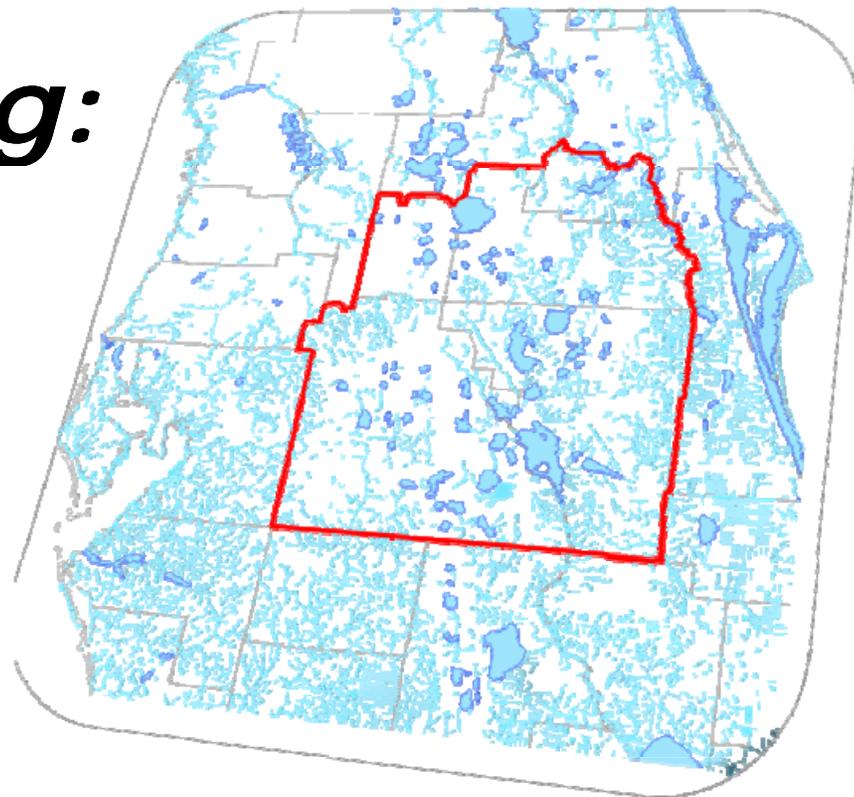


***Regulatory Team
Report Concerning:***

***Consumptive Use
Permit Application
Review During
Interim Period***



Steering Committee Meeting
December 13, 2013

Request for Information

- October Steering Committee created Regulatory Team
- DEP identified an interim period exists between now and implementation of CFWI's long-term solutions
 - Consumptive use permit applications are pending and more will be filed
- DEP requested options regarding coordinated approaches for near-term consumptive use permit application decisions

Process

- Key participants:
 - Regulatory Team members
 - Additional stakeholders
- Compiled a list of options and associated considerations
 - Distributed to Steering Committee
 - Available as handouts
- Today: Present options to Steering Committee for consideration
- Anticipate DEP guidance to the districts

Overview of Stakeholder Discussion

■ Topics discussed:

■ “Transparent” availability of pending application information

- Enhance awareness
- Consistent coordination
- Links with Regulatory Team Scope of Work #1

