



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.

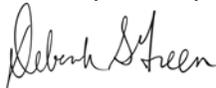
Donations to Orange Audubon Society, Inc., a Florida nonprofit [501(c)(3)] organization, are tax deductible to the extent allowed by law.

A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE, 1-800-435-7352, WITHIN THE STATE. FROM OUTSIDE OF FLORIDA CALL 1-850-410-3800. VISIT www.800helpfla.com FOR HELP. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL OR RECOMMENDATION BY THE STATE. REGISTRATION NO. CH2330

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 StarSM 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