5 Yr MA		Grnd.Surf	Total	5 Yr MA		Grnd.Surf	Total	5 Yr MA		Grnd.Surf	Total	5 Yr MA		YEAR
1980	27.9	1	28.9		4.8	0.6	5.4		0.1	0	0.1		171	20.3	191		19.1	1.3	20.4		141	1.4	143		1980
1981	31.3	4.1	35.4		4.6	0.6	5.2		0.2	0	0.2		39.3	67.4	107		20.3	1.3	21.6		145	2.3	148		1981
1982	31.3	1.5	32.8		4.1	0.6	4.7		0.2	0	0.2		88.5	26.6	115		17.8	1.3	19.1		130	2.3	132		1982
1983	30.4	1.5	31.9		5	0.6	5.5		0.3	0	0.3		89.1	27.6	117		16.4	1.3	17.7		134	2.3	136		1983
1984	32.1	1.4	33.5	32.5	4.5	1.1	5.5	5.3	0.4	0	0.4	0.24	99.4	29.7	129	132	18.5	1.4	19.9	19.7	144	1.4	146	141	1984
1985	28.5	0	28.6	32.4	5.4	2.2	7.6	5.7	0.3	0	0.3	0.28	116	39.8	156	125	21.3	5.3	26.6	21	151	1.4	153	143	1985
1986	28.9	0.1	29.9	31.3	5.6	2.2	7.8	6.2	0.3	0	0.3	0.3	124	26.3	150	132	22.6	4.9	27.5	22.2	141	1.2	142	142	1986
1987	30.3	0.2	30.5	30.9	5.8	2.2	8	6.9	0.4	0	0.4	0.34	110	27.2	137	125	23.4	0.4	23.8	23.1	162	1	163	148	1987
1988	31.1	0.2	31.3	30.8	5.9	2.2	6.1	7	0.5	0	0.5	0.38	119	30.8	149	133	24	0.3	24.3	24.4	162	1	163	153	1988
1989	32.5	0.2	32.6	30.6	7.1	2.2	9.3	7.8	0.3	0	0.3	0.36	110	26.4	137	138	23.9	0.3	24.2	25.3	161	1	162	156	1989
1990	35.6	0.2	35.7	32	7.1	2.2	9.3	8.1	0.3	0	0.3	0.36	118	26.6	149	144	25.2	0.4	25.6	25.1	143	1.4	154	157	1990
1991	31.2	0.2	31.3	32.3	6.2	0.9	7.1	8	0.4	0	0.4	0.38	129	26.8	145	146	25.4	0.4	25.8	24.7	147	0.9	149	158	1991
1992	30.1	0.1	30.1	32.2	5.1	0.4	5.5	7.5	0.3	0	0.3	0.36	97.7	24.7	156	143	22.8	0.1	23	24.6	143	0.3	143	154	1992
1993	32.2	0.1	32.3	32.4	4.4	0.4	4.8	7.2	0.4	0	0.4	0.34	154	29	122	145	21.4	0.4	21.8	24.1	142	1	143	150	1993
1994	32.4	0.1	32.5	32.4	4.2	0.4	4.6	6.3	0.4	0	0.4	0.36	151	30.1	183	142	23.1	0.4	23.5	23.9	142	1	143	146	1994
1995	31.8	0.1	32.8	31.8	4.4	0.6	5	5.4	0.4	0	0.4	0.38	113	22.5	181	148	21.3	0.2	21.5	23.1	145	0.5	145	145	1995
1996	31.8	0.2	32	31.9	5.5	0.9	6.5	5.3	0.4	0	0.4	0.38	125	23.2	136	157	21.5	0.3	21.8	22.3	151	0.7	152	145	1996
1997	30.3	0.2	30.5	32	5.4	0.8	6.2	5.4	0.4	0	0.4	0.4	74.4	19.1	148	155	20.1	0.3	20.5	21.8	151	0.7	152	147	1997
1998	36.6	0.2	36.8	32.9	4.9	0.5	5.4	5.5	0.4	0	0.4	0.4	193	28.2	93.5	154	21.9	0.4	22.3	21.9	151	0.8	152	149	1998
1999	33.8	0.1	33.9	33.2	4.8	0.4	5.2	5.7	0.4	0	0.4	0.4	75.6	19.3	221	148	23.2	0.5	23.6	21.9	152	0.7	153	151	1999
2000	36.9	0.3	37.2	34.1	5.6	1.7	7.4	6.1	0.4	0	0.4	0.4	144	39.2	94.9	156	33.6	0.5	34.1	24.5	154	1.7	156	153	2000
2001	33.4	0	33.4	34.4	5.6	1.1	6.7	6.2	0.2	0	0.2	0.36	93.5	23.7	183	139	27.5	0.7	28.2	25.7	143	3	146	152	2001
2002	31.9	0.1	32	34.7	5.3	0.9	6.2	6.2	0.3	0	0.3	0.34	123	33.3	117	148	27.5	0.5	28	27.2	144	3.5	148	151	2002
2003	35	0.2	35.6	34.3	8.7	2.7	11.4	7.4	3	0	3	0.86	113	40.5	156	142	28.1	0.3	28.4	28.5	147	8.1	153	151	2003
2004	37.8	0.3	38	35.2	5.9	1	6.9	7.7	3.2	0	3.2	1.42	118	38.6	153	154	31.4	2	33.4	30.4	158	7.3	166	154	2004
2005	31.5	0.2	31.7	34.1	6.1	0.9	7	7.6	2.6	0	2.6	1.9	95.5	22.6	157	141	22.7	0.4	23.1	28.2	165	6.4	172	157	2005
2006	36.2	2.6	38.8	35.7	7.2	1.2	8.4	8.1	2.5	0.1	2.6	2.4	113	45.5	118	149	26.4	2.5	28.9	28.5	174	5.8	180	165	2006
2007	34	2.4	36.4	36	5.5	0.3	5.9	7.9	1.5	0.1	1.6	2.6	75.2	66.4	159	146	26.4	1.8	28.2	28.4	175	4.2	179	170	2007
2008	31.7	2.2	33.9	35.8	4.9	0.1	5	6.6	1	0.1	1.1	2.2	78.2	36.2	142	138	24.4	1.3	25.8	27.9	159	4.8	164	172	2008
2009	29.2	1.6	30.8	34.3	5.1	0.1	5.2	6.3	0.9	0	0.9	1.8	85	40	114	132	17.9	1.1	19	25	147	4.9	152	169	2009
2010+			29.2	33.8			4.7	5.8				0.9	1.4		125	135			23.7	24.1			160	157	2010+
2011+			29.2	31.8			7.9	5.7				1.5	1.2		137	135			24.9	24.3			163	154	2011+
2012+			26.3	29.9			9.4	6.4				1.4	1.2		131	130			19.8	22.6			148	157	2012+

NOTES: 1; All Data is in MGD-- Shown to 3 Significant Figures When Above the 0.1 MGD Lower Reporting Criteria
2; Years 2010*-2012* are ONLY REPORTED as TOTAL

18 DEC 2013

*Joe Bourassa (2/19/2014) – Comment 17 Attachments***SJRWMD TOTAL GW & SW USE -- By County 1980-2012 Page 2**

	FLAGLER				INDIAN RIV.				LAKE				MARION				NASSAU				OKEECHOBEE			
YEAR	Grnd.	Surf	Total	SyrMa	Grnd.	Surf	Total	SyrMa	Grnd.	Surf	Total	SyrMa	Grnd.	Surf	Total	SyrMa	Grnd.	Surf	Total	SyrMa	Grnd.	Surf	Total	SyrMa
1980	11	0.2	11.2		79.8	215	294		93.5	7.6	101		37	2	39		53.7	0.9	54.6		4.3	1.1	5.4	
1981	9.2	0.2	9.4		122	203	325		138	21.7	160		39.7	2.1	41.8		51.1	0.9	52		11.2	1.9	13.1	
1982	7.8	0.2	8		108	162	271		121	22.1	143		31.7	2.7	34.4		52.5	0.9	53.4		11.7	2	13.8	
1983	8.3	0.2	8.4		107	176	282		129	21.6	141		31.1	2.5	33.6		40.1	0.9	40.9		14.6	1.5	16.1	
1984	8.8	0.5	9.2	9.24	105	174	279	290	127	18.7	145	138	34	2.5	36.4	37	43.9	0.9	44.8	49.1	14.3	1.8	16.1	12.9
1985	9	0.9	10	9	45	107	152	262	64.9	8.3	73.2	133	31.6	3.1	34.7	36.2	46.1	0.9	47.1	47.6	7.8	0.6	8.4	13.5
1986	9.4	1.3	10.7	9.26	62.5	114	177	232	69.7	12.4	82.1	117	34.7	2.7	37.4	35.3	47.7	1	48.6	47	8	0.5	8.5	12.6
1987	8.7	1.1	9.8	9.62	64.2	106	170	212	89.8	12.7	103	109	32.4	1.4	33.8	35.2	43.6	1	44.6	45.2	7.3	0.3	7.5	11.3
1988	10.4	0.9	11.4	10.2	78.2	136	214	199	88	11.3	99.3	100	33.3	1.3	34.6	35.4	42.9	1	43.8	45.8	9.8	0.3	9.1	9.9
1989	11	1	12	10.8	71	107	178	178	96	13.5	110	93.3	36.7	1.3	38	35.7	41	0.5	41.5	45.1	9.9	0.3	10.2	8.7
1990	13.5	1.2	14.7	11.7	72.9	166	239	196	84.4	12.7	97	98.1	37.6	1.4	39	36.6	42.8	0.6	43.4	44.4	9.9	0.3	10.2	9.1
1991	11.4	1.1	12.5	12.1	62.1	98.5	161	192	97.3	17.2	115	105	32	1.1	33.1	35.7	43.1	0.2	43.3	43.3	10	0	10	9.4
1992	14.6	0.6	15.2	13.2	95.8	179	275	213	70.5	11.5	82	100	37.5	1	38.5	36.6	45.7	0.1	45.8	43.6	15.8	0	15.8	11.1
1993	13.2	1	14.2	13.7	79.7	134	214	213	74	12	86	97.8	33.4	1.1	34.5	36.6	48.6	0.2	48.8	44.6	12.1	0	12.1	11.7
1994	13.7	1	14.8	14.3	82.8	144	227	223	77	12.6	89.6	93.8	36.6	1.1	37.7	36.6	45.2	0.2	45.4	45.3	13	0	13	12.2
1995	13.6	0.9	14.5	14.2	76.6	136	213	218	75.4	7.7	83.1	91	39.9	0.8	40.6	36.9	44.5	0.1	44.7	45.6	12	0	12	12.6
1996	13.3	1.4	14.7	14.7	71.1	130	201	226	79.7	8.4	88.1	85.8	42.5	1	43.5	39	46.8	0.2	47	46.3	10.3	0	10.3	12.6
1997	13.2	1.5	14.7	14.6	53.2	87	140	199	78.7	7.8	86.6	86.7	39	1.1	43.1	39.9	46.8	0.2	47	46.6	6.8	0	6.8	10.8
1998	15.8	1.6	17.4	15.2	76.3	122	198	196	103	11.6	115	92.4	41.3	1.4	42.7	41.5	48	0.2	48.2	46.5	11.6	0	11.6	10.8
1999	18.3	1.2	19.5	16.2	59.9	96.7	157	182	79.7	6.1	85.8	91.7	40.9	0.9	41.8	42.3	45.2	0.2	45.4	46.5	7.9	0	7.9	9.8
2000	24.6	3.6	28.2	18.9	87.4	161	284	196	90.8	9.8	101	95.2	43.9	1.9	45.9	43.4	46.5	0.5	47	46.9	15.3	0	15.3	10.4
2001	16.4	0.4	16.7	19.3	67.8	124	192	194	84.4	7.2	91.6	95.9	36.5	2.9	39.4	42.6	47.7	1.2	48.9	47.3	11.8	0	11.8	10.7
2002	16.2	0.3	16.6	19.7	57.3	97	154	197	80.9	6.9	87.8	96.1	34.1	1.8	35.9	41.1	46.8	0.9	47.7	47.4	7.8	0	7.8	10.9
2003	15.8	0.1	15.9	19.4	79.3	120	199	197	77.9	38.7	117	96.5	39.5	1.9	41.4	40.9	47.9	2.4	50.3	47.9	4.8	0	4.8	9.5
2004	17.7	0.9	18.7	19.2	96.8	163	260	218	82.5	41.3	124	104	38	4.7	52.6	41	47.1	0.7	47.8	48.3	6.6	0	6.6	9.3
2005	15.5	3.8	19.3	17.4	71.6	112	184	198	74.8	10.3	85.2	101	35.4	1.2	36.6	39.2	52	1.8	53.9	49.7	17	0	17	9.6
2006	22.1	7	29.1	19.9	195	101	295	218	93.6	22.7	116	106	45.3	5.7	51	41.5	53.2	1.5	54.7	50.9	18.3	9.2	27.5	12.7
2007	26.8	9.2	36	23.8	79.9	38.4	118	211	97.2	18.6	116	112	44	5.5	49.5	44.2	50.3	1.5	51.7	51.7	14.2	7.1	21.3	15.4
2008	22.6	6.6	29.2	26.5	73.7	36.3	110	193	95.8	19.4	105	109	42.1	6.5	48.6	45.7	48.9	2	48.6	51.3	12.6	6.3	18.9	18.3
2009	18.2	4.9	23.1	27.3	92.8	45.6	138	169	79.2	19	98.2	104	40	5.3	45.2	46.2	47.1	1.4	48.4	51.5	15	7.5	22.5	21.4
2010+			23.4	28.2			143	161			104	108			45	47.9			50.5	50.8			17.2	21.5
2011*			26.3	27.6			168	135			114	107			44.8	46.6			53.3	50.5			19.6	19.9
2012+			21.1	24.6			158	143			114	107			36.3	44			52.9	50.7			10.5	17.7

NOTES: 1; All Data is in MGD-- Shown to 3 Significant Figures When Above the 0.1 MGD Lower Reporting Criteria
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JB DEC 2013

*Joe Bourassa (2/19/2014) – Comment 17 Attachments***SJRWMD TOTAL GW & SW USE -- By County 1980-2012 Page 3**

	ORANGE				OSCEOLA				PUTNAM				ST. JOHNS				SEMINOLE				VOLUSIA				
YEAR	Grnd.	Surf	Total	5 Yr MA	Grnd.	Surf	Total	5 Yr MA	Grnd.	Surf	Total	5 Yr MA	Grnd.	Surf	Total	5 Yr MA	Grnd.	Surf	Total	5 Yr MA	Grnd.	Surf	Total	5 Yr MA	YEAR
1980	128	106	233		2.8	0.2	3		60.2	25.6	85.8		30.8	0.5	31.2		60.2	0.4	60.6		65.9	5.9	71.9		1980
1981	151	34.7	186		9.2	0.8	10		64.9	9.6	74.4		37.5	0.5	38		55.7	0.4	56.1		69.6	6.2	75.8		1981
1982	144	4.6	149		7.6	0.9	8.5		50.8	38.7	89.5		41.1	0.5	41.6		61.6	0.4	61.5		69.3	6.2	75.5	75.1	1982
1983	142	30.2	172		7.6	0.9	8.5		47.2	42.6	89.9		44.1	0.7	44.8		68.7	0.4	69.1		73.3	2	75.2	102	1983
1984	153	30.2	183	185	7.6	0.9	8.5	7.7	57	15.7	72.6	82.4	44.1	1.4	45.5	46.8	73.3	0.8	74	64.3	71.2	5.7	76.9	127	1984
1985	144	50.9	195	177	6.5	1.2	7.7	8.6	70.3	20.1	90.3	83.3	50.2	1.1	51.3	46.1	66.8	2.1	68.8	65	86.6	118	204	154	1985
1986			200	180			15.1	9.7	66.2	23.8	90	86.5	49.5	1.3	50.8	46.3	70.8	2.3	72.4	69.2	78	124	202	181	1986
1987	148	47.8	196	189	5.6	7.2	12.8	10.5	68.9	16.7	85.8	85.7	37.2	1.1	38.3	46.9	66.4	2.2	68.6	70.6	86	124	210	209	1987
1988	144	41.4	186	192	6.8	7.2	14	11.6	73.5	17.2	90.6	85.8	44.5	0.9	45.4	47.2	67.4	2	69.4	70.6	88.5	124	213	224	1988
1989	166	52.8	219	199	6.8	7.1	14	12.7	73.2	17.7	90.9	89.5	47.7	1.1	48.8	45.4	72.4	2.1	74.6	70.8	90.8	125	216	222	1989
1990	160	60	220	204	5.6	8.1	14.7	14.1	63.5	19.3	83	88	51.3	1.4	52.7	47.3	71.4	1.8	73.2	71.6	77.2	203	281	218	1990
1991	133	49.9	183	200	7.4	9.7	17.1	14.5	47.7	41.9	89.6	87.9	40.9	1.1	42	46.6	61.2	1.2	62.3	69.6	67.3	122	190	215	1991
1992	136	67.7	204	202	8.3	11.4	19.7	15.9	49.4	52.7	102	91.2	47.4	0.4	47.7	45.1	65.9	0.5	66.4	69.2	71.3	119	191	213	1992
1993	130	45.4	175	200	5.4	9.5	14.9	80.4	42.1	46.3	88.4	90.8	40.9	1	41.9	43.8	67.2	1.1	68.3	69	79.2	122	201	189	1993
1994	127	32.4	160	188	5.6	9.6	15.2	16.3	30.3	47.2	77.5	88.1	40.2	1	41.2	44.5	81.4	1.2	82.6	70.6	82.7	121	204	173	1994
1995	132	24.2	156	175	5.9	9.2	15.1	16.4	38.1	50.3	88.4	89.2	45.7	0.6	46.4	43.6	84.8	0.9	84.6	72.8	82.8	75.4	156	152	1995
1996	141	29.7	171	173	5.7	8.3	14	15.8	49.9	34.3	84.2	88.1	44.2	0.9	45.1	45.7	81.1	1.1	82.2	76.8	103	7.8	111	132	1996
1997	136	20.4	157	164	4.8	7.5	12.3	14.3	41.6	36.2	77.8	83.3	42.9	0.8	43.3	47.9	72.4	1.4	73.8	78.3	80.2	7.6	87.8	110	1997
1998	155	33.5	189	166	8.4	14.8	23.2	16	47.6	51.1	98.7	85.3	51.3	1	52.4	49.8	79.9	1.3	81.2	80.9	90.4	8.2	98.6	100	1998
1999	148	2.1	150	165	2.8	2.9	5.7	14.1	49.1	48.9	98	89.4	51.8	0.8	52.5	49.1	71.7	0.9	72.6	78.9	85	8.2	93.2	96.3	1999
2000	157	5.3	163	165	29.5	19.1	48.5	20.7	40.4	48.9	89.3	89.6	52.6	3.2	55.7	48.7	88.5	1.8	90.3	80.2	97	12.1	109	98	2000
2001	134	3.7	138	166	20.9	15.1	35.9	25.1	26.5	47.7	74.2	87.6	38.3	3.1	41.4	43.9	68.4	1.3	69.7	77.5	81.9	10.9	92.8	98.6	2001
2002	135	2.5	138	159	12.5	9.3	21.8	27	24.7	45.8	70.5	86.1	39.6	2	41.6	40	65.3	0.8	66.1	76	80.1	16.1	96.1	101	2002
2003	141	5.5	147	155	29.6	29.9	50.5	32.5	24.5	44.8	69.3	80.3	25.1	3.2	28.3	35.9	77.6	1.1	78.7	75.5	86.7	14.6	101	95.4	2003
2004	141	5.5	147	147	22.8	32.1	54.9	42.3	23.4	43.3	66.8	74	28.5	4.4	32.8	39.6	85.8	1	86.8	78.3	84.3	40.4	105	101	2004
2005	145	4.6	149	146	51.1	0.7	51.8	43	23.4	28.3	51.7	66.5	32.3	3.2	35.6	43.5	68.3	0.9	69.2	74.1	76.6	5.6	82.2	98	2005
2006	158	7.7	181	144	84.6	32.5	97.1	55.2	34.3	29.5	63.8	64.4	43	16.8	59.8	39.6	73.9	4.8	78.8	75.9	91	15.6	107	98.3	2006
2007	160	9.3	169	152	17.7	8.9	26.5	56.2	24	26.9	50.9	60.5	45.4	15.5	60.8	43.5	73.7	5.5	79.2	78.5	83.1	11.4	94.5	98	2007
2008	142	6.7	149	158	15.7	7.9	23.6	50.8	20.9	27	47.9	56.2	37	10.5	47.4	47.3	65.8	3.9	69.7	76.7	76.6	10.9	87.4	95.2	2008
2009	136	7.7	144	158	15.5	7.8	23.3	44.5	22.2	26.4	48.6	55	36.7	11	47.7	50.3	66.5	4.5	71	73.6	75	11.2	86.2	91.5	2009
2010+			144	157			23.4	38.8			56.9	53.6			56.9	54.5			69.1	73.6			110	94.6	2010+
2011*			152	152			53.1	30			55.2	51.9			60.5	54.7			69.6	71.7			85.9	92.8	2011*
2012+			147	147			14.8	27.6			45.6	50.8			49.1	52.4			61.9	68.3			82.6	90.4	2012+

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Joe Bourassa, Concerned Citizen Comments Received (2/19/2014)

Comment 18 (02/19/14) - Of course even more interesting is the Districts PS-Utility Water Use History by Utility & County. Of course this takes a few more attachments [4] but feel assured that the District really wants all Stakeholders and Citizens to know the Historical PS Water use Facts to properly assess the present CSWT's "Projections". Again await seeing these facts in the CFWI's upcoming review of it's Public Comments, expected next month.

Joe Bourassa (2/19/2014) – Comment 18 Attachments

SJRWMD 2000-2010 UTILITY WATER USE DETAILS													
COUNTY	Permit #	NAME	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
ALACHUA	1674	Hawthorne						0.18	0.17	0.18	0.17	0.17	0.165
	11339	GRU-Murphree	25.41	26.1	25.7	25.77	26.42	24.59	25.81	27.2	25.81	24.58	23.6
	11364	Arredondo Farms						0.11	0.13	0.13	0.13	0.1	0
	Alachua	TOTAL > 0.24 now > 0.1	25.41	25.1	25.7	25.77	26.42	24.88	26.11	27.51	26.11	24.85	23.77
BAKER	15	MacClenny	0.81	0.82	0.77	0.73	0.82	0.86	0.89	0.92	0.89	0.95	0.814
	15	MacClenny											0.091
	Baker	TOTAL > 0.24, now > 0.1	0.81	0.82	0.77	0.73	0.82	0.86	0.89	0.92	0.89	0.95	0.91
BRADFORD	431	Keystone Heights	0	0	0	0.35	0.45	0.45	0.48	0.55	0.51	0.46	0.46
	Bradford	TOTAL > 0.24 now > 0.1	0	0	0	0.35	0.45	0.45	0.48	0.55	0.51	0.46	0.46
BREVARD	202	Palm Bay, City	5.74	6.13	5.93	6.72	6.97	6.95	6.23	6.35	6.32	6.04	6.19
	233	Mims North Brevard	0.69	0.75			0.87	0.86	0.87	0.89	0.87	0.8	0.82
	236	Barefoot Bay	0.48	0.44	0.41	0.52	0.34	0.32	0.48	0.47	0.48	0.48	0.48
	10647	Titusville, City	3.15	3.46	3.64	3.74	3.85	3.87	4.36	4.46	4.35	4.29	3.97
	50245	Cocoa, City	25.61	24.77	24.17	22.97	29.2	25.58	21.58	26.35	21.58	22.18	23.43
	50301	Melbourne, City	3.28	4.17	4.87	4.98	4.46	4.73	4.36		4.36	4.32	4.28
	Brevard	TOTAL Groundwater	38.95	39.72	37.74	40.3	51.08	42.31	37.88	38.52	37.96	38.11	39.17
BREVARD, Surface	50245	Cocoa, City						2.39	3.04		3.04	3.9	1.26
	50301	Melbourne, City						13.46	12.32	16.1	12.32	11.92	13.1
	Brevard	TOTAL Surface Water	14.08	14.08	15.57	19.36	16.13	15.85	15.36	16.1	15.36	15.82	14.36
	Brevard	TOTAL, Grand > 0.24 now > 0.1	53.03	53.8	53.31	59.66	67.21	58.16	53.24	54.62	54.32	53.93	53.5
CLAY	416	Orange Park Grid	11.29	11	11.16	12.36	13.96	11.76	7.9	13.58	12.86	9	8.93
	453	Orange Park Water Plant	1.49	1.4	1.25	1.4	1.25	1.07	1.17	1.18	1.22	1	1.01
	499	Green Cove Springs	1.26	1.24	1.27	1.21	1.2	1.14	1.41	1.33	1.19	1.06	1.07
	527	St. Johns Landing							0.13	0.13	0.11	0.11	0.12
	756	Neighborhood Utilities								0.11			
	Clay	TOTAL > 0.24 now > 0.1	14.48	14	14.02	15.59	17.04	13.96	17.03	16.2	15.38	11.17	11.13
DUVAL	784	Baldwin	0.28	0.31	0.24	0.29	0.29	0.31	0.24	0.26	0.24	0.29	0.23
	793	Jacksonville Beach	3.53	3.15	3.13	2.91	2.92	2.78	2.48	2.64	2.46	2.38	2.42
	810	Atlantic Beach	2.17	3.12	3.22	3.11	2.79	2.61	2.39	2.62	2.39	2.28	2.48
	842	Neptune Beach	1.22	1.18	1.12			0.94	0.94	0.98	0.94	0.89	0.89
	50293	Normandy Village	0.4	0.37	0.37	0.37	0.34	0.4	0.32	0.36	0.32	0.32	0.33
	677-88271	JEA	94.36	100.78	102.47	103.57	120.13	127.62	118	131.16	118	112.24	114.7
	Duval	TOTAL > 0.24, now > 0.1	118.7	111.3	112	111.2	126.5	134.7	121.9	138	124.4	118.4	122
	FLAGLER	59	Flagler Beach	0.62	0.57	0.6	?	0.62	0.64	0.59	0.6	0.59	0.56

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Joe Bourassa (2/19/2014) – Comment 18 Attachments

	1947 Palm Coast	5	4.95	5.75	5.8	6.06	7.32	7.68	7.83	7.66	7.05	7.26
	1960 Plantation Bay					0.21	0.23	0.18	0.2	0.18	0.21	0.2
	1982 Bunnell					0.28	0.34	0.3	0.27	0.3	0.28	0.27
	2002 Bulow Campground					0.12						
	51136 Dunes Community					0.1	0.28	0.36	0.44	0.36	0.36	0.41
Flagler	TOTAL > 0.24 now > 0.1	5.53	6.25	6.04		7.39	8.81	9.11	9.34	9.09	8.46	8.71
INDIAN RIVER	2377 Fellsmere, City	0.3	0.29	0.28	0.25	0.26	0.3	0.27	0.29	0.27	0.3	0.33
	10524 Indian River County	5.93	6.51	5.96	8.67	9	9.23	8.52	8.6	8.52	8.04	8.21
	10705 Vero Beach, City	7.58	7.69	6.98	7.24	7.68	7.22	5.84	6.08	5.64	5.89	6.24
	Indian Rver TOTAL > 0.24 now > 0.1	13.81	14.49	13.22	16.16	15.51	16.76	14.63	14.97	14.43	14.23	14.78
LAKE	94 Leesburg East	6.16	5.85	5.83	5.44	5.69	5.69	6.64	7	6.64	6.51	4.82
	279 Harbor Hills	0.51	0.42	0.47	0.47	0.5	0.49	0.7	0.72	0.7	0.67	0.73
	282 Water Oak C. C. Estates	0.3	0.84	0.4	0.38	0.3	0.48	0.25	0.29	0.25	0.27	0.28
	2392 Southlake Utilities	0.71	0.82	0.84	1.03	1.27	2.18	1.57	1.75	1.57	1.5	1.33
	2453 Mascotte, City	0.32	0.3	0.33	0.34	0.4	0.43	0.52	0.6	0.52	0.44	0.41
	2454 Sunlake Estates	0.43	0.31	0.3	0.32	0.34		0.28	0.32	0.28	0.27	0.28
	2478 Clermont East	2.54	247	2.94	4.08	5.08	5.21	6.28	6.74	6.28	5.89	5.56
	2482 Fruitland Park, City	0.77	0.69	0.69			0.51	0.64	0.64	0.64	0.56	0.54
	2531 Thousand Trails Park						0.12	0.2	0.17	0.13	0.15	
	2596 Howey in the Hills		0.27	0.28	0.26		0.27	0.3	0.35	0.3	0.22	0.21
	2634 Eustis, City	2.95	2.53	2.52	2.78	2.88	2.84	3.13	3.35	3.13	3.03	2.98
	2644 Silver Lakes, Aqua						0.76		0.9	0.81	0.63	
	2644 Western Shores, Aqua				0.79	0.81	0.76	0.81	0.83	0.81	0.01	
	2646 Umatilla, City	0.47	0.4	0.44	0.44	0.43	0.41	0.39	0.47	0.39	0.36	0.33
	2662 Mission Inn						0.74				0.48	
	2671 Monterverde, City	0.32	23.2	0.27	0.26	0.29	0.25	0.21	0.31	0.21	0.23	0.2
	2700 Lake Utility Services				3.96	2.16	2.71	7.19	7.95	7.19	5.59	5.21
	2717 Pennbrooke Farways						0.45	0.48	0.5	0.48	0.47	0.45
	2718 Leesburg, The Plantation						0.17	1.49	1.6	1.48	1.32	1.29
	2765 Tavares, City	2.74	2.15	2.09	2.19	2.41	2.4	2.88	3.08	2.88	2.67	2.45
	2796 Groveland, City	0.48	0.52	0.62	0.61	0.65	0.8	1.52	1.13	1.52	0.99	1.05
	2840 Woodland Heitage											0.104
	2860 Hawthorne @ Leesburg	0.51	0.46	0.41	0.41	0.4	0.39	0.41	0.43	0.41	0.39	0.38
	2879 Lake Groves	3.17	2.93	3.01		2.57	2.9					
	2886 Minneola, City	0.6	0.52	0.54	1.55	1.31	1.49	1.47	1.69	1.67	1.4	1.4
	2888 Mid-Florida Lakes						0.34	0.31	0.34	0.31	0.31	0.31
	2913 Groveland, City				0.36	0.39	0.34	0.43	0.13	1.52	0.37	0.4
	2959 Upson Downs						0.26	0.15	0.36	0.16	0.06	
	6398 Clerbrook RV Resorts						0.2	0.27	0.14	0.11	0.09	
	50049 Lady Lake Central						0.56	0.7	0.7	0.7	0.61	0.63
	50115 Pine Island							0.27	0.43	0.3	0.29	0.101
	50147 Mount Dora	3.94	3.07	3.08	3.19	3.07	2.81	3.08		3.08	3.05	2.92
	50152-3 Wedgewood						0.14	0.15	0.17	0.15	0.14	0.124
	50178 Astor, Astor Park Utility	0.31	0.28	0.29	0.29	0.33	0.31	0.32	0.32	0.32	0.3	0.27
	50279-80 Villages of Lake Sumter	5.25	5.99	5.17	3.9	3.74	3.6	3.8	3.94	3.6	3.35	3.82
	50334 Wolf Branch Oaks								0.13	0.1	0.11	

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Letters, Emails, and Other Correspondence

PAGE 4

Orange Audubon Society letter



Orange Audubon Society

(A Chapter of National and Florida Audubon Societies)

PO Box 941142, Maitland, FL 32794-1142

www.orangeaudubonfl.org

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: 2035 Water Resources Protection and Water Supply Strategies Plan document (Solutions Plan)

Orange Audubon Society, with 2,000 member households in the Central Florida Water Initiative Area, respectfully submits the following comments regarding water conservation and the "Solutions Plan".

Water conservation has not been adequately addressed and implemented in the past in the CFWI area as evidenced by the total lack of any reduction in Residential Per Capita Per Day water use from 2001 through 2010 (Figure 4, Page 18). This absence of progress is even more egregious given that recent per capita values do not include any additional residential water use that came from reclaimed and personal well sources—two sources that have increased significantly in recent years. The significant reductions in Residential Per Capita Per Day water use that occurred prior to 2001 were likely due to the statewide adoption of a plumbing code based on the International Plumbing Code, which mirrored Federal water & energy conservation legislation (see Regulatory Measures below).

Unfortunately, the CFWI draft RWSP makes it clear that water conservation will not be adequately addressed and implemented in the future. Despite the fact that the CFWI Conservation and Other Management Strategies sub-team identified a myriad of proven water Conservation Projects and Strategies that are less costly than many of the Alternative Water Supply Projects (Table 17, Page 124), only 6.1% of the funding is shown to be dedicated to conservation (Table 18, page 125). A further obvious glaring mistake is the way that funding is allocated over time. Rather than concentrating on less expensive conservation and education efforts early on that could forestall the need for costly and potentially environmentally damaging construction projects, funds for conservation are dribbled out as a small amount each year over time. That is not a good strategic plan.

