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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 How can you allow millions of gallons of water a day to be withdrawn from the flow of the river, while also fulfilling

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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