



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.

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,

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