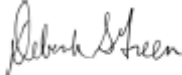
Donations to Orange Audubon Society, Inc., a Florida nonprofit [501(c)(3)] organization, are tax deductible to the extent allowed by law.

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Here is what we suggest should be done:

- 1) **Regulatory Measures** – As stated on page 43, “Regulatory measures are one of the three main tools of an effective conservation program...”. As the example above illustrated, adoption of water-conserving standards can have significant effects.
 - a. Make the Florida Water Star™ water conservation certification program mandatory for any new construction either statewide or at least in the CFWI area. Gold certification would be preferable to Silver, and we recommend requiring the use of site-appropriate native plants.
 - b. Modify the State Plumbing Code to require that all new construction must use USEPA WaterSense® certified fixtures and devices (California, Colorado, Georgia and Texas have done this already), as well as ENERGY STAR qualified appliances.
 - c. Require, as a condition of sale, that any building built prior to 1993 be retrofitted with WaterSense® certified plumbing fixtures. (This has already been implemented in California and DeKalb County, Georgia.)
- 2) **Water Conservation Funding and Incentives**
 - a. Spend more money at the front end of the 20-year period on conservation education (water ethic building). This should be the unified, consistent CFWI or statewide water-conservation message.
 - b. Spend more money at the front end of the 20-year period on implementation of conservation measures.
 - i. Provide more funding for toilet retrofit rebates
 - ii. Exempt WaterSense® certified products from the state sales tax

Thank you for your time and consideration.



Deborah Green, President
Orange Audubon Society

USDOI – Estenoz, February 19, 2014



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

February 19, 2014

Tom Bartol
St. Johns River Water Management District
4049 Reid Street
Palatka, FL 32177

Re: CFWI Regional Water Supply Plan

Dear Mr. Bartol:

The United States Department of the Interior (Department) appreciates the opportunity to comment on the Central Florida Water Initiatives (CFWI) Regional Water Supply Plan. The Department has recently learned that the South Florida Water Management District's Kissimmee Basin Water Supply Plan has been divided into the Upper Kissimmee Basin and the Lower Kissimmee Basin Planning Areas, with the CFWI Regional Water Supply Plan as the water supply plan for the Upper Kissimmee Basin Planning Area. The Upper Kissimmee Basin Planning Area of the CFWI includes the Upper Chain of Lakes which feed into the Kissimmee River as well as a portion of the Kissimmee River and its floodplain. The Upper Chain of Lakes include Lake Hart, Lake Mary Jane, Lakes Myrtle, Joel, and Preston, East Lake Tohopekaliga, Lake Tohopekaliga, Cypress lake, Lake Hatchineha, Alligator Lake, Lake Gentry, and Lake Kissimmee.

There has been considerable public investment in restoration of the Kissimmee River. The Kissimmee River Restoration Project is an \$800 Million restoration project to restore 40 square miles of Kissimmee River and Floodplain ecosystem, including almost 25,000 acres of wetlands and 40 miles of historic river channel. Additionally, the Headwater Revitalization Project, which has been combined with the Kissimmee River Restoration Project, involves modifications to Lakes Kissimmee, Hatchineha, Cypress, and Tiger in the Upper Kissimmee Basin to provide the volume of water to the river restoration project necessary to achieve project success. Inflows to the Kissimmee will mimic the historic condition. The secondary purpose is to improve the condition of approximately 7,000 acres of lake littoral wetlands. A greater area of littoral zones of Lakes Kissimmee, Cypress, and Hatchineha will be inundated, creating a greater coverage of littoral wetlands. More than 100,000 acres of land acquisition needed for Kissimmee River Restoration and Headwaters Revitalization is substantially completed. More than \$300 million have already been expended by both the federal government and state of Florida. This restoration project is considered a tremendous success. The river and its floodplain have already improved in remarkable ways, surpassing at times the anticipated environmental response.

The Kissimmee Basin is home to many species of concern (see attached listing) including federal endangered and threatened species and state species of special concern and threatened species. Some of these species are also found throughout the CFWI Planning Area.

Recognizing the need to prevent allocation of water needed for the protection of fish and wildlife, the South Florida Water Management District (SFWMD), on June 12, 2008, initiated Rule development for a water reservation for the Kissimmee River and Upper Chain of Lakes. Waters affected by this rulemaking effort are the surface waters needed for the protection of fish and wildlife as well as the surficial groundwater that affects that surface water. Included in the reservation are the Kissimmee Upper Chain of Lakes (Myrtle-Joel-Preston, Hart-Mary Jane, East Lake Tohopekaliga, and Tohopekaliga to the west;

Alligator Chain and Gentry to the east; and the Kissimmee Group including Kissimmee-Cypress-Hatchineha) and the Kissimmee River and Floodplain.

In 2008, the SFWMD staff anticipated that a final draft rule would be published in June of 2009. In the analysis done to support this reservation, as presented in March of 2009, it was determined that although surface water in excess of the defined fish and wildlife protection targets occurs in some of the lakes in the Upper Chain when looked at on an individual lake by lake scale, there is a lower potential for surface water in excess of the defined fish and wildlife protection targets when looked at on a system wide scale. It was also determined that the Kissimmee River has a low potential for surface water in excess of the defined fish and wildlife targets. A scientific peer review panel found that the modeling was sound, biologic linkages to hydrology were sound, and the approach to defining water for protection of fish and wildlife (performance measures) was sound. However, this reservation was never completed. It appears that work stopped in 2009.

The Upper Kissimmee Basin Planning Area also includes the site of the Service's recently authorized Everglades Headwaters National Wildlife Refuge and Conservation Area (Refuge and Conservation Area) (See attached map). The Refuge and Conservation Area, a high priority for the Department, is an initiative to preserve the natural resources and rural way of life in the Kissimmee River Valley. The Refuge and Conservation Area was authorized to protect 150,000 acres in the threatened wetland, grassland and long-leaf pine savannah landscapes north of Lake Okeechobee, through fee title acquisition and permanent conservation easements on private lands, allowing continued cattle and agricultural production.

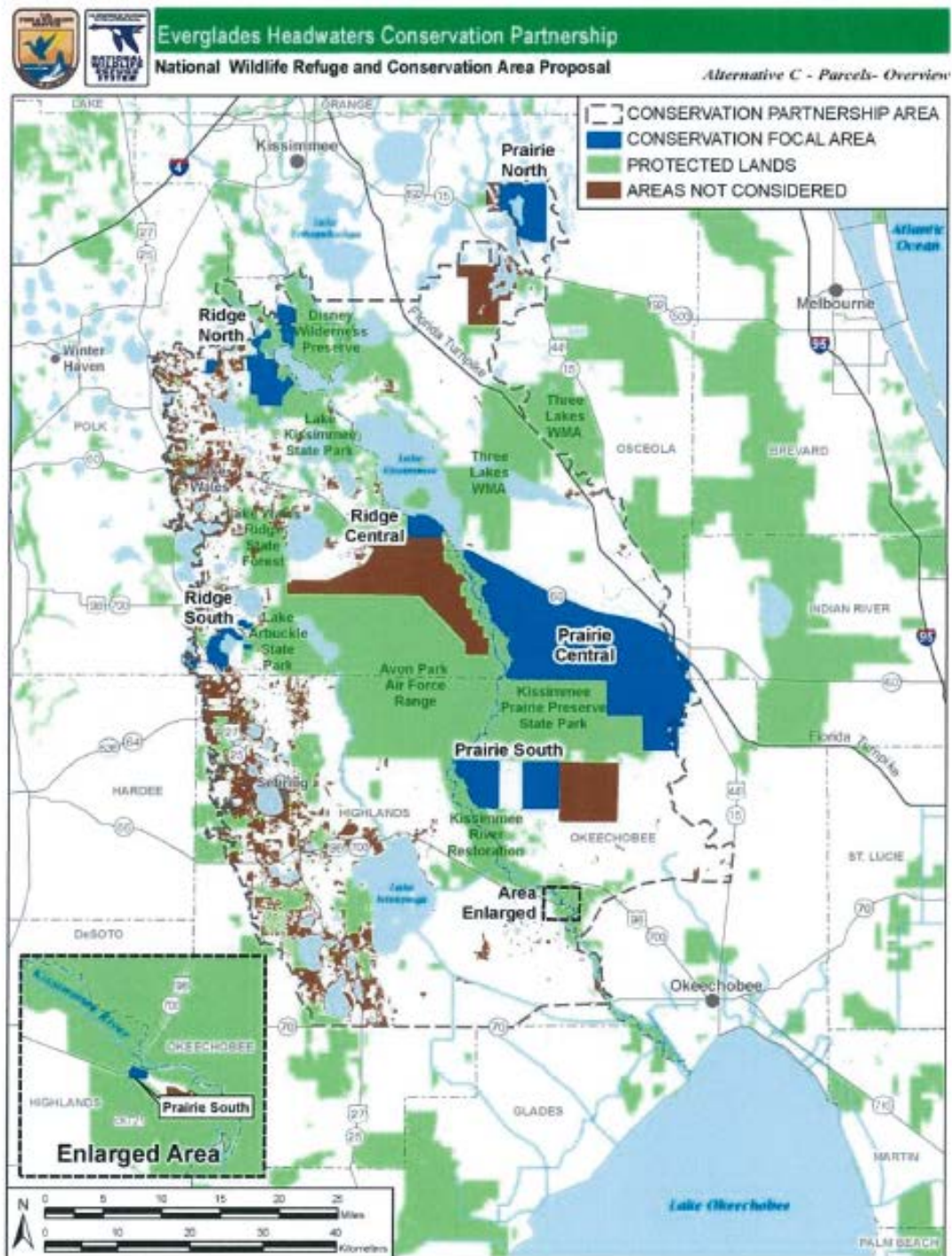
The CFWI Regional Water Supply Plan lists several surface water projects including one described in the Appendix as the *Kissimmee River Basin AWS Project* and as being located in the Kissimmee River Basin. The project capacity is listed as supplying up to 25 million gallons per day. The Department has scheduled a meeting with SFWMD staff to learn more about this and the other surface water projects.

The Department is concerned that the CFWI Regional Water Supply Plan Projects will erode the considerable federal and state investment in Kissimmee River Restoration, and further negatively impact the federally endangered and threatened Species located in the Upper Chain of Lakes and the Kissimmee River and Floodplain. Also, given the conclusions reached by the SFWMD reservations analysis, it is unlikely there is any substantial quantity of excess water in either the Upper Chain of Lakes or the Kissimmee River and Floodplain above that required for the protection of fish and wildlife. The Department believes that the SFWMD should adopt a reservation for the Upper Chain of Lakes and the Kissimmee River and its Floodplain before implementing any surface water projects in the Upper Kissimmee Basin. The Department may provide supplemental comments after meeting with the SFWMD staff regarding the surface water projects.

Sincerely,



Shannon A. Estenoz
Director, Office of Everglades Restoration Initiatives
United States Department of the Interior



Species of Concern within the Kissimmee basin.

(E: Endangered, T: Threatened, SC: Species of Special Concern, SA: Similarity of Appearance, Candidate: C, State Threatened: ST)

Common Name	Scientific Name	Status	Agency
Amphibians			
Striped newt	<i>Notophthalmus perstriatus</i>	C	Federal
Gopher frog	<i>Lithobates capito</i>	SC	State
Birds			
Black skimmer	<i>Rynchops niger</i>	SC	State
Burrowing owl	<i>Athene cunicularia</i>	SC	State
Florida grasshopper sparrow	<i>Ammodramus savannarum floridanus</i>	E	Federal
Florida sandhill crane	<i>Grus canadensis pratensis</i>	ST	
Florida scrub-jay	<i>Aphelocoma coerulescens</i>	T	Federal
Everglade snail kite	<i>Rostrhamus sociabilis plumbeus</i>	E	Federal
Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	T	Federal
Limpkin	<i>Aramus guarauna</i>	SC	State
Little blue heron	<i>Egretta caerulea</i>	SC	State
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Federal
Snowy egret	<i>Egretta thula</i>	SC	State
Southeastern American kestrel	<i>Falco sparverius paulus</i>	ST	State
Tricolored heron	<i>Egretta tricolor</i>	SC	State
White ibis	<i>Eudocimus albus</i>	SC	State
Whooping crane	<i>Grus americana</i>	Experimental Population non-essential	Federal, State
Wood stork	<i>Mycteria americana</i>	E	Federal
Fish			
Lake Eustis pupfish	<i>Cyprinodon hubbsi</i>	SC	State
Insects			
Highlands tiger beetle	<i>Cicindela highlandensis</i>	C	Federal
Lichens			
Florida perforate cladonia	<i>Cladonia perforata</i>	E	Federal
Mammals			
Florida panther	<i>Puma concolor coryi</i>	E	Federal
Florida manatee	<i>Trichechus manatus</i>	E	Federal
Puma	(=mountain lion) (<i>Puma</i> (=Felis) concolor (all subsp. except coryi))	T/SA	Federal
Florida bonneted bat	<i>Eumops floridanus</i>	ST, Proposed Endangered	State, Federal
Florida mouse	<i>Peromyscus floridanus</i>	ST	State
Homosassa shrew	<i>Sorex longirostris eonis</i>	SC	State
Sherman's fox squirrel	<i>Sciurus niger shermani</i>	SC	State
Reptiles			
American alligator	<i>Alligator mississippiensis</i>	T/SA	Federal
Bluetail mole skink	<i>Eumeces egregius lividus</i>	T	Federal
Eastern indigo snake	<i>Drymarchon corais couperi</i>	T	Federal
Florida pine snake	<i>Pituophis melanoleucus mugitus</i>	SC	State

Gopher tortoise	<i>Gopherus polyphemus</i>	C, ST	Federal, State
Sand skink	<i>Neoseps reynoldsi</i>	T	Federal
Short-tailed snake	<i>Stilosoma extenuatum</i>	ST	State
Plants			
Short-leaved rosemary	<i>Conradina brevifolia</i>	E	Federal
Scrub mint	<i>Dicerandra frutescens</i>	E	Federal
Highlands scrub hypericum	<i>Hypericum cumulicola</i>	E	Federal
Scrub blazingstar	<i>Liatris ohlingerae</i>	E	
Papery whitlow-wort	<i>Paronychia chartacea</i>	T	Federal
Lewton's polygala	<i>Polygala lewtonii</i>	E	Federal
Wireweed	<i>Polygonella basiramia</i>	E	Federal
Sandlace	<i>Polygonella myriophylla</i>	E	Federal
Scrub plum	<i>Prunus geniculata</i>	E	Federal
Florida bonamia	<i>Bonamia grandiflora</i>	T	Federal
Pygmy fringe-tree	<i>Chionanthus pygmaeus</i>	E	Federal
Pigeon wings	<i>Clitoria fragrans</i>	T	Federal
Beautiful pawpaw	<i>Deeringothamnus pulchellus</i>	E	Federal
Scrub buckwheat	<i>Eriogonum longifolium</i> var. <i>gnaphalifolium</i>	T	Federal
Snakeroot	<i>Eryngium cuneifolium</i>	E	Federal
Britton's beargrass	<i>Nolina brittoniana</i>	E	Federal
Wide-leaf warea	<i>Warea amplexifolia</i>	E	Federal
Carter's mustard	<i>Warea carteri</i>	E	Federal
Scrub lupine	<i>Lupinus aridorum</i>	E	Federal
Garrett's mint	<i>Dicerandra christmanii</i>	E	Federal
Florida ziziphus	<i>Ziziphus celata</i>	E	Federal
Avon Park harebells	<i>Crotalaria avonensis</i>	E	Federal

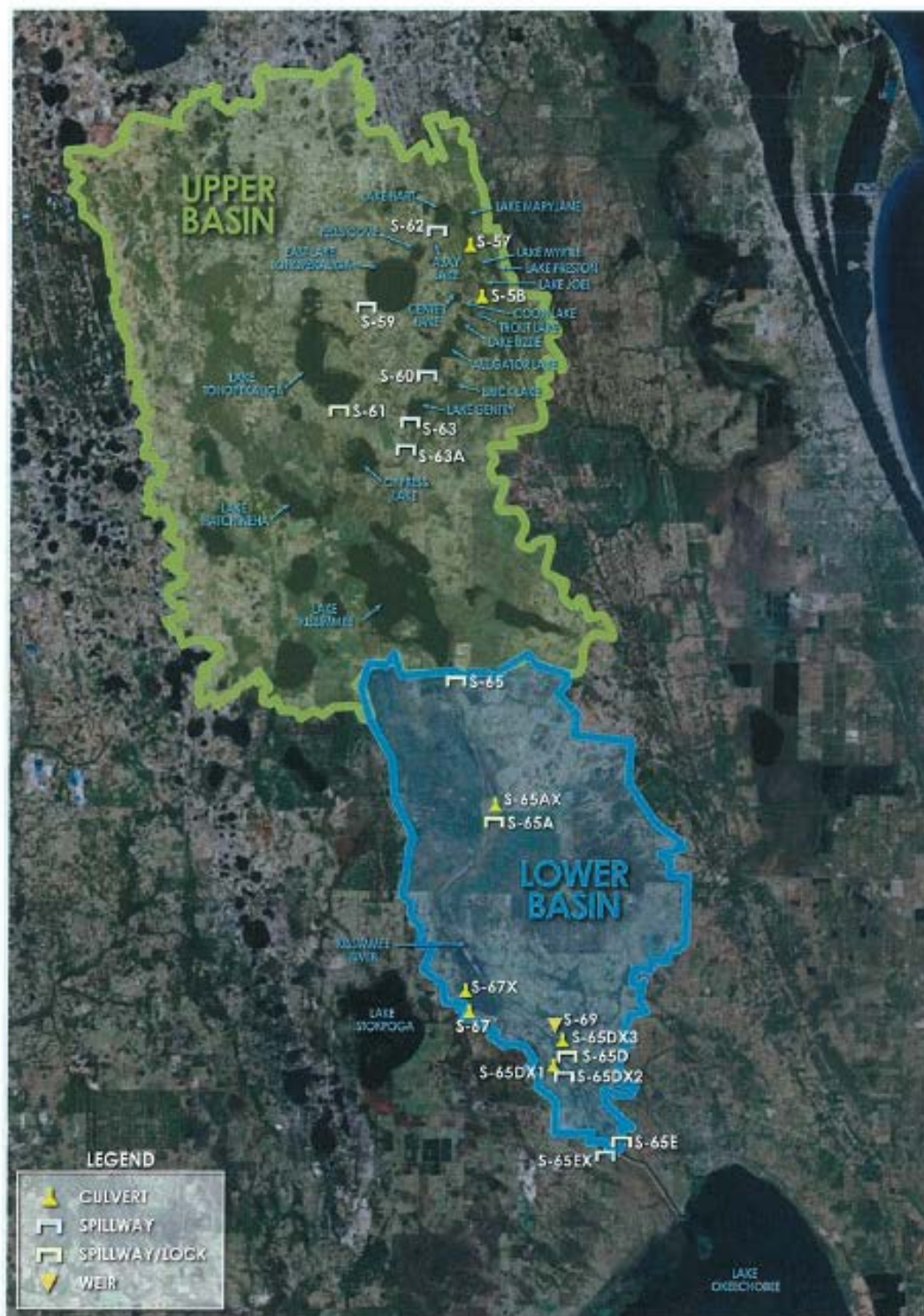


Figure 1 – Kissimmee Basin.

USDOI – Estenoz, May 8, 2015



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

May 8, 2015

Mr. Don Medellin
South Florida Water Management District
Coastal Ecosystems Section
3301 Gun Club Road
West Palm Beach, Florida 33406

Dear Mr. Medellin:

The United States Department of the Interior (Department) appreciates the opportunity to comment on the proposed water reserved for the protection of fish and wildlife contained within the Upper Chain of Lakes, Headwater Revitalization Lakes, and the Kissimmee River and commends the South Florida Water Management District (SFWMD) for moving forward with this effort.

This reservation rule is very important to the Department. The Department generally supports the SFWMD's proposal for reserving water in the Headwaters Revitalization Lakes and the Kissimmee River. However, we are concerned that not enough water has been reserved in the Upper Chain of Lakes; inadequate water reserved in the Upper Chain of Lakes may not only negatively affect the wildlife in those lakes, but also may have negative downstream effects.

Background:

Parallel to the reservation process, the Central Florida Water Initiative (CFWI) is developing its Regional Water Supply Plan; the purpose of which is to provide options to meet water supply demands in the CFWI area through 2035. In the Department's February 19, 2014, letter commenting on the CFWI Regional Water Supply Plan, the Department stated that the SFWMD should adopt a reservation for the Upper Chain of Lakes, Headwaters Revitalization Lakes, and the Kissimmee River and its Floodplain *before* implementing any surface water projects in the Upper Kissimmee Basin.¹ We are pleased that the CFWI is following the recommendation of the Department and is not proposing to plan or implement surface water projects in the Kissimmee Basin until the SFWMD develops a reservation for the protection of fish and wildlife. Furthermore, we understand once the reserved water is identified and the reservation is finalized, water over and above the reservation amounts *may* be identified as available for CFWI Projects (as identified in the CFWI Regional Water Supply Plan) and other consumptive uses.

Reservation Objectives:

The SFWMD's stated reservation objectives are to:

- Protect water for the authorized Kissimmee River Restoration Project;
- Ensure a healthy and sustainable native fish and wildlife community;
- Maintain C&SF Project operations consistent with federal regulation schedules;
- Protect water supply inflows to Lake Okeechobee and the Greater Everglades ecosystem (natural and human uses); and

¹ The Department's 2014 letter is attached and made part hereto and incorporated by reference; the letter contains a list of federally endangered and threatened species and state species of special concern and threatened species located in the reservation area. The 2014 letter also describes the Upper Kissimmee Basin Planning Area as including the site of the United States Fish and Wildlife Service's (Service) recently established Everglades Headwaters National Wildlife and Conservation Area.

- Support solutions for Central Florida's water supply needs, consistent with other objectives.

The Department agrees that efforts to support Central Florida's water supply needs must be consistent with all of the other objectives set forth above.

Restoration Water Needs:

Water from the reservation area within the SFWMD boundaries is important to meet water needs in South Florida for both natural and human uses. The reservation water bodies together form the headwaters of the Kissimmee-Okeechobee-Everglades System. The outflow of surface water from the Kissimmee Chain of Lakes is to the Kissimmee River; the Kissimmee River is the largest tributary to Lake Okeechobee, accounting for approximately 50% of inputs. Water moving south from Lake Okeechobee is crucial to rehydrating the remnant Everglades. The Department is concerned that not enough water is being reserved in the Upper Chain of Lakes and that future consumptive use projects utilizing the water identified as over and above the reservation will have a negative effect on the considerable federal and state investment in Everglades Restoration by allocating to consumptive use water necessary not only for Kissimmee River Restoration but also for the Comprehensive Everglades Restoration Project (CERP).

The Department believes that water budgets should be developed for flows from the Upper Chain of Lakes to the Headwater Revitalization Lakes, for flows from the Headwater Revitalization Lakes to the Kissimmee River, and for flows from the Kissimmee River to Lake Okeechobee. These water budgets should contain adequate water to ensure that the regulation schedules in the Headwaters Revitalization Lakes are met, that the Kissimmee River Restoration goals are met, and that the quantity and timing of water to Lake Okeechobee is adequate to meet the water needs of the environment and Everglades Restoration. Such water budgets should inform the development of the reservation.

Period of Record Utilized:

The Department shares the concerns of the United States Fish and Wildlife Service (Service) over the period of record used in developing the proposed reservation. In relation to snail kite usage specifically, it excludes data from years having the highest level of kite nesting on the Kissimmee Chain of Lakes, which increased dramatically beginning in 2007 and has remained much higher than historical usage in every year since 2007.

Water Reservation Hydrograph:

Additionally, the Department shares the Service's concerns that a steep straight line method to connect the seasonal high stage to the seasonal low stage to develop the water reservation hydrograph is not adequately protective of fish and wildlife. A further explanation of this method is necessary. Also, the Service has indicated its desire to work with the SFWMD to establish more protective stage elevation reservation lines.

Ephemeral Source Permits:

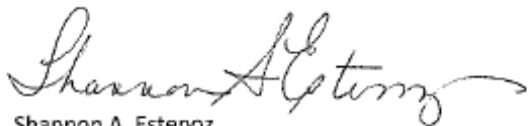
A new category of consumptive use permit has been created to accompany the reservation for the Upper Chain of Lakes. Under this type of permit the water available for allocation does not have a 1 in 10 level of certainty. It is described by the SFWMD as a "unique, ephemeral source". Water will be available for withdrawal as determined by the SFWMD on a daily basis, consistent with the reservations. The SFWMD has proposed additional criteria for permit applications from these sources; the additional criteria attempt to place further controls on the use of water from these ephemeral sources.

Florida Statutes provide for the ability to review and revise reservations. If it is later determined that insufficient water was reserved in the Upper Chain of Lakes, the Department is concerned that it will be difficult to revise the reservation and either decrease or eliminate water available under these ephemeral source permits once infrastructure has been built. Also, the Department is concerned that after the infrastructure for storage has been constructed there will be requests from the permit holders to withdraw more water from the source than contemplated by the ephemeral source permit and pressure placed on the SFWMD to allow withdrawal of additional water.

Based on our own concerns and because this is a new, untested category of consumptive use permit, a more detailed explanation of this type of permit is necessary before the reservation is finalized. An example from application to approval, including the basis of review, would be helpful in addition to a discussion of how the permit allocation would be implemented in relation to the stage elevations. The Department recommends that the SFWMD convene a workshop similar to those held during the development of the B-List and Restricted Allocation rules, to provide for dialogue about this new permit category.

Thank you for the opportunity to provide comments on the proposed reservation. I and my staff are available for any follow up discussions that the SFWMD may want to convene. If you have any questions regarding this letter, please contact me or Joan Lawrence at 786-390-8087.

Sincerely,



Shannon A. Estenoz
Director, Office of Everglades Restoration Initiatives
United States Department of the Interior

USDOl – Estenoz, August 17, 2015



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

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: Draft Regional Water Supply Plan & 2035 Water Resources Protection and Water Supply Strategies Plan

Dear Mr. Powell:

The United States Department of the Interior (Department) appreciates the opportunity to comment again on the draft *Central Florida Water Initiatives (CFWI) Regional Water Supply Plan* and to provide initial comments on the draft *CFWI 2035 Water Resources Protection and Water Supply Strategies Plan (Protection and Strategies Plan)*. In the Department's February 2014 comment letter, the Department stated its concern that the CFWI Regional Water Supply Plan Projects, including a proposed reservoir project in the Upper Kissimmee Basin, will erode the considerable federal and state investment in Kissimmee River Restoration, and further negatively impact the federally endangered and threatened species located in the Upper Chain of Lakes and the Kissimmee River and Floodplain.¹ Due to this concern, the Department recommended that the South Florida Water Management District (SFWMD) adopt a reservation for the Upper Chain of Lakes, Headwaters Revitalization Lakes, and the Kissimmee River and its Floodplain before implementing any surface water projects in the Upper Kissimmee Basin. We are pleased that the CFWI is following the recommendation of the Department and is not proposing to plan or implement surface water projects in the Kissimmee Basin until the SFWMD develops a reservation for the protection of fish and wildlife. The Department is actively involved with the SFWMD and other stakeholders in developing the Kissimmee Basin reservation and commented on the draft reservation on May 8, 2015.²

In its 2015 reservation comment letter the Department stated its additional concern that future consumptive use projects in the Upper Kissimmee Basin will have a negative effect on the considerable

¹ The Department's 2014 letter is attached and made a part hereto and incorporated by reference; the letter contains a list of federally endangered and threatened species and state species of special concern and threatened species located in the Upper Kissimmee Basin. The 2014 letter also describes the Upper Kissimmee Basin Planning Area as including the site of the United States Fish and Wildlife Service's (Service) recently established Everglades Headwaters National Wildlife and Conservation Area.

² The Department's 2015 reservation comment letter is attached and made a part hereto and incorporated by reference.

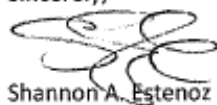
state and federal investment in Everglades Restoration by allocating to consumptive use water necessary for the Comprehensive Everglades Restoration Project (CERP). The outflow of surface water from the Kissimmee Chain of Lakes is to the Kissimmee River; the Kissimmee River is the largest tributary to Lake Okeechobee, accounting for approximately 50% of inputs. Water moving south from Lake Okeechobee is crucial to rehydrating the remnant Everglades.

The draft *Protection and Strategies Plan, Chapter 3: Solutions Plan Projects* contains a project, the Grove Land Reservoir and Stormwater Treatment Area (Grove Land), which is neither mentioned in the *CFWI Regional Water Supply Plan* nor located within the CFWI Planning Area. The *Protection and Strategies Plan* describes the Grove Land Project as having the potential to provide a variety of benefits, including surface water augmentation, groundwater recharge, and nutrient reduction. Grove Land is described as a 5,000-acre reservoir, 2,000-acre Stormwater treatment area (STA), intake/discharge structures, conveyance improvements, and other associated facilities. It is stated that the reservoir water would be supplied from excess stormwater runoff captured from the C-25, C-24, and C-23 basins via the C-25, C-24, and C-23 Canals, which are owned by the SFWMD. The project has been conceptually designed to deliver 136mgd. It is further stated that the project is technically feasible as long as sufficient water supply can be legally supplied from the C-25, C-24, and C-23 Canals.

The C-25, C-24, and C-23 Canals are part of the United States Army Corps of Engineers (Corps) Central and Southern Florida (C&SF) Project. Water captured from the C-25, C-24, and C-23 Canals is planned to supply the above-ground reservoirs in the Indian River Lagoon (IRL) (C-44) – South CERP Project.³ It is unclear whether Grove Land is in conflict with the CERP Project and whether the CFWI is supporting the Grove Land Project as part of the CFWI Planning. The Department requests that these questions be clarified.

Thank you for the opportunity to provide comments. I and my staff available for any follow-up discussions that the SFWMD and/or CFWI may want to convene. If you have any questions regarding this letter, please contact me or Joan Lawrence at 786-390-8087.

Sincerely,



Shannon A. Estenoz
Director, Everglades Restoration Initiatives
United States Department of the Interior

³ The IRL – South Project was approved by Congress in 2007 and is expected to include, in part, the following components:

- Construction and operation of four new large-scale above-ground reservoirs and their connecting canals, control structures, levees and pumps to capture water from the C-23, C-24, C-25, and C-44 Canals for increased storage. A total combined new water storage of about 130,000 acre-feet (44 billion gallons) of new storage.
- Construction and operation of four new STAs (combined area of about 9,100 acres), one for each C-23/C-24 North, C-23/C-24 South, C-25, and C-44 basins, to reduce sediment, phosphorus, and nitrogen entering the St. Lucie Estuary and the IRL.
- Construction is underway on the C-44 Reservoir and STA.

Save the Manatee Club Letter



Save the Manatee® Club
The Voice for Manatees Since 1981

Mr. Dean Powell
CFWI Comments
South Florida Water Management District
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406
cfwiwater@sfwmd.gov

August 17, 2015

Submitted via email

Re: Central Florida Water Initiative Draft 2035 Water Resources Protection and Water Supply Strategies Plan and Regional Water Supply Plan.

Dear Mr. Powell,

Thank you for the opportunity to comment on the Central Florida Water Initiative ("CFWI") draft 2035 Water Resources Protection and Water Supply Strategies Plan ("Solutions Plan") and Regional Water Supply Plan ("RWSP").

Save the Manatee Club

Save the Manatee Club ("SMC") is an award-winning national 501(c)(3) nonprofit, established in 1981 by singer and activist Jimmy Buffet and former Senator Bob Graham. The organization represents 4,500 members throughout Florida, 16,000 nationwide, in efforts to protect endangered manatees and their aquatic habitat from threats posed by human activity, including habitat destruction. It is with that mission in mind that we offer the following comments regarding the Central Florida Water Initiative Solutions Plan and RWSP.

The Central Florida Water Initiative

The CFWI is a collaboration among the St. Johns River, South Florida, and Southwest Florida water management districts, as well as the Florida Department of Environmental Protection, the Florida Department of Agriculture and Consumer Services, regional public water supply utilities, and other stakeholders to address long-term water planning and supply needs in Central Florida. The planning region includes Orange, Osceola, Polk, Seminole, and southern Lake counties.

The Solutions Plan aims to provide detailed plans for water conservation and water supply projects by identifying partnership opportunities, assessing finances for project options, and developing management and implementation strategies. The Draft Regional Water Supply Plan is a multi-district Regional Water Supply Plan for the St. Johns River, South Florida, and Southwest Florida water management districts to identify sustainable water source options and potential water supply development projects. These planning documents are to be updated every five years with a twenty-year planning horizon.

Save the Manatee Club supports the concept of regional planning and the need for the various water management districts to work together to guard against actions in one district impairing water interests in another district, to ensure the long-term viability of Florida's water resources.

