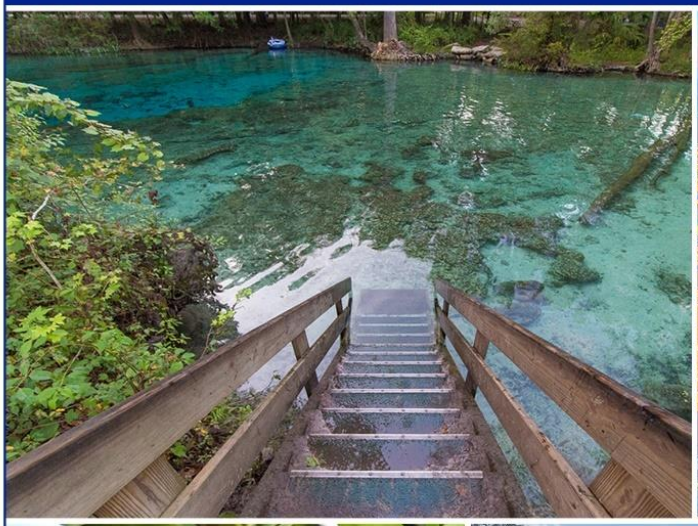
Central Florida Water Initiative

Comments and Responses Document



REGIONAL WATER SUPPLY PLAN 2020

A comprehensive plan for Orange, Osceola, Polk, Seminole, and southern Lake counties.

This document is the Comments and Responses Document for the Draft Central Florida Water Initiative (CFWI) May 2020 Draft Regional Water Supply Plan (RWSP). Staff from the South Florida Water Management District (SFWMD), St. Johns River Water Management District (SJRWMD), and Southwest Florida Water Management District (SWFWMD) worked together and in conjunction with members of various CFWI technical teams to generate this document.

TABLE OF CONTENTS

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Acronyms and Abbreviations

AFSIRS	Agricultural Field Scale Irrigation Requirements Simulation
AG	Agriculture
ASR	aquifer storage and recovery
AWS	alternative water supply
BEBR	University of Florida's Bureau of Economic and Business Research
BMPs	best management practices
CII	commercial/industrial/institutional
cfs	cubic feet per second
CFWI	Central Florida Water Initiative
CUP/WUP	consumptive use permit/water use permit
DMIT	Data, Monitoring, and Investigations Team
DSS	domestic self-supply and small public supply systems
ECFTX	East Central Florida Transient Groundwater Expanded Model
EMT	Environmental Measures Team
F.A.C.	Florida Administrative Code
FAS	Floridan aquifer system
FDACS	Florida Department of Agriculture and Consumer Services
FDOT	Florida Department of Transportation
FDEP	Florida Department of Environmental Protection
F.S.	Florida Statutes
FSAID	FDACS Florida Statewide Agricultural Irrigation Demand
GAT	Groundwater Assessment Team
gpcd	gallons per capita per day
gpd	gallons per day

gpm	gallons per minute
HAT	Hydrologic Assessment Team
LFA	Lower Floridan aquifer
MFL(s)	Minimum Flow(s) and Minimum Water Level(s)
mgd	million gallons per day
MIL	mobile irrigation laboratory
OCU	Orange County Utilities
OFS	Outstanding Florida Spring
OUC	Orlando Utility Commission
PRWC	Polk Regional Water Cooperative
PS	Public Supply
RIB	Rapid Infiltration Basin
RWSP	Regional Water Supply Plan
SAS	surficial aquifer system
SFWMD	South Florida Water Management District
SJRWMD	St. Johns River Water Management District
STOPR+2	regional water utility partnership which includes: City of St. Cloud, Tohopekaligia Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission
SWFWMD	Southwest Florida Water Management District
SWUCA	Southern Water Use Caution Area
TDS	total dissolved solids
TWA	Tohopekaliga Water Authority
UFA	Upper Floridan aquifer
USGS	United States Geological Survey
WSIS	Water Supply Impact Study

INTRODUCTION

The work of the Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) consists of the 2020 Regional Water Supply Plan (RWSP) and the associated Appendices. Each of these documents is available from www.cfwiwater.com.

This 2020 CFWI RWSP was available for public review and comment from March 13, 2020 through May 15, 2020. Two public workshops were held via Zoom webinar in April 2020 to present the draft 2020 CFWI RWSP. Originally four in-person public workshops were scheduled for April 2020; however, due to COVID-19 the Districts followed the Governor's directive for social distancing and were able to host the workshops via an online format. The comments submitted by the public and other stakeholders were received through a variety of forums including online through the web portal or via email. These comments (unedited for grammar or spelling) were compiled along with responses into this CFWI RWSP Comments and Responses Document that describe any changes made to the documents.

Note: "The views expressed by individual public commenters on this 2020 Central Florida Water Initiative Regional Water Supply Plan are their own and do not reflect the views of the South Florida Water Management District (SFWMD), the St. Johns River Water Management District (SJRWMD), or the Southwest Florida Water Management District (SWFWMD)."

2020 CFWI RWSP COMMENTS WITH RESPONSES

Index of 2020 CFWI RWSP Commenters – Organized by Commenter's Last Name

Summary Table of Stakeholder RWSP 2020 Comments with CFWI Responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team.

