



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,

The St. Johns River is a treasured watershed that provides enormous ecological, recreational, economic and aesthetic benefits for all Floridians. In 1998, President Clinton recognized the importance of the St. Johns River with a designation of an American Heritage River. The St. Johns is the only river in Florida and one of only 14 rivers in the entire United States to receive this prestigious national recognition. More recently, the America's Great Waters Coalition named the St. Johns to its list of our country's Great Waters.

Unfortunately, the ecological health and integrity of the St. Johns River system is threatened due to years of neglect and the cumulative impacts of a growing population.

Fortunately, the State of Florida, the St. Johns River Water Management District and local governments throughout the watershed have invested millions of public dollars to restore the health of the St. Johns and to undo the damage. However, the St. Johns and many of its tributaries are still impaired, with much work left to be done. Every effort must be made to avoid undermining this significant public investment and the progress that has occurred.

Clean, fresh water is the lifeblood of the St. Johns River and its tributaries. Our wetlands, forests, riparian zones adjacent to waterways, and aquatic plants provide the habitat and food sources that sustain healthy plant, fish, and wildlife populations. The St. Johns system also sustains nearly 5 million people who live within its watershed.

The St. Johns Riverkeeper's (SJRK) mission is to work on behalf of the community for clean and healthy waters in the St. Johns River, its tributaries and its wetlands, through citizen-based advocacy.

Since 2005, SJRK has actively participated in the public conversation and voiced our concerns regarding the controversial proposals to remove water from the St. Johns River. SJRK remains adamantly opposed to surface water withdrawals to meet future water demand due to the ecological impacts to the St. Johns and its tributaries. SJRK challenges the need for water withdrawals and questions the societal benefits in light of the enormous economic and

environmental costs. SJRK continues to urge our leaders to make water conservation the priority.

Unfortunately, Florida's water planners continue to rely heavily on unsustainable surface water withdrawals, fail to make water conservation a priority and appear to be driving decisions with inflated population and water demand projections.. To make matters worse, those who stand to benefit from this apparent water grab are driving the process without the involvement of stakeholders most at risk from being adversely impacted

### **Central Florida Water Initiative – Fueling Sprawl**

Central Florida has reached the sustainable limits of its predominant source of water, the Floridan Aquifer, with an average total water use expected to increase from approximately 800 million gallons a day (mgd) to 1,100 mgd in 2035. As a result, The St. Johns River, South Florida and Southwest Florida Water Management Districts created the Central Florida Water Initiative (CFWI) to identify alternative sources of water to meet the projected demand and fuel further unbridled growth.

The CFWI Planning Area is located in Central Florida and consists of all of Orange, Osceola, Seminole, and Polk counties and southern Lake County, covering approximately 5,268 square miles.

The CFWI Planning Area is currently home to approximately 2.7 million people and supports a large tourism industry, significant agricultural industry, and a growing industrial and commercial sector. According to the CFWI, the area's population is projected to reach approximately 4.1 million by 2035, which is a 49 percent increase from the 2010 estimate.

In May 2015, the CFWI released an updated Draft Regional Water Supply Plan (CFWI RWSP) and the 2035 Water Resources Protection and Water Supply Strategies Plan (CFWI WSSP)<sup>1</sup> to address future steps toward meeting water supply needs of the CFWI Planning Area. These plans rely heavily on surface water withdrawals and not enough on proven, cost-effective conservation strategies. Of the projected 250 mgd deficit, only 37 mgd is estimate to come from conservation initiatives. This is actually less than 42 mgd that was originally projected in previous drafts. In addition, the CFWI estimates that 50 mgd of traditional groundwater remains available that will not cause additional ecological harm. SJRK challenges that estimate due to the clear evidence that the Floridan Aquifer is already over-tapped in the Central Florida area.

In the 2014 draft plan, the CFWI calls for potentially withdrawing more than 150 million gallons of water a day (mgd) from the St. Johns at an estimated expense of nearly \$1.5 billion. The current CFWI Plans propose to increase withdraws from the St. Johns River to 160 mgd to yield 134 mgd at a cost of \$1.79 billion. The CFWI has also identified the Ocklawaha River, the largest tributary of the St. Johns, as a potential source for millions of additional gallons of water.