500 N. Maitland Ave. • Maitland, FL 32751 • 407-539-0990 • Fax 407-539-0871 • 800-432-JOIN (5646) • www.savethemanatee.org

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Water demand in the Central Florida region exceeds available supply, and the CFWI should place greater emphasis on reducing demand instead of using technological advances to increase supply.

The CFWI planning region consists of Oranges, Osceola, Polk, Seminole, and southern Lake counties. The region's dominant water supply demands are from the public supply and agricultural sectors. The area's population is expected to grow by 1.4 million people by 2035, an increase of nearly fifty percent. Meanwhile, water demand is expected to total 1,100 million gallons per day ("MGD"), an increase of 300 MGD over the same time period. According to planning documents, there is only an additional 50 MGD of traditional groundwater available in the aquifer, leaving a 250 MGD deficit that the CFWI and Solutions Plan seek to address.

The CFWI ambitiously points to potential alternative water supply projects that rely on expensive taxpayer financing and technological innovation, and essentially engages in verbal and mathematical acrobatics to assure the public that there is sufficient water to meet coming demand. The plan's torturous logic assumes that these technological and financial feats will be accomplished, but contains no concrete forcing provisions to ensure the success of these efforts. Meanwhile, each of the three water management districts proceeds to issue consumptive use permits without due regard for impacts to the natural environment or to the future sustainability of the region's water resources.

The planning documents grapple with attempts to control the supply side of resource allocation. Yet, the region's planners simultaneously acknowledge that Florida only receives an average of 50-55 inches of rain each year, only approximately 13 of which make it to groundwater recharge. The rational policy would therefore focus instead on the demand side of water supply. In fact, the Solutions Plan acknowledges this, stating that, "a well-crafted conservation/demand management plan can reduce, defer, or eliminate the need for investments in new production capacity, which may include the development of higher cost alternative water supply sources."

Of the 250 MGD water deficit that the CFWI identifies, only 37 MGD will be made up from conservation initiatives. The region's planners should take advantage of this opportunity to establish cost- and water-saving conservation practices. For example, the water management districts and state agencies should require all new commercial, residential, and institutional construction projects to meet Florida Water Star Standards to promote both indoor and outdoor water conservation. Likewise, the agencies should impose plumbing fixtures ordinances requiring that all structures, when sold, must obtain verification that toilets and other water fixtures meet water conservation standards before the utility may turn on water services. Additionally, the agencies or the State could supply incentives for individual home and business owners to install EPA WaterSense compliant plumbing fixtures, such as low-flow toilets. Local ordinances should be revised to encourage if not require Florida Friendly Landscaping. At a minimum, homeowner associations should be prohibited from requiring members to plant and fertilize heavy water use lawns and landscaping.

Only six percent of the CFWI's 2.2 billion dollar budget is allocated to conservation and demand reduction efforts. The rest of the funds are destined for complex and costly infrastructure development. The Solution Plan acknowledges that conservation is often the most cost effective option, and certainly conserving water for future use saves money throughout the planning horizon by delaying the need for infrastructure to exploit increasingly deep or non-potable water supply sources. The CFWI should reallocate funding to incentivize home and business water conservation or to offer cost sharing and rebates for installing water conservation fixtures and programs. The Solutions Plan indicates that additional funds for conservation would be effective, especially in overcoming resistance to implementation of best management plan ("BMP") farming practices.

Lastly, minimum flows and levels ("MFLs") and water reservations are under development for a number of water bodies within the CFWI planning region. It is impossible for either the Solutions Plan or the RWSP to ensure that conservation is sufficiently protective of these flows and levels without knowing what they will be. Additional water allocations should be set aside for conservation in anticipation of the highest foreseeable MFLs, so that when the levels are set the water bodies are not immediately beginning from a point of deficit. The Solutions Plan states that any new MFLs and reservations to be adopted will be taken into account in the plan's update in five years' time; however, it makes more sense to begin by being more protective from the outset, open to the possibility of freeing up some additional water resources in five years, rather than the other way around. It is much harder to recover a resource that has already been depleted than to be conservative from the beginning.

The bottom line is that the plans should focus more on water efficiency and demand reduction than on tapping and drying out ever-deeper and less accessible water sources.

Alternative Water Supply projects that include tapping the Lower Floridan Aquifer or using additional surface water are not sustainable.

There seems to be a rush to designate a variety of unsustainable water resource development projects as alternative water supply ("AWS") projects. AWS designations are attractive because additional funding is often available for such projects. However, tapping the Lower Floridan Aquifer ("LFA"), as proposed in the case of the deep well projects in Lake and Polk counties, will result in further depletion of the Upper Floridan Aquifer ("UFA") and may increase the risk of saltwater intrusion. Such projects are not sustainable and should not be incentivized. Indeed, of the sixteen regional multi-district water supply project options ("WSPOs"), three include tapping the LFA, the hydrology of which the CFWI admits is not well understood.

Additional surface water withdrawals are no better in terms of sustainability. For example, the proposal includes project options to remove up to 160 MGD of surface water from the St. Johns River, with potential infrastructure costs of up to 1.79 *billion* dollars. The St. Johns River is already at risk from increased levels of pollution and increased salinity, and suffers from reduced flows. These factors together have resulted in higher incidence of algae blooms and fish kills throughout the river system. This river that is already under so much stress; it needs protection and conservation in order to be a sustainable recreational and economic resource for the future. Exploiting this resource by further drawing down its already diminished flows poses a risk to the entire St. Johns system.

Save the Manatee Club is on record with the Florida Department of Environmental Protection in response to the agency's proposed revisions to 62-40 F.A.C. that using nontraditional surface waters and tapping the LFA are not sustainable alternative water supplies and should not be classified as such. Rather, the AWS designation should be reserved for projects that innovate truly alternative sources, such as toilet-to-tap reclaimed water programs and the necessary education and public outreach initiatives required to support changing the public mindset regarding alternative water sources.

Thank you again for the opportunity to offer comment on this important matter. We respectfully request to be added to the agency's list of interested parties for any further developments regarding this initiative. Please send any correspondence or notices of any future CFWI activity to aharvey@savethemanatee.org.

Regards,

Anne Harvey, JD, MS
FL Bar No. 89808
Conservation Staff
Save the Manatee Club
803.629.5003
aharvey@savethemanatee.org

Deseret Ranches of Florida

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: East Central Florida Services and Farmland Reserve Comments on Central Florida Water Initiative Regional Water Supply Plan and 2035 Water Resources Protection and Water Supply Strategies Plan

Dear Mr. Powell,

East Central Florida Services, Inc., and Farmland Reserve, Inc. submit the following comments to 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”). As background, East Central Florida Services, Inc. is a publicly-regulated, private water utility that provides agricultural and potable water service to a certificated area in Orange, Osceola, and Brevard Counties. Farmland Reserve, Inc. is an agricultural company owning approximately 295,000 acres in Orange, Osceola, and Brevard Counties. The Orange and Osceola County portions of its property, about 255,000 acres, lie within the CFWI area. East Central Florida Services, Inc., and Farmland Reserve, Inc. (collectively “Deseret”) have an existing permitted agricultural water use of approximately 13.0 million gallons per day (MGD). This makes Deseret one of the largest landowners and agricultural operations within the CFWI.

Much of Deseret’s land is currently used as unirrigated pasture with no water use allocation. Over time, Deseret has steadily intensified portions of its agricultural production and associated water usage in response to market conditions. For example, in the past several years, Deseret’s permitted allocation for agricultural irrigation has increased by 6.0 MGD. Deseret’s agricultural operations and associated water use make it substantially affected by the provisions of the draft CFWI RWSP and the Solutions Plan.

Lack of Identified Sources to Meet Agricultural Water Need in Recognition of Agriculture’s Limited Alternative Water Supply Options

As it relates to the projected agricultural needs in Osceola County, including Deseret's projected needs, the draft CFWI RWSP appears to not comply with statutory requirements. Subsection 373.709(2)(a)2., Florida Statutes (F.S.), requires that a regional water supply plan contain a list of water supply development project options, including traditional and alternative water supply project options, from which self-suppliers may choose for water supply development. That subsection also states that the list of water supply development options in a regional water supply plan must contain provisions recognizing that alternative water supply options for agricultural self-suppliers are limited.

Other than conservation, the draft CFWI RWSP does not list any significant water supply options – either traditional or alternative – from which agricultural self-suppliers in Osceola County may choose for water supply development. For agricultural conservation throughout the CFWI area, the Solutions Plan estimates that through the greater use of conservation best management practices (BMPs) an estimated 4.30 MGD of water can be conserved by the year 2035. (See table 9 on page 41.) This quantity is not broken down by county. However, even assuming a significant portion of this conservation savings can be achieved in Osceola County, this still leaves unmet agricultural water demand in Osceola County for the year 2035.

The only other water source identified for agriculture in Osceola County in the CFWI RWSP or Solutions Plan is reclaimed water. But for projected agricultural demands in Osceola County, reclaimed water is not identified as a significant agricultural water supply project option. According to Appendix E, Table E-2, of the draft CFWI RWSP, reclaimed water is projected only to provide 0.61 MGD of agricultural irrigation supply in Osceola County by the year 2035.

Given that (a) agricultural water demands in Osceola County are projected to increase to at least 100.83 MGD by 2035; (b) the identified programmatic agricultural conservation measures are insufficient to meet all of the 2035 projected Osceola County agricultural demand; (c) no significant reclaimed water or other water sources have been identified to meet the 2035 agricultural water demands in Osceola County; and (d) alternative water supply options for agricultural self-suppliers are limited (see §373.709(2)(a)2., F.S.); Deseret would like to further discuss with water management district staff water supply options to meet this need and include those options in the CFWI RWSP or Solutions Plan as applicable.

Extending Consumptive Use Permit Duration and Including Additional Crops or Acreage as Incentive for Agricultural Water Conservation

The Solutions Plan emphasizes conservation as a means for meeting the project 2035 future water demand for the CFWI. As part of this emphasis, the discussion under the heading "Regulatory Measures" on page 43 of the Solutions Plan notes that regulations can be used to incentivize conservation, and gives as an example recent changes to FDEP and water management conservation rules that allow a public supply permittee to obtain a permit extension by implementing a conservation plan and demonstrating quantifiable water saving attributable to

conservation beyond that required to achieve efficient water use in the permit. This example is a beneficial program and should be expanded to include agriculture water use as a means of incenting additional agricultural conservation within the CFWI and meeting future agricultural demands.

Therefore, Deseret would request the following revision to the paragraph entitled "Regulatory Measures" on page 43 of the Solutions Plan:


Furthermore, regulations can be used to incentivize additional conservation. For example, the FDEP and water management districts recently implemented conservation rules that allow a public supply permittee to obtain a permit extension by implementing a conservation plan and demonstrating quantifiable water savings attributable to conservation beyond that required to achieve efficient water use in the permit. The FDEP and water management districts should revise their consumptive use permitting conservation rules to provide the same opportunity for agriculture. These conservation rules should be amended to allow an agricultural water use permittee to obtain a permit extension by implementing a conservation plan and demonstrating quantifiable water savings attributable to conservation beyond that required to achieve efficient water use in the permit. These conservation rules should also allow the agricultural user the option of including additional acreage and crops using water saved through demonstrated conservation. Expanding this program to also include agriculture would provide an additional means of implementing the agriculture programmatic conservation measures and meeting identified future agricultural demand. It would also provide an additional means of meeting unanticipated future agricultural needs caused by the uncertainty in agricultural demand projections. The Conservation Subteam identified

Similarly, Deseret would request that the following be added to the bulleted list on page 131 of the Solutions Plan:

- Identify and undertake rule revisions to allow agricultural water use permittees the option of extending their consumptive use permit duration by implementing a conservation plan and demonstrating quantifiable water savings attributable to conservation beyond that required to achieve efficient water use in the permit. Identify and undertake potential rule revisions to allow agricultural water use permittees the option of including additional crops or acreage into their existing permitted allocation using water saved through demonstrated conservation.

Thank you for considering Deseret's comments to the CFWI RWSP and Solutions Plan. If you have any questions regarding this letter, please contact me.

Sincerely,



David Wright
dwright@deseretranches.com

For:



13754 Deseret Lane
St. Cloud, Florida 34773
(407) 892-3672

East Central Florida Services, Inc.

4550 Deer Park Rd.
St. Cloud FL 34773
(407) 957-6651

cc: Mike Register
Mary Ellen Winkler

City of Altamonte Springs Letter



August 17, 2015

Mr. Dean Powell
South Florida Water Management District
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406

Subject: Central Florida Water Initiative (CFWI) Comments

Dear Mr. Powell,

As the CFWI water supply plan process draws to a close, the City of Altamonte Springs would like to again commend the Water Management Districts and the Florida Department of Environmental Protection for undertaking the initiative to identify sustainable water supply strategies for the Central Florida region. The process has been very open and collaborative with the opportunity for all stakeholders to come to the table. City staff has been engaged in the solutions planning phase at different levels from that of observing to leading a technical sub-team. Prior to completion of the process, we would like to provide the following comments for consideration:

- As provided in our August 8, 2012 letter, the City has concerns about the approach used to establish population projections. Though the City acknowledges the method utilized was consistent across utility providers, we still maintain the approach resulted in an artificially low future water demand calculation. Looking at historical water usage within the City's service area, it is clear that vacancies and underutilization of existing dwellings and commercial buildings during the recent economic downturn caused reductions in potable demand that will not remain true during this planning period. Using projection numbers derived from the worst recession our country has had since the great depression of the 1930's is a fundamentally flawed approach for planning the region's future water needs.
- The City believes it is critical to acknowledge and consider the progressive efforts undertaken by certain utilities to reduce potable demand within their service areas and/or participate in efforts to plan and execute alternative water supply projects to reduce or offset future demands within the region. In that light, we would like to highlight certain City projects in keeping with these goals.
 - Project APRICOT was undertaken in the late 1980s, making the City the first of its kind with a municipal irrigation demand almost 100% served by reclaimed water. The City expanded its water reclamation facility to become a regional facility and retrofitted most

Mr. Dean Powell

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August 17, 2015

of the City with dual pipe infrastructure allowing the delivery of reclaimed water throughout the majority of the service area. This project was accomplished at great expense to City rate payers and helped reduce justifiable future demand projects to less than half. The City and the region continue to benefit from this progressive investment made by the City decades ago by reducing demand on the Floridan aquifer that would have otherwise served these needs.

- More recently, the City spearheaded the cooperation between the Florida Department of Transportation, Florida Department of Environmental Protection and the St Johns River Water Management District and itself to plan, design and construct the A-FIRST alternative water supply project, which will be complete this fiscal year. Originally conceived in the mid-2000 time frame, the project was resurrected in 2012 and aggressively pursued by the City in conjunction with the timing for the I-4 Ultimate construction project, bringing it from a shelved concept to complete construction in just over a two year timeline. When complete, A-FIRST will result in the delivery of up to 4.5MGD of alternative water supply to the City of Apopka, while at the same time reducing current and future nutrient discharges to the Little Wekiva River by as much as 62,000 lbs/year and 28,000 lbs/year of Total Nitrogen and Total Phosphorus, respectively. This project will play an important role in protection of the environment in an area constrained by both water supply and quality issues. The City again progressively funded this project in conjunction with cost-share contributions from FDOT, FDEP and SJRWMD.
- The City supports the recommendation for developing potable reuse demonstration projects within the CFWI area. The technology exists to purify reclaimed water to meet drinking water standards and potable reuse is a reality in other regions of the United States, but it is important to demonstrate the technology specifically in Florida and begin development of regulations now in order to begin the groundwork for the future use of this alternative water supply. It is also important to evaluate technologies that minimize or eliminate the need for concentrate disposal, which can be an impediment to potable reuse projects within the CFWI where deep injection wells that are being used for concentrate disposal in coastal areas are not available.

The City is committed to the service of its customers and the protection of the environment and has progressively pursued opportunities to sustainably use available water supply for decades. It is important that the long-standing contributions of the City and other public utilities are considered when evaluating alternatives for future CFWI solutions phase efforts. The City is committed to the goals of the CFWI and believes it has played a vital role in accomplishing those goals within its service area.

Sincerely,



Ed Torres, M.S., P.E., LEED AP
Director of Public Works and Utilities

Cc: Franklin W. Martz, II, City Manager
Chris Rader, P.E., Division Director of Engineering/City Engineer
Jo Ann Jackson, P.E., Division Director of Water, Wastewater & Reuse

• We Are People Who Care About People •

City of Minneola, Mark E. Johnson



City of Minneola *"Discover the Possibilities"*

Pam Serviss, Seat 1
Lisa Jones, Seat 2
Pat Kelley, Seat 3
Kelly Price, Seat 4
Joe Saunders, Seat 5

August 17, 2015

Via Email to cfwiwater@sfwmd.gov

South Florida Water Management District
C.F.W.I. Comments
ATTN: Dean Powell
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406

Re: Draft C.F.W.I. Water Supply Planning Documents
City of Minneola Comments on Draft 2035 Regional Water Supply Plan

Dear Mr. Powell:

I am submitting the following comments regarding the draft Central Florida Water Initiative (C.F.W.I.) water supply planning documents on behalf of the City of Minneola. The City owns and operates a public water supply utility serving a rapidly growing customer base of over 10,000 citizens in southern Lake County, which over the next twenty years has the potential to expand to a customer base of 50,000 residents. The City has participated in and closely monitored the C.F.W.I. process, including the development of the C.F.W.I. Regional Water Supply Plan (R.W.S.P.) and the Solutions Plan. The City commends the efforts of the water management districts, and all those individuals who have contributed to the C.F.W.I. R.W.S.P. We believe a coordinated regional effort to protect our water resources and to ensure adequate water is available to meet the region's needs is essential to the continued prosperity and growth of the communities in southern Lake County, especially the City.

In the spirit of continued collaboration, the City has identified several areas of concern in the C.F.W.I. R.W.S.P. documents with regards to its existing and projected water supply needs, which may result in poor planning to meet the demands of anticipated growth. In particular, the City believes the draft R.W.S.P. significantly understates both the growth in population and water demands expected for City's service area during the planning period.

We understand that the draft R.W.S.P.'s demand projections for public suppliers located in the St. Johns River Water Management District were prepared by multiplying the average 2006-2010 unadjusted gross per capita rate, a period of economic downturn, for each public supplier

by a projected service area population derived from a proprietary model that incorporates 2011 University of Florida Bureau of Economic and Business Research (B.E.B.R.) medium county permanent population projections. Additionally, it is our understanding that the draft R.W.S.P. indicates a second public supply demand projection was prepared using the 2011 B.E.B.R. high population projections, which resulted in a projected public supply water demand that is fourteen percent (14%) higher than in the B.E.B.R. medium scenario. The City's concern is that in the case of its service area, both the B.E.B.R. medium and high methodologies do not take in to account known and approved housing and roadway improvement projects, and therefore grossly underestimate the projected growth in population and water demands for the City's 2015 to 2035 planning period.

Table A-1 in Appendix A to the draft R.W.S.P. contains the projected population and demand projections for public suppliers, derived using the B.E.B.R. medium scenario:

CFWI Draft RWSP Public Supply Population and Water Demand Projections for the City of Minneola: BEBR Medium Scenario											
Population Projections						Demand Projections (5 in 10)(mgd)					
2010	2015	2020	2025	2030	2035	2010	2015	2020	2025	2030	2035
9,535	10,480	11,619	12,876	14,251	15,868	1.48	1.62	1.80	2.00	2.21	2.46

As stated above, the City believes these projections drastically understate the growth in population and water demand that will occur within its service area between 2015 and 2035, based on several factors. First, the gross per capita demand amount does not take documented new development characteristics into account. Unlike new developments, the majority of the City's current customer base has mature landscaping, most of which has historically not been irrigated. In addition, new home construction typically includes in-ground automatic irrigation systems and requirements for upkeep of lawns and landscaping, which results in a higher water demand than what has historically been realized; therefore, there is a significant difference in water use patterns for new home construction compared the City's existing customer base. Second, the projection methodology uses proprietary modeling, applied using data extracted from a period of low growth during an economic downturn, that has not been updated in over four years, and thus does not take into account more recent changes in growth drivers and inhibitors within the census block levels used in the model.

Population and water demand projection concerns are particularly acute in the case of the City, where utility service lines have been extended and new and already vested and approved residential and mixed-use developments have begun construction. In addition, new roadways are going in and transportation access will result in greater growth rates than previously recognized. More specifically, within the City's service area, eight vested developments have been approved, which on buildout will comprise 9,694 new residences, 9,141 of which are single family units. The City anticipates that 8,990 of these new homes will be built within the 20-year planning period of the draft R.W.S.P. This reflects a significant increase in both its projected population growth rate and the estimated water demand projected in the draft

R.W.S.P. This new development will also use more water on a per capita basis than is currently the case due to development characteristics associated with new home construction, mainly irrigation demands. This per capita increase is a reflection of water demands associated with new home construction, not a reflection of the inefficient use of water, and is similar to new home construction demands and gallons per capita realized by other C.F.W.I. municipalities.

The following table reflects what the City believes will be the projected increase in population and water demand for the 2015 to 2035 planning period, based upon already approved and currently occurring residential growth:

City of Minneola's Service Area Population and Water Demand Projections											
Population Projections						Demand Projections (5 in 10)(mgd)					
2014	2015	2020	2025	2030	2035	2010	2015	2020	2025	2030	2035
10,870	11,150	19,107	29,599	39,939	50,596	1.48	2.08	4.12	7.00	9.82	12.73

We believe this table reflects the most representative projections of the expected growth in population and water demand within the City's service area. Our confidence in these projections is based on several factors. As explained above, the projected growth is based on development that has already been vested and approved. Furthermore, the Florida Department of Transportation has begun construction on a new interchange in the City for the Florida Turnpike north of State Road 50 and south of U.S. Highway 27, which was approved based on the Hills of Minneola Development of Regional Impact, which is located within the City's service area. In conjunction with this Turnpike project, Lake County has approved construction of an extension to Hancock Road to serve this new development. These projects will significantly improve the City's accessibility to the Greater Orlando market, which will be a significant driver of growth during the planning period. Finally, the City's water use projections for these new developments are based on actual water use by developments within Lake County, which are comparable in terms of persons per household, lot size, irrigable area, irrigation requirements. This water use data provides a more reliable guide regarding expected future water use within the City's service area than the existing water use estimates that are the basis for the C.F.W.I. R.W.S.P. water use projections.

Minneola recognizes that the primary purpose of the public supply population and water demand projections prepared in the C.F.W.I. process is to evaluate changes in water use on a regional basis, in order to assure that our water resources are protected and that regional water supply needs are met. However, the utility-specific projections for Minneola found in the draft R.W.S.P. have significant implications for the City's own planning obligations. For example, planning for future water demands in the next draft of the City's Water Facilities Plan, based on the City's water use projections rather than the water use projections contained in the C.F.W.I. R.W.S.P., could be used by the Department of Economic Opportunity to find that the Water Facilities Plan is not in compliance because it is not financially feasible. Furthermore, to the extent that projections contained in the R.W.S.P. may be later used in the

consumptive use permitting process, reliance on unrealistically low population of water demand projections could result in a permitted allocation that is wholly inadequate to meet the City's actual water needs. These consequences, and the fact that the City's own projections differ so significantly from the projections contained in the R.W.S.P., compel us to express our concerns and request that the information outlined above be acknowledged and taken into consideration before the R.W.S.P. is finalized.

We appreciate the opportunity to provide comments on the draft R.W.S.P., and look forward to continuing to work with the water management districts on the important water supply issues in our region. Thank you for your consideration, and please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark E. Johnson', with a long horizontal flourish extending to the right.

Mark E. Johnson, City Manager
City of Minneola

cc: Sarah Whitaker, S.M.W. Geosciences, Inc.
Edward P. de la Parte, de la Parte & Gilbert, P.A.

Greater Arlington Civic Council

GREATER ARLINGTON CIVIC COUNCIL, INC.

PO BOX 8283, JACKSONVILLE, FL 32202

WHEREAS, the St. Johns River is our community's greatest natural resource; and

WHEREAS, the St. Johns River Water Management District (SJRWMD), has concluded in their St. Johns River Water Supply Impact Study (WSIS) that an excess of 150 million gallons of water daily could be safely removed from the St. Johns River between the headwaters and Deland to provide drinking water for Orlando and Central Florida; and

WHEREAS, a group of independent scientists and experts from the National Research Council (NRC) conducted a peer review of the WSIS, and while acknowledging its benefits, identified significant shortcomings and limitations in the study and expressed concerns regarding many of the conclusions; and

WHEREAS, according to the Central Florida Water Initiative (CFWI) Water Supply Plan, the total proposed withdrawals from the St. Johns could exceed 150 million gallons daily; and

WHEREAS, large-scale water withdrawals may worsen existing pollution problems, increase the frequency of toxic algal blooms, further reduce flow, increase salinity levels farther upstream, and adversely impact the fisheries, wildlife and submerged vegetation in and along the St. Johns and its tributaries; and

WHEREAS, CFWI has not required any mandatory conservation programs for the requesting counties prior to those counties removing water resources from the St. Johns River; and

WHEREAS, no one, including the CFWI, fully understands all of the potential impacts to the River's health and fisheries from the proposed withdrawals; and

WHEREAS, once the removal of the water has begun and the impacts, whatever they may be, propounded, the reversal of such water withdrawal will be difficult if not impossible; now, therefore

BE IT RESOLVED that the GREATER ARLINGTON CIVIC COUNCIL, INC. opposes the withdrawal of millions of gallons of water a day from the St. Johns River to meet the irrigation and drinking water needs of Orlando and Central Florida; and

BE IT FURTHER RESOLVED that the CFWI should mandate aggressive water conservation measures to reduce the amount of water being withdrawn from the Floridan Aquifer and pursue more sustainable, long-term solutions to Florida's water problems including the reuse of reclaimed water and stormwater, use of smart growth management practices to prevent unsustainable development and implementation of green building principals.

Dated August 13, 2015

By Lad Hawkins, President

A handwritten signature in blue ink, appearing to read "Lad Hawkins", is written over the printed name.

Donald Blanchard

Donald H. Blanchard, Esq.
301 Second Street
Atlantic Beach, FL 32233
Abcde08@comcast.net

August 14, 2015

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

RE: CFWI Proposals for Draft Regional Water Supply Plan

Dear Mr. Powell and Governing Board members:

I am writing to express my concerns about the recent Central Florida water planning effort. As described below, I believe the Board and the Districts are ignoring the vital role that conservation must play in this matter. And we must not include surface waters in the calculus unless and until major new rules are adopted to enforce such conservation.

As you know, Central Florida is reaching the sustainable limits of its predominant source of water, the Floridan Aquifer, and faces a projected future water deficit of 250 million gallons of water a day (mgd). As a result, three of the water management districts created the Central Florida Water Initiative (CFWI) to develop alternative sources of water to meet the growing demand in this region.

Inherent Conflict of Interest

Unfortunately, your Board and the Water Management Districts have a serious conflict of interest in dealing with this issue. Per state statute, the Districts must provide enough water to meet the demand of Floridians, while also fully protecting our water resources (FL Water Resources Act, 1972). Now, the CFWI and the participating Districts are faced with the challenge of adopting a water supply plan that somehow satisfies both charges of this contradictory mission.

To address the water "demand" of Central Florida, the Board has identified the St. Johns River as the primary source for the needed water. How can you allow millions of gallons of water a day to be withdrawn from the flow of the river, while also fulfilling

SFWMD
August 14, 2015
Page 2

your duty to “protect” this important water resource? Unfortunately, you can’t. As a result, the Board and Districts must focus on more sustainable options, such as conservation, by requiring companies, farmers and utilities to use our existing water supplies much more efficiently. In order to protect our surface waters, you must now adopt meaningful conservation standards for all CUPs. Only after that is done could you justify surface water withdrawals under your charge to “protect” our surface waters. In effect, strong conservation has become a condition precedent to Any future use of surface waters like the St. Johns river.

We Have Reached the “Tipping Point” in Florida

We have reached a point where we must change our approach to water use and planning. As you know, Florida’s water belongs to the state, in public trust for the people. This is unlike most states, where private water ownership rights exist. We must change the calculus of water and protect it as a valuable, finite resource that belongs to all of us, not a cheap commodity that is to be given away to whoever requests it. Perhaps it is time to put a real, per gallon price on the hundreds of millions of gallons of our water that the CFWI plans to “give away” to satisfy the increasing demand of users in this region.

It is also time to get more serious about protecting the St. Johns River and the aquifers that belong to all Floridians, instead of using them to fuel more unsustainable growth. There should be no use of surface waters until strict conservation standards are adopted, with serious inspections of users and financial penalties to assure compliance with CUP terms. We can no longer afford to use water so carelessly or to give-away our water resources to CUP applicants without a serious commitment to conservation by all parties.

Thank you for your consideration and for your service. Please contact me at any time if you wish to discuss this matter.

Sincerely,

Donald Blanchard

CC: Governing Board

City of Jacksonville



OFFICE OF THE MAYOR

LENNY CURRY
MAYOR

CITY HALL SUITE 400
117 W. DUVAL STREET
JACKSONVILLE, FL 32202

August 17, 2015

Mr. Drew Bartlett, Chair
Central Florida Water Initiative Steering Committee
c/o Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399

Dear Deputy Secretary Bartlett:

Thank you for extending the period for public comment on the proposed "2035 Water Resources Protection and Water Supply Strategies Plan" that was developed under the auspices of the Central Florida Water Supply Initiative (CFWI). The work of the Department of Environmental Protection (DEP) and the three water management districts overseeing the CFWI is critical to ensuring that Florida's water resources are properly managed for the benefit of all our citizens.

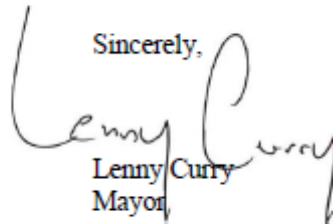
While the work of the DEP and the CFWI in attempting to identify viable water protection and supply strategies is appreciated, I am nonetheless concerned about certain aspects of the draft plan. Therefore, as the period for public comment draws to a close, I would like to offer the following recommendations on behalf of the consolidated City of Jacksonville:

1. Aggregate water use in the five-county area (Seminole, Orange, Osceola, Polk and southern Lake County) of the CFWI has been flat for the period of 1995 to 2012 despite an increase in total population of approximately 50%. Consequently, it is our belief that the projected need for an additional 300 million gallons a day by 2035 may be overstated. Before any plan for surface water withdrawals moves forward, we recommend that CFWI study teams reassess the projections for future water demand inside the CFWI service area.
2. The plan allows for the withdrawal of, at most, an additional 50 million gallons of groundwater per day by 2035; a tacit admission that the portion of the aquifer supplying Central Florida is already close to exhaustion. Under these circumstances, we recommend that the final plan place substantially greater emphasis on all forms of water conservation, as well as efficiency programs, as a means of addressing future water needs.

3. The official position of the consolidated City of Jacksonville, as stated in City Council Resolution 2014-37-A, is that we are opposed to surface water withdrawals from the upper and middle basins of the St. Johns River at this time and under these circumstances. Instead, we recommend revisiting the issue of surface water withdrawals when the plan is updated in 2020. We also recommend that a variety of alternative water sources, other than surface water withdrawals from the St. Johns River, be explored over the next several years. Specifically, we recommend that the CFWI conduct a thorough evaluation of the Grove Land Reservoir and Stormwater Treatment plan to determine its potential as an alternative water supply.

While I am sympathetic to the future water needs of Central Florida, transfers of water outside the St. Johns River watershed should be a last resort. Instead, the CFWI should do everything possible to forestall surface water withdrawals from the St. Johns River; withdrawals that could not only affect the health of the river and long term water availability, but would also set an unwelcome precedent for future water supply planning initiatives.

On behalf of the City of Jacksonville, I look forward to working with stakeholders to find a solution to the region's water needs that protects Florida's water resources for future generations.

Sincerely,

Lenny Curry
Mayor

Audubon Florida



Audubon FLORIDA

August 17, 2015

Dean Powell
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406

1101 Audubon Way
Maitland, Florida 32751
Tel: (407) 620-5178
www.audubonofflorida.org
chlee2@earthlink.net

RE: Comments of Audubon Florida on draft 2035 Water Resources Protection and Water Supply Strategies Plan

Dear Mr. Powell:

The following constitute the comments of Audubon Florida regarding the draft 2035 Water Resources Protection and Water Supply Strategies Plan.

We believe that the plan as currently drafted substantially fails to recommend measures which will achieve the advantages of regionally effective water conservation.

Most of the water conservation success measured on a per capita basis that is considered in the plan results from past regulatory actions, primarily the implementation of the state plumbing code and federal legislation mandating the installation of water conserving toilets and other end use plumbing fixtures. Monitoring of per capita use declines presented (see Figure 4, Page 18) shows a substantial decline in residential per capita use which began just after the implementation of federal requirements for 1.6 per gallon flush toilets and similar fixture standards circa 1994. The decline of per capita use essentially ceased in 2005 and has remained "flat" for the decade subsequent to that date. The failure achieve further advancements in the reduction of per capita use since that date has occurred regardless of the fact that all three Water Management Districts have consistently "promoted" water conservation, and have established regulatory requirements that cause utilities holding Consumptive Use Permits to also "promote" water conservation.