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Brian Turcotte, General Public	3/20/2020 1.0 There are far more declarative sentences (should, could, will) than imperative sentences (must). There are 5 occurrences of "must". 47 occurrences of "could", 28 occurrences of "should", and 85 occurrences of "will". A Plan such as this should prescribe solutions, resources, and time frames. it reads like there is agreement on many facts but not enough of a set of specific actions that MUST be undertaken. This lack of specific direction could :) result in a fragmented implementation.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Dan Hilliard, W.A.R. Inc.	3/20/2020 2.1 I agree with the conclusion below and suggest its validity predates the initiative by many decades. CONCLUSION This 2020 CFWI RWSP concludes that fresh groundwater resources alone cannot meet future water demands or currently permitted allocations without resulting in unacceptable impacts to water resources and related natural systems. Further, it is suggested, respectfully, that past practices led us to our current state of affairs and it is unfortunate that we continue to walk the same path. MFL rules are contrivances for maintaining the status quo and on the best of days are little more than an educated guess. There is little evidence that any such rules have contributed to maintenance or recovery of any Florida water body. This is said because of the state's record of designating a given water body as impaired for any number of reasons yet rationalizing significant take increase. Most water bodies in the state are impaired due to a variety of pollutants and nowhere do the rules examine additional pollutant loads that will be generated by increased use.	Minimum Flow and Minimum Water Level criterion have been adopted across the State of Florida and have been an effective tool to prevent further harm to resources while implementation of specific recovery efforts are put into place. However, this resource protection tool is not used to deal with pollutant loads, which is addressed by other programs of the FDEP.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Dan Hilliard, W.A.R. Inc.	3/20/2020 2.2 A few suggestions for improvement of our waters and the long term welfare of the people: Funding support for the various projects which enhance efficiency of use should be mandated via a use fee, statewide. I suggest a charge of .01/gallon be assessed for all metered water users. Few things enhance conservation like the almighty dollar. This should be applied for new applicants and existing permit holders during permit renewal processes. Such a fee would not be crippling and would generate $10,000,000/billion gallons of consumption. Need more? Try .02/gal	Funding support for conservation projects that enhance efficiency of use and for alternative water supply development has been in the hundreds of millions of dollars over the past decades. State laws and regulations do not allow water management districts to charge per gallon of water and public utilities are regulated by the state for setting fees and rate structures for drinking water.
Dan Hilliard, W.A.R. Inc.	3/20/2020 2.3 Legal requirements should be set forth that promote reclaimed and re-use of public water supply resources. This is an undertaking already underway on a small scale and it has seen success. Our future relies entirely upon adopting such methodologies across the board. If it is good enough for the International Space Station, it is likely good enough for the people.	The FDEP regulates reuse under their domestic wastewater program in the State of Florida and the water management districts promote the use of reclaimed water through water use/consumptive use permitting programs. These permitting programs require all applicants using greater than 0.1 million gallons per day to determine the feasibility of using reclaimed water. In the CFWI Planning Area, utilities have robust reuse programs and use over 95% of available flows for beneficial purposes.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Dan Hilliard, W.A.R. Inc.	3/20/2020 2.4 ASR is not a viable path due to pre-treatment costs. If one is going to treat water to a level necessary for such methodologies it is only a short step to meeting reuse standards.	Aquifer Storage and Recovery systems have been successfully used throughout the U.S. and the State of Florida for several decades. ASR represents a valuable tool to capture and store storm water, reclaimed water and wet-weather flows that can be used during high demands in the dry season. ASR is regulated by the FDEP through the Underground Injection Control program and the water must meet appropriate water quality standards. The FDEP and water management districts support use of this technology as an alternative water supply.
Dan Hilliard, W.A.R. Inc.	3/20/2020 2.5 A feature ignored in the report deals with economic impact. Florida water resources are the single largest contributor to the state's annual gross product. They are also a fundamental requirement for future success. Across the state they have been grossly abused, and on recurrent occasions significant health risks to the people. I cannot show or share with my children or grand children the things I experienced as a child, or even as a young adult, in context of recreational activities once available throughout the domain, and they were many. If we wish to continue reliance upon our water resources we must do a much, much better job of protecting them. That includes lakes, streams, rivers and our coastal estuaries. The best time to get started was around 1970, but it's not too late.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Angel Martin, General Public	4/5/2020. 3.1 Suggest adding to the document the Florida water-use report for 2015 recently released by the USGS--see link below. Could add a sentence or two in a couple of places just mentioning the report and a sentence on the trends and add the report to the reference list. https://pubs.er.usgs.gov/publication/sir20195147	Thank you for your comment.
Angel Martin, General Public	4/5/2020 3.2 Water Resource Assessment section--Suggest adding a couple of sentences concerning model limitations as given in Section 6.3 on the ECFTX Final Model Report, especially related to the recognized data limitations and that model simulation is more appropriate at regional/sub-regional scales than at local or site-specific scales.	As noted in this 2020 CFWI RWSP, the ECFTX model is a regional planning level tool. Details concerning the ECFTX model can be found in this 2020 CFWI RWSP Chapter 4 and Appendix D and the Model Documentation Report-East Central Florida Transient Expanded (ECFTX) Report (ECFTX Model Documentation Report) available at https://www.cfwiwater.com/hydrologic.html/
Angel Martin, General Public	4/5/2020 3.3 Also, suggest that a couple of sentences be added concerning future data collection, specifically including infilling portions of the CFWI area as described in Section 6.4 of the model report.	In Chapter 9 the conclusions and recommendations note that additional data collection, including continued implementation of the DMIT Hydrogeologic Work Plan, is needed within the CFWI Planning Area.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Angel Martin, General Public	4/5/2020 3.4 Also, suggest adding a sentence concerning future model refinements, including future model calibrations using PEST and the possible application of the 2015 water-use data as mentioned above for possible future model verification.	Chapter 7 includes a section on potential updates to the ECFTX model as well as the ECFTX Model Documentation Report.