■ Options for CUP applications

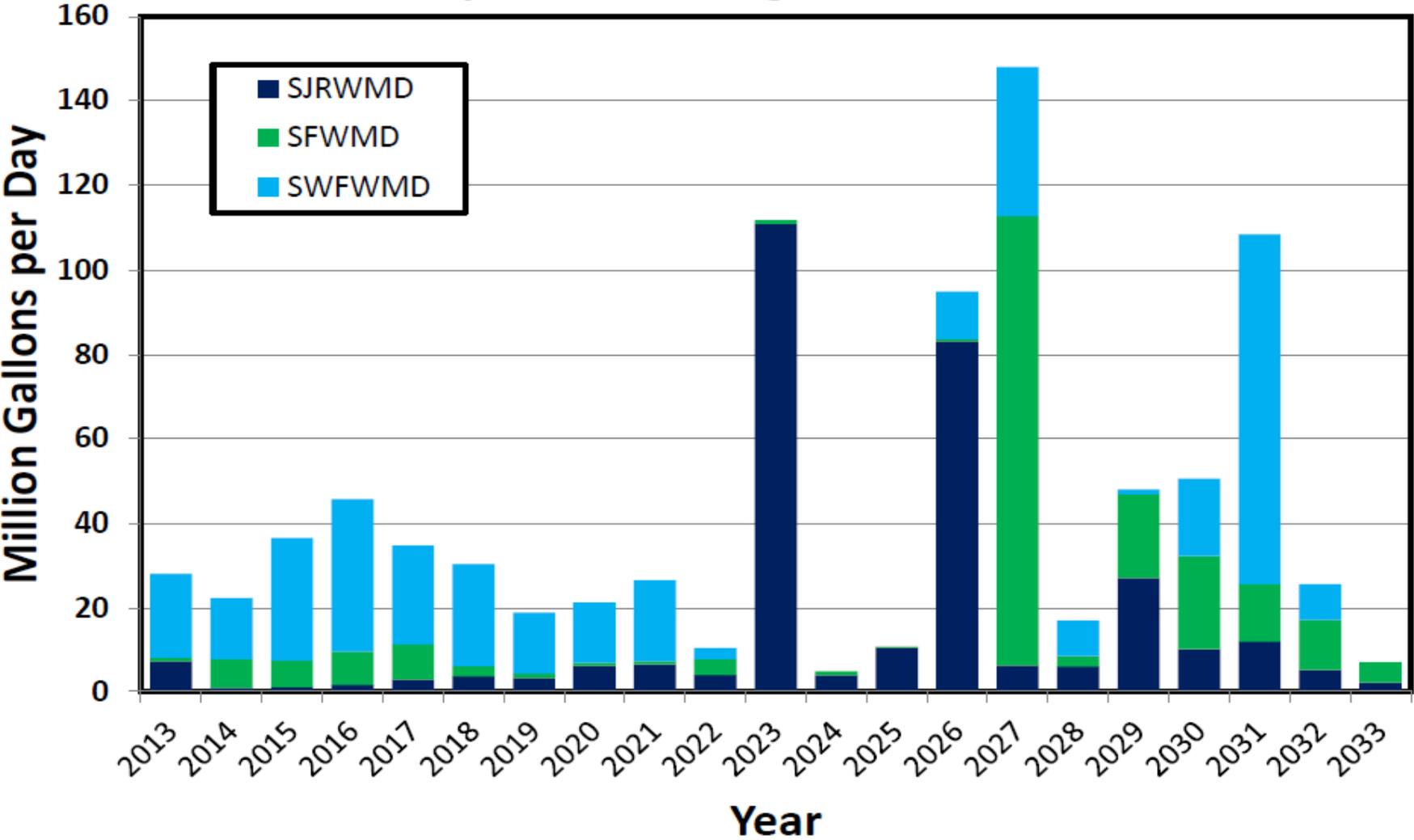
- Identified a full range of options
- Discussed considerations associated with the options

“Transparent” Availability of Pending Application Information

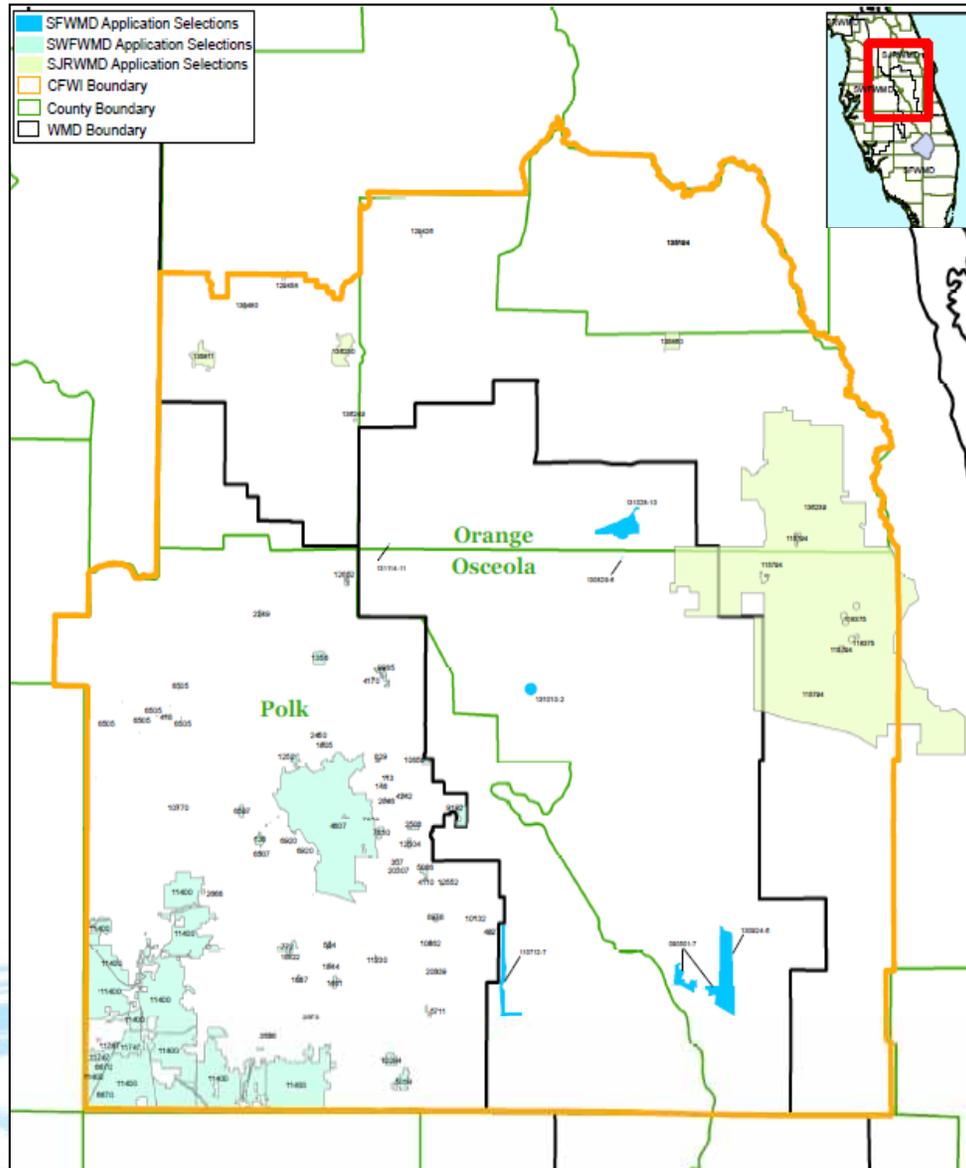
- Generated foundational information to gain insight into scope of issue presented
 - Volumes pending
 - Volumes anticipated
- Current application status summarized in spreadsheet
 - Updated bi-weekly
 - Key project information
 - E.g.: Volumes requested, project status, duration, etc.
 - Companion location map
- Regular distribution to Regulatory Team members and posted on www.CFWI.com