Audubon Florida believes that the most cost effective source of potable water supplies to meet the needs of future growth is the additional reduction of per capita use through regulatory mechanisms and specifically targeted financial incentives.

Recommendations

We believe that the 2035 CFWI plan should be amended to include the following regulatory proposals:

1. Make the Florida Water StarSM water conservation certification program mandatory for any new construction in the CFWI area. Gold certification would be preferable to Silver and the use of native plants should be mandatory.
2. Require utilities, as a condition of CUP permits, to obtain certification that any building built prior to 1993 has been retrofitted with WaterSense[®] certified plumbing fixtures prior to the “turn on” of potable water for the new customer subsequent to a real estate sale.
3. Require, as a condition CUP permits, that utilities offer landscape replacement rebate/subsidy programs to encourage the elimination of water wasting landscapes at existing homes and businesses through the replacement landscape materials with “Florida Friendly” native plants that do not require maintenance irrigation.
4. Seek legislation to modify the State Plumbing Code to require that all new construction* must use USEPA WaterSense[®] certified fixtures and devices (California, Colorado, Georgia and Texas have done this already), as well as ENERGY STAR qualified appliances. (*Note- new construction should clearly include issuance of any building permit to remodel or expand any existing structure. In the case of remodeling or expansion, all water fixtures within both existing and new portions of the structure should be compliant with WaterSense[®] standards.)

The pre capita reductions achieved the period covered by Figure 4, Page 18 largely resulted from the U.S. Energy Policy Act of 1992, which mandated 1.6 gallon per flush toilet fixtures in addition to other requirements. Significant reductions in water use below 1.6 gallons per flush are now available through WaterSense[®] certified plumbing fixtures. Further, there is a very large inventory of existing buildings constructed prior to 1994 (when the U.S. Energy Policy Act’s 1.6 GPF standard went into effect). A survey of the construction dates of currently occupied structures in Orange County, FL (both residential and commercial) documents that approximately 207,000 structures built prior to 1994 continue in use. Similarly large inventories of older structures with large numbers of antiquated plumbing fixtures exist in every county. It is essential that antiquated plumbing fixtures in these older buildings be replaced with water conserving fixtures. While certain utilities within the CFWI area offer rebate programs to customers encouraging the replacement of older fixtures, the impact of these voluntary programs on the existing inventory antiquated plumbing fixtures in old structures is minimal.

Numerous local jurisdictions around the nation now require certification that modern water saving plumbing fixtures are in place prior to allowing utilities to be turned on for new customers who have purchased real property. An excellent example of these regulatory programs can be found in Dekalb County, Georgia. References to the Dekalb County regulatory program can be found at:

<http://dekalbwatershed.com/PDF/plumbingFixturesReplacement.pdf>

http://www.dekalbwatershed.com/PDF/low_flow_faqs.pdf

<http://www.garealtor.com/PoliticalAdvocacy/LegislativeResources/IssuesResources/DeKalbPlumbingFixturesRetrofitPlan/tabid/225/Default.aspx>

With regard to landscape irrigation, requiring future development to utilize “Florida Friendly” landscaping and specifically plants native to Florida from the “Florida Friendly” list will eliminate most landscape irrigation needs. CFWI should utilize a variety of strategies to both require future landscaping to be sustainable without maintenance irrigation, and to encourage, through incentives, the replacement of existing “water wasting” landscape choices made in the past.

Other jurisdictions in the United States have clearly taken the lead in this regard. CFWI should include recommendations for requirements in utility CUP permits that would require Florida utilities to emulate successful programs in other jurisdictions.

In particular the programs of the Southern Nevada Water Authority, and the City Austin, Texas should be considered.

These utilities are aggressively paying homeowners and owners of commercial property to remove their lawns or reduce the size of their lawns and switch to landscape requiring little or no irrigation. The Southern Nevada Water Authority will pay up to \$1.50 per square foot, up to 5,000 square foot and \$1.00 per square foot from 5,000 square feet and up, with a \$300,000 cap per property where lawns are eliminated. These utilities are finding that these programs are cost effective, and are providing “new water” for their systems at a cost significantly lower than other options.

For information on the Southern Nevada Water Authority and City of Austin programs, see:

<http://www.snwa.com/rebates/wsl.html>

<http://austintexas.gov/department/waterwise-landscape-rebate>

In conclusion, we find the failure of the current recommendations in the CFWI 2035 Water Resources Protection and Water Supply Strategies Plan to meaningfully advance water conservation to be very disappointing.

We urge the decision makers in CFWI to correct this by incorporating substantial modifications to the plan. We hope that you will consider the specific recommendations in this letter as you develop changes in the plan responsive to public comment.

Sincerely,



Charles Lee
Director of Advocacy

East Central Florida Services

East Central Florida Services, Inc. | 4550 Deer Park Rd. St. Cloud, FL 34773 | (407) 957-6651

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.

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East Central Florida Services, Inc. | 4550 Deer Park Rd. St. Cloud, FL 34773 | (407) 957-6651

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

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East Central Florida Services, Inc. | 4550 Deer Park Rd. St. Cloud, FL 34773 | (407) 957-6651**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

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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.

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St. Johns Riverkeeper, Lisa Rinaman



August 17, 2015

Mr. Drew Bartlett,
Chair Central Florida Water Initiative Steering Committee
c/o Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399

Dear Deputy Secretary Bartlett,

The St. Johns River is a treasured watershed that provides enormous ecological, recreational, economic and aesthetic benefits for all Floridians. In 1998, President Clinton recognized the importance of the St. Johns River with a designation of an American Heritage River. The St. Johns is the only river in Florida and one of only 14 rivers in the entire United States to receive this prestigious national recognition. More recently, the America's Great Waters Coalition named the St. Johns to its list of our country's Great Waters.

Unfortunately, the ecological health and integrity of the St. Johns River system is threatened due to years of neglect and the cumulative impacts of a growing population.

Fortunately, the State of Florida, the St. Johns River Water Management District and local governments throughout the watershed have invested millions of public dollars to restore the health of the St. Johns and to undo the damage. However, the St. Johns and many of its tributaries are still impaired, with much work left to be done. Every effort must be made to avoid undermining this significant public investment and the progress that has occurred.

Clean, fresh water is the lifeblood of the St. Johns River and its tributaries. Our wetlands, forests, riparian zones adjacent to waterways, and aquatic plants provide the habitat and food sources that sustain healthy plant, fish, and wildlife populations. The St. Johns system also sustains nearly 5 million people who live within its watershed.

The St. Johns Riverkeeper's (SJRK) mission is to work on behalf of the community for clean and healthy waters in the St. Johns River, its tributaries and its wetlands, through citizen-based advocacy.

Since 2005, SJRK has actively participated in the public conversation and voiced our concerns regarding the controversial proposals to remove water from the St. Johns River. SJRK remains adamantly opposed to surface water withdrawals to meet future water demand due to the ecological impacts to the St. Johns and its tributaries. SJRK challenges the need for water withdrawals and questions the societal benefits in light of the enormous economic and

environmental costs. SJRK continues to urge our leaders to make water conservation the priority.

Unfortunately, Florida's water planners continue to rely heavily on unsustainable surface water withdrawals, fail to make water conservation a priority and appear to be driving decisions with inflated population and water demand projections.. To make matters worse, those who stand to benefit from this apparent water grab are driving the process without the involvement of stakeholders most at risk from being adversely impacted

Central Florida Water Initiative – Fueling Sprawl

Central Florida has reached the sustainable limits of its predominant source of water, the Floridan Aquifer, with an average total water use expected to increase from approximately 800 million gallons a day (mgd) to 1,100 mgd in 2035. As a result, The St. Johns River, South Florida and Southwest Florida Water Management Districts created the Central Florida Water Initiative (CFWI) to identify alternative sources of water to meet the projected demand and fuel further unbridled growth.

The CFWI Planning Area is located in Central Florida and consists of all of Orange, Osceola, Seminole, and Polk counties and southern Lake County, covering approximately 5,268 square miles.

The CFWI Planning Area is currently home to approximately 2.7 million people and supports a large tourism industry, significant agricultural industry, and a growing industrial and commercial sector. According to the CFWI, the area's population is projected to reach approximately 4.1 million by 2035, which is a 49 percent increase from the 2010 estimate.

In May 2015, the CFWI released an updated Draft Regional Water Supply Plan (CFWI RWSP) and the 2035 Water Resources Protection and Water Supply Strategies Plan (CFWI WSSP)¹ to address future steps toward meeting water supply needs of the CFWI Planning Area. These plans rely heavily on surface water withdrawals and not enough on proven, cost-effective conservation strategies. Of the projected 250 mgd deficit, only 37 mgd is estimate to come from conservation initiatives. This is actually less than 42 mgd that was originally projected in previous drafts. In addition, the CFWI estimates that 50 mgd of traditional groundwater remains available that will not cause additional ecological harm. SJRK challenges that estimate due to the clear evidence that the Floridan Aquifer is already over-tapped in the Central Florida area.

In the 2014 draft plan, the CFWI calls for potentially withdrawing more than 150 million gallons of water a day (mgd) from the St. Johns at an estimated expense of nearly \$1.5 billion. The current CFWI Plans propose to increase withdraws from the St. Johns River to 160 mgd to yield 134 mgd at a cost of \$1.79 billion. The CFWI has also identified the Ocklawaha River, the largest tributary of the St. Johns, as a potential source for millions of additional gallons of water.

¹ "CFWI Plans" refer to both of the newly updated CFWI RWSP and the CFWI WSSP.

Unfortunately, the CFWI Plans fail the public by not protecting the public's natural resources while facilitating the continuation of unsustainable growth and the unsustainable use of water.

CFWI - Flawed Process, Flawed Plan, Flawed Justification

FLAWED PROCESS

Florida Statute 373.709 Regional water supply planning. —

(1) The governing board of each water management district shall conduct water supply planning for a water supply planning region within the district identified in the appropriate district water supply plan under s. 373.036, where it determines that existing sources of water are not adequate to supply water for all existing and future reasonable-beneficial uses and to sustain the water resources and related natural systems for the planning period. The planning must be conducted in an open public process, in coordination and cooperation with local governments, regional water supply authorities, government-owned and privately owned water and wastewater utilities, multijurisdictional water supply entities, self-suppliers, reuse utilities, the Department of Environmental Protection, the Department of Agriculture and Consumer Services, and other affected and interested parties. The districts shall actively engage in public education and outreach to all affected local entities and their officials, as well as members of the public, in the planning process and in seeking input.

LIMITED PUBLIC PARTICIPATION

The 2014 draft CFWI RSWP reports, "The Districts conducted more than 91 public workshops, presentations, and meetings to explain CFWI RWSP, collect input on the major components of the CFWI RWSP, and develop water resource and water supply development project options."

Unfortunately, all but one of the referenced workshops and meetings were held within the CFWI Planning Area. Although years of discussion took place developing water policy and water supply decisions that affect the entirety of the three participating Water Management Districts, the meetings were limited to the five county area of the CFWI, ignoring stakeholders in the other 43 affected counties.

In addition, the CFWI completely failed to engage public officials outside the CFWI Planning Area in the planning process or even to reach out to them to make sure they were aware of the impending plans and the opportunities that existed for input. This flawed public process does not meet the requirements of Florida Statute, foster public participation or provide an open public process.

STAKEHOLDER CONCERNS BLATENTLY IGNORED

In 2007-2008, more than 60 local government and civic organizations passed resolutions opposed to water withdrawals from the St. Johns and Ocklawaha Rivers. Four resolutions

opposing the water withdrawals have been unanimously adopted in 2014, including the City of Neptune Beach and the City of Jacksonville.

In Spring 2014, CFWI held a meeting at Stetson University in Deland, Florida at our request. With more than 100 elected officials and stakeholders from the 13 counties adjacent to the St. Johns River, the SWFWMD and SFWMD leadership seemed shocked to learn of the collective concerns of counties downstream from the CFWI Planning Area. Promises were made, but unfortunately, concerns were never addressed and no follow-up was ever made.

In fact, the CFWI made little to no effort to involve community leaders, elected officials, and residents outside of Central Florida, despite the fact that downstream communities would potentially be impacted by the proposed surface water withdrawals from the St. Johns.

The CFWI did not organize a public meeting in Northeast Florida until June 29, 2015, a little more than a month from the original public comment period deadline. At that meeting, surface water withdrawals were not even mentioned, until St. Johns Riverkeeper raised the question. Recently, CFWI has reacted to growing concerns in NE Florida with a few additional meetings, but much work must be done before the CFWI documents are finalized.

CENTRALIZED DECISION MAKING OUT OF THE SUNSHINE

The CFWI Planning Teams continue to meet regularly in Central Florida to develop water policy, more detailed water supply plans, consistent rules and amended regulations for the South Florida, Southwest Florida and St. Johns River Water Management Districts.

“The CFWI Solutions Planning Team will use this CFWI RWSP to select specific water supply and water resource development projects to meet the water needs of the region.” (Pg. iii, CFWI RWSP Executive Summary)

“A (CFWI) Regulatory Team will establish consistent rules and regulations for the three Districts that meet the collaborative process goals and implement the results of this CFWI planning effort.” (Pg. 168, CFWI RWSP)

Members of the public are sometimes invited to attend or call-in to these critical committees, but the public is not allowed to participate or ask questions. In addition, not all meetings are even open to the public.

Stakeholders throughout the SJRWMD, SFWMD and SWFWMD have little chance of participating in important water policy discussions. Each team is set up to represent important stakeholders groups – public water supply utilities, regional leaders, business representatives, agriculture landowners and the environmental organizations. Without the requirement of noticed, transparent, and open public meetings, individual participants and special interests have a greater opportunity to privately drive the agenda. This lack of stakeholder involvement and transparency could lead to rules, regulations, and water supply projects that are not in the best interest of the public or the St. Johns River.

ACTIVE LEGAL CHALLENGE

In 2009, Putnam County Environmental Council (PCEC) filed a Request for Review to the Florida Land and Water Adjudicatory Commission (FLWAC), asking for a review the 4th Addendum of 2005 SJRWMD Water Supply Plan. and the SJRK, along with the Public Trust Environmental Legal Institute of Florida, Inc., Florida Audubon Society, Inc. and Florida Defenders of the Environment, submitted an Amici Curiae Brief supporting PCEC's case. PCEC requested the Commission "determine that the Fourth Addendum . . . improperly identifies surface water withdrawals from the St. Johns River and the Ocklawaha River as 'alternative water supplies' under Section 373.109(1), Florida Statutes, and to order that such designations be stricken and/or specifically limited to capture during wet weather flows." The FLWAC Secretary declined review request, claiming FLWAC was without jurisdiction. However, on April 25, 2014, the First District Court of Appeal ruled that the Water Supply Plan "raises a policy issue sufficient to invoke the Commission's jurisdiction" and reversed the order declining review. As a result, this legal challenge is still active and must be addressed by FLWAC before the CFWI Plans or any other supply plans that include surface water withdrawals are considered for approval.

FLAWED PLAN

STEEP, UNREALISTIC POPULATION GROWTH

CFWI estimates future public supply water demand by multiplying the average 2006 to 2010 unadjusted gross per capita rate by the projected population for each five-year increment of the plans. This flawed approach ignores the historical trends of declining per capita rates of consumption, the potential of ongoing conservation programs and incentives and the likelihood of future advances in conservation technologies, strategies, and policies. As a result, the conclusions and recommendations of CFWI Plans are based on unrealistic water use deficit projections that are likely to significantly exceed actual demand in 2035.

CFWI FAILS TO MAKE WATER CONSERVATION A PRIORITY

According to the SJRWMD, "lawn and landscape irrigation accounts for more than half of all residential water use."

"It is the duty of the state and local governments, as well as water providers, to educate, incentivize and, in some cases, require actions, which lead to conservation." (Pg. 77 – CFWI RWSP)

Unfortunately, many effective tools driving water conservation have been eliminated recently due to budget cuts and special interests.

- Educational programs designed to promote water conservation have been abandoned.
- Incentive programs are lacking.
- Deregulation in Tallahassee relies on voluntary, less aggressive conservation measures.

- Enforcement of existing protective regulations is insufficient.

The previous draft of the CFWI RWSP determined that only “42.3 million gallons per day (mgd) or 3.9 percent of the projected demand for 2035 can be eliminated by water conservation” and those estimates are “based on voluntary consumer actions.” (P. 78, chapter 5) Despite that fact that such a large percentage of water from the public supply is used for irrigation, the CFWI RWSP only estimated a 2.8% potential savings rate for outdoor conservation. The plan also estimated a meager 1.2% potential savings rate for Commercial/Industrial/Institutional customers.

The revised CFWI Plans attempt to present a narrative illusion of prioritizing water conservation stating that “water conservation is an important element in meeting future water needs.”

But, CFWI has now actually reduced the “starting point” of water conservation savings from the 2014 42.3 mgd to 36.8 mgd. If water conservation is a priority, it is counterproductive to use a “starting point” for planning purposes instead of an actual goal. In regards to Alternative Water Supply (AWS), CFWI uses a projected goal instead of a “starting point” demonstrating CFWI’s prioritization of AWS instead of water conservation.

CFWI states “that additional savings could be available through higher participation rates of BMPs (Best Management Practices) or implementation of other conservation measures.” But CFWI did not focus their approach on how best to increase participation through reasonable, responsible and quantifiable water conservation mandates stating “lack of authority.” In contrast, CFWI made a herculean effort to determine all permitting and legislative “impediments” to siphoning more than 160 mgd from the St. Johns River and will be spearheading a legislative effort to remove those protections in the 2016 Legislative Session.

If CFWI had focused on removing “impediments” to achieving more water savings with conservation, a plan would emerged that would produce enough water savings to meet the inflated CFWI demand projections.

The State of Florida needs bold leadership to craft statewide water policy that prioritizes water conservation, sustainable building and planning practices, incentives that encourage the efficient use of water, and market solutions, such as aggressive conservation rates and pricing strategies for CUP withdrawals.

WATER CONSERVATION MUST BE A PRIORITY

“The overall conservation goal of the state is to prevent and reduce wasteful, uneconomical, impractical, or unreasonable use of water resources.” (Section 373.227(1), F.S.)

Unfortunately, our limited public resources are being directed towards new risky sources of water instead of addressing the root causes of our water supply problems and exhausting all opportunities to use existing water resources more efficiently.

Voluntary measures alone are not sufficient. Water pricing strategies and mandatory requirements must also be implemented and enforced to achieve maximum conservation and efficiency benefits.

The following charts illustrate how responsible regulatory measures can greatly reduce water use resulting in sustainable protection of Florida's water supply.

Based on past history, CFWI can expect Public Supply and Self-Supplied Water Users to save approximately 32.45 mgd due to water conservation as shown in the following table.

Program Savings Table from draft report, with participation rates based on past history

Use Sector	Conservation Practice	Modeled Participation Rate	Total Number of Implementations	Cost (\$/kgal) ¹⁾	Total Cost (\$ million)	Estimated Savings (mgd)
Public Supply	Advanced ET Irrigation Controllers ²⁾	25%	2,845	\$0.88	\$1.14	0.28
	CII Facility Water Assessment/Audit	12.50%	169	\$2.41	\$0.50	0.10
	Irrigation System Audits	12.50%	99,695	\$2.65	\$6.00	1.21
	High-Efficiency Toilets	23%	373,215	\$0.74	\$74.70	7.45
	High-Efficiency Faucet Aerators	23%	1,057,602	\$0.40	\$16.30	7.35
	High-Efficiency Showerheads	25%	527,728	\$0.09	\$11.50	8.68
	High-Efficiency Urinals	23%	3,808	\$0.52	\$1.40	0.30
	Pre-Rinse Spray Valves	23%	307	\$0.04	\$0.02	0.20
	Soil Moisture Sensors	23%	28,617	\$1.07	\$2.00	1.51
	Waterwise Florida Landscaping ³⁾	0.10%	3,956	\$1.77	\$7.91	0.87
PS Sub-total					\$122.17	27.91
Other Self-Supplied	CII Facility Water Assessment/Audit	12.50%	8	\$2.41	\$0.02	0.005
	Irrigation System Audits	12.50%	TBD	\$2.65	\$4.00	0.05
	High-Efficiency Toilets	23%	39,275	\$0.74	\$7.86	0.78
	High-Efficiency Faucet Aerators	23%	111,292	\$0.40	\$1.72	0.77
	High-Efficiency Showerheads	25%	33,333	\$0.09	\$1.19	0.9
	High-Efficiency Urinals	23%	226	\$0.52	\$0.08	0.02
	Pre-Rinse Spray Valves	23%	18	\$0.04	\$0.00	0.01
	Soil Moisture Sensors	23%	TBD	\$1.07	\$2.30	1.19
Other self-supply sub-total					\$17.97	4.65
Total					\$140.14	32.56

By prioritizing water conservation, CFWI can increase water savings to 117.30 mgd. The following table factors in reasonable regulation and targeted cost-sharing to yield a much greater water savings. By updating the Florida Building Code, new construction water efficiency would dramatically reduce future demand. In addition, existing water users must participate in effective conservation programs to protect Florida's water supply. A combination of regulatory measures and incentives makes responsible participation affordable.

Program Savings Table, with participation rates based on moderately aggressive water conservation implementation over 20 years

1. 95% for new growth (reasonable if Florida Building code is updated to include these water efficiency measures)
2. 40 to 70% for existing water users (reasonable with targeted cost-sharing over 20 years)

Use Sector	Conservation Practice	Modeled Participation Rate	Total Number of Implementations	Cost (\$/kgal) ^b	Total Cost (\$ million)	Estimated Savings (mgd)
Public Supply	Advanced ET Irrigation Controllers ^a	77%	9,525	\$0.86	\$8.82	0.87
	Oil Facility Water Assessment/Audit	55%	771	\$2.41	\$2.28	0.48
	Irrigation System Audits	55%	454,199	\$2.65	\$27.36	5.52
	High-Efficiency Toilets	77%	1,249,459	\$0.74	\$250.08	24.94
	High-Efficiency Faucet Aerators	77%	3,540,661	\$0.40	\$54.57	24.61
	High-Efficiency Showerheads	77%	1,766,742	\$0.09	\$37.83	28.99
	High-Efficiency Urinals	77%	12,749	\$0.52	\$4.89	1.00
	Pre-Rinse Spray Valves	77%	1,028	\$0.04	\$0.07	0.67
	Soil Moisture Sensors	77%	85,805	\$1.07	\$0.71	5.06
	Waterwise Florida Landscaping ^a	4%	30,560	\$1.77	\$79.10	8.70
PS Sub-total					\$469.50	100.81
Other Self-Supplied	Oil Facility Water Assessment/Audit	55%	35	\$2.41	\$0.09	0.02
	Irrigation System Audits	55%	780	\$2.65	\$21.12	4.18
	High-Efficiency Toilets	77%	131,486	\$0.74	\$26.31	2.61
	High-Efficiency Faucet Aerators	77%	372,586	\$0.40	\$5.76	2.58
	High-Efficiency Showerheads	77%	185,913	\$0.09	\$3.96	3.01
	High-Efficiency Urinals	77%	757	\$0.52	\$0.27	0.07
	Pre-Rinse Spray Valves	77%	60	\$0.04	\$0.00	0.03
	Soil Moisture Sensors	77%	780	\$1.07	\$7.70	3.98
Other self-supply sub-total					\$65.23	16.49
Total					\$534.73	117.30

Water conservation and smart growth management practices will not only protect Florida's long-term water supply but will also realistically save billions of dollars and potentially save the St. Johns River and other Florida waters from significant harm. Water conservation will also save taxpayers billions of dollars by reducing the need for environmental restoration to restore the damage done by over consumption.

The bottom line is that water conservation does work, can potentially meet most if not all of our water supply needs, and is much more cost-effective and environmentally-responsible.

CFWI PRIORITIZES UNSUSTAINABLE SURFACE WATER WITHDRAWALS FROM THE ST. JOHNS

Massive water withdrawals will worsen existing pollution problems, increase the frequency of toxic algal outbreaks, further reduce flow, increase salinity levels farther upstream, and adversely impact the fisheries, wildlife and submerged vegetation in and along the St. Johns and its tributaries.

The St. Johns River drops less than 30 feet from the source to its mouth, making it difficult for our river to efficiently flush pollutants and sediments. Removing millions of gallons a day from the river will potentially worsen current pollution problems, including toxic algal blooms.

However, CFWI Plans include projects that could remove up to 160 mgd of surface water from the St. Johns River at a cost of up to \$1.79 billion. Up to 60 mgd of surface water would come from the Taylor Creek Reservoir and St. Johns River at State Road 520, up to 50 mgd near State Road 46, and 50 mgd near Yankee Lake. This would produce an estimated 134 mgd of finished water. The Yankee Lake and State Road 46 projects would also require treatment by reverse osmosis (RO). The byproduct, or pollutant, that results from RO is called “concentrate”. The concentrate has a high mineral and/or salt content and would be disposed by injecting it into the Lower Floridan Aquifer creating additional pollution problems.

FLAWED JUSTIFICATION

Surface water withdrawals are being justified based on the findings of a limited St. Johns River Water Management District study, the St. Johns River Water Supply Impact Study (WSIS). A group of independent scientists and experts from the National Research Council (NRC) conducted a peer review of the WSIS and identified significant shortcomings in the study, expressing concerns regarding many of the conclusions. According to the NRC review “the WSIS operated within a range of constraints that ultimately imposed both limitations and uncertainties on the study’s overall conclusions.”

The WSIS was not comprehensive and its shortcomings are well documented.

“A cumulative impact assessment should consider not only the impact of current and future actions on the environment, but also the impacts of past actions. Anyone evaluating the impact of proposed withdrawals should be able to consider the extent to which the waterbody has been degraded by historic actions such as drainage, diversion, withdrawals of ground or surface water, dredging or damming. Depending on the extent of those impacts, a decision-maker might conclude that restoration rather than additional degradation is appropriate. Unless the study documents the effects of historic impacts, it cannot be termed a cumulative impacts assessment and should not be used as the basis for determining whether to allow additional withdrawals.” – 9/24/08 memo to SJRWMD staff from Richard Hamann, former Governing Board Member and Associate in Law at the UF Levin College of Law Center for Governmental Responsibility

“The report (WSIS) lacks a comprehensive synthesis of the model results.” (pg. 34, NRC WSIS Final Report)

“Of particular concern is that the uncertainty analysis has not been synthesized with the water level, salinity, and age analysis to provide a deeper understanding of the model’s ability to explain the system.” (Pg. 35, NRC WSIS Final Report)

“The committee expressed concern from the outset of this study about the exclusion from the WSIS of potential effects of withdrawals on the Ocklawaha River (NRC, 2009).” (Pg. 102, NRC WSIS Final Report)

“The Committee concludes that the WSIS should have included a water quality workgroup.” (pg. 35, NRC WSIS Final Report)

"The modeling conducted by the District did not have a water quality component, and the District considered the potential ecological effects of significant increases in degraded stormwater runoff, as well as, changes in the frequency distribution of stream flows in urbanized areas, to be outside the scope of the WSIS." (pg. 102, NRC WSIS Final Report)

"The standard for evaluating impacts is also troubling. If the goal is to determine the point at which "significant harm" occurs, then it is too limited. Significant harm is the standard for establishing minimum flows and levels (MFL). MFLs should not, however, be the only limit on withdrawals. Decision-makers might choose to allow some lesser degree of harm in the allocation of water. They might choose, for example, to reserve water from consumptive use for the "protection" of fish and wildlife. The permitting process itself is intended to insure that use is "not harmful to the water resources" and "consistent with the overall objectives of the district". The reasonable beneficial use and public interest criteria are also applicable and, in some circumstances, might provide the basis for determining that a withdrawal that does not violate MFLs should not be permitted. Hopefully this concern is only one of semantics and the results can be used in other contexts than establishing an MFL. "– 9/24/08 Memo from Richard Hamann to SJRWMD

Full analysis of WSIS shortcomings and recommendations cited within the NRC's Peer Review must be conducted prior to the inclusion of surface water projects within the CFWI Plan.

Flawed Groundwater Model

The hydrologic model, MODFLOW, to model groundwater levels and to evaluate consumption use permits (CUP) for additional water use does not incorporate the critical interface between surface water and groundwater. This flaw must be corrected before adoption of either plan.

Not Consistent with Chapter 373, Florida Statutes and Chapter 62-40, F.A.C.

For the forgoing reasons, the proposed surface water withdrawals are not consistent with Chapter 373, Florida Statutes and Chapter 62-40, Florida Administrative Code and must not be approved as Alternative Water Supplies.

SJRK Recommendations

The CFWI fails the public and fails to protect Florida's natural resources. Adoption of the CFWI Plans is premature and potentially damaging to the very natural resources they are intended to protect and appears to drive unbridled and unsustainable growth at all costs.

The inherent flaws in the process, plans and justification must be corrected and the constitutional and statutory obligations must be met.

- The St. Johns River, the Ocklawaha and other Florida waterways must be fully protected by removing surface water withdrawal projects from the CFWI Plans.
- Full analysis of WSIS shortcomings and recommendations cited within the NRC's Peer Review must be conducted prior to the inclusion of surface water projects within the CFWI Plans.
- Water conservation must be made a priority. The focus should be on living within our water means. As a result, we must develop a statewide water policy that prioritizes water conservation; mandates sustainable building, landscaping and planning practices; incentivizes the efficient use of water; establishes regulations that protect our water resources and mandate efficiency where needed; and implements market solutions, such as aggressive tiered conservation rates and CUP pricing strategies.
 - Please provide background of CFWI's decision to focus on a "starting point" for Water Conservation as opposed to a goal as used for AWS.
 - Please provide a 15-year history of SJRWMD, SFWMD and SWFWMD funding and descriptions for the following critical activities to encourage water conservation.
 - Water Conservation Education Programs
 - Water Conservation Incentive Programs
 - Please provide detailed minutes to the Regulatory Subcommittee Meetings that focused on legislative actions needed for more productive water conservation.
- Establish rules and regulations necessary to mandate and incentivize efficiency and protect our water resources. First and foremost, reinstate the rulemaking process to implement the following nine water conservation "rule enhancements" to the Consumptive Use Permit (CUP) and Environmental Resource Permit (ERP) application processes proposed by SRJWMD staff in 2010 to require: 1) landscape irrigation ordinance, 2) informative billing, 3) stormwater reuse, 4) water use reporting for per capita calculations, 5) updated regulatory approach for public supply water conservation, 6) ERP water conservation provisions, 7) concurrent ERP/CUP application processing, 8) water conservation rate structure, and 9) landscape irrigation system design/installation constraints.
- Genuine participation with stakeholders and local governmental officials must occur throughout the 48 counties that will be potentially affected by these plans.
- Complete and approve the North Florida Regional Water Supply Partnership RWSP prior to CFWI adoption.
- All legal challenges, including the active PCEC/FLWAC case, are resolved.
- The flawed groundwater model must be corrected before adoption of either plan.

- River, springs, lakes and wetlands throughout all three water management districts must be prioritized for protection and restoration with comprehensive MFLs, recovery and prevention strategies, and a prohibition from using surface water or groundwater as supplementation for reclaimed water.
- WMDs must increase water quality monitoring to acquire the most current data for decision making.
 - Please provide a detailed 15-year history of SJRWMD Water Quality Monitoring funding and monitoring stations.

On behalf of the St. Johns River and the St. Johns Riverkeeper members, I submit these comments for your consideration. I look forward to the opportunity to participate in a fully open, public process that will further explore the flaws noted in the comments above and will strive to achieve a balanced approach to Florida's water needs and the protection of Florida's natural resources.

For the river,



Lisa Rinaman
St. Johns Riverkeeper

Sharon Garrett, July 31, 2015

July 31, 2015 comments on the Central Florida Water Initiative

I attended your Winter Haven meeting and I have been reading your books on the Central Fl. Water Initiative. I would suggest you have a list of the acronyms or abbreviations and what they mean in the appendix or in the front. One could flip back and forth to determine what you are talking about. It is like a foreign language, if you don't deal with this material on an everyday basis.

I would also like to see some of the maps have township and ranges identified so I can better determine where my properties are located in relation to what you are discussing or include individual county maps with township and ranges.

I do not agree with the suggestion at the meeting by an audience member that all existing owners of toilets that are not low flow be forced to convert to low flow toilets. My experience with low flow toilets is that I have to flush them several times whereas with the high flow, 1 flush was good. More flushes use more water. I did some research on low flow problems. I discovered the slope of the pipes in older homes was developed for the higher gallonage as the plumbing needs a certain amount of water to work properly without clogging etc. At the time no one ever thought the gallonage would be reduced. It is not practical to retro drill a concrete foundation and re-pipe a house to change the slope of the pipes to work with the new low flow toilets.