Angel Martin, General Public	4/5/2020 3.5 It is imperative that the present model be maintained and improved on a continuous basis. There is a tendency to complete these types of models and then "place them on the shelf" until many years later when a new model is prepared. This should be mentioned in the water-supply plan.	As more hydrogeologic data becomes available through implementation of the DMIT Hydrogeologic work plan, appropriate updates to the ECFTX model are planned in preparation for the next 5-year RWSP update.
Angel Martin, General Public	4/11/2020 4.0 I have made previous comments but would like to add an additional comment. Concerning the climate change and groundwater-modeling sections--suggest adding a couple of sentences concerning the possible use of the groundwater-flow model to simulate the possible effects of sea-level rise on groundwater availability and the effects on assigned minimum flows and levels. This factor is of special importance along the coasts where the effects of possible sea-level rise will have the greatest effects.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Michael Minton, General Public	***4/14/2020*** ***5.1*** ***Emails from M Minton (4/7/2020 and 4/14/2020)*** 1. In the main body of the draft CFWI RWSP, one important project - Grove Land Reservoir & Stormwater Treatment Area (GLRSTA) generates 100 MGD of fresh water which makes up about 1/3 of the proposed increase from surface water of 324 MGD and about 20% of all the increased water supply of 532 MGD for all of CFWI— (see footnote #1 in Table 20 on p 69 and additional ref. on p 73), but there are no other references to this important project within the body of the draft RWSP. I propose that we are missing an opportunity to highlight the progress made on GLRSTA since 2015 if we don't include some reference in Chapter 2 entitled - Progress Since 2015 CFWI RWSP. Please consider including either on p.11 after the bullet for St Johns River/Taylor Creek Reservoir (TCR) Partnership or p.18 with the Water Storage And Restoration Projects, the following: Grove Land Reservoir & Stormwater Treatment Area - Since its inclusion in the 2015 CFWI Regional Water Supply Plan, with support via a grant issued through the Florida Department of Environmental Protection, the Grove Land Reservoir and Stormwater Treatment Area (GLRSTA) has been advanced through the Project Development and Environment (PD&E) Study phase. The GLRSTA Project is an approximately 5,000-acre reservoir capable of storing 75,000 ac-ft of water and a 2,000-acre stormwater treatment area to improve water quality. The GLRSTA is a super- regional project that is designed to keep in excess of 112,000 ac.ft. of runoff from this basin (which constitutes approximately 25-30% of the average annual runoff from the C-23,24 & 25 basins) from damaging coastal estuaries and deliver up to 100 mgd via the St. Johns River to the CFWI region. The project is currently in the regulatory process as both Environmental Resource Permit and Consumptive Use Permit applications have been submitted.	Although the Grove Land Reservoir & Stormwater Treatment Area is located outside of the CFWI Planning Area, this project is a potential water supply option and it is listed on Table E-5 of Appendix E. The following text has been added to the Surface Water section in Chapter 7: The Grove Land Reservoir and Stormwater Treatment Area (GLRSTA) Project is proposed to be an approximately 5,000-acre reservoir capable of storing 75,000 ac-ft of water and a 2,000-acre stormwater treatment area to improve water quality, located outside the CFWI Planning Area in Okeechobee and Indian River counties. The FDEP funded the recently completed project development and environmental study. The GLRSTA may be able to deliver up to 100 mgd to the headwaters of the St. Johns River and ultimately to the CFWI Planning Area after water availability determinations have been calculated and regulatory issues resolved.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Michael Minton, General Public	4/14/2020 5.2; 2. P. 60 - In the discussion of Surface Water, at the end of the paragraph reference is made to the Hillsborough River as not being discussed in this plan, but it may be worth noting that the CFWI planners should study the use of the Hillsborough River by the City of Tampa and Tampa Bay Water as a conduit for surface water deliver and water quality mitigation. Rivers in CFWI such as the St. Johns River could serve a similar role and much could be learned from the Tampa Bay Water experience.	Thank you for your comment.
Michael Minton, General Public	4/14/2020 5.3 3. P. 62 — Please consider including at the end of the section entitled St. Johns River System, the following: Additional supplemental surface water supply (and/or environmental mitigation for withdrawals) could be achieved by diverting additional flows to the St Johns River upstream of existing or proposed withdrawals such as the TCR Partnership. This additional water could be provided from water stored in offstream reservoirs (similar to the Peace River Manasota Regional Water Supply Authority discussed below) within the St Johns River basin or outside of the basin by projects such as the GLRSTA. Much of the water generated by GLRSTA would have flowed naturally up the St. Johns River but for the C&SF Project and the construction of the Florida Turnpike. Any additional nutrients associated with the augmentation could be offset by wetlands treatment prior to discharge and the downstream withdrawals. The use of water withdrawals to offset nutrient loads to an impaired water body from upstream water augmentation was investigated by Tampa Bay Water and conceptually approved by the FDEP for additional water to be provided by the Hillsborough River/Tampa Bypass Canal system.	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Michael Minton, General Public	4/14/2020 5.4 4. P. 65 — Please consider inclusion of the following at the end of the second paragraph of the Stormwater section--FDOT through the Florida Turnpike Authority should undertake planning for stormwater augmentation of flows to the St. Johns River through GLRSTA.	Thank you for your comment; however, after consideration no change was made.
Michael Minton, General Public	4/14/2020 5.5 5.P. 66 — Please insert at end of the second bullet of the Storage Capacity- ASR and Reservoirs Section — Another regional reservoir just outside the CFWI Planning Area in Okeechobee & Indian River Counties but which will provide water supply augmentation through the St. Johns River is Grove Land Reservoir & Stormwater Treatment Area discussed above.	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Michael Minton, General Public	4/14/2020 5.6 6. P. 74- Please insert in the Section entitled Surface Water Storage Projects, the following — Another example is Grove Land Reservoir & Stormwater Treatment Area. Since its inclusion in the 2015 CFWI Regional Water Supply Plan, with support via a grant issued through the Florida Department of Environmental Protection, GLRSTA has been advanced through the Project Development and Environment (PD&E) Study phase. The GLRSTA Project is an approximately 5,000-acre reservoir capable of storing 75,000 ac-ft of water and a 2,000-acre stormwater treatment area to improve water quality. The GLRSTA is a superregional project that is designed to keep in excess of 112,000 ac.ft. of runoff from this basin (which constitutes approximately 25-30% of the average annual runoff from the C-23,24 & 25 basins) from damaging coastal estuaries and deliver up to 100 mgd via the St. Johns River to the CFWI region. The project is currently in the regulatory process as both Environmental Resource Permit and Consumptive Use Permit applications have been submitted.	Please refer to Comment #5.1 response.