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<sup>1</sup> "CFWI Plans" refer to both of the newly updated CFWI RWSP and the CFWI WSSP.

Unfortunately, the CFWI Plans fail the public by not protecting the public's natural resources while facilitating the continuation of unsustainable growth and the unsustainable use of water.

## **CFWI - Flawed Process, Flawed Plan, Flawed Justification**

### **FLAWED PROCESS**

*Florida Statute 373.709 Regional water supply planning.—*  
*(1) The governing board of each water management district shall conduct water supply planning for a water supply planning region within the district identified in the appropriate district water supply plan under s. 373.036, where it determines that existing sources of water are not adequate to supply water for all existing and future reasonable-beneficial uses and to sustain the water resources and related natural systems for the planning period. The planning must be conducted in an open public process, in coordination and cooperation with local governments, regional water supply authorities, government-owned and privately owned water and wastewater utilities, multijurisdictional water supply entities, self-suppliers, reuse utilities, the Department of Environmental Protection, the Department of Agriculture and Consumer Services, and other affected and interested parties. The districts shall actively engage in public education and outreach to all affected local entities and their officials, as well as members of the public, in the planning process and in seeking input.*

### **LIMITED PUBLIC PARTICIPATION**

The 2014 draft CFWI RSWP reports, “The Districts conducted more than 91 public workshops, presentations, and meetings to explain CFWI RWSP, collect input on the major components of the CFWI RWSP, and develop water resource and water supply development project options.”

Unfortunately, all but one of the referenced workshops and meetings were held within the CFWI Planning Area. Although years of discussion took place developing water policy and water supply decisions that affect the entirety of the three participating Water Management Districts, the meetings were limited to the five county area of the CFWI, ignoring stakeholders in the other 43 affected counties.

In addition, the CFWI completely failed to engage public officials outside the CFWI Planning Area in the planning process or even to reach out to them to make sure they were aware of the impending plans and the opportunities that existed for input. This flawed public process does not meet the requirements of Florida Statute, foster public participation or provide an open public process.

### **STAKEHOLDER CONCERNS BLANTENTLY IGNORED**

In 2007-2008, more than 60 local government and civic organizations passed resolutions opposed to water withdrawals from the St. Johns and Ocklawaha Rivers. Four resolutions

opposing the water withdrawals have been unanimously adopted in 2014, including the City of Neptune Beach and the City of Jacksonville.

In Spring 2014, CFWI held a meeting at Stetson University in Deland, Florida at our request. With more than 100 elected officials and stakeholders from the 13 counties adjacent to the St. Johns River, the SWFWMD and SFWMD leadership seemed shocked to learn of the collective concerns of counties downstream from the CFWI Planning Area. Promises were made, but unfortunately, concerns were never addressed and no follow-up was ever made.

**In fact, the CFWI made little to no effort to involve community leaders, elected officials, and residents outside of Central Florida,** despite the fact that downstream communities would potentially be impacted by the proposed surface water withdrawals from the St. Johns.

The CFWI did not organize a public meeting in Northeast Florida until June 29, 2015, a little more than a month from the original public comment period deadline. At that meeting, surface water withdrawals were not even mentioned, until St. Johns Riverkeeper raised the question. Recently, CFWI has reacted to growing concerns in NE Florida with a few additional meetings, but much work must be done before the CFWI documents are finalized.

### **CENTRALIZED DECISION MAKING OUT OF THE SUNSHINE**

The CFWI Planning Teams continue to meet regularly in Central Florida to develop water policy, more detailed water supply plans, consistent rules and amended regulations for the South Florida, Southwest Florida and St. Johns River Water Management Districts.