The 2nd reason I disagree with forcing someone change to low flow is it seems like we would be living in Communist Russia or Nazi Germany.

I hate the new more water efficient dishwashers because one wash does not get my dishes clean, and I have to wash them more than once which defeats the purpose of using less water the first time.

In your books the suggestion that agriculture use surface water to irrigate the crops is impractical with the new federal food safety requirements. The feds want you to test the surface water each time before you irrigate for bacteria etc. Your crops could die before the test results come back.

Precision Ag, automation and computerization sound like a good idea for irrigation systems but there are problems. This only works if you have electricity and do not have vandals and thieves. Our power units are all LP gas and are manually started and stopped. Additionally, all it takes is one lightning strike to wipe out a very expensive automated controller in the Lightning Capital of the US. We are always fixing underground irrigation pipes hit by lightning.

To me it seems a lot of your projected conservation comes from agriculture. Ag does not use its allotment on a daily basis but only on an as needed basis. Every time you start the power unit it costs you money, so you don't want to run it any more than you have to. Ag is actually a water bank because we don't use water every day. If you make it too difficult for a farmer to make a profit from farming the only other option is for the farmer to sell his land to development which then creates more daily water

users per acre. Ag provides a lot of green space which has been proven to uplift the human spirit and mental outlook from just driving by it. Ag also provides a home to wildlife.

I think the Blue Belt law that was enacted but never implemented should be put into use. This would give people some benefit for their property providing a place for water to be soaked up or recharged. It should cover wet lands as well as high recharge soils. Wet lands serve as a storage place for excess water. If vacant land or undeveloped is so important for putting water back in the aquifer then landowners should receive annual rent for this benefit.

On talking to one of the water management people about water issues, I mentioned every time people conserved water their water bill went up due to a decrease in funds coming into the cities. He said the conservation initiative overcame this problem by saving water that could further be divided up between more users thus enabling more development and maintaining the cities income level. This defeats the purpose of conserving water to ultimately spread it among more development. More development only increases the other demands and services that must be provided to more citizens ultimately putting a greater strain on Florida's ecosystem. Florida's BIG problem is it has too many people and a lot of them want to live on the waterfront of which there is a limited supply. Developing waterfront properties increases runoff as the filtering vegetation is removed. I do not think we should still be draining and developing wetlands. Wetlands serve a very important place in the Florida ecosystem.

Combining several counties in this initiative may seem like a good idea but I think it creates an opportunity for large population centers such as Orlando Metro to try to take water from other less developed areas

Thank you for the opportunity to comment.

Sharon Garrett garrettshabitat@aol.com

Sharon Garrett, August 11, 2015

Aug 10, 2015 Central Florida Water Initiative Comments

In your books on the Central Florida Water Initiative, the suggestion has been put forth to use injection wells to put treated waste water back into one of the aquifer layers. I think this is a bad idea. This is an idea that keeps resurfacing periodically over the years. My father installed turbine pumps on agriculture properties throughout Lake and Polk counties and he thought it was a bad idea back in the 1970's.

About 20 years ago, I read a science article that mentioned a group tested for pharmaceuticals in water, and were astonished to find antibiotics, hormones, cancer drugs etc. If your standards for determining treated water only test for the lack of bacteria and intestinal parasites, then technically the water is clean. If you don't look for it – then it is not there and one can say THE WATER IS CLEAN.

Before water is injected into the aquifer, I want to know how you are going to remove pharmaceuticals or their metabolites from the water and to what level - parts per thousand, parts per billion, etc. that is considered safe. How are you going to test for pharmaceuticals? As I understand it pharmaceuticals cannot be removed except by Reverse Osmosis on the back end of the waste water plant.

I would like some real answers not an answer that our water as currently tested is safe, which is basically the answer I received at the Water Summit on 8-10-15. This is a true answer but only for what is currently required testing and I do not know what the current required tests are. Therefore, if you are not required to test for pharmaceuticals then your statement is true.

I also opposed to drinking treated waste water until the pharmaceutical issue can be determined and fixed if needed.

Possibly, the treated waste water could be used to raise the levels on some lakes. If the treated waste water soaked through the sandy lake bottom due to an incorrect potentiometric pressure the sand should act as a filter.

Thanks for the opportunity to comment.

Sharon B Garrett
PO Box 1332
Haines City, FL 33884

Jacksonville Environmental Protection Board, Michelle Tappouni

Air Odor Noise Committee

Lucinda Sonnenberg, Ph.D. – Chair
Nick Howland
Amy Fu, P.E.
Mobeen Rathore, M.D.

Education & Public Outreach

Tony Bellamy, P.E.
Steven Jenkins
Lucinda Sonnenberg, Ph.D.
Michelle Tappouni



Michelle Tappouni – Chairman
Nick Howland – Vice Chairman
Bobby L. Baker, P.E., Tony C. Bellamy, P.E.
Roi Dagan, M.D., Amy Fu, P.E., Steven Jenkins,
Mobeen Rathore, M.D., Lucinda Sonnenberg, Ph.D.

Water Committee

Bobby L. Baker, P.E. – Chair
Tony C. Bellamy, P.E.
Roi Dagan, M.D.
Steven Jenkins

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: Public Comments
CFWI Draft 2035 Water Resources Protection and Water Supply Strategies Plan

Dear Mr. Powell:

Thank you for the opportunity to present comments related to the Central Florida Water Initiative (CFWI) Draft 2035 Water Resources Protection and Water Supply Strategies Plan on behalf of the Jacksonville Environmental Protection Board (JEPB). The City of Jacksonville has a long-standing focus on environmental issues impacting the quality of life of its residents. Established in 1965, the JEPB acts as the local hearing platform for all environmental matters that occur within Duval County.

Since 2008, the JEPB has sustained a public policy position opposing water withdrawals from the St. Johns River to support increased water demand in other areas of the State. We maintain that position today. We support strategies that include conservation incentives, aquifer recharge, hydration of wetlands and the reuse of potable and nonpotable water. In addition, we believe increased public education and outreach regarding water conservation should be used to offset increased water demand.

We strongly advise SJRWMD, and other managers of the public water supply, to adopt policies prioritizing proven strategies before any consideration of plans that include water withdrawal projects.

Sincerely,

Michelle M. Tappouni, Chair
Jacksonville Environmental Protection Board

cc: Environmental Protection Board
Drew Bartlett, FDEP
Robin Lumb, Mayor's Office
Kimberly Scott, Director - Regulatory Compliance Department
Melissa Long, Chief - Environmental Quality Division

UF IFAS Letter, Eleanor Foerste, August 18, 2015

I am writing with a few comments regarding the **2035 Water Resources Protection and Water Supply Strategies Plan**.

I am a UF IFAS Extension faculty member for 35 years in Osceola County, FL. I have educated local residents and businesses in the areas of home landscape, 4-H youth development, home construction, energy and water conservation, stormwater, local ecosystems, invasive species, stormwater ponds and wildlife.

The document is very comprehensive and provides great ideas to move residents and businesses toward key conservation strategies. Thank you to the team for your intensive discussions and optimistic outcomes.

A few suggestions:

1. Hyperlink key words in the document to the glossary.
2. Include a list of committee members and their titles and contact info as an appendix.
3. Did the committee investigate the use of greywater (from laundry, sinks and showers/tubs) for flushing toilets since toilets are a significant water use indoors and currently use the highest quality water. Example retrofit product is available for approximately \$400 per sink <http://www.shophsg.com/sloan.html>
4. Individual domestic water treatment systems (softeners and conditioners) use a significant amount of water for backwashing. Are there effective solutions to capture the backwash water for reuse somehow?
5. It is important to work with legal issues related to Homeowners Associations and Condominium Associations and clarify how state rules, bylaws and covenants are barriers to implementing water conservation practices in landscapes.
6. Improper landscape irrigation and maintenance is linked to excess nutrient rich runoff into stormwater ponds resulting in algal blooms, fish kills, pond management costs and possible health impacts from toxic algal blooms. Perhaps linking conservation and water quality could offer additional support for discussions and funding to lead to mutual solutions.
7. I agree that education is a key component to the success of practice change regardless of the audience from consumers to commercial agriculture to industrial users. Dr. Liz Felter conducted an extensive literature search and study of behavior change and shares the importance of education in her recent doctoral dissertation. (Felter, 2013)
8. Please be sure that adequate funding is allocated to this critical component (education for behavior change). Significant financial and staff inputs must be in place at the front end of any project and continued to allow for modifications to address barriers to practice change. As the committee is well aware, UF IFAS Extension is already well positioned with a variety of extension faculty (educators) in each of the counties involved with CFWI and can address conservation behavior change with the many target audiences mentioned in the Plan. Working in partnership with local water utilities and other stakeholders, faculty could play a key role in significant water conservation in an efficient and effective manner.

Felter, E. A. (2013). *An examination of community based social marketing strategies to increase water conservation practices by homeowners with automated irrigation systems in central Florida* (Doctoral dissertation, UNIVERSITY OF FLORIDA).

Literature suggests that education is important to people and crucial to their success in adopting new behaviors. However, researchers agree that information alone will not motivate someone to adopt a new behavior (Schultz, 2002; Kollmuss & Agyeman, 2002; Stern, 2000; Hungerford & Volk, 1990). Information is knowledge communicated from facts and news, whereas education is the process of imparting or acquiring general knowledge, developing the powers of reasoning and judgment for future use. Neither definition includes any mention of the behavioral change that might occur as a result.

Kollmuss and Agyeman refer to this information-driven approach as a linear progression model of learning. This approach is based on the linear progression of environmental knowledge leading to environmental awareness and concern (environmental attitudes), which in turn was thought to lead to pro-environmental behavior. Burgess (1998) reported that these rationalist models assumed that educating people about environmental issues would automatically result in more pro-environmental behavior, and termed them (information) “deficit models of public understanding and action” (p.1447). Basically, providing educational materials to people about beneficial environmental practices doesn’t always result in a behavior change that supports a particular environmental concern.

It is equally clear that a lack of information can be a barrier to changing behavior (Schultz, 2002; Cochran, et al. 2007). DeYoung (1988) indicated that the basic how-to-conduct-the-behavior information package is important to the participant. If specific and necessary details are not provided, the participant may feel confused and lack the confidence needed to make behavioral changes, thus creating an impediment to the desired change.

STOPR+2 July 17, 2015 – Editorial Comments Letter

July 17, 2015

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

RE: Draft Central Florida Water Initiative (CFWI) Water Supply Planning Documents

Dear Mr. Powell:

The regional utility partnership informally referred to as "STOPR+2" which includes the City of St. Cloud, Tohopekaliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission—offers the attached editorial comments on the draft Central Florida Water Initiative (CFWI) water supply planning documents (see Attachment A). These comments are provided by STOPR+2 as a courtesy, for the water management districts' consideration, to address several minor items and prepare cleaner versions of the final documents.

Please note that the STOPR+2 Group will also provide, under separate cover, a set of comments addressing more substantive issues we have identified via a thorough review of the latest draft documents.

We appreciate the opportunity to review and provide comments on the Draft CFWI documents. We look forward to continuing to work with the Districts to implement programs that meet the water supply needs of the region.

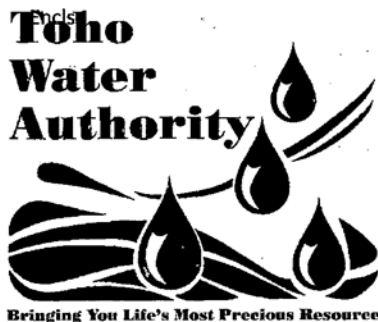
If you have any questions, please feel free to contact us.

Sincerely,



Brian L. Wheeler, P.E.
Executive Director, Tohopekaliga Water Authority
On behalf of the STOPR+2 Group

BLW/ncd



Office of the Executive Director
951 Martin Luther King Boulevard, Kissimmee FL 34741
407.944.5131 Fax 407.343.4371 • www.tohowater.com

STOPR+2 Attachment A – Editorial Comments – Solutions Strategies

Attachment A

Central Florida Water Initiative Draft 2035 Water Resources Protection and Water Supply Strategies Plan and Draft Regional Water Supply Plan

STOPR+2 Group Editorial Comments on May 2015 Public Drafts

Editorial Comments on Draft Solutions Plan Document (May 1, 2015 Public Draft)

- 1) Global Change: Replace the word “historic” with the word “historical.”
- 2) Preface, Page i, Second Bullet: Suggest adding “expanding water conservation” to list of strategies provided in second sentence.
- 3) Executive Summary, Page vii, Projects Section, Second Paragraph, Last Sentence: Change the text to state “The 16 WSPOs are estimated to potentially produce up to 256 mgd of finished water and potentially up to an additional 122 mgd in raw surface water.”
- 4) Executive Summary, Page x, Implementation Costs Section, First Sentence: Change “implemented” to “developed”.
- 5) Executive Summary, Page xii, Conclusions and Summary of Key Findings, Fourth Bullet on Page, First Sentence: Change text as follows: “Project costs were estimated, potential cost scenarios were identified, and strategies that address data collection needs and environmental recovery projects were developed ~~implemented~~ to provide a balanced approach for a sustainable water supply.”
- 6) Chapter 1, Page 1, First Paragraph, Third Sentence: Add “adoption of the” after “...delaying final agency action on the....”
- 7) Chapter 1, Page 1, Second Paragraph, Sixth Sentence: Change “demand deficit” to “supply deficit”.
- 8) Chapter 2, Page 19, First Full Paragraph, First Sentence: Delete the parenthesis at the end of the sentence.
- 9) Chapter 1, Page 3, First Paragraph after Bullet List: Change the text “...optimizing the use of existing groundwater”... to “evaluating projects to potentially increase the use of existing groundwater sources.” No optimization was performed as part of the CFWI process; therefore, the current text is inaccurate.
- 10) Chapter 2, Page 20, Water Conservation Project and Program Options Subsection, Last Paragraph, Last Sentence: Change the text in this sentence as follows: “Targeted education, public information, and social marketing provide opportunities for building a conservation culture, a stewardship ethic, and to permanently reducing individual, agricultural, industrial, and commercial water use.”

- 11) Chapter 3, Page 50, Table 10: Footnote "a" is not applicable to RWSP Projects 1 and 2.
- 12) Chapter 3, Page 66, Grove Land Reservoir and Stormwater Treatment Area, First Paragraph, Last Sentence: The benefits at the end should include more detail for increased reader understanding. Add "...of the St. Johns River" after surface water augmentation, indicate which aquifer is being recharged (most readers from central Florida will think UFA recharge—however, recharge to the UFA is minimal in the area of this project), and indicate what surface water systems will receive a nutrient reduction benefit.
- 13) Chapter 3, Page 71, Table 14: RWSP Project 145 includes note "b"; however, there is no note "b" for Table 14. Suggest correcting as applicable.
- 14) Chapter 4, Page 79, Figure 6: Lakes Apopka (and associated chain), Searcy, Hodge, and East Crystal were not used in CFWI analysis and should be removed from Figure 6. This also applies to Figure F-1 in Appendix F.
- 15) Chapter 4, Page 80, First Paragraph, Second to Last Sentence: Suggest changing sentence to say, "The remaining freeboard represents the approximate amount of allowable change in UFA potentiometric surface, springflow, or groundwater flow ~~associated with remaining once~~ a specific withdrawal condition or WSPO is considered."
- 16) Chapter 4, Page 81, Last Paragraph: There may be 46 adopted MFLs within CFWI, but according to Table F-9 only 31 were used as constraints. Please add text or modify the current text to clarify this issue.
- 17) Chapter 4, Page 81, Second to Last Sentence: Add a period to the end of the sentence.
- 18) Chapter 4, Page 85, Last Paragraph: Throughout the report, it is indicated that the RWSP identified 142 WSPOs, and that 8 additional WSPOs were added during the Solutions Planning Phase for a total of 150 WSPOs. This paragraph notes the 142 WSPOs identified during the RWSP, but does not mention the 8 WSPOs identified as part of the Solutions Planning Phase. In addition, the disaggregated list (surface water, reclaimed water, etc.) included in this paragraph adds up to 151 WSPOs. Suggest correcting this paragraph as appropriate.
- 19) Chapter 4, Page 87, Environmental Evaluation Process Subsection, Paragraph between Bullet Lists: Modify this paragraph as follows, "Based on these measuring sticks, a variety of methods and assumptions were used to determine the magnitude of hydrologic change predicted by the ECFT groundwater model that could occur without:"
- 20) Chapter 4, Page 88, Non-MFL Water Bodies Subsection, Second Sentence: Change this sentence as follows, "It is not possible to assess the condition of every wetland, partly because of time and budget constraints and partly because many of them are located in remote locations and/or on private property where access is difficult or cannot be obtained, but such assessment will be essential for data gathering in future CFWI phases."
- 21) Chapter 4, Page 90, Second Paragraph, Third and Fourth Sentence: This sentence indicates five additional constraints were not met. However, Table F-9 appears to indicate the four additional constraints were not met. Please confirm the correct number. In addition, we suggest noting if the water level changes shown are changes in SAS or UFA water levels. In summary, we suggest these sentences be updated as follows, "Figures 10 and 11 show the Baseline Condition status of MFL

and non-MFL water bodies evaluated as part of the CFWI process, and the simulated change in UFA potentiometric surface elevation at these water bodies compared to Reference Condition elevations wetland water levels, and characterization of stressed condition of non-MFL lakes and wetlands. The status counts of MFL constraints and other considerations evaluated for the Baseline Condition indicate that ~~five~~four additional constraints were not met with the increased groundwater withdrawal under this condition compared to the updated 2005 Reference Condition (CFWI, 2015b Appendix F, Table F-3)."

- 22) Chapter 4, Page 92, Figure 11: The title of this figure is "Baseline Condition status of wetland water levels and characterization of stressed condition of non-MFL lakes and wetlands." This does not appear accurate. The change in head values shown in the figure are either model-simulated SAS or UFA groundwater elevations. Suggest changing the title of this figure to "Baseline Condition status of non-MFL lakes and wetlands", and adding a note to the figure indicating that the "Change in water level shown is the ECFT model simulation change in [SAS or UFA] groundwater elevation compared to Reference Condition elevations."
- 23) Chapter 4, Page 94, South Lake County Wellfield - Centralized and Distributed Project: Change the first sentence as follows: "This project is proposed to provide ~~up to~~ 12.7 mgd of finished water to meet projected demands in South Lake County over the 2035 planning horizon."
- 24) Chapter 4, Table 15: Chapter 4 discusses the environmental evaluations performed in support of the Solutions Planning Phase process. Table 15 includes discussion of results regarding the general range of change in surficial aquifer and Floridan aquifer groundwater levels observed for each modeled scenario. However, the range of fluctuation in groundwater levels does not relate to the environmental constraints. A 1-foot change in surficial aquifer water table does not have relevance to this chapter if that change wasn't simulated as one of the environmental constraints evaluated as part of this process. The discussion of changes in groundwater levels in this table is not necessary and makes the table cumbersome to the reader. This table should focus on just the environmental evaluation. Other changes in groundwater levels are discussed in the groundwater flow modeling sections of the report.
- 25) Chapter 6, Page 112, Environmental Recovery Projects Section, Second Paragraph, First Sentence: Remove "or flows" after "MFL recovery".
- 26) Chapter 6, Page 120, Last Sentence: Change this sentence as follows, "Public supply BMPs ranging from irrigation controllers to water audits, would cost approximately \$122 million and result in about 28 mgd in savings. OSS practices would cost an estimated \$18 million to achieve approximately 4.6 mgd in savings."
- 27) Chapter 6, Page 122, Data, Monitoring, and Investigations Section, First Paragraph, Sixth Sentence: "Based on deficiencies and redundancies in data collection identified in the Solutions Planning Phase..." to "Based on deficiencies and redundancies in current data collection efforts identified as part of the Solutions Planning Phase..."
- 28) Chapter 6, Page 122, Other Investigations Section: Direct Potable Reuse, Fourth Sentence: Suggest starting sentence as follows, "A project to further investigate..."
- 29) Chapter 6, Page 124, Table 17, Reclaimed Water Projects: The quantity listed for Project RENEW, West Ditch Stormwater for Reuse Augmentation, and 160-ac Site Indirect Potable Reuse projects

do not match the quantities listed elsewhere in the Solutions Plan document. The quantities for these projects should be 9.2 mgd, 1.5 mgd, and 5.0 mgd, respectively.

- 30) Chapter 7, Pages 128 and 129, List of Key Findings: Multiple comments:
- The first bullet should be split into two bullets. The second bullet should start at "Sixteen regional..."
 - In the current second bullet, change the comma after "(Appendix D)" to a period.
 - Add "Conceptual" to the beginning of the current fifth bullet.
- 31) Chapter 7, Page 132, First Paragraph, Third Sentence: Change the text as follows, "These strategies will identify and may include the development of water supply and water resource plans and projects in addition to those included in this plan, when needed to achieve recovery to the established minimum flow or level as soon as practicable, or prevent the existing flow or level from falling below the established minimum flow or level."
- 32) Chapter 7, Page 133, Support Development & Implementation of Regional Project Solutions Section, First Paragraph of this Subsection: Add "The status of these projects should be included in the annual status report to the Steering Committee." to this paragraph.
- 33) Chapter 7, Page 134, Surface Water Section: Change the last bullet to read "Create opportunities for conjunctive use of surface water with other water sources."
- 34) Appendix C, Page C-2, Table C-1: First line of the table (Solutions Project ID GW1), change the project capacity from 12.7 to 12.5 MGD if appropriate to be consistent with the project description that says Montverde will be self-supplied.
- 35) Appendix C, Page C-75, Grove Land Reservoir & Stormwater Treatment Area, Project Description, Groundwater Recharge Bullet Number 2: Please indicate which aquifer is being recharged for clarity.
- 36) Appendix C, Page C-76, Grove Land Reservoir & Stormwater Treatment Area, Project Description, Nutrient Reduction Bullet: Please indicate which watershed(s) are receiving a nutrient reduction benefit for clarity.
- 37) Appendix D, Page D-1, Introduction, Third Paragraph, First Sentence: Suggest changing the sentence as follows, "A project identified for inclusion in the Solutions Plan may not necessarily be selected for development by the listed water supplier(s)."
- 38) Appendix D, Page D-4, Table D-1, Project 3 – Cypress Lake Wellfield: Change estimated completion date from "2017" to "N/A".
- 39) Appendix E, Page E-24, Scenario 3C, Second Paragraph: Chapter 3 of the Solutions Plan document indicates that 3.4 mgd of groundwater from the UFA will be blended with 6.4 mgd of groundwater from the LFA. The Appendix indicates 3.4 mgd and 6.5 mgd. Suggest correcting these values as appropriate.
- 40) Appendix E, Page E-26, Round 2 Conceptual Management Option Scenarios, Overview, Third Paragraph, First Sentence: Suggest changing "...the potential issue of excessive irrigation rates." to "...any potential issues associated with the assumed spatial distribution of irrigation."

- 41) Appendix E, Page E-27, Scenario 4b, Fourth Sentence: Text says, "...adding one hypothetical 2 mgd UFA well (10 mgd finished supply)." Should this be "...adding five hypothetical 2 mgd UFA wells (10 mgd finished supply)."?
- 42) Appendix E, Page E-29, Scenario 2, Second to Last Sentence: Suggest changing as follows, "While significant drawdowns are simulated for the LFA layer within some portions of the LFA, these drawdowns do not extend to the simulated UFA or the simulated SAS layers of the model result in significant drawdowns in the UFA or SAS due to confinement between the UFA and LFA."
- 43) Appendix E, Page E-29, Scenario 2, Last Sentence: This sentence indicates LFA figures will not be repeated through the remainder of this section; however, all the panel figures appear to include the LFA. Suggest correcting this sentence as appropriate.
- 44) Appendices E-1 and E-2, Pages E-49 through E-63, Footer: Footer text on odd pages incorrectly labeled. Correct footer text to read, "~~Appendix F~~ Appendix E: Water Resource Assessment".
- 45) Appendix F, Page F-5, Figure F-1: Incorrect figure title of "Figure E-19" should be changed to "Figure F-1". Lakes Apopka (and associated chain), Searcy, Hodge, and East Crystal were not used in CFWI analysis and should be removed from Figure F-1.

STOPR+2 Attachment A – Editorial Comments – RWSP

Editorial Comments on Draft RWSP Document (May 8, 2015 Public Draft)

- 46) Global Change: Replace the word “historic” with the word “historical.”
- 47) Preface, Page i, Second Bullet: Suggest adding “expanding water conservation” to list of strategies provided in second sentence.
- 48) Executive Summary, Page viii, Second Full Paragraph: Suggest changing last half of this sentence to read, “...have documented that the development of traditional water sources is near, has already reached, or, in some areas, has exceeded the sustainable limits” for consistency with how this concept was written in the Solutions Plan document.
- 49) Chapter 3, Page 38, Fourth Paragraph, Last Sentence: The text should be modified to indicate that rulemaking has been initiated and that the draft water reservation has been published regarding the Kissimmee River Basin. Suggest changing this sentence as follows, “~~Contingent upon future Governing Board approval, Rulemaking may be~~ was initiated in 2014 to develop a water reservation rule for the Kissimmee Basin in the CFWI Planning Area.”
- 50) Chapter 3, Page 39, Last Paragraph: This paragraph indicates that “freeboard” and “remaining freeboard” are the same thing, which is not accurate. In addition, only adopted MFLs were used as measuring sticks. Suggest using text from Solutions Plan document that distinguishes between the terms “freeboard” and “remaining freeboard” as follows, “Additionally, the adopted ~~or currently proposed~~ MFL sites were used as measuring sticks for evaluations of regional groundwater availability. The allowable changes in UFA potentiometric surface in the vicinity of lakes and wetlands or spring flow at MFL measuring stick locations were based on the differences between adopted MFLs and recent conditions determined through field observation and site specific and regional modeling and statistical evaluations. This allowable change is referred to as “freeboard” and is the magnitude of change that can occur without causing exceedance of an adopted or proposed MFL. Based on the ECFT groundwater model predicted changes in Upper Floridan aquifer (UFA) water levels, spring flows, or groundwater flows, the magnitude of drawdowns of

~~the potentiometric surface of the UFA in the vicinities of the MFL lakes, wetlands, or springs that could occur without causing exceedance of adopted (or proposed) MFLs was estimated. This allowable UFA drawdown is referred to as the MFLs measuring stick "freeboard" or "remaining freeboard." For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface or spring flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body, in spring flow, or in groundwater flow that can occur in association with future increases in water withdrawals.~~

- 51) Chapter 3, Page 41, SJRWMD Section, Third Paragraph, Second Sentence: This paragraph indicates MFL Prevention and Recovery will resume in 2014, which is no longer accurate. Suggest deleting this sentence or updating as appropriate.
- 52) Chapter 3, Page 45, Effects of Climate Change on Water Supply, Second Paragraph: Suggest deleting first four sentences regarding sea-level rise potentially resulting in the migration of population from coastal to inland communities. This RWSP has a 20-year planning horizon. A significant change in the location of Florida's population due to sea-level rise is unlikely to occur in the current 20-year planning horizon.
- 53) Chapter 4, Page 51, Minimum Flows and Levels Water Bodies, First Paragraph: This paragraph indicates "freeboard" and "remaining freeboard" are the same this, which is not accurate. Suggest updating the text for accuracy and consistency with the Solutions Plan document as follows, "For evaluation of lake, wetland, or spring MFL measuring sticks, the magnitude of estimated drawdown (in feet) of the Upper Floridan aquifer (UFA) potentiometric surface in the vicinity of the MFL sites or springflow (in cfs) that could occur without contributing to exceedance of adopted MFLs was identified for a Reference Condition (2005) and other simulated withdrawal scenarios. ~~This~~The model-predicted change in UFA potentiometric surface or springflow was used to calculate the drawdown variable, referred to as "freeboard" or "remaining freeboard", was expressed as the which is the potential or allowable drawdown in the UFA, in feet, for lake or wetland MFLs or springflow, in cfs, for spring MFLs. In cases where current MFLs are not being achieved, the remaining freeboard would be a negative value."
- 54) Chapter 4, Page 56, Third Paragraph: Suggest rewording sentence as, "The 2005 scenario also corresponds with the most recent land use condition incorporated in the ECFT groundwater model, and is consistent~~was contemporary~~ with the time period when time environmental data were collected at wetland and lake sites in central Florida associated with the CFWI planning effort."
- 55) Chapter 5, Page 99, Second Paragraph, Second Sentence: The comma is misplaced. This sentence should read, "Opportunities for additional water conservation remain, but, achieving further improvement will become more challenging."
- 56) Chapter 6, Page 108, Surface Water Section, Second Paragraph, Second Sentence: There are several references to surface water supporting conjunctive use projects, but there is no definition of what constitutes a conjunctive use project. Suggest changing this sentence to incorporate a definition for conjunctive use as follows, "Capturing available flows from these surface water bodies for water supply, particularly to support conjunctive use projects that integrate the use of other sources with surface water in a manner that minimizes any potential harmful effects to the sources, may be effective but can be expected to have varying levels of certainty, depending on climatic conditions."

- 57) Chapter 6, Page 112, Partial Paragraph at Top of Page, Second Full Sentence: Suggest modifying this sentence as follows, "~~Contingent upon future Governing Board approval, In 2014, rulemaking will be~~was initiated to develop a water reservation rule for the river system, 19 lakes, and the associated floodplain in the CFWI Planning Area." In addition, the follow-on sentence refers to an estimated 25 mgd being currently permitted from the Kissimmee River and KCOL. The technical document released in support of the reservation indicates this is closer to 34 mgd. Suggest updating as appropriate.
- 58) Chapter 6, Page 114, Second Paragraph: There is a misplaced comma. Suggest changing the sentence as follows, "The WSIS included withdrawal scenarios that; simulated the effects of future land use conditions (estimated 2030 land use), future sea levels, and completion of the Upper St. Johns River Basin restoration projects."
- 59) Chapter 6, Page 118, Second Paragraph, First Sentence: This text should read, "In 2010, there were 80 wastewater treatment plants in the CFWI Planning Area..."
- 60) Chapter 7, Page 126, Partial Paragraph at Top of Page, Second Full Sentence: Suggest modifying this sentence as follows, "By using reclaimed water to replace all or a portion of an existing permitted use, a different user or use could initiate and increase to its FAS withdrawal.
- 61) Chapter 7, Page 131, Table 21: Suggest confirming that the table accurately reflects changes made to WSPOs as part of the Solutions Plan.
- 62) Chapter 8, Page 139, First Paragraph: Suggest updating this text to reflect the postponement of KBMOS as follows, "Additional modeling efforts ongoing within the CFWI Planning Area include SWFWMD's District-wide Regulation Model Simulation; ~~the Kissimmee River Modeling and Operations Study~~; the SJRWMD East Central Florida (ECFT) groundwater model; and the Agricultural Irrigation Requirement Simulation model (AFSIRS)."
- 63) Chapter 8, Page 143, Second paragraph: Suggest mentioning the draft rule and technical document availability. Suggest changing this paragraph as follows, "~~Contingent upon future Governing Board approval~~In 2014, rulemaking will be~~was~~ initiated to develop a water reservation rule for 19 lakes and the Kissimmee River system and its associated floodplain in the CFWI Planning Area. The draft rule and technical document for the proposed reservation were published in 2015. As part of this rulemaking effort, the SFWMD will identify the location, timing and ~~amount of water~~lake stage necessary to best manage the system and lakes in order to achieve the approved restoration goals. The modeling tools used to develop the water reservation are currently available to the public to identify and design cooperative projects to store and withdraw surface water."
- 64) Chapter 10, Page 161, Blue Underlined Text in Middle of Page: Modify text as follows, "As described in this CFWI RWSP, fresh groundwater resources alone cannot meet projected future water demands or current permitted allocations without resulting in unacceptable impacts to water resources and related natural systems."
- 65) Chapter 10, Page 163, Last Paragraph: The first sentence of "Next Steps" is not a complete sentence. Please correct accordingly.

