



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

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.

- o 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