Marc Welch, Black & Veatch	4/23/2020 6.1 On page 59, you mention Direct Potable Reuse (DPR) and the Potable Reuse Commission. Much is happening in the State to move this forward. This Report should identify the quantity of treated wastewater that could be made available for DPR in the future.	The implementation of DPR will be dependent on continued technological and regulatory progress.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Marc Welch, Black & Veatch	4/23/2020 6.2 Table 20 on page 69 describes the potential sources of water. Noticeably absent is wastewater discharge that could be made available for DRP. CFWI should include potential wastewater quantities that "could" be made available for Direct Potable Reuse.	Given the current uncertainty with how DPR will be implemented in the State and in the CFWI Planning Area, the quantity of water that "could" be generated by DPR is not possible at this time.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald General Public	4/27/2020 7.1 Looking at the 2020 RWSP presentation data, I see the following: For 2015 population 2,933,915 with 385.97 MGD of public water usage For 2040 population 4.373,309 with 592.28 MGD of public Water usage Doing simple math, I see 132 gallons per day per person for 2015 and 134 gallons per day per person for 2040. Does this make any sense to you? In 25 years I would expect to see a huge reduction in per capita public water usage, but you data is actually showing an increase. Most areas in the SWFWMD are showing a per capita water usage below 100 now. Please revise your projected water usage to reflect a more reasonable figure for public water usage.	The Districts recognize the importance of water conservation and promote best management practices through our planning, cost-share, education and outreach, and regulatory programs. The water demand projections have undergone a thorough review process and as such were approved by the Steering Committee. Water demand projections were based on the most recent five-year (2011-2015) average gross per capita rate (at the time the projections were developed), which accounts for annual variations in water use with respect to rainfall variations and recent implementation of conservation programs. For this 2020 CFWI RWSP it is assumed that current levels of water conservation and use of reclaimed water will continue through the year 2040 planning horizon; noting that additional water conservation and the use of reclaimed water will be effective in reducing future water demands. The Districts have observed a reduction in per capita water use over the last decade that may be attributed to a variety of factors, including economic conditions, climatic variability, indoor and outdoor water conservation, and source substitution with reclaimed water. The use of a five-year average gross per capita accounts for some variability in these factors. Of note, some utilities do anticipate future water demands that could increase their historic per capita rates; these typically represent significantly large commercial uses to be supplied by a utility.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald General Public	4/27/2020 7.2 Looking at the slide titled "Planning-Level Groundwater Availability" it would appear that the three water management districts permitted 300 MGD of groundwater more than what was available. What does this tell us about our current permitting system and it's ability to protect our water resources? Should our WMD's be the ones to develop a RWSP for the Central Florida Area given their track record?	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Laura D'Alisera, General Public	4/28/2020 8.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? As a resident of Jacksonville and north Florida, the bottom line is that water conservation does work. It is a far more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns River, cease over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems for a finite resource.	The Districts recognize the importance of water conservation and promote best management practices through our planning, cost-share, education and outreach, and regulatory programs. Unfortunately, water conservation alone will not meet all of the future water demands while protecting our water resources and related-natural systems. this 2020 CFWI RWSP identifies a suite of water supply and water resource development project options that utilities could pick from to implement to help meet our future water demands. Any of these projects, if chosen, would still need to undergo further review, analysis for area specific benefits, design of the project, and potential permitting requirements. With respect to the St. Johns River as a potential source, the Water Supply Impact Study (WSIS), was a four-year study which provided a comprehensive and scientifically rigorous analysis of the potential environmental effects to the St. Johns River. The WSIS was peer-reviewed by the National Research Council and confirmed the findings of earlier investigations indicating that the St. Johns River can be used as an alternative water supply source with minimal to negligible environmental effects. The WSIS was endorsed by the Academy of Sciences; as part of the SJRWMD's ongoing planning efforts and to reflect the most recent conditions and data and comments received, SJRWMD is in the process of updating the WSIS.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
JJ Snow, General Public	4/28/2020 9.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Brian Paradise, Citizen	4/28/2020 10.0 I do not find it necessary to spend a great deal of money , and prejudice the health of our rivers, with huge surface water withdrawals. Instead we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Kristanna Barnes, Concerned Tax Payer/member of St. Johns Riverkeeper	4/28/2020 11.0 I was born in 1954 in Jacksonville and grew up on the St. Johns River in Switzerland, Florida which is located in St. Johns County. This was a time when raw sewage was being dumped into the St. Johns River and people were beginning to discuss cleaning up the river. We have come so far in realizing the importance of healthy waterways that surely a more sustainable, cost-effective solution can be found. I want to be assured that my grandchildren will have clean healthy waterways to enjoy and provide for their well-being. Thank you!	The Florida Department of Environmental Protection is the state agency that is responsible for ensuring water quality standards are met. Refer to the FDEP adopted and pending Basin Management Action Plans (BMAPs) at https://floridadep.gov/dear/water-quality-restoration/content/basin-management-action-plans-bmaps