- 66) Chapter 11, Page 166, Second Bullet: Replace the text with the following, "Determine the water conservation potential of public supply utilities and assist utilities with analytical work contributing to the development of effective standard or goal-based water conservation plans."
- 67) Chapter 11, Page 167: The bullet list is not presented in a parallel manner (e.g. the 3rd bullet should read, "Coordination of monitoring...") Suggest modifying text accordingly.
- 68) Chapter 11, Page 168, Groundwater Subsection: Add the following bullet to the bullet list, "Support continuing efforts to refine and update the ECFT model so that it may be used as a permitting tool in the future."
- 69) Appendix B, Page B-3, Executive Summary, First Full Paragraph, First Three Sentences: Suggest using text consistent with the Solutions Planning Document similar to the following, "For evaluation of the MFL measuring sticks, the magnitude of drawdown of the potentiometric surface of the UFA in the vicinity of lakes and wetlands, or springflow-MFL sites that can occur without causing violation of established MFLs was characterized as the "freeboard," or ~~"remaining freeboard."~~ Freeboard ~~or remaining freeboard~~ was expressed as the potential or allowable drawdown in the UFA, (in feet) for those lake or wetland MFL sites classified as MFL constraints or other considerations. Similarly, freeboard ~~or remaining freeboard~~ for spring MFL sites was expressed as a flow rate (in cubic feet per second or cfs) ~~and a percentage of the flow associated with the Minimum Flow Regime adopted for MFL springs.~~ For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface or spring flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body or in spring flow that can occur in association with future increases in water withdrawals."
- 70) Appendix B, Page B-23, Table B-5: Lake Searcy has been removed from the priority list and should be removed from this table and all other references (such as Figure B-1). Lake Hiawassee should be omitted from this table as it is no longer scheduled for MFL adoption.
- 71) Appendix B, Page B-28, Section 3, First Full Paragraph: Suggest using text from Solutions Plan document that distinguishes between the terms "freeboard" and "remaining freeboard" as follows, "The magnitude of drawdown of the potentiometric surface of the UFA in the vicinity of lakes and wetlands or change in springflow at MFLs sites that can occur without causing violation of established MFLs is referred to in this appendix as the "freeboard," or ~~"remaining freeboard."~~ Freeboard ~~or remaining freeboard~~ is expressed as the potential or allowable drawdown in the UFA, in feet, for lake or wetland MFL sites classified as MFL constraints or other considerations. Similarly, freeboard ~~or remaining freeboard~~ for spring MFL sites is expressed as a flow rate (in cubic feet per second or cfs) ~~and percentage of the flow rate associated with the Minimum Flow Regime adopted for MFL springs.~~ For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface, spring flow, or groundwater flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body, in springflow, or in groundwater flow that can occur in association with future increases in water withdrawals."
- 72) Appendix B, Page B-30, Table B-8: Lake Hiawassee should be omitted as it is no longer proposed for adoption.

- 73) Appendix B, Page B-68, Table B-11: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 74) Appendix B, Page B-72, Table B-12: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 75) Appendix B, Page B-82, First and Third Paragraphs: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 76) Appendix B, Page B-90, First and Third Paragraphs: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 77) Appendix B, Page B-98, Third Paragraph: Lake Hiawassee should be omitted as it is no longer proposed for adoption.

STOPR+2 July 17, 2015 – Substantive Comments Letter

July 17, 2015

Submitted via email to: cfwiwater@sfwmd.gov

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

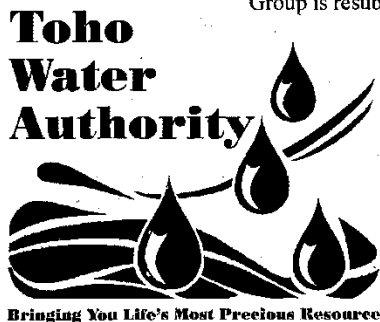
**SUBJECT: Proposed CFWI Water Supply Planning Documents
STOPR+2 Comments on Draft 2035 Water Resources Protection and Water Supply
Strategies Plan and Draft Regional Water Supply Plan**

Dear Mr. Powell:

Please accept this letter and the attached consolidated comments from the regional utility partnership informally referred to as “STOPR+2” which includes the City of St. Cloud, Tohopekaliga Water Authority (TWA), Orange County, Polk County, Reedy Creek Improvement District (RCID), Seminole County, and Orlando Utilities Commission (OUC)—on the draft Central Florida Water Initiative (CFWI) water supply planning documents.

Each of our organizations has actively participated in and contributed significant resources to the CFWI process. Our staff and consultants worked alongside District staff and other stakeholders during the development of the 2035 Water Resources Protection and Water Supply Strategies Plan (referred to as the “Solutions Plan”) and the Regional Water Supply Plan (RWSP). As participants and contributors to the CFWI process, we have previously provided comments on the draft Solutions Plan on January 29, 2015 and March 14, 2015. In the spirit of continued collaboration, we have reviewed and generated comments on the May 2015 Public Draft versions of the RWSP and the Solutions Plan. These comments are provided as a series of four attachments, as listed below.

- Attachment 1: Copy of a letter submitted separately on behalf of the STOPR+2 utilities related to the conjoining of the RWSP and Solutions Plan.
- Attachment 2: Comments on the May 2015 Draft RWSP.
- Attachment 3: New comments on the May 2015 Draft Solutions Plan.
- Attachment 4: Comments submitted on previous drafts of the Solutions Plan that the STOPR+2 Group is resubmitting for further consideration.



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Mr. Dean Powell
July 17, 2015
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We commend the Districts for achieving the difficult and complicated task of consolidating the input of so many parties into documents that are intended to lead the region toward a sustainable future condition in which our communities' water supply needs are met, while protecting the environment. Nevertheless, we do have significant comments on some aspects of the draft CFWI documents and summarize those key concerns below.

1. **The role of the Solutions Plan as an integral component of the RWSP should be better defined.** The importance of this issue is that the RWSP has a distinct place in the law and a stand-alone Solutions Plan does not. The Solutions Plan should be expressly recognized as an integral part of the RWSP and identified as such in both documents. Specific comments provided to address this concept have been submitted on behalf of the STOPR+2 Group in a separate letter from Silvia Alderman dated June 24, 2015, which is provided as Attachment 1.
2. **An explanation of known differences in the information presented between the RWSP and the Solutions Plan should be added for clarity.** Compared to the RWSP, some information presented in the Solutions Plan is the result of different, refined, or updated evaluations. For example, some sections of the RWSP were updated with the results of such Solutions Plan evaluations (e.g., the Water Supply Project Options). In other cases (e.g., potential future conservation projections), the RWSP document was not updated to reflect the results of the Solutions Plan analyses, making various sections of the overall series of CFWI documents appear inconsistent—though they are not. It is suggested that supplemental text be added to better explain this linkage between evaluations performed as part of the RWSP and the Solutions Plan. A specific comment addressing this concern (Comment #2) is included in Attachment 2.
3. **Certain definitions used in the documents for planning purposes are inconsistent with existing water management district rules.** Of particular concern to the STOPR+2 utilities are the stated definitions of key concepts such as “brackish water”, “fresh water”, “traditional sources”, and “non-traditional sources”. We believe that the definitions expressed in the CFWI planning documents should be carefully restated to properly characterize the intent of how these terms were used in the RWSP and Solutions Plan. We provide various suggestions of how this might be accomplished in the detailed comments of Attachments 2 and 3.
4. **Input previously provided on STOPR+2 related projects was not incorporated into the updated May 2015 version of the Solutions Plan document.** As stated above, we provided comments on earlier draft versions of the Solutions Plan document, and some of the comments on projects that identified STOPR+2 utilities as stakeholders were not addressed. As the entities responsible for implementing these projects, it is important that these proposed changes be made. Such comments are resubmitted for consideration in Attachment 4.
5. **The Solutions Plan does not adequately emphasize DMIT recommendations.** The significance of implementing the recommendations of the Data, Monitoring and Investigations Team (DMIT) are not given adequate priority. For example, in the sections of the Solutions Plan discussing modifications and improvements to the ECFT model, there is no mention of incorporating the additional data points recommended within the DMIT plan. Adding these data points has the potential to significantly improve the accuracy of the model results, and therefore the future assessment of withdrawal impacts on the aquifer. We therefore request that the DMIT

Mr. Dean Powell
July 17, 2015
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recommendations for additional monitoring be more specifically detailed in the Solutions Plan, as suggested by various comments provided in Attachment 3.

6. **As discussed in the plan documents, “consistency” should focus on general consistency amongst the Districts, and not only on consistent rules and regulations.** We feel the Districts should continually strive for consistency with regard to all programs. While a consistent set of rules is certainly one tool that should be applied to the CFWI region, the process of developing consistency in the region should be open to other potential tools that may provide additional support for the Districts’ and stakeholders’ ability to implement the strategies developed in the CFWI process. Therefore, we request the text in the RWSP and Solutions Plan documents be modified to emphasize consistency amongst the Districts, in addition to developing a consistent set of rules, as a goal of this plan. Specific comments regarding this concern have been provided in Attachments 2, 3 and 4.
7. **The consensus-driven work performed by the Water Conservation Subteam should be more strongly reflected in the Solutions Plan.** Central Florida has experienced significant water savings through conservation over the past decade. The Water Conservation Subteam worked diligently to characterize potential conservation practices that could be implemented in the future to further augment the already significant water conservation programs of the region. Through the documentation of the Water Conservation Subteam’s efforts, the significance of historical water conservation practices and resulting water savings has not been given due acknowledgment. In addition, some of the consensus-driven work performed by the Water Conservation Subteam has not been accurately reflected in the Solutions Plan. In our attached proposed comments for Chapter 2 of the Solutions Plan (in Attachment 3), we have indicated where the significance of historical conservation practices should be more strongly reflected and where the water conservation work effort and results should be modified to more clearly reflect the consensus of the Water Conservation Subteam.
8. **The discussion of water conservation alternatives should better emphasize and promote further development of the Conserve Florida Water Clearinghouse.** An existing statewide clearinghouse, the Conserve Florida Water Clearinghouse, was established at the University of Florida but has not received significant funding in recent years. Chapter 2 of the Solutions Plan discusses various conservation BMPs but does not emphasize the existing Clearinghouse. Although not a ‘project’ to which a potential demand reduction volume can be attributed, the Clearinghouse nonetheless is a fundamental component of a comprehensive CFWI water conservation strategy. Additional data on the performance of various conservation measures will help with the selection and implementation of BMPs, and the Clearinghouse is a primary source of such data. We recommend that more emphasis be placed in the Solutions Plan document on additional development of the Conserve Florida Water Clearinghouse, as suggested by specific comments offered in Attachment 3.
9. **Cost estimates for some projects do not reflect more accurate estimates developed and provided by utilities.** We recognize the need to utilize the CFWI Cost Estimating (CE) Tool to produce consistent planning-level cost estimates for the water supply projects named in the Solutions Plan document. However, the utilities tasked with implementing the projects have more detailed and therefore more accurate information on the project costs, and also are accountable

Mr. Dean Powell
July 17, 2015
Page 4 of 4

for funding them. We therefore request that utilities' costs also be included for reference within the project descriptions, as noted in various comments of Attachment 3.

We appreciate the opportunity to review and provide comments on the Draft CFWI documents. We look forward to continuing to work with the Districts to implement programs that meet the water supply needs of the region. We are available to meet with the Districts to discuss any questions you may have on our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian L. Wheeler".

Brian L. Wheeler, P.E.
Executive Director, Tohopekaliga Water Authority
On behalf of the "STOPR+2" Group

BLW/ncd

Enclosures: Attachments 1-4

STOPR+2 Attachment 1 –Alderman Letter

Attachment 1



Silvia Morell Alderman

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June 24, 2015

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Southwest Florida Water
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Tampa, FL 33637-6758

Re: CFWI Regional Water Supply Plan ("RWSP")

Dear All:

The Water Cooperative of Central Florida and the entities informally referred to as "STOPR+2," (City of St. Cloud, Tohopekalliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Orlando Utilities Commission and Seminole County) will be providing independent comments on the RWSP and Solution Strategies Plan through the assigned process. However, they asked me to write to you and highlight a particular concern, which was, coincidentally, also addressed in general terms during the last Regulatory Team conference call.

While there seems to be no disagreement among participants that the Solutions Plan ("SP") is part of the RWSP, we do not believe the drafters have adequately conjoined the two documents. The importance of this issue, as you are well aware, is that the RWSP has a distinct place in the law and a stand-alone SP does not. This makes it of paramount importance that there never be any doubt about the status of the SP as an element of the RWSP. The SP should be expressly recognized as an integral part of the RWSP and identified as such in both documents. We note that the documents as drafted make reference to an intent to make the SP 'one of the CFWI documents;' however, it is more than that. It should be prominently identified as an element of

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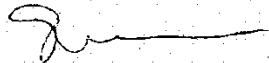
June 24, 2015

Page 2

the RWSP. Regrettably the volumes lack a consistent, unambiguous statement to that effect. The fact that the SP is called a 'Plan' in itself implies a separate document.

Both the RWSP and the SP should clearly express the intent that they are *one* document in multiple volumes, with associated appendices. The SP should not be called a 'plan' at all, which separates it from the RWSP; a better short name for the SP would be the "Solutions Strategies" or 'SS' for short. Something as simple as labeling the RWSP documents as consecutively numbered volumes (i.e., Volumes I, II, III and IV instead of a two-volume set with appendices) would help create a better unity. To facilitate understanding our suggestion, we provide an example of how these two documents might be joined. See Attachment 1. The most important changes are to the beginning of the document (the unnumbered first page and pages i, ii, and v) in the SP sample provided. Similar changes should be made to the RWSP. Naturally, there would need to be global edits to carry this forward. However, this should be possible with limited effort. If you agree, we would appreciate your assistance in carrying this message to your respective agencies.

Sincerely yours,



Silvia Morell Alderman

Enclosure

cc: STOPR+2

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ATTACHMENT 1

This document is the Public Draft of the 2035 Water Resources Protection and Water Supply Strategies ~~Plan~~ document (Solutions ~~Plan~~ Strategies) of the Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP). Staff from the South Florida Water Management District (SFWMD), St. Johns River Water Management District (SJRWMD), and Southwest Florida Water Management District (SWFWMD) worked together and in conjunction with members of various Central Florida Water Initiative technical teams to generate this Solutions ~~Plan~~ Strategies document.

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Preface

CENTRAL FLORIDA WATER INITIATIVE

In Florida, the water management districts develop regional water supply plans to ensure the protection of the water resources and related natural systems and to identify sustainable water supply for all water uses. Through the Central Florida Water Initiative (CFWI), three water management districts — the St. Johns River Water Management District, South Florida Water Management District, and Southwest Florida Water Management District — are working collaboratively with other agencies and stakeholders to implement effective water resource planning, along with development and management procedures to protect, conserve and restore our water resources. The CFWI Planning Area includes all of Orange, Osceola, Seminole, and Polk counties and southern Lake County. This effort used a unified process to address central Florida's current and long-term water supply needs. The guiding principles of the CFWI as contained in the CFWI Guiding Document are:

- ◆ Identify the sustainable quantities of traditional groundwater sources available for water supplies that can be used without causing unacceptable harm to the water resources and associated natural systems.
- ◆ Develop strategies to meet water demands that are in excess of the sustainable yield of existing traditional groundwater sources. Strategies include optimizing the use of existing groundwater sources, implementing demand management, and identifying alternative water supplies that can be permitted and will be implemented as demands approach the sustainable yield of existing sources.
- ◆ Establish consistent rules and regulations for the three water management districts that meet their collective goals, and implement the results of the Central Florida Water Initiative.

The work of the CFWI is captured in a ~~the~~ series of documents that ~~include make up~~ the Regional Water Supply Plan, ~~the Regional Water Supply Plan Appendices, the 2035 Water Resources Protection and Water Supply Strategies Plan, and the 2035 Water Resources Protection and Water Supply Strategies Plan Appendices.~~ The following table summarizes the main types of information found in each document of the ~~CFWI Document Series~~ RWSP. Each of these documents is available from cfwiwater.com.

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CFWI Document Series: Summary of Volume Contents

Volume I Regional Water Supply Plan	Volume I-B-III Regional Water Supply Plan Appendices to Volume I	Volume II-A-1 Regional Water Supply Plan 2035 Water Resources Protection and Water Supply Strategies Plan	Volume II-B-IV 2035 Water Resources Protection and Regional Water Supply Strategies Plan Appendices to Volume II
<ul style="list-style-type: none"> • Introduction • Population and Water Demands • Resource Protection and Assessment Criteria • Evaluation of Water Resources • Water Conservation • Water Source Options • Water Supply Development • Water Resource Development • Funding for Water Supply and Water Resource Development Projects • Conclusion • Recommendations/Future Direction 	<ul style="list-style-type: none"> • Appendix A: Population and Water Demand Estimates • Appendix B: Proposed MFLs for Evaluating Groundwater Availability • Appendix C: Overview and Use of the ECFT Groundwater Model • Appendix C-I: Evaluation of Water Quality Degradation Potential in the CFWI Planning Area • Appendix D: Agricultural Best Management Practices (BMPs) • Appendix E: Reclaimed Water Use Inventory • Appendix F: Water Supply Project Options 	<ul style="list-style-type: none"> • Introduction • Water Conservation • Solutions Projects • Environmental Evaluation • Regulation • Financial Assessment • Conclusions and Implementation Strategies 	<ul style="list-style-type: none"> • Appendix A: Water Conservation • Appendix A: Cost Estimating Tool • Appendix C: Solutions Plan Projects • Appendix D: Updated Water Supply Development Projects • Appendix E: Solutions Plan Modeling • Appendix F: Environmental Evaluations • Appendix G: Regulatory

(flip former columns IB and II-A)

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Executive Summary

This Central Florida Water Initiative (CFWI) 2035 Water Resources Protection and Water Supply Strategies Plan (Solutions Strategies Plan) addresses future steps toward meeting the water supply needs of the CFWI Planning Area. ~~This The Solutions Strategies Plan, in combination with the updated document together with its appendices completes the~~ CFWI Regional Water Supply Plan (RWSP) ~~and associated Appendices, make up the 2015 CFWI Document Series.~~ In May 2014, the governing boards of the St. Johns River Water Management District (SJRWMD), South Florida Water Management District (SFWMD), and Southwest Florida Water Management District (SWFWMD) (Districts) acknowledged delivery of the 2014 Final Draft CFWI RWSP (CFWI RWSP). The governing boards of the three Districts chose to delay final agency action on the CFWI RWSP until the completion of the Solutions Strategies Plan and any other resulting changes or refinements to the CFWI RWSP.

The CFWI RWSP ~~including the~~ and Solutions Strategies Plan were jointly developed by the Districts in coordination with the Florida Department of Environmental Protection (FDEP), the Florida Department of Agricultural and Consumer Services (FDACS), water utilities and other stakeholders. These documents identify programs, projects and strategies to ensure that adequate and sustainable water supplies are available to meet future water supply needs while protecting the environment and water resources. The CFWI Planning effort was based on a planning horizon extending through 2035 and identifies water conservation measures, water supply development project options, and water resource development project options.

The CFWI Planning Area is located in central Florida and consists of all of Orange, Osceola, Seminole, and Polk counties and southern Lake County. This region's population is expected to increase by 49 percent to more than 4.1 million by 2035. Average total water use is projected to increase from approximately 800 million gallons per day (mgd) to about 1,100 mgd in 2035. Based on the CFWI RWSP work, it was estimated that approximately 50 mgd of additional, traditional groundwater could be available for water supply on a regional basis through the implementation of local management activities (e.g., wellfield optimization, aquifer recharge, and augmentation) to avoid or mitigate impacts to the region's water resources. Based on the 2035 demands, the resulting deficit is approximately 250 mgd. Additional groundwater may be available, but environmental constraints and economic realities, along with regionally appropriate management and operational controls including additional mitigation, will need to be carefully considered as part of implementing additional groundwater development.

Minimum flows and levels (MFLs) have been established for 46 water bodies in the CFWI Planning Area. All of these water bodies are located in the SJRWMD and SWFWMD portions of the CFWI Planning Area. In addition, there are more than 150,000 acres of non-MFL lakes and wetlands within the CFWI Planning Area. The status assessment of MFLs as part of the CFWI RWSP identified 10 water bodies within the CFWI Planning Area that are currently below their established MFLs and an additional 15 water bodies that are projected to fall

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STOPR+2 Attachment 2 –Comments on the May 2015 Draft RWSP**Attachment 2****Central Florida Water Initiative
Draft Regional Water Supply Plan (RWSP)****STOPR+2 Group Comments on May 8, 2015 Public Draft**

- 1) General Comment: Remove Hiawassee, Searcy, and other non-applicable lakes from the MFL discussions and figures. After removing references to Hiawassee, Searcy, etc. from proposed MFL references, tables, and diagrams, check to make sure the counts of MFLs, constraints, etc. are current throughout the RWSP, the Solutions Plan, appendices, text, tables, and graphics.
- 2) General Comment, Preface and Executive Summary: Some information presented in the draft RWSP does not precisely match information in the draft Solutions Plan. This is not necessarily a problem, but it warrants explanation in the RWSP. Some of the analyses supporting the two documents were performed at different times, for different purposes. For example, some information presented in the Solutions Plan Appendices is the result of different, refined, or updated evaluations. In some cases, sections of the RWSP were updated with such Solutions Plan results (e.g., the Water Supply Project Options). In other cases (e.g., potential future conservation projections), the RWSP was not updated to reflect the results of the Solutions Plan, making the various sections of the overall series of documents appear inconsistent—though they are not.

Consistent with the June 24, 2015 letter from Silvia Alderman (see Attachment 1), it is recommended that the Solutions Plan be more clearly identified as an integral component of the RWSP. Furthermore, to address any apparent inconsistency of information in the different document volumes, it is suggested that supplemental text be added as the last paragraph of the RWSP Preface and the second to last paragraph on Page xi of the RWSP Executive Summary to better explain the linkage between the RWSP and the Solutions Plan Appendices. The following paragraph is suggested: "Some of the evaluations described in the Solutions Strategies Plan Appendices represent different, refined, or expanded evaluations of certain aspects of the Regional Water Supply Plan. These evaluations were based on specific assumptions developed by the water management districts and CFWI stakeholders to generate a potential implementation and funding plan for a specific set of Water Supply Project Options identified for the region. As a result, some of the results presented in the Solutions Strategies Plan Appendices (e.g., projections for future potential conservation) are not the same as the results presented in other sections of the RWSP. These results are not inconsistent, but rather represent the results of two different evaluations performed for varying purposes. Only updates to the Water Supply Project Options were integrated into other sections of the RWSP." A similar text addition may also be appropriate for other sections of the RWSP.

- 3) Preface, Page i, Third Bullet: Change bullet text as follows, "Establish consistency among consistent rules and regulations for the three water management districts, including but not limited to developing consistent rules and regulations, to meet the collaborative process goals that meet their collective goals, and implement the results of the Central Florida Water Initiative."

- 4) Preface, Page i: Suggest adding the following text after the bullet list:
"CENTRAL FLORIDA WATER INITIATIVE GOALS
 1. One model.
 2. One uniform definition of harm.
 3. One reference condition.
 4. One process for permit reviews.
 5. One consistent process, where appropriate, to set MFLs and reservations.
 6. One coordinated regional water supply plan, including any needed recovery and prevention strategies."
- 5) Executive Summary, Page viii, First Full Paragraph, First Sentence: The regulatory definition of "brackish" groundwater is not consistent among the three water management districts. For this reason, throughout the RWSP document, we suggest making reference to "traditional" and "non-traditional" sources of groundwater in lieu of distinguishing groundwater sources by water quality. Suggest changing this first sentence as follows, "The CFWI Planning Area traditionally has relied on fresh groundwater from the SAS, IAS, UFA, and some areas of the LFA Floridan aquifer system (FAS) as a primary water source for urban, agricultural, and industrial uses."
- 6) Executive Summary, Page viii, Fourth Paragraph, First Sentence: Suggest changing this sentence as follows, "Based on modeling results and the assessment of groundwater availability, it was concluded that fresh traditional groundwater resources alone cannot meet future water demands in the CFWI Planning Area without resulting in unacceptable impacts to water resources and related natural systems."
- 7) Executive Summary, Page x, First Paragraph, First through Fourth Sentences: Suggest changing these sentences as follows, "There are several sources of water and storage options that were considered to address future water needs. Historically utilized groundwater from the SAS, IAS, UFA, and some portions of the LFA Fresh groundwater sources (i.e., surficial, intermediate, and Floridan aquifers) are considered traditional sources of water while portions of the LFA that have not been historically utilized brackish groundwater, surface water, seawater, reclaimed water, reservoirs and aquifer storage and recovery are considered non-traditional or alternative water sources. The CFWI RWSP identifies 142 potential water supply development project options, consisting of 37 brackish non-traditional LFA groundwater, 15 surface water, 87 reclaimed water, and three management strategy projects that could produce up to a total of 455 mgd in additional water supply by 2035. The 37 brackish non-traditional LFA groundwater projects and 15 surface water projects have an estimated capital cost of up to 2.5 billion dollars, and could generate an estimated potential of up to 284 mgd of water.
- 8) Executive Summary, Page xi, Last Paragraph: Change this sentence as follows, "In addition, a Regulatory Team will promote consistency amongst the water management districts, including but not limited to establishing consistent rules and regulations for the three Districts, that meet the collaborative process goals and implement the results of this CFWI planning effort."
- 9) Introduction, Page 7, South Florida Water Management District Paragraph, Fourth through Sixth Sentences: Suggest changing sentences as follows, "Fresh groundwater from the SAS, UFA and portions of the LFA Floridan aquifer system and groundwater from the surficial aquifer system served the Kissimmee Basin (KB) Planning Area as traditional water sources (SFWMD 2006a). The 2005-2006 KB Plan Update concluded that increased conservation and the development of non-traditional sources or alternative water supplies were needed to meet water needs, as further development of traditional supplies becomes increasingly limited. The non-traditional or

alternative water supply source options identified for the KB Planning Area included ~~brackish groundwater from some portions of the LFA; fresh~~ surface water from the Kissimmee River and Chain of Lakes and associated tributaries; stormwater runoff collection and storage; and reclaimed water."

- 10) Introduction, Page 7, St. Johns River Water Management District Section, Second Paragraph, Second Sentence: Not all the AWS surface water projects identified in the SJRWMD plan include surface water storage in reservoirs. Suggest changing this sentence as follows, "These included increased use of reclaimed water, development of ~~brackish-non-traditional LFA~~ groundwater sources, surface water, storage through reservoirs, and conservation (SJRWMD 2006a)."
- 11) Introduction, Page 8, Southwest Florida Water Management District Section, First paragraph, Last Sentence: Because this section discusses projects identified in the 2010 Heartland Plan, there should be some reference to additional non-traditional AWS sources identified in that plan—such as the Polk Southeast Wellfield, Northeast LFA Wellfield, and Kissimmee River Reservoir projects. Please modify the final sentence as follows, "Polk County may also be able to meet future demands from non-traditional sources such as surface water and LFA groundwater supplies within Polk County, or from importation of water from supplies developed in cooperation with other regional entities outside of Polk County by Tampa Bay Water in the Tampa Bay Planning Region and/or from surface and groundwater supplies in the SWFWMD portion of Polk County."
- 12) Introduction, Page 9, Groundwater Subsection, First Paragraph, Last Sentence: Suggest changing this sentence as follows, "The SAS, IAS, UFA, and portions of the LFA ~~upper portion of the Floridan aquifer has~~ have historically been the ~~primary~~ traditional source of water supply throughout the region."
- 13) Introduction, Page 10, First Full Paragraph, Second and Third Sentences: Suggest changing these sentences as follows, "Therefore, alternatives to ~~fresh-traditional~~ groundwater sources need to be developed and implemented to meet the region's growing demands. AWS sources are presented and described in Chapter 6. AWS sources include reclaimed water, ~~brackishnon-traditional~~ groundwater such as groundwater from some portions of the LFA within the CFWI region, surface water, seawater, and stormwater."
- 14) Introduction, Page 10, Second Paragraph, Second Sentence: Suggest changing this sentence as follows, "However, limited water quality data exists within the LFA and our understanding of the potential local and regional impacts that could result from LFA pumping in areas of the region that have not historically utilized this source ~~other areas such as southern Osceola County~~ is limited as well."
- 15) Chapter 2, Page 29, Summary Second Paragraph, Last Sentence (continued on Page 30): The CFWI RWSP is intended to be the current or in-progress regional water supply plan for all three Districts. As such, suggest changing this sentence as follows, "These changes make it inappropriate to compare the planning demand projections in this CFWI RWSP with current or in-progress ~~District RWSPs, DWSPs, or~~ projections produced by individual Districts for use in other planning efforts or consumptive use permitting."
- 16) Chapter 3, Page 32, Second paragraph: The statement referring to the use of Rule 62-40, FAC, is only true for SFWMD, which specifically references 62-40 in terms of considering what constitutes a reasonable-beneficial use. The other two Districts have established their own standards without

reference to 62-40 in determining reasonable-beneficial use. This either needs to be clarified or the sentence should be deleted.

- 17) Chapter 3, Page 32, Last Bullet under CUP Issues: "Restricted allocation areas" is a term that is only used in SFWMD's rules. This implies that all the Districts have rules relating to restricted allocation areas, which is incorrect. Suggest deleting this bullet or adjusting the text accordingly.
- 18) Chapter 3, Page 33, First Paragraph, Last Sentence: This sentence is incorrect. SWFWMD and SJRWMD have only established the 2-in-10-year drought condition requirement for irrigation type uses. Public water supply permits are evaluated based on average rainfall or drought conditions. Suggest changing this sentence as follows, "Permit applicants for irrigation uses in SWFWMD and SJRWMD must demonstrate the conditions for permit issuance are satisfied during a 2-in-10 year drought condition, except within the SWFWMD's Southern Water Use Caution Area (which includes most of Polk County) where a 5-in-10 year drought condition is used for crops that receive effective rainfall. Permit applicants for PWS uses in the SWFWMD are based on a 5-in-20 year drought condition."
- 19) Chapter 3, Page 34, First Paragraph, First and Second Sentences: Based on the latest amendment to Rule 62-40, FAC, WMDs are required to "simultaneously" prepare a Recovery and Prevention Strategy, when adopting an MFL that will not be met within 20 years. This language does not reflect this requirement. Please update this sentence accordingly. "If the water body is below or projected to fall below the existing MFL criteria, the District shall expeditiously develop and implement a recovery or prevention strategy. If the water body is below or projected to fall below proposed MFL criteria, the District shall simultaneously develop and adopt a recovery or prevention strategy with the MFL. A recovery strategy must be developed and implemented when the water body currently fails to meet MFL criteria."
- 20) Chapter 3, Page 34, Second Paragraph, First Sentence: According to Rule 62-40, a prevention strategy must be implemented concurrently with the adoption of an MFL, where the water body is not projected to meet the MFL within 20 years. Please update this sentence as follows, "A prevention strategy is developed concurrently with the adoption of the MFL ~~or subsequent to adoption~~ when the MFL's criteria ~~are currently met, but~~ are projected not to be met within the next 20 years."
- 21) Chapter 3, Page 35, First Paragraph, Second Sentence: This statement is inconsistent with Rule 62-40.473(2), FAC. Please update this text as follows, "However, a minimum flow or level need not be expressed as multiple flows or levels if other resource protection tools, such as reservations, ~~are implemented in coordination with the MFLs to protect fish and wildlife or public health and safety, which and provide equivalent or greater protection of the hydrologic regime of the water body, are developed and adopted in coordination with the minimum flow or level.~~"
- 22) Chapter 3, Page 35, Second Paragraph, First Sentence: Reference should be made to the fact that SWFWMD Rule 40D-80 contains the regulatory portion of MFL Recovery and Prevention Strategies for certain MFLs. Suggest changing this sentence as follows, "Chapters 40C-8, 40D-8, and 40E-8, F.A.C., contain the adopted MFLs as well as definitions and the policy and purpose considerations used in the establishment of MFLs, and Chapter 40D-80 contains the regulatory portion of MFL Recovery and Prevention Strategies for certain MFLs."
- 23) Chapter 3, Page 40, Second Paragraph, Last Sentence: New Rule 62-40 requires Recovery and Prevention Strategies to be implemented simultaneously with adoption of MFLs. Suggest updating

this sentence as follows, "An important part of the water supply planning process is the assessment of MFL water bodies to determine if existing flows and levels are below the MFL or projected to fall below, the MFL within 20 years. For existing MFLs in such cases, the Districts shall expeditiously develop and implement a recovery or prevention strategy. For proposed MFLs, the District shall simultaneously develop and adopt a recovery or prevention strategy with the MFL."

