



OFFICE OF THE MAYOR

LENNY CURRY
MAYOR

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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:

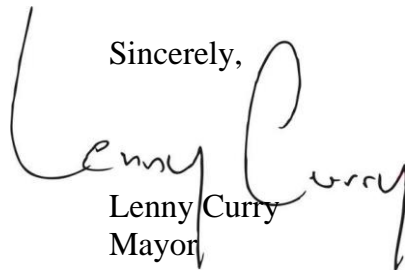
1. Aggregate water use in the five-county area (Seminole, Orange, Osceola, Polk and southern Lake County) of the CFWI has been flat for the period of 1995 to 2012 despite an increase in total population of approximately 50%. Consequently, it is our belief that the projected need for an additional 300 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,

A handwritten signature in black ink that reads "Lenny Curry". The signature is written in a cursive style with a large initial "L" and a long, sweeping tail on the "y".

Lenny Curry
Mayor