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Amanda Gordon, General Public	4/28/2020 12.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently?	Please refer to Comments #8 and #37 responses.
Marcy Jean Brenner, At Johns County Audubon/St Johns Riverkeeper	4/28/2020 13.0 Our rivers and aquifers are being mistreated daily. Allocations for surface water withdrawal are already too high, and are likely to increase. There are other ways of doing what needs to be done! Conserve our water and keep trash from entering the waterways! The bottom line is that CONSERVATION of our waters does work and is without question a much more sustainable, cost-effective and environmentally responsible solution. Let's Get serious about addressing the root causes of our water use problems!	Please refer to Comments #8 and #37 responses.
Wendy Wieser, Citizen	4/28/2020 14.0 I am greatly concerned for our rivers, springs, etc. in Florida For money too many are allowing water to be taken by companies such as nestle, coke etc. I have seen what effect taking water from Peace River has done - not good So often people are ask to conserve water but then given millions of gallons to companies free to get the to come to an area. ALL OF USE need to practice conservation.	Please refer to Comments #8 and #37 responses. The SWFWMD is currently evaluating the progress of its Lake Hancock Lake Level Modification Project in helping achieve the established MFL for the upper Peace River.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Carol Bailey, General Public	4/28/2020 15.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Randy Reagor, Bird Watcher's Digest	4/28/2020 16.0 To Whom It Concerns; The Jacksonville area needs to do more to conserve water and I will be glad to help. Randy Reagor	Please refer to Comments #8 and #37 responses.
Lawrence Roberts, General Public	4/28/2020 17.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Richard Villadoniga, General Public	4/28/2020 18.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Brenda Wells, General Public	4/28/2020 19.0 Please plan to use our limited and vulnerable water resources more responsibly. Water conservation is a much more sustainable and cost-effective solution than massive surface water withdrawals and costly projects that seek to use more rather than conserve.	Please refer to Comments #8 and #37 responses.
Jesse Johnson, General Public	4/28/2020 20.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Bob Olsen, General Public	4/28/2020 21.0 "Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently?" Paraphrasing Einstein, the definition of insanity is doing the same thing over and over and expecting a different result. Polices such as not approving new septic systems for development are the best modern scientific solutions to solving FL water quality and availability issues. If you need a car for modern use, do you buy a Model T or a Tesla?	Please refer to Comments #8 and #37 responses.
Michael Raymor, General Public	4/28/2020 22.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Cheryl Reagor, General Public	4/28/2020 23.0 I think it is a big mistake to give all of Florida 's water away - and the taxpayers and citizens and for it to be given away at the expense of us in so unfair especially to big money interest companies - makes me furious	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Robert Hoelscher, Colonel US Army Retired, General Public	4/28/2020 24.0 Please do not approve these proposed withdrawals from the st Johns River and Florida Aquifer. These levels are unsustainable. The science and data collected by state scientists, private researchers, and Florida based university researchers indicate that this "plan" will only worsen existing pollution problems, significantly increase the frequency of toxic algae blooms, further reduce flow and increase salinity levels farther upstream, and adversely impact the fisheries, wildlife, and submerged vegetation in and along the St. Johns and its tributaries. These are unacceptable outcomes for Florida's citizens, our environment, and our future. I strongly urge you to remove surface water withdrawal projects from the water supply plans. You must prioritize living within our water means with conservation and sustainable growth. Your failure to do that will destroy everyone's ability to live, work, and enjoy Florida. Water is our economy! Thank you.	Please refer to Comments #8 and #37 responses.
Ross Ghiotto, General Public	4/28/2020 25.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Cristina Tuckness, Duval Audubon Society	4/28/2020 26.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Pauline Berkeley, Riverkeeper	4/28/2020 27.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Ron Zamora, St Johns Riverkeeper	4/28/2020 28.0 We must continue to protect our fragile , beautiful river. A good place to start is to ban plastic straws! Thank you .	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Anne Russell, Private Citizen - Member of Sierra Club and St. Johns Riverkeeper	4/28/2020 29.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The present crisis is a warning bell of the kind of GLOBAL issues that demand local policies to ensure a better future for ALL of us. Access to clean water is undeniable an issue that impacts EVERYONE. Water conservation can be achieved with a a commitment to putting systems and awareness in place. Don't just agree to pump more out. Everyone suffers. The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Marielle Marne, General Public	4/28/2020 30.0 Straws littering the landscape can be found all over. It not only looks unsightly but it's harmful to wildlife, clogs sewers and is overall bad for business. Let's keep all water clean and safe!	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald General Public	4/28/2020 31.0 The slide presentation for the 2020 CFWI RWSP indicates at least 11 water bodies not meeting their MFL's. How does the plan bring these water bodies into compliance? Does the plan address all of the SWUCA problems? If so, how? Does any of the 532 MGD shown for project options fix the identified MFL- problems? How much of the 532 MGD will be used for environmental/ecological restoration?	The SWFWMD's SWUCA Recovery Strategy addresses the noted 9 of the 11 water bodies and outlines a variety of options and initiatives to achieve MFLs recovery. Two of the 11 noted MFLs are in the SJRWMD and are included within the group of Wekiva Basin MFLs that are currently being reevaluated by SJRWMD. For this 2020 CFWI RWSP, MFLs are recognized as resource constraints on the development of water sources. This 2020 CFWI RWSP also includes a number of the water supply and water resource development project options that can assist in the recovery or maintenance of MFLs by providing for development of alternative water supply projects to offset the use of traditional sources.
Phyllis Hall, Seminole Audubon Society	4/29/2020 32.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let’s keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Maura Brady, General Public	4/29/2020 33.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.
Kris Pagenkopf, Alachua County Resident	4/29/2020 34.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Harmony Salvatore, St. John's Riverkeepers	4/29/2020 35.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Ann Pattillo, General Public	4/29/20 36.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems.	Please refer to Comments #8 and #37 responses.
Barbara Ketchum, Citizen	4/29/2020 37.0 Please consider the future and quit treating our water like an economic resource to be given away to development. Ten years ago we were trying to conserve our aquifer and treat it like the finite resource it is, what happened?	The Districts maintain extensive conservation programs that have resulted in significant water savings within all water use categories. In fact, this 2020 CFWI RWSP contains a chapter specifically on water conservation that identifies up to 56 mgd of potential water conservation savings to be obtained by 2040. As also noted in this 2020 CFWI RWSP, historical gross per capita water use has decreased from 182 in 1995 to 140 in 2015.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Sarah Harrison, General Public	4/29/2020 38.0 Just say no!! To so many water withdrawals. As we've learned this past six weeks, we can get by with less--a lot less--of everything. We need to conserve our water for humans, plants, animals, and for itself. After all, it's God's creation. Let's not ruin it.	Thank you for your comment.
Edward McDonald General Public	4/29/2020 39.0 The CFWI RWSP slide presentation shows that Agriculture has a 2040 projected water demand of 163.49 MGD or 18 percent of the 907.59 total. Will agriculture pay 18 percent of the cost for alternative water supply projects? If not, why not?	The Districts work extensively with agricultural entities to implement water conservation and alternative water supply development projects. For example, the SWFWMD's FARMS Program cost-share projects have successfully offset almost 29 mgd of groundwater use districtwide since 2003.