“The CFWI Solutions Planning Team will use this CFWI RWSP to select specific water supply and water resource development projects to meet the water needs of the region.” (Pg. iii, CFWI RWSP Executive Summary)

“A (CFWI) Regulatory Team will establish consistent rules and regulations for the three Districts that meet the collaborative process goals and implement the results of this CFWI planning effort.” (Pg. 168, CFWI RWSP)

Members of the public are sometimes invited to attend or call-in to these critical committees, but the public is not allowed to participate or ask questions. In addition, not all meetings are even open to the public.

Stakeholders throughout the SJRWMD, SFWMD and SWFWMD have little chance of participating in important water policy discussions. Each team is set up to represent important stakeholders groups – public water supply utilities, regional leaders, business representatives, agriculture landowners and the environmental organizations. Without the requirement of noticed, transparent, and open public meetings, individual participants and special interests have a greater opportunity to privately drive the agenda. This lack of stakeholder involvement and transparency could lead to rules, regulations, and water supply projects that are not in the best interest of the public or the St. Johns River.

## **ACTIVE LEGAL CHALLENGE**

In 2009, Putnam County Environmental Council (PCEC) filed a Request for Review to the Florida Land and Water Adjudicatory Commission (FLWAC), asking for a review the 4<sup>th</sup> Addendum of 2005 SJRWMD Water Supply Plan. and the SJRK, along with the Public Trust Environmental Legal Institute of Florida, Inc., Florida Audubon Society, Inc. and Florida Defenders of the Environment, submitted an Amici Curiae Brief supporting PCEC's case. PCEC requested the Commission "determine that the Fourth Addendum . . . improperly identifies surface water withdrawals from the St. Johns River and the Ocklawaha River as 'alternative water supplies' under Section 373.109(1), Florida Statutes, and to order that such designations be stricken and/or specifically limited to capture during wet weather flows." The FLWAC Secretary declined review request, claiming FLWAC was without jurisdiction. However, on April 25, 2014, the First District Court of Appeal ruled that the Water Supply Plan "raises a policy issue sufficient to invoke the Commission's jurisdiction" and reversed the order declining review. As a result, this legal challenge is still active and must be addressed by FLWAC before the CFWI Plans or any other supply plans that include surface water withdrawals are considered for approval.

## **FLAWED PLAN**

### **STEEP, UNREALISTIC POPULATION GROWTH**

CFWI estimates future public supply water demand by multiplying the average 2006 to 2010 unadjusted gross per capita rate by the projected population for each five-year increment of the plans. This flawed approach ignores the historical trends of declining per capita rates of consumption, the potential of ongoing conservation programs and incentives and the likelihood of future advances in conservation technologies, strategies, and policies. As a result, the conclusions and recommendations of CFWI Plans are based on unrealistic water use deficit projections that are likely to significantly exceed actual demand in 2035.

### **CFWI FAILS TO MAKE WATER CONSERVATION A PRIORITY**

According to the SJRWMD, "lawn and landscape irrigation accounts for more than half of all residential water use."

"It is the duty of the state and local governments, as well as water providers, to educate, incentivize and, in some cases, require actions, which lead to conservation." (Pg. 77 – CFWI RWSP)

Unfortunately, many effective tools driving water conservation have been eliminated recently due to budget cuts and special interests.

- Educational programs designed to promote water conservation have been abandoned.
- Incentive programs are lacking.
- Deregulation in Tallahassee relies on voluntary, less aggressive conservation measures.

- Enforcement of existing protective regulations is insufficient.

The previous draft of the CFWI RWSP determined that only “42.3 million gallons per day (mgd) or 3.9 percent of the projected demand for 2035 can be eliminated by water conservation” and those estimates are “based on voluntary consumer actions.”(P. 78, chapter 5) Despite that fact that such a large percentage of water from the public supply is used for irrigation, the CFWI RWSP only estimated a 2.8% potential savings rate for outdoor conservation. The plan also estimated a meager 1.2% potential savings rate for Commercial/Industrial/Institutional customers.

The revised CFWI Plans attempt to present a narrative illusion of prioritizing water conservation stating that “water conservation is an important element in meeting future water needs.”