- 24) Chapter 4, Page 51, Second Paragraph, First Bullet: Proposed MFLs should not be used as a measuring stick, unless they are re-evaluations of existing MFLs. Change this bullet as follows, "Adopted and proposed MFL water bodies within the CFWI Planning Area."
- 25) Chapter 6, Page 101, First Paragraph, First and Second Sentences: Suggest modifying these sentences as follows, "The CFWI Planning Area has primarily relied on water derived from the ~~Floridan aquifer system (FAS)~~ SAS, IAS and UFA, and the LFA in some areas of the CFWI (e.g., traditional sources) ~~with minor uses from the Surficial aquifer system (SAS) and intermediate aquifer system (IAS) and contributions of surface water from rivers, streams, and lakes to meet water supply needs, as well as non-traditional sources such as reclaimed water and some minor surface water uses.~~ As demands increase, and withdrawals approach sustainable limits of traditional water supply resources, it is important to identify options for diversifying water supply sources. The sources of water potentially available to meet projected water demand in the CFWI Planning Area include ~~fresh~~traditional groundwater sources, brackish non-traditional groundwater sources such as groundwater from the LFA in some areas of the CFWI where this source has not been historically used, surface water, seawater, and additional reclaimed water."
- 26) Chapter 6, Page 101, Third Paragraph, First Sentence: Suggest changing this sentence as follows, "Fresh groundwater sources (i.e., ~~surficial, intermediate, and Floridan aquifers~~SAS, IAS, UFA, and the LFA in some areas of the CFWI region) are considered traditional water sources whereas nontraditional or alternative water sources include ~~brackish LFA groundwater from some areas of the CFWI region~~, surface water, seawater, reclaimed water, and water stored in ASRs and reservoirs."
- 27) Chapter 6, Page 102, Second Paragraph, Second Sentence: Suggest modifying the text as follows, "~~Fresh groundwater from the Upper Floridan aquifer (UFA) and some select zones in the Lower Floridan aquifer (LFA) is the principal traditional source of water supply for all water use categories in the CFWI Planning Area.~~"
- 28) Chapter 6, Page 106, Brackish Groundwater Section, First Paragraph: The final two sentences of this paragraph reference different definitions for brackish groundwater depending on the WMD. In addition, from a practical perspective these definitions are not adequately encompassing. For example, a source of water may have sulfate concentrations above drinking water standards that require a utility to use advanced treatment. In this example, that source would be considered a brackish AWS source for that utility. We suggest these two sentences be modified as follows to adequately capture a practical definition of brackish water for planning purposes, "Brackish water, for alternative water supply planning purposes in the CFWI Planning Area ~~for SJRWMD and SWFWMD~~, is generally defined as water requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use, with a total dissolved solids (TDS) concentration of greater than 500 mg/L. SJRWMD defines saline water, which includes brackish water, as water with chloride concentrations greater than 250 mg/L."

- 29) Chapter 6, Page 106, Brackish Groundwater Section, Fourth Paragraph: Please modify the beginning of this paragraph as follows, "Currently, the Water Cooperative of Central Florida (WCCF) (a cooperative that includes Orange County Utilities, TWA, City of St. Cloud, and Polk County Utilities) and Reedy Creek Improvement District (RCID) are implementing the development of a non-traditional groundwater ~~brackish~~ wellfield to withdraw water from sections of the LFA. The WCCF and RCID (as co-permittees) were recently granted a water use permit to withdraw 37.5 mgd (30 mgd finished and 7.5 mgd treatment process reject) in central Osceola County from the brackish LFA. In addition, Polk County Utilities is implementing the Southeast Wellfield Project and was recently granted a water use permit to withdraw 37.5 mgd (30 mgd finished and 7.5 mgd treatment process reject) of non-traditional LFA groundwater in southeast Polk County."
- 30) Chapter 6, Page 116, Seawater Section, Second Paragraph on page: Modify paragraph as follows to more accurately represent the concepts discussed between Polk County and Tampa Bay Water: "Polk County Utilities and TBW have previously discussed the potential for the county to partner in an expansion of the 25 mgd Tampa Bay Desalination Facility. In exchange for a funding commitment, TBW could also supply a quantity of water to Polk County through a future interconnect ~~from the Lithia area of Hillsborough County to utilities in western Polk County or by a net-benefit relocation of groundwater withdrawals within the Most Impacted Area of the SWUCA.~~
- 31) Chapter 7, Page 125, Last Paragraph, First and Second Sentences: Suggest changing these sentences as follows, "The majority of the 2010 public supply water demand was met by ~~fresh~~ groundwater from the FAS. The UFA and portions of the LFA ~~freshwater portions of the upper and lower Floridan aquifer~~ are considered the traditional sources for most water users within the CFWI Planning Area. ~~Where the water quality in the upper and lower portions of the FAS is brackish, the source~~ Some portions of the LFA within the CFWI region ~~are~~ is considered non-traditional. "
- 32) Chapter 7, Page 126, Last Paragraph, Title: Change "Brackish Groundwater Projects" to "Non-Traditional Groundwater Projects".
- 33) Chapter 7, Page 126, Last Paragraph: Brackish groundwater, for alternative water supply planning purposes in the CFWI Planning Area ~~for SJRWMD and SWFWMD~~, is generally defined as water requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use, with a total dissolved solids (TDS) concentration greater than 500 mg/L. SWFMD defines saline water, which includes brackish water, as water with chloride concentrations greater than 250 mg/L can be found in the Lower Floridan aquifer (LFA) within portions of the CFWI Planning Area. Additionally, brackish groundwater has been identified at depths below the FAS in most areas of the CFWI Planning Area. Brackish groundwater is a non-traditional supply source for the CFWI area. However, some portions of the LFA within the CFWI area are also non-traditional regardless of the quality of the groundwater. Thirty-seven potential ~~brackish non-traditional groundwater~~ supply projects, mostly in Polk County, have been identified to generate water within portions of the CFWI Planning Area. As currently described, these alternative water supply (AWS) projects could generate an estimated 45 mgd of new groundwater. Projects are still being evaluated and could increase the amount of potential new ~~brackish non-traditional~~ groundwater by an additional 30 mgd.
- 34) Chapter 7, Page 127, ~~Brackish~~ Non-traditional Groundwater Projects, Second Paragraph: Modify this paragraph as follows, "The Cypress Lake Wellfield ~~project and proposed~~ Southeast Polk County Wellfield projects (included in the AWS estimates above) have both been permitted by the SWFMD and are anticipated to provide new potable supply by tapping the LFA in areas not

traditionally used for water supply. The Cypress Lake Wellfield project in central Osceola County is being developed by the Water Cooperative of Central Florida (WCCF) and the Reedy Creek Improvement District (RCID). ~~This project was permitted for construction in 2012.~~ The Southeast Polk County Wellfield project is being pursued ~~(including water quality analysis)~~ developed by Polk County Utilities and is, which proposes development of a LFA wellfield at a facility located west of the Kissimmee River near SR 27 and SR 60. A number of additional ~~brackish~~ non-traditional groundwater projects are relatively small in size and are designed as blending projects with existing fresh groundwater sources.”

- 35) Chapter 7, Page 127, Surface Water Subsection, Second Paragraph, First Sentence: Suggest modifying this sentence as follows, “Fifteen potential non-traditional surface water supply projects have been identified to generate new water within the CFWI Planning Area and are shown in Table F-1 in Appendix F.”
- 36) Chapter 7, Page 128, Seawater Section, First Paragraph, First Sentence: Suggest changing this sentence as follows, “Seawater is defined by the SJRWMD and SFWMD as water with a chloride concentration at or above 19,000 mg/L and by the SWFWMD as water with a chloride concentration at or above 10,000 mg/L.” This suggestion is based on review of SJRWMD AH §1.1(r), SFWMD AH §1.1, and SWFWMD AH §1.1(o).
- 37) Chapter 7, Page 131, Second Paragraph, Third Sentence: This sentence indicates that a CUP may be required if a withdrawal is within three miles of the coastline. This follows a sentence regarding the withdrawal of seawater and use of reclaimed water. This criterion is not included in SJRWMD’s rules regarding withdrawals of seawater. Rule 40C-2.051 indicates that seawater withdrawals are exempt from permitting, except for withdrawals from estuaries, lagoons, rivers, streams and intracoastal waters. Also, SJRWMD exempt projects that use 100% reclaimed water. Regardless of whether it has a rule to that effect, Section 373.019(17), Florida Statutes states that reclaimed water “is not subject to regulation pursuant to s. 373.175 or part II of this chapter, until it has been discharged into waters as defined in s. 403.031(13).” Suggest changing this text as follows, “In SJRWMD, a consumptive use permit may be required for withdrawals from estuaries, lagoons, rivers, streams, and intracoastal waters ~~if the withdrawal is within three miles of the coastline.~~ A consumptive use permit is not required for the use of reclaimed water in the SJRWMD.”
- 38) Chapter 7, Page 135, Impact of Political Boundaries on Water Supply Planning Subsection: This section only discusses transfers of groundwater across District boundaries and transfers of water across county boundaries. However, there is a third set of water transfers that should be mentioned. Suggest adding a brief section regarding surface water across District boundaries, which is governed by Rule 62-40.422(1) and (2), FAC.
- 39) Chapter 11, Page 161, Blue Text in Box after Second Paragraph: Change this sentence as follows, “As described in this CFWI RWSP, fresh-traditional groundwater resources alone cannot meet...”
- 40) Chapter 11, Page 161, Last Full Paragraph, First Sentence: Change this sentence as follows, “In some areas, utilization of fresh-traditional groundwater has already reached, exceeded, or is near the sustainable limits.”
- 41) Chapter 11, Page 168, Groundwater Subsection: Add the following bullet to the bullet list, “Support continuing efforts to refine and update the ECFT model so that it may be used as a permitting tool in the future.”

- 42) Chapter 11, Page 169, First Paragraph, First Three Sentences: This sentence would benefit from including a definition of conjunctive use. Suggest changing this text as follows, "There are opportunities for the development of surface water supplies from the lakes and rivers in or near the CFWI Planning Area as non-traditional water supply sources. Smaller, local lakes are generally considered a limited resource and often provide the local landowners with water for irrigation purposes. ~~However, the capture and storage of water from river/creek systems during times of high flow can supply significant quantities of water and could be a conjunctive use component of many multi-source water supply development projects that integrate the use of other sources with surface water in a manner that minimizes any potential harmful effects to the sources (e.g., conjunctive use).~~"
- 43) Chapter 11, Page 170, Minimum Flows and Levels Last Bulleted Item: Suggest rewriting this bullet as follows, "Expediently develop and implement the recovery and prevention strategies identified in Chapter 3 and others for adopted MFLs projected to fall below their MFL criteria within the next 20 years, develop and adopt recovery and prevention strategies simultaneous to the adoption of new MFLs when the MFL is projected to fall below their MFL criteria within the next 20 year, as additional MFLs are developed, and continue to implement the strategies identified in the Southern Water Use Caution Area (SWUCA) Recovery Strategy."
- 44) Glossary, Page 180, Definition of "Brackish water": As no consistent regulatory definition exists among the water management districts, suggest a practical definition instead, as follows: "Brackish water, for alternative water supply planning purposes in the CFWI, is generally defined as water that requires advanced treatment technologies such as membranes to meet regulatory drinking water standards."
- 45) Glossary, Page 183, Definition of "Fresh water": This definition is not representative of the existing rules for the three water management districts. SWFWMD is the only District with a definition of fresh water. It is defined in AH §1.1(p) as "water that contains less than 3,000 mg/L of TDS." Suggest using the following practical definition, "For alternative water supply planning purposes in the CFWI Planning Area, fresh water is generally defined as water not requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use."
- 46) Glossary, Page 184, Definition of "Harm": Suggest deleting this definition as there currently isn't any common definition of "harm" among the three Districts.
- 47) Glossary, Page 188, Definition of "Seawater or salt water": Suggest changing this definition as follows, "Seawater is defined by the SJRWMD and SFWMMD as water with a chloride concentration at or above 19,000 mg/L and by the SWFWMD as water with a chloride concentration at or above 10,000 mg/L." This suggestion is based on review of SJRWMD AH §1.1(r), SFWMMD AH §1.1, and SWFWMD AH §1.1(o).
- 48) Appendix F: The details provided in Appendix F should be updated to match the details provided in Appendix D of the Solutions Plan document. For example, in Appendix D of the Solutions Plan document, the costs and phasing details of the three sub-projects associated with the overall Cypress Lake Project were removed and summarized as part of the overall cost and phasing for the combined project.
- 49) Appendix F, Page F-12, Table F-1, Embedded Title "Brackish/Non-traditional": Suggest deleting the last two sentences.

- 50) Appendix F, Page F-13, Table F-1, Projects 4 and 5: Change "Cypress Lake Brackish Groundwater Wellfield" to "Cypress Lake Wellfield" everywhere in these two project names and descriptions.
- 51) Appendix F, Page F-38, Table F-1, Project 126, Project Description: The source water for the St. Johns River/TCR Project is not "brackish". The 2009 PDR did not propose advanced treatment such as membranes. Suggest changing this text as follows, "Regional AWS project withdrawing a non-traditional surface water from the Taylor Creek Reservoir and the St. Johns River. Major components include intake structure, reservoir, treatment, storage and transmission facilities. ~~brackish~~"

STOPR+2 Attachment 3 – New Solutions Strategies Comments

Attachment 3

Central Florida Water Initiative Draft 2035 Water Resources Protection and Water Supply Strategies Plan ("Solutions Plan")

New Comments from STOPR+2 Group on May 1, 2015 Public Draft

- 1) General Comment: The significance and importance of implementing the recommendations of the Data, Monitoring and Investigations Team (DMIT) are not given the high level of priority due such recommendations. For example, in the Solutions Plan discussions regarding future modifications and improvements to the ECFT model, there is no discussion of the significance that obtaining additional data from the implementation of the recommended DMIT plan could have on model outcomes and future assessment of the status of the Floridan aquifer relative to the withdrawals. The importance of implementing the DMIT recommendations needs to receive more emphasis throughout the Solutions Plan. Specific comments related to this general comment have been provided below.
- 2) Executive Summary, Page viii, Assessment Section, First Bullet: Suggest changing "brackish" to "non-traditional" as follows, "~~Brackish~~Non-traditional groundwater project options from the LFA..."
- 3) Executive Summary, Page viii, Assessment Section, Second Bullet: Change the text of this bullet as follows: "A conceptual new LFA Centralized Wellfield (62.5 mgd withdrawal capacity; 50 mgd of finished water capacity) could be strategically located away from the areas susceptible to impacts in Osceola County such that there is little or no change in stressed non-MFL isolated wetlands acres, and no change in MFL considerations or constraints relative to the Baseline Condition."
- 4) Executive Summary, Page viii, Groundwater Section: Suggest changing this paragraph as follows, "~~Brackish~~Non-traditional groundwater project options have the potential to meet some of the future demand while reducing the impact to water resource constraints when compared to the use of traditional groundwater sources. The non-traditional groundwater projects evaluated as AWS sources were all LFA projects, some of which are known to be in areas of brackish groundwater. For long-term management of the withdrawals, it will be necessary to expand current data collection and testing to ensure these quantities can be developed in a manner that minimizes environmental impacts and changes in aquifer water quality."
- 5) Executive Summary Page x: Change paragraph title to "Implementation Costs and Categories of Funding".
- 6) Executive Summary, Page xi, Reporting Section, First Paragraph: Add an additional sentence: "CFWI RWSP updates should result in an iterative process that increases the certainty of environmental protection over time."
- 7) Executive Summary, Page xii, Conclusions and Summary of Key Findings, Second Bullet on page: Change the text in this bullet as follows; "Conceptual management strategies evaluated during the Solutions Planning Phase can be developed into specific ~~projects~~ strategies to address protection and recovery of the regions environmental systems. The results of this evaluation and future plans

provide information needed to manage existing withdrawals and to develop new water supply options or other mitigation strategies (Chapter 4). Implementation of these strategies will continue to provide for the protection and recovery of the water resources.”

- 8) Executive Summary, Page xiii, Bullet List, Second Bullet: Change the second bullet to, “Develop specific prevention and recovery ~~projects~~ strategies”; and add the following bullet to the bullet list: “Evaluate environmental risks through iteration and robust data gathering”.
- 9) Executive Summary, Page xiii, Final Bullet List, Sixth Bullet: Change as follows: “Develop options for consistency amongst the water management districts, including but not limited to consistent rules and regulations.”
- 10) Chapter 1, Page 5, Third Bullet: The third bullet should not specify the quantity of groundwater potentially to be developed, as the quantity is currently a preliminary estimate. Suggest the bullet point be changed as follows, “Identify alternatives for potentially developing additional available groundwater projects ~~up to 925 mgd~~ (with appropriate regional management and operational controls).”
- 11) Chapter 1, Page 6, Regulatory Team Goals and Objectives, Regulatory Team Goal Box: Suggest changing this text as follows, “...to establish consistency amongst the water management districts, including but not limited to consistent rules and regulations for the three water management districts that meet the Collaborative Process Goals and implement the results of this Central Florida Water Initiative. ~~CFWI Guiding Document (CFWI 2014)~~”
- 12) Chapter 1, Page 6, Regulatory Team Goals and Objectives, Bullet: Suggest changing this text as follows, “Develop options for consistency amongst the water management districts, including but not limited to developing consistent regulations, as well as identify legislative changes, as needed, to implement the solution strategies identified in the CFWI process, to assist with resource recovery strategies, and to provide for equitable and predictable review of consumptive use permit applications among the Districts.”
- 13) Chapter 1, Page 14, Groundwater Section: Suggest modifying these two paragraphs as follows, “The primary source of water supply in the region is ~~fresh~~-traditional groundwater. ~~Groundwater~~ is supplied from the surficial, intermediate, and Floridan aquifer systems. The surficial aquifer system (SAS) is a shallow, unconfined aquifer that generally yields low quantities of water. The intermediate aquifer system (IAS) does not produce large quantities of water and acts as a semi-confining unit in most areas separating the overlying surficial aquifer from the underlying Floridan aquifer system (FAS). The FAS is subdivided into the Upper and Lower Floridan aquifers. The Upper Floridan aquifer (UFA) is a semi-confined aquifer, portions of which are capable of producing large amounts of water. The UFA has historically been the primary source of water supply throughout the region, though the Lower Floridan aquifer (LFA) in some areas of the CFWI has also been used as a traditional source.

The LFA has the potential to provide additional water in the CFWI Planning Area, particularly in areas where the LFA has not historically been utilized as a traditional supply source, and a number of studies are in progress to evaluate this potential water source. However, there is limited hydrogeologic information available for the LFA, so the potential local and regional effects of pumping from the LFA are not as well understood in some areas of the CFWI.”

- 14) Chapter 1, Page 14, Surface Water Section: Suggest adding the following text after the second sentence, "Thus, surface water is considered a non-traditional supply source in this planning region."
- 15) Chapter 2, Page 17, First Sentence: The first sentence of this section sets a poor tone regarding water conservation. Suggesting changing this sentence as follows, "Water conservation (conservation) is the efficient use of water as well as the prevention and reduction or elimination of wasteful or unnecessary uses of water to improve efficiency of use."
- 16) Chapter 2, Page 17, Second Paragraph: Change the text of this paragraph as follows: "Conservation opportunities exist across all water use sectors in the CFWI Planning Area. Individuals, businesses, the agricultural industry, water providers, and the natural environment will all benefit greatly from additional conservation. Implementing effective conservation throughout the CFWI Planning Area will be challenging given the conservation already achieved and will require coordinated efforts among stakeholder groups. As the cost of developing new water supplies increases, more costly water conservation projects will become more appealing."
- 17) Chapter 2, Page 17, Third Paragraph, First sentence: Change the text of this sentence as follows: "Many studies show that implementation of conservation programs is initially often among the lowest cost solutions compared to Alternative Water Supplies to meet future water needs...."
- 18) Chapter 2, Page 18, First Paragraph, Last Sentence: The data do not support the assertion in this sentence that the "recent economic downturn" contributed to the decrease of per capita water use. The economic downturn began in 2007 and lasted till about 2012. Observing the graph in Figure 4 shows that per capita water use for residential declined prior to 2007 and remained level from 2007 to 2012. Suggest modifying this sentence as follows: "The installation of private irrigation wells, ~~the recent economic downturn~~, and other external factors may also contribute to this decrease."
- 19) Chapter 2, Page 23, Identifying Conservation BMPs and Programs Subsection: The BMPs discussed should be prefaced as "potential", as there were not data to establish which potential BMP is cost effective and provides significant water conservation.
- 20) Chapter 2, Page 25, Bullet 5: Provide more explanation on how greenroofs increase indoor efficiency, or remove this bullet.
- 21) Chapter 2 Page 36, Table 5: Add footnote 'f' for Advanced Irrigation ET Controllers as follows: "f) Savings are for the modeled service life. BMP replacements at additional costs will be required to sustain savings."
- 22) Chapter 2 Page 39, Third Paragraph, Agricultural Programmatic Approach Section: Modify this paragraph as follows; "The Conservation Subteam concluded that historical data from the FARMS Program and other existing cost-share BMP programs, as well as what is known about agriculture within the CFWI Planning Area, should be used to estimate potential water savings. ~~This methodology is referred to as the agricultural programmatic approach.~~ This approach considers several factors in the development of a conservation estimate including participation rate, water savings, BMPs, and project costs."
- 23) Chapter 2, Page 41, Last Paragraph: Change this paragraph as follows, "Adoption of conservation BMPs and actual water savings can be greatly enhanced with increased levels of education,

outreach efforts and funding. Furthermore, there are many additional BMPs, not quantified during these analyses that could be implemented to yield additional savings. Funding of the Conserve Florida Water Clearinghouse and subsequent planning updates may be able to quantify some of these BMPs as well as estimate passive savings known to occur in the absence of program efforts."

- 24) Chapter 2, Page 43, Funding Subsection: Change this paragraph as follows, "Reducing current water demands using conservation BMPs is often less expensive than developing alternative water supplies, but can also require capital expenditures. Many water users have limited discretionary income that can be used for efficiency upgrades. Furthermore, unlike costs associated with alternative water supply projects, the costs to implement conservation projects are not generally financed by bonds and must be assumed by the party implementing the project, making some types of conservation BMPs more costly to attain. Financial incentives and assistance for end users are often necessary with a variety of funding mechanisms available, such as rebates, grants, and credits. Cost share programs at the state and water management districts, often provide annual reoccurring funding assistance to aid local partners with implementation. Continued significant and recurring funding of these programs will help ensure that these water use reductions are achieved."
- 25) Chapter 2, Page 43, Implementing BMPs Subsection, Partial Paragraph at Top of Page, Last Sentence: Change this sentence as follows, "Additional data and advances in tools such as the Conserve Florida Water Clearinghouse would be beneficial to improve these evaluations."
- 26) Chapter 3, Page 49, Groundwater Section, First Paragraph: Suggest this paragraph be rewritten as follows, "The traditional primary source of water supply in the CFWI Planning Area is ~~fresh traditional groundwater from the SAS, IAS, UFA, and LFA in some portions of the CFWI.~~ Non-traditional groundwater sources, such as groundwater from the LFA in portions of the CFWI area where the LFA has not been used as a traditional groundwater supply source. Brackish groundwater project options have the potential to meet some of the future demand while reducing the impact to water resource constraints when compared to traditional ~~fresh~~ groundwater sources. The non-traditional water supply projects evaluated by the Groundwater (GW) Subteam were all ~~Lower Floridan aquifer (LFA)~~ projects, some of which are known to be in areas with brackish groundwater. Brackish groundwater exists in the lower portion of some areas of the Floridan aquifer system in the CFWI Planning Area and adjacent areas. The location of brackish water within the LFA is not well defined in the CFWI Planning Area. In some areas, targeted withdrawals from the LFA may result in less distinctive, and possibly delayed, impacts to surface features such as lakes and wetlands compared to withdrawals from the ~~Upper Florida aquifer (UFA).~~ However, this deeper groundwater source has a higher unit cost of production than traditional groundwater sources ~~due primarily to the cost to treat the water for consumption.~~ For ~~alternative or non-traditional~~ water supply planning purposes in the CFWI Planning Area, groundwater from the LFA in some areas of the CFWI is considered a non-traditional or AWS source. for SJRWMD and SWFWMD, brackish water is generally defined as water with a total dissolved solids (TDS) concentration of greater than 500 mg/L. The SWFWMD defines saline water as water with chloride concentrations greater than 250 mg/L. Also for planning purposes in the CFWI Planning Area, brackish groundwater is defined as water requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use. ~~The treatment of brackish groundwater typically may be accomplished by using low pressure reverse osmosis (RO) or electrodialysis reversal (EDR); each method requires disposal of concentrate or reject water. Other technologies available to treat brackish water are typically more costly (e.g., ion exchange and distillation).~~"

- 27) Chapter 3, Page 50, Groundwater Project Options Subsection, First Sentence: Suggest changing this sentence as follows, "The GW Subteam began by reviewing the 35 ~~brackish~~ non-traditional groundwater projects identified in the CFWI RWSP that have a total estimated water supply capacity of approximately 75 mgd (Appendix F, CFWI RWSP, 2014d)."
- 28) Chapter 3, Page 51, Cypress Lake Wellfield, Second Paragraph, First Sentence: Change this sentence as follows, "The project is the development of a non-traditional LFA ~~brackish~~ groundwater wellfield in central Osceola County."
- 29) Chapter 3, Page 52, Polk County Southeast Wellfield, Second Paragraph, First Sentence: Change this sentence as follows, "The project is the development of a centralized non-traditional LFA ~~brackish~~ groundwater wellfield in southeast Polk County."
- 30) Chapter 3, Page 52, Polk County Southeast Wellfield, Fourth Paragraph: Add the following text at the end of this paragraph, "The cost developed by the CE Tool does not include all aspects of the Polk County Southeast Wellfield Project, including all finished water distributions system infrastructure. In addition, the CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given these considerations, the results of the CFWI CE Tool provide a conceptual level estimate of cost that will need to be refined as each project progresses. In the case of the Polk County Southeast Wellfield project, Polk County Utilities independently estimates the capital cost of the project to be \$359 million."
- 31) Chapter 3, Page 53, Polk County Blended LFA Distributed Wellfield, Third Paragraph: Delete the second sentence as follows, "~~Although the model does show impacts, producing a portion of the water from the LFA should reduce the potential impacts when compared to traditional Upper Floridan sources.~~"
- 32) Chapter 3, Page 53, Polk County Blended LFA Distributed Wellfield, Fourth Paragraph: Add the following text at the end of this paragraph, "The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses."
- 33) Chapter 3, Page 53, Challenges Section, First Sentence: Suggest modifying this sentence as follows, "The Solutions Planning Phase non-traditional groundwater project options presented above have the potential to supply up to 63.2 mgd (GW1, GW2, and GW3) of alternative water supply to the CFWI Planning Area."
- 34) Chapter 3, Page 67, Polk County Regional Alafia River Basin, Second Paragraph: Add the following text at the end of this paragraph, "The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the Polk County Regional Alafia River Basin project, Polk County Utilities independently estimates the capital costs of the project to be \$399.7 million with a unit production cost of \$6.42 per 1,000 gallons."

- 35) Chapter 3, Page 59, 160-Acre Site Indirect Potable Reuse, Third Paragraph: Please add the following text after the second sentence, "The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the 160-Acre Indirect Potable Reuse project, TWA independently estimates the capital cost of the project to be \$14.3 million."
- 36) Chapter 4, Page 82, Figure 7: This figure appears to present all existing MFLs in lieu of the MFLs considered as part of the RWSP and Solutions Planning Phase. Please update this figure to only present MFLs used as part of the analyses performed in support of the RWSP and Solutions Planning Phase.
- 37) Chapter 6, Page 121, Environmental Recovery Projects, First Paragraph, End of Second Sentence: Change as follows, "...most technically, environmentally, and economically effective options."
- 38) Chapter 6, Page 121, First Two Paragraphs: Change these two paragraphs as follows:
- "These costs are based on the initial implementation of the BMP. Additional costs may be required depending on service life and date of implementation. Refer to Chapter 2, Table 5 for more information on BMP service lives. Potential Agricultural BMPs, based on past performance and implementation of various cost-shared FARMS Program BMPs. These would cost an estimated \$10.1 to \$19.9 million to achieve approximately 4.35 to 6.40 mgd reduction in groundwater use. Public education for conservation will be aligned annually with PS and OSS projects and activities. Activities may include: media outreach, including traditional and social media techniques; exhibits, demonstrations and events; support for schools and county extension efforts; and training for irrigation professionals."
- "~~Research is needed to~~ Continued development of a statewide clearinghouse, such as the Conserve Florida Water Clearinghouse developed by the University of Florida, that will serve as a repository for conservation data, publications and goal-based planning tools (e.g., EZ Guide, FAWCET) will benefit for PS entities."
- In general, there should be a greater emphasis and promotion of the Clearinghouse throughout the document. This strategy is not a project that generates a specific quantity of water; however, it is a fundamental piece to a comprehensive Conservation Strategy. Gathering data and evaluating various proposed BMPs to provide a basis for selecting appropriate BMPs for a conservation program should be key to developing future conservation plans.
- 39) Chapter 6, Page 121, Environmental Recovery Projects Subsection: Change subsection title to "Environmental Recovery Plans and Projects".
- 40) Chapter 6, Page 121, Environmental Recovery Projects Subsection, Second Paragraph, First Sentence: Change this sentence as follows, "Once these analyses are complete, recovery strategies and projects can be developed and implemented to achieve MFL recovery or flows, where necessary."
- 41) Chapter 6, Page 122, Data, Monitoring, and Investigations Subsection: At the end of this section add text that emphasizes the importance of implementing the DMIT recommendations. Suggested text is as follows, "The implementation of the DMIT recommendations is a critical component to future water supply planning for the CFWI region. The additional data collected as a result of the

DMIT recommendations will facilitate the refinement and expansion of models and hydrologic and environmental analyses, the further development of water supply project options, and the assurance that environmental measures are being met."

- 42) Chapter 6, Page 123: After the last sentence add the following text, "The funding plan should be amended as updated project specific costs are developed."
- 43) Chapter 6, Page 124, Table 17: Add footnote 'e' as follows, "e) The CFWI cost-estimating tool is considered a "Conceptual Screening" tool and was designed to produce Class 5 cost estimates, with an expected accuracy of -50% to +100%."
- 44) Chapter 6, Page 124, Table 17: Table should include funding for the Conserve Florida Water Clearinghouse to put forth the need and funding requirement. If it is not on the funding lists, it is unlikely to receive funding. In addition, change the Potential Benefits for the DMIT as follows, "Provides necessary information for the region to better assess the environmental systems for the protection and the recovery of those systems and to improve models and the associated future assessment of environmental system relative to withdrawals."
- 45) Chapter 6, Page 125, Table 18: Add footnote 'e' as follows, "e) The CFWI cost-estimating tool is considered a "Conceptual Screening" tool and was designed to produce Class 5 cost estimates, with an expected accuracy of -50% to +100%."
- 46) Chapter 7, General Comment: The significance and potential benefits from the implementation of the DMIT recommendations does not really come out in this chapter. There are several implementation strategies discussed in the chapter where DMIT could and should play a role and could have an impact; under the titles Support Development & Implementation of Regional Project Solutions subtitle Groundwater, Water Resource Development Priorities, and Improve Water Resource Assessment Tools and Supporting Data subtitle Update the ECFT Model. Add a bullet that says, "Implement the recommendations of the DMIT to increase the data available for analyses and modeling related to characterizing the water resources of the region and in support of the development of Water Supply Project Options." to each of these sections.
- 47) Chapter 7, Page 129, Implementation Strategy Subsection, Second Bullet: Change this bullet as follows, "Develop Specific Prevention and Recovery Strategies and Projects"
- 48) Chapter 7, Pages 130 and 131, Implement Conservation Programs Subsection, Bullet List:
 - First Bullet: Change text as follows, "Identify and secure significant and recurring funding to implement Conservation Programs."
 - Sixth Bullet, Sub-bullet: Change text as follows, "Determine the appropriate means to participate in the Florida Building/Plumbing Code modification process to improve water conservation statewide by evaluating the current code provisions and Florida Statutes affecting water conservation and identify potential amendments to improve water conservation including:..."
 - Eleventh Bullet: Change text as follows, "Expand water use accounting for Agriculture to improve water use efficiency and provide improved data and metering for groundwater modeling."
 - Last bullet: Move this bullet up as it gets lost in the surrounding subject matter.
- 49) Chapter 7, Page 132, Develop Specific Prevention and Recovery Projects Subsection: Change title as follows, "Develop Specific Prevention and Recovery Strategies and Projects".

- 50) Chapter 7, Page 132, Second to Last Bullet: Change the text as follows, "Before moving forward in implementing any specific WSPO or management strategy, it should be confirmed that it would not conflict with any MFL prevention or recovery strategy, it will produce the desired CFWI benefit, and the timing is appropriate."
- 51) Chapter 7, Page 134, Bullet List: Add bullet after third bullet that states the following, "Funding dollars should reflect updated project specific costs rather than planning level costs as they become available."
- 52) Glossary, Page 142, Definition of "Brackish water": As no consistent regulatory definition exists among the water management districts, suggest a practical definition instead, as follows: "Brackish water, for alternative water supply planning purposes in the CFWI, is generally defined as water that requires advanced treatment technologies such as membranes to meet regulatory drinking water standards."
- 53) Glossary, Page 144, Definition of "Fresh water": This definition is not representative of the existing rules for the three water management districts. SWFWMD is the only district with a definition of fresh water. It is defined in AH §1.1(p) as "water that contains less than 3,000 mg/L of TDS." Suggest using the following practical definition instead, "For alternative water supply planning purposes in the CFWI Planning Area, fresh water is generally defined as water not requiring advanced treatment technologies such as membranes to treat the water source to appropriate regulatory standards or to appropriate concentrations for the intended water use."
- 54) Glossary, Page 149, Definition of "Seawater or salt water": Suggest changing this definition as follows, "Seawater is defined by the SJRWMD and SFWMD as water with a chloride concentration at or above 19,000 mg/L and by the SWFWMD as water with a chloride concentration at or above 10,000 mg/L." This suggestion is based on review of SJRWMD AH §1.1(r), SFWMD AH §1.1, and SWFWMD AH §1.1(oo).
- 55) Appendix C, Page C-15, Cypress Lake Wellfield Project, Second Paragraph, First Sentence: Change this sentence as follows, "This proposed project will develop a non-traditional LFA-brackish groundwater wellfield in central Osceola County."
- 56) Appendix C, Page C-20, Southeast Polk County Wellfield Project, Second Paragraph, First Sentence: Change this sentence as follows, "The proposed project will develop a non-traditional LFA-brackish water public supply wellfield in southeast Polk County."
- 57) Appendix C, Page C-22, Southeast Polk County Wellfield Project, Estimated Planning-level Costs: Add the following text at the end of this section, "The cost developed by the CE Tool does not include all aspects of the Polk County Southeast Wellfield Project, including all finished water distributions system infrastructure. In addition, the CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given these considerations, the results of the CFWI CE Tool provide a conceptual level estimate of cost that will need to be refined as each project progresses. In the case of the Polk County Southeast Wellfield project, Polk County Utilities estimates the capital cost of the project to be \$359 million."
- 58) Appendix C, Page C-29, Polk County Blended LFA Distributed Wellfield Project, Estimated Planning-level Costs: Add the following text at the end of this section, "The CE Tool developed for the CFWI

solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses."