Jonathan Worth, Private Citizen	4/29/2020 40.0 Please stop overpermitting use of the aquifer in central Florida; it is bad enough. I am against this practice and will be watching our leaders closely and voting accordingly. How bad does it have to get before we do something? Thank you, Jon Worth	Thank you for your comment.
Joyce Palmer, St. Johns Riverkeepers	4/29/2020 41.0 Water conservation is the solution. It is sustainable, cost-effective and environmentally responsible. Keep straws out of the St. Johns and quit over-allocating our ground water.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Barbara Dees, General Public	4/30/2020 42.0 It's hard to believe, with all we know about facing serious water shortages now and in the future, that we still have to ask/demand that elective officials take their heads out of the sand and protect our water supply! Please start doing everything you can NOW to conserve and protect the water that we cannot do without. This is a MUST for the future!	Please refer to Comments #8 and #37 responses.
Edward McDonald, General Public	4/30/2020 43.0 The slide presentation for the CFWI RWSP shows 532.27 MGD of water supply and water resource development options. Are all of these projects mutually exclusive? In other words, could all of these projects be developed or will the development of some preclude the development of others on the list? Also, what is the impact of footnote "a" which talks about a Grove Land Reservoir Project? Will all of the identified projects be required to be base loaded; i.e. first on last off?	This 2020 CFWI RWSP identifies project options that far exceed those necessary to meet the projected shortfall of 95 mgd. Projects likely to be implemented will have the most benefit to the CFWI Planning Area after further analysis is conducted. See comment #5.1 for additional information regarding Grove Land Reservoir.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Sandra Walters, General Public	4/30/2020 44.0 I've lived in Florida for 30 years and it seems nothing changes. Everyone recognizes we have water issues to solve. Everyone talks about the problem, but the solutions get lost in bureaucracy, politics, apathy and mistakes. There is no incentive for the average person to conserve water. It doesn't make enough of a difference in their water bill. And when they see Nestle getting groundwater to bottle water, that's all it takes to make them say, "why should I try when politicians are giving away water?" For Pete's sake! Times are changing before our eyes. Take a stand, support/enact strong conservation incentives and treat the water we have like the valuable asset it is. Stop sucking it from the rivers.	Please refer to Comments #8 and #37 responses.
Terri Morgan, General Public	4/30/2020 45.0 The health of our rivers is poor. We need to help them heal -- we need them now and for the future. GAMBLING with our grandchildren isn't something we should do. We can find a way. We can meet the need today, conserve them, responsibly use them, and they will be here for many more centuries. Destroy them now by overuse, pollution, plastic, dumping, and whatever other means and they won't come back. Then what? Water conservation works, is environmentally responsible, and preserves resources for my great-grandchildren. We need a much more sustainable, cost-effective and environmentally-responsible solution. Let’s keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Ella Sprull, General Public	4/30/2020 46.0 Sooner or later our current system of water supply must change drastically- why not take huge steps now to start? Why wait until citizens are force to protest or until another ecosystem is out at great risk? Florida is the real water world of America. We can and must be an example for the rest of the country and the world. Short term thinking may result in big money for some, but if we dramatically change our ways in terms of conservation NOW we can be a shining light attracting attending and revenue from all over. Imagine Florida being known for its brave conservation stances as opposed to being know for our reckless and shortsighted use of our most precious resource- water. Please listen to the people who have spent their lives learning and pouring themselves into conservation and science, the people of Florida will benefit far further into the future if you do.	Please refer to Comments #8 and #37 responses.
P. Para General Public	4/30/2020 47.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root cause of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald, General Public	5/1/2020 48.0 Per the CFWI RWSP slide presentation there will be a population increase of 1,439,394 residents. Assuming an indoor water use of 75 gallons per day per resident 107.95 MGD of water will be added to our wastewater treatment plant influent. Both the EPA and the FDEP are (or have written) writing rules and regulations for potable reuse. How does this plan utilize potable reuse (direct and indirect) to meet future water demands?	As identified throughout this 2020 CFWI RWSP, the Districts support further investigations for the use of reclaimed water either via direct or indirect potable reuse projects.
Edward McDonald, General Public	5/2/2020 49.0 The following comment concerns the CFWI 2040 RWSP. NASA data shows a steady sea level rise of 3.3 mm per year. Multiplying this by 20 years results in a 2040 sea level that is 66 mm or 2.6 inches higher than today. How does the CFWI 2040 RWSP address this increase? The inland migration of the sea water/fresh water interface is a major consideration in setting water management policy. This will also impact river flowrates and salinity.	The Districts do recognize that climate change poses significant challenges to water supply availability, and that local management actions and regional collaborations will help mitigate the associated impacts and enhance the continued reliability of water supply in the CFWI Planning Area. To plan and prepare for regional climate change, the Districts have identified that coordination with other resource management entities and governments should continue to occur to ensure a common approach for developing effective adaptation strategies.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald, General Public	5/3/2020 50.0 The following concerns the CFWI RWSP effort. I notice that water management districts are adding the following conditions to water use permits that are located within the CFWI planning area. "This project is located in the Central Florida Water Initiative (CFWI) area, an area with on-going impacts to water resources which are being addressed by the CFWI. If the District determines that adverse impacts to water resources or existing legal users are occurring or are projected to occur because of the Permittee's authorized withdrawals over the permit duration, the District, upon reasonable notice to the permittee and including a statement of facts upon which the District based its determination, may modify quantities permitted or other conditions of the permit, as appropriate, to address the impact, but only after an opportunity for the permittee to resolve or mitigate the impact or to request a hearing. Such modification, if any, will consider such factors as the permittee's relative contribution to the water resource impact being addressed_due to groundwater withdrawals, the timing of this permit issuance compared to presently existing legal use of water, and other considerations identified by the CFWI Solutions Planning and Regulatory Teams. Modifications may include mitigation of impacts and / or reconsideration of allocations or requirements to timely implement required actions that are consistent with the long-term, regional water supply solutions as implemented by rules. Such actions may include the development of alternative water supplies, the implementation of water resource and / or water supply development projects, the application of impact offsets or substitution credits, operating plans, heightened water conservation or other appropriate actions. Nothing in this condition is intended to abrogate the rights of the Governing Board or of any other person under Section 373.233, F.S. " resource environmental impacts within its boundaries. Comment Continued on Next Page.	As stated in both permit conditions, they are unique to the CFWI Planning Area which was formed due to water resource impacts as a result of groundwater withdrawals to serve population growth where three water management district boundaries meet. The FDEP has begun rulemaking efforts to provide a consistent regulatory approach to permitting in the CFWI Planning Area. Public workshops have been held to solicit input on this effort and additional workshops are being planned to discuss specific rule language that may affect permit allocations in the CFWI Planning Area.