But, CFWI has now actually reduced the “starting point” of water conservation savings from the 2014 42.3 mgd to 36.8 mgd. If water conservation is a priority, it is counterproductive to use a “starting point” for planning purposes instead of an actual goal. In regards to Alternative Water Supply (AWS), CFWI uses a projected goal instead of a “starting point” demonstrating CFWI’s prioritization of AWS instead of water conservation.

CFWI states “that additional savings could be available through higher participation rates of BMPs (Best Management Practices) or implementation of other conservation measures.” But CFWI did not focus their approach on how best to increase participation through reasonable, responsible and quantifiable water conservation mandates stating “lack of authority.” In contrast, CFWI made a herculean effort to determine all permitting and legislative “impediments” to siphoning more than 160 mgd from the St. Johns River and will be spearheading a legislative effort to remove those protections in the 2016 Legislative Session.

If CFWI had focused on removing “impediments” to achieving more water savings with conservation, a plan would emerged that would produce enough water savings to meet the inflated CFWI demand projections.

The State of Florida needs bold leadership to craft statewide water policy that prioritizes water conservation, sustainable building and planning practices, incentives that encourage the efficient use of water, and market solutions, such as aggressive conservation rates and pricing strategies for CUP withdrawals.

### **WATER CONSERVATION MUST BE A PRIORITY**

“The overall conservation goal of the state is to prevent and reduce wasteful, uneconomical, impractical, or unreasonable use of water resources.” (Section 373.227(1), F.S.)

Unfortunately, our limited public resources are being directed towards new risky sources of water instead of addressing the root causes of our water supply problems and exhausting all opportunities to use existing water resources more efficiently.

Voluntary measures alone are not sufficient. Water pricing strategies and mandatory requirements must also be implemented and enforced to achieve maximum conservation and efficiency benefits.

The following charts illustrate how responsible regulatory measures can greatly reduce water use resulting in sustainable protection of Florida’s water supply.

Based on past history, CFWI can expect Public Supply and Self-Supplied Water Users to save approximately 32.45 mgd due to water conservation as shown in the following table.

Program Savings Table from draft report, with participation rates based on past history

Use Sector	Conservation Practice	Modeled Participation Rate	Total Number of Implementations	Cost (\$/kgal) <sup>b</sup>	Total Cost (\$ million)	Estimated Savings (mgd)
Public Supply	Advanced ET Irrigation Controllers <sup>a</sup>	23%	2,845	\$0.86	\$1.14	0.26
	CII Facility Water Assessment/Audit	12.50%	169	\$2.41	\$0.50	0.10
	Irrigation System Audits	12.50%	99,605	\$2.65	\$6.00	1.21
	High-Efficiency Toilets	23%	373,215	\$0.74	\$74.70	7.45
	High-Efficiency Faucet Aerators	23%	1,057,602	\$0.40	\$16.30	7.35
	High-Efficiency Showerheads	23%	527,728	\$0.09	\$11.30	8.66
	High-Efficiency Urinals	23%	3,808	\$0.52	\$1.40	0.30
	Pre Rinse Spray Valves	23%	307	\$0.04	\$0.02	0.20
	Soil Moisture Sensors	23%	28,617	\$1.07	\$2.90	1.51
	Waterwise Florida Landscaping <sup>a</sup>	0.10%	3,956	\$1.77	\$7.91	0.87
<b>PS Sub-total</b>					<b>\$122.17</b>	<b>27.91</b>
Other Self-Supplied	CII Facility Water Assessment/Audit	12.50%	8	\$2.41	\$0.02	0.005
	Irrigation System Audits	12.50%	TBD	\$2.65	\$4.80	0.95
	High-Efficiency Toilets	23%	39,275	\$0.74	\$7.86	0.78
	High-Efficiency Faucet Aerators	23%	111,292	\$0.40	\$1.72	0.77
	High-Efficiency Showerheads	23%	55,533	\$0.09	\$1.19	0.9
	High-Efficiency Urinals	23%	226	\$0.52	\$0.08	0.02
	Pre Rinse Spray Valves	23%	18	\$0.04	\$0.00	0.01
	Soil Moisture Sensors	23%	TBD	\$1.07	\$2.30	1.19
<b>Other Self-supply Sub-total</b>					<b>\$17.97</b>	<b>4.63</b>
<b>Total</b>					<b>\$140.14</b>	<b>32.54</b>