Central Florida Water Initiative

Permitted Groundwater Allocations up for Renewal in CFWI by Water Management District



Pending Water Use Applications within CFWI



Summary of Options for Pending CFWI CUP Applications

- **1:** No new, traditional source groundwater allocations
- **2:** Short duration permits for all new or increased allocations from traditional groundwater source applications
- **3:** Short duration permits for new or increased allocations from traditional groundwater source applications, *as based on use class and/or source*
- **4:** Allocation of available water
- **5:** Do not change anything (i.e. rely on existing programs) / Any others?

Summary of Options for Pending CFWI CUP Applications, cont.

- **Option #1: No new, traditional source groundwater allocations**
 - Restrict issuance of new or increased allocations from specific aquifers in CFWI
 - Renewals of demonstrated, historic use will be authorized in accordance with existing WMD rules
- **Pros:** low risk of additional stress
- **Cons:** presumes 'every drop' causes impact, yet possible to meet criteria
- **Process:** Rulemaking likely

Summary of Options for Pending CFWI CUP Applications, cont.

- **Option #2: Short duration permits**
 - For all new or increased allocations from traditional groundwater source
- **Pros:**
 - Limits demands allocated to permit duration
 - Preserves opportunity to review after long-term strategies identified
 - Existing legal user considerations
- **Cons:**
 - Two 'classes' of permittees; risks during renewal
 - May encourage 'run' on applications
- **Process:** Rulemaking likely

Summary of Options for Pending CFWI CUP Applications, cont.

- **Option #3: Short duration permits based on use class and/or source**
 - For all new or increased allocations from traditional groundwater source
- **Pros:**
 - Potential for flexibility – small volumes for a ‘preferred’ use class could receive long duration
- **Cons:**
 - Which use classes should get short duration?
- **Process:** Rulemaking required

Summary of Options for Pending CFWI CUP Applications, cont.

- **Option #4: Allocation of available water**
 - Continued issuance of permits when all existing criteria satisfied and with limiting condition
 - Explanation of CFWI in proposed agency action
 - See handout
- **Pros:**
 - Permit issuance continues, if conditions satisfied
 - Prevents 'two classes' of permittees
 - Future implement long-term solutions
- **Cons:**
 - Existing legal user considerations
- **Process:** No rulemaking

Summary of Options for Pending CFWI CUP Applications, cont.

- **Option #5: Do not change anything (i.e. rely on existing programs) / Any others?**
- **Pros:**
 - Permit issuance continues, if conditions satisfied
- **Cons:**
 - No recognition of long-term solutions
 - Existing legal user considerations
 - Potential for inconsistent district actions
- **Process: No rulemaking**

On-Going WMDs Activities

■ Conservation and Outreach

- With Team members, prepare a “menu” of conservation options to post on CFWI website and make available to applicants
- Work with largest utility customers to assess use and identify conservation opportunities
- Random survey re: conservation and CFWI

Questions?