	Comment Continued from previous Page. This Initiative remains underway and is, in part, crafting long-term water supply solutions for the region. As a component of immediate, interim measures the permittee is encouraged to participate in the District's on-going, heightened water conservation public education program. Given the permittee's use class, opportunities may include such activities as participation in water conservation public service announcements, demonstrations of irrigation efficiency at community gardens, posting water conservation information or links on the permittee's website. Please contact Simon Sunderland, P.G. at ssunder@sfwmd.gov to discuss opportunities for participation in this important District effort." Why are these two items singled out as "special" to the CFWI planning area? Have the impacts to the water resources within the CFWI been identified or are they still being studied? What is the real purpose of the CFWI effort and when will we see concrete results? When will we stop issuing water use permits for the UFA and how will existing permits be modified to lower their permitted value to total the sustainable withdrawal rate?	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Larry Lesniak, St. Johns River Keeper	5/4/2020 51.0 If you haven't included water conservation in your management plans you've made a grave error.	Please refer to Comments #8 and #37 responses.
Lewis Kontnik, General Public	5/5/2020 52.0 Water is at the heart of Florida's life, please do NOT waste our precious resource to satisfy special interests. Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.
Stanley Grover, St. Johns Riverkeeper	5/5/2020 53.0 Please do not spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? Water conservation works and is a much more sustainable, cost-effective and environmentally-responsible solution. Please stop the excessive withdrawals of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems. We need our water and if you don't act now the future of our waterways, especially the St Johns River, will be at risk.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Billy Kemper, Florida Cattlemen's Association	5/8/2020 54.0 The classification of the term brackish is a very high concern to those of us down gradient of the withdrawals from the upper and lower Floridan aquifer. I realize we should be protected by the language "harm to the existing legal users", but by the time there is harm it is already too late. There are only about 6 agriculture operations with well permits in SE Osceola County within the CFWI region. There's in excess of 400 permitted flowing artesian wells in eastern Osceola, central and south Brevard, and Indian River counties with a significant permitted volume of over 60MGD. There are several additional pumped wells I didn't include in the volumes. I very much appreciate and concur with the memorandum comments dated May 1, 2019 sent to Kristine Morris, FDEP, from Angela Chelette with FDACS related to harmful saline water intrusion or harmful upcoming resulting from fresh and brackish water withdrawals. Most withdrawals within this area are already well above the fresh level, most are in the 300-450 PPM chloride with one as high as 800. One producer I know is having to blend his with surface water for his crops. If these levels used on pastures increase, it would prevent our ability to irrigate thousands of acres of pastures therefore greatly reduce the carrying capacity, which would result in an unrecoverable economic hardship. One ranch in central Brevard has already reached the point where they can only use the wells for watering livestock. We are also concerned that if our water is determined to be an alternative water source, therefore helping reach the goal of reducing the withdrawal of fresh water from the upper Floridan, it might be more easily allocated to another permit, which would make the problem worse. History has shown the harm or damage to the upper Floridan. There were numerous Comment Continued on Next Page	As part of the review of consumptive/water use permit applications, each of the water management districts must consider whether the application meets the conditions for issuance. Among those conditions for issuance is a consideration of whether the proposed use of water will cause harmful saline water intrusion or upconing. Each District's rules are designed to protect not only water resources that would be considered fresh, but also water resources with higher chloride and TDS concentrations (e.g., brackish water). In 2016, the legislature required rulemaking by the FDEP to provide uniform rules for consumptive/water use permitting. The FDEP anticipates this rulemaking effort will result in consistent rules that continue to protect water resources of varying chloride and TDS concentrations.