By prioritizing water conservation, CFWI can increase water savings to 117.30 mgd. The following table factors in reasonable regulation and targeted cost-sharing to yield a much greater water savings. By updating the Florida Building Code, new construction water efficiency would dramatically reduce future demand. In addition, existing water users must participate in effective conservation programs to protect Florida’s water supply. A combination of regulatory measures and incentives makes responsible participation affordable.

Program Savings Table, with participation rates based on moderately aggressive water conservation implementation over 20 years

1. 95% for new growth (reasonable if Florida Building code is updated to include these water efficiency measures)
2. 40 to 70% for existing water users (reasonable with targeted cost-sharing over 20 years)

Use Sector	Conservation Practice	Modeled Participation Rate	Total Number of Implementations	Cost (\$/kgal) <sup>b</sup>	Total Cost (\$ million)	Estimated Savings (mgd)
Public Supply	Advanced ET Irrigation Controllers <sup>a</sup>	77%	9,525	\$0.86	\$3.82	0.87
	CII Facility Water Assessment/Audit	57%	771	\$2.41	\$2.28	0.46
	Irrigation System Audits	57%	454,199	\$2.65	\$27.36	5.52
	High-Efficiency Toilets	77%	1,249,459	\$0.74	\$250.08	24.94
	High-Efficiency Faucet Aerators	77%	3,540,668	\$0.40	\$54.57	24.61
	High-Efficiency Showerheads	77%	1,766,742	\$0.09	\$37.83	28.99
	High-Efficiency Urinals	77%	12,749	\$0.52	\$4.69	1.00
	Pre Rinse Spray Valves	77%	1,028	\$0.04	\$0.07	0.67
	Soil Moisture Sensors	77%	95,805	\$1.07	\$9.71	5.06
	Waterwise Florida Landscaping <sup>a</sup>	1%	39,560	\$1.77	\$79.10	8.70
<b>PS Sub-total</b>					<b>\$469.50</b>	<b>100.81</b>
Other Self-Supplied	CII Facility Water Assessment/Audit	55%	35	\$2.41	\$0.09	0.02
	Irrigation System Audits	55%	TBD	\$2.65	\$21.12	4.18
	High-Efficiency Toilets	77%	131,486	\$0.74	\$26.31	2.61
	High-Efficiency Faucet Aerators	77%	372,586	\$0.40	\$5.76	2.58
	High-Efficiency Showerheads	77%	185,915	\$0.09	\$3.98	3.01
	High-Efficiency Urinals	77%	757	\$0.52	\$0.27	0.07
	Pre Rinse Spray Valves	77%	60	\$0.04	\$0.00	0.03
	Soil Moisture Sensors	77%	TBD	\$1.07	\$7.70	3.98
<b>Other Self-supply Sub-total</b>					<b>\$65.23</b>	<b>16.49</b>
<b>Total</b>					<b>\$534.73</b>	<b>117.30</b>

Water conservation and smart growth management practices will not only protect Florida’s long-term water supply but will also realistically save billions of dollars and potentially save the St. Johns River and other Florida waters from significant harm. Water conservation will also save taxpayers billions of dollars by reducing the need for environmental restoration to restore the damage done by over consumption.

The bottom line is that water conservation does work, can potentially meet most if not all of our water supply needs, and is much more cost-effective and environmentally-responsible.

**CFWI PRIORITIZES UNSUSTAINABLE SURFACE WATER WITHDRAWALS FROM THE ST. JOHNS**

Massive water withdrawals will worsen existing pollution problems, increase the frequency of toxic algal outbreaks, further reduce flow, increase salinity levels farther upstream, and adversely impact the fisheries, wildlife and submerged vegetation in and along the St. Johns and its tributaries.