- 59) Appendix C, Page C-29, Polk County Blended LFA Distributed Wellfield Project, Estimated Implementation Schedule: Please make the following changes to the Implementation Schedule for this project:
- Change the title of Phase 2 as follows, "Phase 2: 10 mgd Finished Water from ~~this-the~~ Southeast Polk County Wellfield project (2023-2032)"
 - Change the title of Phase 3 as follows, "Phase 3: ~~2010~~ mgd Finished Water from ~~this-the~~ Southeast Polk County Wellfield project (2023-2032)"
 - Change the last bullet under Phase 3 as follows, "Construct additional treatment facilities, expanding production capacity to 20 mgd total finished water from Southeast Polk County Wellfield".
- 60) Appendix C, Page C-37, Project RENEW, Estimated Implementation Schedule: "Change Orlando Utility Commission" to "Orlando Utilities Commission".
- 61) Appendix C, Page C-38, Project RENEW, Potential Partners and Governance Options: Please delete the reference to Orange County. Though it is true that Orange County and the City of Orlando have a contract with the City of Winter Garden through the Water Conserv II project, Orange County is not a partner in OUC's Project RENEW.
- 62) Appendix C, Page C-48, 160-Acre Site Indirect Potable Reuse, Estimated Planning-level Costs: Add the following text at the end of this section, "The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the 160-Acre Indirect Potable Reuse project, TWA estimates the capital cost of the project to be \$14.3 million."
- 63) Appendix C, Page C-87, Polk County Regional Alafia River Basin Project, Estimated Planning-level Costs: Add the following text at the end of this paragraph, "The CE Tool developed for the CFWI solutions planning phase was designed to achieve a Class 5 Estimate level (AACE, 2005), which is considered a "Conceptual Screening" level, with an expected accuracy range of -50% to +100%. Given the intended accuracy level of costs developed using the CFWI CE Tool, the costs developed as part of this plan will need to be refined as each project progresses. In the case of the Polk County Regional Alafia River Basin project, Polk County Utilities estimates the capital cost of the project to be \$399.7 million."

STOPR+2 Attachment 4 –Resubmitted Solutions Strategies Comments

Attachment 4

Central Florida Water Initiative Draft 2035 Water Resources Protection and Water Supply Strategies Plan ("Solutions Plan")

Resubmitted Comments from STOPR+2 Group on May 1, 2015 Public Draft (also previously submitted on Final Internal Draft)

- 1) Preface, Page i, Third Bullet: Suggest changing bullet to state "Establish consistency among consistent rules and regulations for the three water management districts, including but not limited to developing consistent rules and regulations, to meet the collaborative process goals that meet their collective goals, and implement the results of the Central Florida Water Initiative."
- 2) Preface, Page i: Suggest adding the following text after the bullet list:
"CENTRAL FLORIDA WATER INITIATIVE GOALS
 1. One model.
 2. One uniform definition of harm.
 3. One reference condition.
 4. One process for permit reviews.
 5. One consistent process, where appropriate, to set MFLs and reservations.
 6. One coordinated regional water supply plan, including any needed recovery and prevention strategies."
- 3) Executive Summary, Page vi, Solutions Planning Phase Section, Last Sentence: Delete the last sentence of this paragraph, as follows: ~~"The estimated 850 mgd total water use condition was used as a starting point or Baseline Condition for the Solutions Planning Phase, which evaluated projects and conceptual management strategies to meet the estimated 250 mgd future demand deficit."~~
- 4) Executive Summary, Page viii, Assessment Section, Third and Fourth Bullets: Remove the specifics regarding the number of acres discussed in these bullets. Those acreages were a function of the specific conditions simulated under a hypothetical simulation and should not be misconstrued as representing an "answer".
- 5) Executive Summary, Page ix, Reclaimed Water Section, Last Sentence: This sentence says, "Going forward, it is recommended an integrated approach between wastewater management and water supply...." This could be misconstrued to mean that integrated water resource planning is currently not occurring in central Florida, which is not the case. Suggest modifying this sentence as follows: "Going forward, it is recommended an integrated approach between wastewater management and water supply continues to be implemented...."
- 6) Executive Summary, Page x, Water Conservation Section, First Paragraph, Fourth Sentence: As written, this sentence does not accurately reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. Therefore, we request modification as follows, "Based on Solutions Planning Phase analysis, the CFWI RWSP water savings goal estimate was reduced from 42 mgd to 37 mgd ~~and is considered a starting point for potential savings~~

through ~~implementing a select~~ implementation of a number of conservation BMPs in the CFWI Planning Area. Additional savings ~~could be available~~ might be possible through higher participation rates of BMPs or the implementation of other conservation measures.”

- 7) Executive Summary, Page xi, Conclusion and Summary of Key Findings, First Bullet: As written, this bullet does not accurately reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, “Water conservation is an important element in meeting future water needs. The conservation estimate of 37 mgd, determined during the Solutions Planning Phase, represents ~~a starting point of savings~~ that could be achieved by ~~implementing a limited set~~ implementation of the PS and OSS conservation BMPs and the agricultural programmatic efforts evaluated ~~in this Plan~~ (Chapter 2). Of this 37 mgd, it was estimated that 76 percent could be conserved by PS utilities, 12 percent by OSS users, and 12 percent by agricultural operations. Additional savings ~~could be available~~ might be possible through higher participation rates of BMPs or the implementation of other conservation measures.”
- 8) Chapter 1, Page 10, Updates to Minimum Flows and Levels, First Paragraph, Fifth Sentence: This section is about changes made to the MFL analyses performed in support of the RWSP process as part of the Solutions Planning Phase process. The MFLs listed in this sentence were not included in either the RWSP or Solutions Planning Phase processes, and therefore do not constitute a change in the analysis. Reference to these lakes should be removed. Delete the fifth sentence as follows, “~~The following water bodies located inside the CFWI Planning Area are on SJRWMD’s and SWFWMD’s priority lists and are scheduled for rule development in 2015: Lake Apopka, Lake Hancock, and St. Johns River at State Road 520—Lake Poinsett.~~”
- 9) Chapter 2, Page 18, Last Complete Sentence: To better reflect the actual gpcd rate trends and for consistency with the recommended language from the Water Conservation Subteam, we recommend modification as follows, “However, as can be seen in Figure 4, the gross gpcd rate appears to be declining while the residential gpcd rate reduction ~~remained relatively level~~ has moderated over the past decade.”
- 10) Chapter 2, Page 19, Starting with the Last Complete Sentence: As written, this section does not accurately reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, “Based on the subteam’s preliminary findings and SC guidance the original water savings ~~goal~~ estimate was reduced to 37 mgd (Table 3). This is ~~considered a starting point for an estimate of the potential savings possible~~ through conservation BMPs with additional savings ~~available~~ possible through higher participation rates of evaluated BMPs and/or the implementation of other measures not evaluated but recognized as being applicable within the CFWI Planning Area (Table 3).”
- 11) Chapter 2, Page 35, Penultimate Sentence: To clarify the fact that different BMPs have different service lives, we request modification as follows, “The amounts shown in Table 5 include the entire cost of the BMP for its estimated life ~~(though some service lives are less than 20 years) and, which includes costs potentially borne by third parties that would include non-rebate portions.~~”
In addition, the indication that portions of the costs will be paid by others could be said for the costs of any of the water supply strategies. Suggest indicating this as a general statement applicable to all water supply strategies.
- 12) Chapter 2, Page 36, Table 5: To provide for an additional cost effectiveness metric, please add a column showing cost in dollars per gallon per day of water conserved (e.g., “Total Cost” for each

STOPR+2 Table 5

BMP divided by the estimated savings to generate a cost per gallon conserved). A copy of the revised Table 5 is provided below. The proposed additional column of data is presented in red.

Table 5. Summary of conservation potential estimates for PS and OSS conservation practices.

Use Sector	Conservation Practice	Modeled Participation Rate	Total Number of Implementations	Cost (\$/kgal) ^b	Cost (\$/gpd)	Total Cost (\$ million)	Estimated Savings (mgd)
PS	Advanced ET Irrigation Controllers ^a	23%	2,845	\$0.86	\$3.67	\$1.14	0.26
	CII Facility Water Assessment/Audit	12.50%	169	\$2.41	\$5.00	\$0.50	0.10
	Irrigation System Audits	12.50%	99,605	\$2.65	\$4.96	\$6.00	1.21
	High-Efficiency Toilets	23%	373,215	\$0.74	\$10.03	\$74.70	7.45
	High-Efficiency Faucet Aerators	23%	1,057,602	\$0.40	\$2.22	\$16.30	7.35
	High-Efficiency Showerheads	23%	527,728	\$0.09	\$1.30	\$11.30	8.66
	High-Efficiency Urinals	23%	3,808	\$0.52	\$4.67	\$1.40	0.30
	Pre Rinse Spray Valves	23%	307	\$0.04	\$0.10	\$0.02	0.20
	Soil Moisture Sensors	23%	28,617	\$1.07	\$1.92	\$2.90	1.51
	Waterwise Florida Landscaping ^a	0.10%	3,956	\$1.77	\$10.26	\$7.91	0.87
	PS Subtotal				\$4.95	\$122.17	27.91
Other Self-Supplied	CII Facility Water Assessment/Audit	12.50%	8	\$2.41	\$4.00	\$0.02	0.005
	Irrigation System Audits	12.50%	TBD ^c	\$2.65	TBD	\$4.80	0.95
	High-Efficiency Toilets	23%	39,275	\$0.74	\$10.08	\$7.86	0.78
	High-Efficiency Faucet Aerators	23%	111,292	\$0.40	\$2.23	\$1.72	0.77
	High-Efficiency Showerheads	23%	55,533	\$0.09	\$1.32	\$1.19	0.9
	High-Efficiency Urinals	23%	226	\$0.52	\$4.00	\$0.08	0.02
	Pre Rinse Spray Valves	23%	18	\$0.04	\$0.00	\$0.00	0.01
	Soil Moisture Sensors	23%	TBD ^a	\$1.07	TBD	\$2.30	1.19
	Other Self-Supply subtotal				\$3.87	\$17.97	4.63
	Total				\$4.80	\$140.14	32.54

- 13) Chapter 2, Page 37, Participation Rates Section: Because of the importance of the term "Participation Rates", we suggest the addition of a sentence that defines participation rate as it was used in this study. Please add the following text, "The participation rate of a conservation BMP is defined as the percentage of users who adopt a conservation measure from the total pool of potential adopters."
- 14) Chapter 2, Page 38, Participation Rates Section: We suggest the addition of a penultimate sentence that provides additional context on participation rates. Please add the following text, "In practice, however, the relationship is not linear and increases in participation rates will require increased expenditures."
- 15) Chapter 2, Page 41, Summary of Potential Water Savings Subsection, 5th, 6th and 7th Sentences: As written, this section is inaccurate and does not reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, "The savings estimates are based on historic assumed participation rates, which were based on historical participation rates of actual conservation projects are the result of past levels of education, outreach and incentive funding. The conservation estimates determined during the Solutions Planning Phase represent savings a starting point of savings that could be achieved using best available information on BMPs, modeling tools, and current levels of agricultural program implementation. Adoption of conservation BMPs and actual water savings can be greatly could possibly be enhanced with increased levels of education, outreach efforts and funding."
- 16) Chapter 3, Page 51, South Lake County Wellfield, Second Paragraph: Add "However, the projected increases in groundwater use represented by this project are currently not permitted to utilize either the Upper or Lower Floridan aquifers" as the third sentence in this paragraph.
- 17) Chapter 3, Page 51, Cypress Lake Wellfield, Last Paragraph: Replace the second and third sentence with "The water use permit issued by the SFWMD includes an environmental monitoring program."
- 18) Chapter 3, Page 52, Polk County Southeast Wellfield, Third Paragraph: Please change the third paragraph of this section to read as follows, "Impacts to wetlands and lakes near the wellfield are expected to be minimal due to extensive confining units above the LFA where water is being withdrawn. Producing water from the LFA should minimize the potential for impacts along the ridges within Polk County. The water use permit issued by the SFWMD includes an environmental monitoring program, an environmental harm contingency plan, and annual project status verification reports of wetlands monitoring plan. Chapter 4 discusses the environmental evaluations for this project in more detail. "
- 19) Chapter 3, Page 52, Polk County Southeast Wellfield, Fourth Paragraph: Delete the first sentence as follows: ~~"The Southeast Polk County Wellfield Project has a water use permit and has conducted exploratory drilling, testing, and permitting activities."~~
- 20) Chapter 3, Page 53, Polk County Blended LFA Distributed Wellfield, Third Paragraph: Delete the second sentence.
- 21) Chapter 3, Page 67, Polk County Regional Alafia River Basin, Second Paragraph: Change "one or more raw water" to "two river water" and delete the "treatment" between "preliminary treatment of raw water" and "storage".

STOPR+2 Comment #22

- 22) Chapter 3, Page 73, Reedy Creek Stormwater Mitigation/Recharge: In past drafts of the Solutions Plan document, the STOPR+2 Group has provided comments on this project. Some of these comments have not been implemented and are reiterated below. In addition, the capital costs presented do not appear to adequately consider the infrastructure and land that would be required to implement this project.

"The Reedy Creek Stormwater Mitigation/Recharge project is a stormwater project that will capture and develop 4 mgd of stormwater to recharge the surficial aquifer in strategic locations that are currently stressed or projected to worsen in the future. This project does not directly provide a new supply of water, but may indirectly make additional fresh groundwater supplies available as a result of increased recharge. The quantity of water that could be made available has not been determined. In addition to water supply benefits, the proposed project will also improve flood protection, water quality, and natural systems.

The Reedy Creek Basin, located in Orange and Osceola counties, would be the source of stormwater for this project. Project construction elements include a water level control weir, low head pumping unit and intake structure, piping systems, and receiving storage areas. It is important to note that the construction of a new water control structure within the Reedy Creek Basin would have to be designed and implemented to not cause any adverse flooding impacts upstream or adverse changes in flow downstream of the new weir. At this time, it is unknown if a new water control structure could feasibly be implemented within the Reedy Creek Basin. For example, a significant portion of the Reedy Creek and Bonnet Creek Basins in this area are under the control of the Reedy Creek Improvement District (RCID). This project could not adversely impact RCID's stormwater management system. No land purchases will be required.

Planning level capital costs are estimated to be \$1.56 million. Operation and maintenance costs are estimated at \$50,000 annually, which results in a unit production cost of \$0.09 per 1,000 gallons. This assumes a 4-mgd stormwater capture system is developed. However, as previously noted the quantity of additional water supplies (if any) that could be made available by this project is unknown. In addition, these costs do not include the infrastructure potentially associated with any water supply aspects of this proposed project. As such, the capital and O&M costs provided herein are only for the stormwater recovery aspects of this project. Construction is estimated for years 2019-2020. Funding sources for this potential project still need to be identified. }

Project monitoring and groundwater flow modeling will be required to determine if this project may be used for groundwater offsets potentially allowing increased groundwater withdrawals in the area. Surface water and stormwater modeling will likely be required to determine the feasibility of capturing and reapplying stormwater within the Reedy Creek basin. The surface water and groundwater flow modeling will also be required to assure the project does not cause adverse flooding impacts. Water quality modeling may be required.

Stormwater treatment areas and other natural low lying areas may be used for water quality treatment prior to being use for surficial aquifer recharge. Existing treatment ponds are designed for specific hydrologic conditions and to accommodate specific design storm events. Discharges to existing stormwater systems, if permittable based on ERP regulations, will need to be implemented as to not adversely affect the functionality of the ponds, or the ponds will require modification to accommodate the additional flow. Coordination with the owners of the ponds, and possibly land acquisition, will also be required. The use of existing low-lying area cannot result in adverse flooding impacts or impacts to adjacent land uses and will also

require coordination with land owners and possibly land acquisition. Acquisition of land may be challenging due to the extensive development in the Reedy Creek Basin.

Potential project partners include, but are not limited to, Town of Celebration, RCID, Town of Windermere, Orange County, Central Florida Expressway Authority, FDOT, and other private property interests. There may be interest from other potential partners that hold groundwater permits in the region as the benefits to the surficial aquifer may also improve groundwater availability."

- 23) Chapter 4, Page 108, Targeted Recharge for MFL Water Bodies Conceptual Scenario, First Paragraph: Add a sentence after the first sentence that says, "An alternate targeted recharge scenario estimated that 22 mgd of recharge could be needed if RIBs are used to recharge MFL lakes in lieu of direct injection."
- 24) Chapter 6, Page 123, Other Investigations Section: ECFT Model Improvements: Add "In addition, modifications to the model may be required for the model to be suitable for a permitting process" as the second sentence in this paragraph.
- 25) Chapter 7, Pages 128 and 129, List of Key Findings: Multiple comments:
 - First Bullet: As written, this section is inaccurate and does not reflect the work completed by the Water Conservation Subteam to quantify potential water conservation savings. We request modification as follows, "Water conservation is an important element in meeting future water needs. The conservation estimate of 37 mgd, determined during the Solutions Planning Phase, represents ~~a starting point of~~ savings that could be achieved by implementing the PS and OSS conservation BMPs and the agricultural programmatic efforts evaluated (Chapter 2). If achieved, the 37 mgd would reduce the projected 250 mgd deficit to 213 mgd. Of this 37 mgd, 76 percent could be conserved by public supply utilities, 12 percent from other self-supply users, and 12 percent by agricultural operations. Additional savings could be available might be possible through higher participation rates of evaluated BMPs and/or the implementation of other measures not evaluated but recognized as being applicable in the CFWI.
 - The sentence before the text "Sixteen regional..." should be deleted as it is unknown if higher participation rates can be achieved.
 - In the current second bullet suggest adding, "However, some of these projects have not been fully evaluated or developed to know which ones will actually be constructed. Based on past experience with regional water supply plans a portion of the proposed projects will not be constructed for a variety of reasons." as a sentence in this bullet.
 - Change the current sixth bullet to, "The establishment of consistency among the water management districts, including but not limited to the development of consistent rules and regulations, will continue to be needed to meet the collaborative process goals and implement the results of the CFWI Planning effort (Chapter 5)."
- 26) Chapter 7, Page 133, Develop Specific Prevention and Recovery Projects Section, First Bullet at Top of Page: This bullet says to complete an evaluation of wetland systems identified as having existing stress and those deemed to be at risk from future withdrawals. However, the statistical method developed to evaluate non-MFL wetlands cannot be used to evaluate individual wetlands. This bullet should be modified to accurately reflect this. Suggest changing the text as follows, "Formulate a process to complete an evaluation of wetland systems identified as having existing stress..."

- 27) Chapter 7, Page 137, Update the ECFT Model Section, Second and Third Bullets: Suggest indicating that these two potential updates will be implemented as a later phase of the model improvements due to the time and cost associated with making these changes.
- 28) Chapter 7, Page 137/138, Update the ECFT Model Section, Updated Water Use Bullet: Add "Expanded metering for agricultural water uses will provide improved data for groundwater flow modeling."
- 29) Chapter 7, Page 138, Update the ECFT Model Section, Overall Approach Bullet: Change the text of this bullet as follows, "Overall Approach – Although the model has been and will be used for planning purposes, it is envisioned and desired to have the model available for the regulated community to apply for specific consumptive use permit applications. It is important to note that the above list of model improvements is a significant undertaking with regard to both cost and level of effort and tasks should be prioritized. Some tasks may not be achieved in the near future. It is also desired to have a model that is accessible to and easy to utilize for a wide-range of potential model users. Though some of the improvements listed above serve to achieve these goals, others (such as expanding the model boundaries), could serve to make the model more difficult to use to some potential users."
- 30) Chapter 7, Page 138, Develop Options for Consistent Rules and Regulations Section: Change the title of this subsection to "Develop Options for Consistency".
- 31) Chapter 7, Page 138, Develop Options for Consistent Rules and Regulations Section, First Paragraph, First Sentence: Change this sentence as follows, "Now that the Solutions Planning Phase has identified strategies to achieve water resource sustainability in the CFWI Planning Area, the Regulatory Team (RT) is better positioned to continue its work to develop consistency among options for consistent rules and regulations for the Districts, including but not limited to the development of consistent rules and regulations, that meet CFWI collaborative process goals and implement the results of the CFWI. "
- 32) Chapter 7, Page 140, Develop Options for Consistent Rules and Regulations Section, Last Sentence: Change this sentence as follows, "As options for consistency ~~rules and regulations among the Districts, including but not limited to developing consistent rules and regulations,~~ are developed, it is anticipated to be presented to the Steering Committee for consideration.
- 33) Appendix C, Page C-11, South Lake County Wellfield Project, Water Resource Constraints, First Paragraph: Delete the fifth sentence as follows, "~~Although the model does show impacts, producing water from the LFA should minimize the potential for impacts when compared to traditional LFA sources."~~
- 34) Appendix C, Page C-11, South Lake County Wellfield Project, Cost-benefit Analysis of Yield: Add the following sentence to the end of the paragraph, "However, given uncertainties regarding the permissibility of the project and the ultimate yield of the wellfield, the project may prove to be less cost-effective than other potential projects under consideration."
- 35) Appendix C, Page C-11, South Lake County Wellfield Project, Other Considerations: Replace "None" with "Given uncertainties regarding the permissibility of the project and the ultimate yield of the wellfield, the project may prove to be less cost-effective than other potential projects under consideration."

- 36) Appendix C, Page C-13, South Lake County Wellfield Project, Regulatory Review, Fifth Paragraph: Delete third sentence as follows, "~~Although the model does show impacts, producing water from the LFA should minimize the potential for impacts when compared to traditional UFA sources.~~"
- 37) Appendix C, Page C-59, St. Johns River/Taylor Creek Reservoir, Other Considerations: Delete the second paragraph regarding water quality considerations. The paragraph discusses a straightforward design issue that does not warrant being discussed in this section.
- 38) Appendix C, Page C-61, St. Johns River/Taylor Creek Reservoir, Figure C-4: Please delete the figure, as it is outdated. In addition, most project descriptions do not include a figure.
- 39) Appendix C, Page C-86, Polk County Regional Alafia River Basin Project, Description of Project, Second Paragraph, Third Sentence: Modify start of sentence as follows, "The project components include ~~one or more water intakes~~ two river water intakes, raw water transmission mains...."

STOPR+2 Comment #40

- 40) Appendix C, Pages C-102 through C-106, Reedy Creek Stormwater Mitigation/Recharge Project: In past drafts of the Solutions Plan document, the STOPR+2 Group has provided comments on this project. Some of these comments have not been implemented and are reiterated below. Any specific reference to any member of the STOPR+2 Group should be removed from this project description. In addition, the capital costs presented do not appear to adequately consider the infrastructure and land that would be required to implement this project.

"Project Description

The Reedy Creek Stormwater Mitigation/Recharge conceptual project includes several components, including stormwater compensatory treatment, flood protection, and surficial aquifer recharge. This effort potentially meets multiple outcomes in flood protection, water quality, natural systems and water supply.

The project is a stormwater treatment project that initially focuses 4 mgd of recharge to areas that are shown in the regional groundwater model to have lower surficial aquifer water-table conditions now that are projected to worsen in the future. ~~will develop protect existing groundwater withdraws in the vicinity of the enhanced recharge while providing~~ This project could also provide a quantifiable water quality compensatory treatment alternative for future or instead of existing stormwater treatment. This project does not provide finished potable water, it is a source water project for recharge to extend and protect existing and possibly future increases in groundwater withdrawals. The quantity of water that could be made available has not been determined.

The project components include a water elevation control weir to protect the area from flooding; an intake structure and low-head pump; and receiving wetlands/ surface water storage areas where the recharge can take place. It is important to note that the construction of a new water control structure within the Reedy Creek Basin would have to be designed and implemented to not cause any adverse flooding impacts upstream or adverse changes in flow downstream of the new weir. At this time, it is unknown a new water control structure could feasibly be implemented within the Reedy Creek Basin. For example, a significant portion of the Reedy Creek and Bonnet Creek Basins in this area are under the control of the Reedy Creek Improvement District (RCID). This project could not adversely impact RCID's stormwater management system.

STOPR+2 Comment #40 (continued)

Permit authorization will be sought through the Environmental Resource Permitting (ERP) process, though other permits may be required. Further, an applicant may pursue options to modify existing groundwater withdraw permits in the area to recognize the resulting enhanced recharge conditions that become apparent with the operation of the system. As currently configured, this project may be used toward a pollutant load reduction strategy and included in a future Lake Okeechobee Basin Management Action Plan.

Planning-Level Project Details

The project includes the following systems and components.

Added Surface Water Storage Capacity

Increase surface/stormwater water storage capacity will be accomplished by pumping water back up into the contributing drainage area. The receiving sites selected will be based on an optimum cost/benefit basis. In general, the locations could be: existing wetlands, stormwater treatment ponds or other water features that would enhance recharge in to this area ~~predicted to be and verified by field reconnaissance to have depressed surficial aquifer conditions. Existing treatment ponds are designed to specific hydrologic conditions and to accommodate specific design storm events. Discharges to existing stormwater systems, if~~ permittable based on ERP regulations, will need to be implemented as to not adversely affect the functionality of the ponds, or the ponds will require modification to accommodate the additional flow. Coordination with the owners of the pond, and possibly land acquisition, will also be required. The use of existing low-lying areas cannot result in adverse flooding impacts or impacts to adjacent land uses and will also require coordination with land owners and possibly land acquisition. Acquisition of land may be challenging due to the extensive development in the Reedy Creek Basin. There will not be a need for property acquisition and will likely enhance existing property value.

Water Treatment

This project is, by its nature, a water quality treatment system. The design principal develops operating protocols for intake structures on ditch and canal systems that were constructed ~~below historic seasonal high groundwater elevation for flood control. In the Orange County area, these drainage conveyance ditches bleed off the surficial aquifer nearly year round (typically 330-360 days a year). The design approach removes the water from the canals that flows in an unnatural condition and pumps it upstream to stormwater treatment areas or other low-lying areas where the surficial aquifer has increased storage capacity due to the dewatering effects of the bleed down condition to recharge the SAS. The owner applicant of the system gains a water quality compensatory treatment consideration within its watershed and the surficial aquifer receives increased recharge in potential areas of stress (potential wetland ecosystem impacts).~~

Raw Water Mains

Raw water is pumped upstream relatively short distances into the watershed under low pressure (head) conditions. Water is allowed to return to the surficial aquifer in a manner that more closely mimics the natural condition compared to the developed condition where the Directly Connected Impervious Area (DCIA) has increased discharge rates and volumes over various temporal scales. Getting the system back to a natural condition also requires increased monitoring and management actions likely through the use of Supervisory Control And Data Acquisitions (SCADA) systems to protect the area from flood conditions.

STOPR+2 Comment #40 (continued)**Project Yield**

The RCR Reedy Creek Stormwater Mitigation/Recharge project ~~will~~ could yield water and value for the ~~owner~~ applicant in water quality compensatory treatment and possibly through enhanced groundwater withdrawal performance. The ~~owner~~ applicant will make the determination on these combined resource values at a later date. Preliminary project evaluations of the altered annual hydrographs in the area have shown that approximately 4 mgd of water may be available for redistribution with this approach at this location, at this time. This project does not directly yield water for water supply. The quantity of groundwater that may be protected for withdrawal or additional withdrawals was not determined as part of the project conceptualization constraints.

Estimated Planning-level Costs

~~It was assumed that a potential~~ The applicant will not be pursuing external funding for the Reedy Creek Recharge project. Table C-22 summarizes the preliminary estimated planning-level costs.

Table C-22. Summary of estimated planning-level costs for the Reedy Creek Stormwater Mitigation/Recharge Project.

Planning Level Estimate	Millions
Construction costs	\$1.3
Non-construction costs	\$0.3
Land costs	-
Total Capital Costs	\$1.6
Equivalent Annual Costs	\$0.1
Annual Operation and Maintenance	
Total Annual Costs	\$0.1
Unit Cost of Production (\$/kgal)	0.09

Estimated Implementation Schedule

Design, permitting and construction based on financial resources of the potential partners.

Water Resource Constraints

The final evaluation of the watershed hydrographs and resulting operating protocols will be developed by the design team. This will include a consideration of the altered downstream ecosystems. These considerations will include evaluating the enhanced wetland system performance upstream as well as a view of any potential effects to the altered ecosystems downstream.

The watershed has an upper limit on yield that can be used for these restorative efforts so that the downstream conditions can be maintained at a level consistent with a historic condition. This approach could be considered as an entrepreneurial effort; the first applicant that evaluates the watershed and implements a project through the permitting process will create a new paradigm in the hydrograph. Any subsequent property owners in the watershed will use this as a new "baseline" condition.

At this time, it is unknown if a new water control structure could feasibly be implemented within the Reedy Creek Basin. For example, a significant portion of the Reedy Creek and

STOPR+2 Comment #40 (continued)

Bonnet Creek Basins in this area are under the control of the Reedy Creek Improvement District (RCID). This project could not adversely impact RCID's stormwater management system. In addition, this project could not adversely impact other existing stormwater management systems or result in adversely flooding to off-site uses. This project may also require a consumptive use permit, depending on how the project is configured.

Project Feasibility

This project ~~may be~~ feasible and is in consideration by the project partners. No project limitations due to rule inconsistencies have been identified.

Cost-Benefit Analysis of Yield

This project does not provide a direct source of water supply, but could indirectly provide water supply through groundwater recharge. The potential yield and cost of this project are unknown. As an alternative water supply (AWS) project, the Reedy Creek Stormwater Mitigation/ Recharge Project is intended to extend the usefulness of the existing groundwater withdraws in the area.

Other Considerations

The project when implemented may limit other applicants from being able to do similar efforts in this particular watershed. Please note that the use of compensatory treatment mechanisms in this approach is limited by the total runoff volumes and the need to maintain some flow at the right times of the year to the downstream ecosystems. Therefore, there is a natural limit to the number of parties that could pursue this compensatory design alternative.

This approach increases recharge in a stressed ecosystem environment. It is well suited to protecting wetlands at this location. This approach is under consideration in areas of the CFWI where the enhanced recharge could have other water resource benefits like enhanced recharge for springs protection (Wekiwa Spring) and oligohaline ecosystem enhancement and restoration (Indian River Lagoon).

Other considerations include water quality impacts, flooding impacts, impacts to stormwater systems, and cost feasibility.

Potential Partners and Governance Options

~~The project is under consideration by some of the entities that have enough land ownership to have value for the compensatory treatment option. These Potential project partners include but are not limited to Town of Celebration (CDD), Reedy Creek Improvement District (298 District), Town of Windermere, Orange County, Celebration Central Florida Expressway Authority, FDOT, and other private property interests. With the powers afforded to the RCID, they would have initial review of ERP permit applications for the areas within their jurisdiction. After their review, it would go to the SFWMD for consideration. Areas in the Reedy Creek watershed outside of the RCID, would be reviewed by the SFWMD.~~

There may be interest in seeking other partnerships with groundwater permit holders in the region as the benefits to the surficial aquifer may enhance their respective ability to withdraw water. ~~This would likely be one of the partners in STOPR (St. Cloud, TWA, Orange County, Polk County, RCID).~~

Funding Sources

Implementation of the approach will be conducted by an entity that has an appropriate financial interest in the outcome. The result will be a financially sustainable approach with beneficial outcomes in water quality, flood protection, natural systems and water supply."

- 41) Appendix D, Page D-1, Introduction, Last Sentence: This sentence indicates that District assumes the projects listed in the Appendix have a likelihood of being permittable; however, the individual project descriptions do not always indicate this. Suggest rewording as follows, "However, the WSPOs included in this Appendix have been screened for feasibility and the Districts have indicated if projects assume that they have a likelihood of being permittable."



...A collaborative regional
water supply endeavor
to protect, conserve, and restore
our water resources



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