The St. Johns River drops less than 30 feet from the source to its mouth, making it difficult for our river to efficiently flush pollutants and sediments. Removing millions of gallons a day from the river will potentially worsen current pollution problems, including toxic algal blooms.

However, CFWI Plans include projects that could remove up to 160 mgd of surface water from the St. Johns River at a cost of up to \$1.79 billion. Up to 60 mgd of surface water would come from the Taylor Creek Reservoir and St. Johns River at State Road 520, up to 50 mgd near State Road 46, and 50 mgd near Yankee Lake. This would produce an estimated 134 mgd of finished water. The Yankee Lake and State Road 46 projects would also require treatment by reverse osmosis (RO). The byproduct, or pollutant, that results from RO is called “concentrate”. The concentrate has a high mineral and/or salt content and would be disposed by injecting it into the Lower Floridan Aquifer creating additional pollution problems.

### **FLAWED JUSTIFICATION**

Surface water withdrawals are being justified based on the findings of a limited St. Johns River Water Management District study, the St. Johns River Water Supply Impact Study (WSIS). A group of independent scientists and experts from the National Research Council (NRC) conducted a peer review of the WSIS and identified significant shortcomings in the study, expressing concerns regarding many of the conclusions. According to the NRC review “the WSIS operated within a range of constraints that ultimately imposed both limitations and uncertainties on the study’s overall conclusions.”

The WSIS was not comprehensive and its shortcomings are well documented.

“A cumulative impact assessment should consider not only the impact of current and future actions on the environment, but also the impacts of past actions. Anyone evaluating the impact of proposed withdrawals should be able to consider the extent to which the waterbody has been degraded by historic actions such as drainage, diversion, withdrawals of ground or surface water, dredging or damming. Depending on the extent of those impacts, a decision-maker might conclude that restoration rather than additional degradation is appropriate. Unless the study documents the effects of historic impacts, it cannot be termed a cumulative impacts assessment and should not be used as the basis for determining whether to allow additional withdrawals.” – 9/24/08 memo to SJRWMD staff from Richard Hamann, former Governing Board Member and Associate in Law at the UF Levin College of Law Center for Governmental Responsibility

“The report (WSIS) lacks a comprehensive synthesis of the model results.” (pg. 34, NRC WSIS Final Report)

“Of particular concern is that the uncertainty analysis has not been synthesized with the water level, salinity, and age analysis to provide a deeper understanding of the model’s ability to explain the system.” (Pg. 35, NRC WSIS Final Report)

“The committee expressed concern from the outset of this study about the exclusion from the WSIS of potential effects of withdrawals on the Ocklawaha River (NRC, 2009).” (Pg. 102, NRC WSIS Final Report)

“The Committee concludes that the WSIS should have included a water quality workgroup.” (pg. 35, NRC WSIS Final Report)

“The modeling conducted by the District did not have a water quality component, and the District considered the potential ecological effects of significant increases in degraded stormwater runoff, as well as, changes in the frequency distribution of stream flows in urbanized areas, to be outside the scope of the WSIS.” (pg. 102, NRC WSIS Final Report)

“The standard for evaluating impacts is also troubling. If the goal is to determine the point at which "significant harm" occurs, then it is too limited. Significant harm is the standard for establishing minimum flows and levels (MFL). MFLs should not, however, be the only limit on withdrawals. Decision-makers might choose to allow some lesser degree of harm in the allocation of water. They might choose, for example, to reserve water from consumptive use for the "protection" of fish and wildlife. The permitting process itself is intended to insure that use is "not harmful to the water resources" and "consistent with the overall objectives of the district". The reasonable beneficial use and public interest criteria are also applicable and, in some circumstances, might provide the basis for determining that a withdrawal that does not violate MFLs should not be permitted. Hopefully this concern is only one of semantics and the results can be used in other contexts than establishing an MFL. “– 9/24/08 Memo from Richard Hamann to SJRWMD

Full analysis of WSIS shortcomings and recommendations cited within the NRC’s Peer Review must be conducted prior to the inclusion of surface water projects within the CFWI Plan.

### **Flawed Groundwater Model**

The hydrologic model, MODFLOW, to model groundwater levels and to evaluate consumption use permits (CUP) for additional water use does not incorporate the critical interface between surface water and groundwater. This flaw must be corrected before adoption of either plan.

### **Not Consistent with Chapter 373, Florida Statutes and Chapter 62-40, F.A.C.**

For the forgoing reasons, the proposed surface water withdrawals are not consistent with Chapter 373, Florida Statutes and Chapter 62-40, Florida Administrative Code and must not be approved as Alternative Water Supplies.

### **SJRK Recommendations**

The CFWI fails the public and fails to protect Florida’s natural resources. Adoption of the CFWI Plans is premature and potentially damaging to the very natural resources they are intended to protect and appears to drive unbridled and unsustainable growth at all costs.

The inherent flaws in the process, plans and justification must be corrected and the constitutional and statutory obligations must be met.

- **The St. Johns River, the Ocklawaha and other Florida waterways must be fully protected by removing surface water withdrawal projects from the CFWI Plans.**
- Full analysis of WSIS shortcomings and recommendations cited within the NRC’s Peer Review must be conducted prior to the inclusion of surface water projects within the CFWI Plans.
- Water conservation must be made a priority. The focus should be on living within our water means. As a result, we must develop a statewide water policy that prioritizes water conservation; mandates sustainable building, landscaping and planning practices; incentivizes the efficient use of water; establishes regulations that protect our water resources and mandate efficiency where needed; and implements market solutions, such as aggressive tiered conservation rates and CUP pricing strategies.
  - Please provide background of CFWI’s decision to focus on a “starting point” for Water Conservation as opposed to a goal as used for AWS.
  - Please provide a 15-year history of SJRWMD, SFWMD and SWFWMD funding and descriptions for the following critical activities to encourage water conservation.
    - Water Conservation Education Programs
    - Water Conservation Incentive Programs
  - Please provide detailed minutes to the Regulatory Subcommittee Meetings that focused on legislative actions needed for more productive water conservation.
- Establish rules and regulations necessary to mandate and incentivize efficiency and protect our water resources. First and foremost, reinstate the rulemaking process to implement the following nine water conservation “rule enhancements” to the Consumptive Use Permit (CUP) and Environmental Resource Permit (ERP) application processes proposed by SRJWMD staff in 2010 to require: 1) landscape irrigation ordinance, 2) informative billing, 3) stormwater reuse, 4) water use reporting for per capita calculations, 5) updated regulatory approach for public supply water conservation, 6) ERP water conservation provisions, 7) concurrent ERP/CUP application processing, 8) water conservation rate structure, and 9) landscape irrigation system design/installation constraints.
- Genuine participation with stakeholders and local governmental officials must occur throughout the 48 counties that will be potentially affected by these plans.
- Complete and approve the North Florida Regional Water Supply Partnership RWSP prior to CFWI adoption.
- All legal challenges, including the active PCEC/FLWAC case, are resolved.
- The flawed groundwater model must be corrected before adoption of either plan.

- River, springs, lakes and wetlands throughout all three water management districts must be prioritized for protection and restoration with comprehensive MFLs, recovery and prevention strategies, and a prohibition from using surface water or groundwater as supplementation for reclaimed water.
- WMDs must increase water quality monitoring to acquire the most current data for decision making.
  - Please provide a detailed 15-year history of SJRWMD Water Quality Monitoring funding and monitoring stations.

On behalf of the St. Johns River and the St. Johns Riverkeeper members, I submit these comments for your consideration. I look forward to the opportunity to participate in a fully open, public process that will further explore the flaws noted in the comments above and will strive to achieve a balanced approach to Florida's water needs and the protection of Florida's natural resources.

For the river,

A handwritten signature in cursive script that reads "Lisa Rinaman".

Lisa Rinaman  
St. Johns Riverkeeper