	Comment continued from previous page. wells in the Kissimmee basin that quit flowing years ago. The wells in the Deer Park town site that historically had enough pressure to push water into houses, even the two-story house I grew up in, would fill a bathtub or flush the toilet We didn't have electricity until the early 50s. Today those wells will only flow during extended periods of high rainfall. There is a small 2 inch well in our southernmost pasture that I had to cut the casing off at ground level during a drought, so the cattle could have water. It didn't have enough pressure to push it to the head above ground. These factual harmful reductions in flow and degradation of water quality should warrant extreme caution in planning for and permitting additional users from these sources. With the current definition of brackish water, the agricultural users referenced above have lower chloride concentration brackish water as their primary source which requires protection from additional users. We respectfully request the existing monitoring and evaluation that demonstrates the regions agricultural source volumes and quality will be protected with current planned/anticipated additional users. The last definition of brackish I have seen is 250/500 to 3000PPM chloride and TDS. We suggest the definition of brackish/ saline be revised to higher (greater than 250PPM) source chloride levels to help protect existing primary users not just within the CFWI region but those producers outside the region closer to the coast.	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
David Gore, General Public	5/11/2020 55.0 To all concerned This WSP plan uses false deceptive science ideas about the storage and flow of water in central Fla to promote very costly actions that do very little or nothing to accomplish the goals of the CFWI and will make the problems we have greater. These ideas are seriously affecting the perception of the physical cause of our problems , how to address them , and even how we conserve water. The plan written by WMD's ignore the most critical and basic proven physical facts that greatly effect the storage and flow of water within the saturated space of Fla's hydrology. My numerous many requests over five yrs to CFWI and WMD Officials for scientific explanations concerning the fake science ideas from WMD staff has been ignored. At three special meetings arranged for WMD staff and me to discuss these misleading ideas the Staff evaded discussing or any explanation or anything to support these flawed ideas. This plan and modeling being used is based on blaming the use of water as the cause of the problem when the much bigger more serious cause is the failure of WMD to adequately manage or protect the natural water containment ability of the land at the land surface that determines the water level , amount , pressure ,and useful storage of Fla's hydrology at any time or location This plan should not be brought up for approval until there has been a panel of some highly credible qualified persons providing something more scientific than using some imaginary thoughts to explain or justify these misleading ideas. Please refer to my emails to the CFWI and WMD Officials on 5/10/2018 at 10:33 , 10:36 , 10:40 , 10:48 and 9/13/2019 10:02 and many other emails sent over 6 yrs concerning this matter.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Rhea Smith, General Public	5/12/20 56.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Phyllis Hall, General Public	5/12/20 57.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Carter, General Public	5/12/20 58.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Sharon Rich, General Public	5/12/20 59.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Linda Evans, General Public	5/12/20 60.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Martha Harnit, General Public	5/12/20 61.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lucinda Hutchison, General Public	5/12/20 62.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Roy Walters, General Public	5/12/20 63.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Cynthia Haller, General Public	5/13/20 64.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Tim Glover, General Public	5/13/20 65.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Angela Chelette, Florida Department of Agriculture and Consumer Services General Public	5/13/2020 66.0 Memo from FDACS (5/13/2020) The Florida Department of Agriculture and Consumer Services (FDACS) appreciates the efforts of all cooperating agencies and stakeholders to implement the requirements of Section 373.0465, F.S. We have reviewed the draft regional water supply plan and note that brackish water is recognized as a current ground water source but is also identified as an alternative supply source. Eleven brackish/nontraditional water resource development project options are identified in the plan with a total potential 113.7 mgd available for water supply. Currently there are several agricultural producers utilizing brackish groundwater as their primary source of supply which have not been adequately identified in the draft plan. FDACS urges the Department of Environmental Protection and the water management districts to carefully consider potential impacts to existing legal users when evaluating permit applications for alternative water supply so as to prevent the brackish source from becoming unusable for existing agricultural purposes.	Please refer to Comment #54 response.
Edward McDonald, General Public	5/14/2020 67.1 The plan does not have a section that defines the purpose of the plan. Why is the plan written? Is it written to merely satisfy some legal requirement? Is it written to force municipalities and other suppliers of public water to spend 100's of millions of taxpayer dollars? Is it written to provide some level of protection to the environment? Why are we going to all of this trouble and expense?	Please refer to Chapter 1 of this 2020 CFWI RWSP which defines why the water management districts engage in regional water supply planning.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald, General Public	5/14/2020 67.2 The Florida Statutes say that it is the intent of the legislation that: Sufficient water be available for all existing and future reasonable-beneficial uses and the natural systems, and that the adverse effects of competition for water supplies be avoided. Is the above statement the driving force behind the writing of the plan? The legislation does not indicate that this goal (if that's what it is) is possible to achieve. It does not consider economic feasibility. It does not describe natural systems or indicate what is meant by "sufficient". All water use involves competition as if one party uses a given water source another party is precluded from using that same source. The truth is that prior to man's arrival in Florida, all rain water that fell was utilized in some way by natural systems. As man consumed, diverted, or otherwise manipulated the water the natural systems were forced to adapt to these changes. Knowing this fact, who can define the amount of water that is sufficient for natural systems? How much change is too much?	Thank you for your comment.
Edward McDonald, General Public	5/14/2020 67.3 With so many uncertainties how can a plan be written that has no stated goals or legal authority to enforce them? I don't have the answer because I don't think that there is an absolute answer. It all depends on what the public is willing to accept.	The Districts recognize this is a planning level effort; please refer to the robust consumptive/water use permitting programs of the respective Districts.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald, General Public	5/14/2020 67.4 How much environmental damage is acceptable? Should water uses be given priorities? Should a set level of water conservation be mandatory? Should all users of water pay for their water use? Who should pay for alternative water projects? These are just a few of the questions to be answered.	The Districts recognize this is a planning level effort and refer to the Districts robust and consumptive/water use permitting programs. Also refer to Comments #8 and #37 responses.
Edward McDonald, General Public	5/14/2020 67.5 Will the writers of this plan have the humility to listen to public input or will they do what they think is best regardless?	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
TJ Fish, City of Groveland	5/15/2020 68.0 The purpose of this letter is to comment on the Draft Central Florida Water Initiative (CFWI) Regional Water Supply Plan 2020 (RWSP 2020). The City of Groveland (City) owns a public water supply utility serving a rapidly growing customer base of over 21,000 residents in south Lake County. Groveland has grown from a population of 8,729 in 2010 to approximately 21,000 today, or 140% growth in 10 years. Based on trends the last decade, the next 20 years has the potential to expand to a customer base of nearly 50,000 residents. The City acknowledges the efforts of the Water Management Districts and all those who have contributed to the development of the CFWI RWSP. We believe a coordinated regional effort (Water Management District, Department of Environmental Protection, adjacent communities/purveyors, Lake County Water Authority, and others) is necessary to protect and to responsibly manage the region's water resources as it relates to continued prosperity and managed growth of the communities in south Lake County. The City is in the process of developing a Comprehensive Utilities Master Plan for drinking water, wastewater, and reclaim to responsibly manage the City's infrastructure and water resources. This planning effort and the City's water conservation efforts are intended to optimize water use to support future growth. This approach also integrates stormwater master planning into a "one water conservation approach. ***Letter from City of Groveland (5/12/2020)*** *for graphs and tables concerning demands.*	The population and water demand projections were developed collaboratively with all stakeholders over a two-plus year timeframe and were approved by the CFWI Steering Committee. These projections will be reevaluated during the next 5-year update during which time any change of trends in development will be taken into account. For additional information refer to Chapter 3 and Appendix A.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Paul Owens, 1000 Friends of Florida	5/15/2020 69.1 1000 Friends of Florida is pleased to submit the following comments on the Draft 2020 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP). We welcome a regional approach to water supply planning. While some progress has been made by CFWI, there remains a lot to be done, including the finalization of the 2020 CFWI RWSP. As drafted, we find the current draft inadequate for the reasons set out herein. We find that by far the biggest shortcoming in the Draft 2020 CFWI RWSP is the lack of emphasis on the conservation of water. This is particularly true with the amount of projected water conservation by the public utilities. According to the information contained in materials distributed at the April 30, 2020 workshop (slide 20 of 29), the public suppliers with a projected demand of 592.28 mgd project a conservation savings of 41.50 - 44.16 mgd. This means that conservation measures will account for less than 7.5% of the projected demand. This is incredibly low. Past experiences by the Southwest Florida Water Management District (SWFWMD) has shown that the per capita water use can be reduced to less than 100 gallons per day per capita. This was done in the Northern Tampa Bay Water Use Caution Area (NTB WUCA) designated by SWFWMD. The NTB WUCA consisted of portions of Hillsborough County, Pinellas County and Pasco County. Since SWFWMD is one of the three water management districts participating in this effort, why can't the SWFWMD model from its NTB WUCA be used in the CFWI? Through water conservation projects (primarily reuse projects) and alternative water supplies, Tampa Bay Water was able to reduce its groundwater pumping from a permitted 190 mgd to approximately 80 mgd, which is a reduction of Comment continued on next page.	As noted throughout this 2020 CFWI RWSP water conservation and reclaimed water play an essential role in the CFWI Planning Area which has the highest beneficial use of reclaimed water in the State of Florida and the nation. In addition to the water conservation potential of 50 -56 mgd this 2020 CFWI RWSP identifies over 500 mgd of water supply and water resource development project options. Also refer to Comments #8 and #37 responses for additional information.

	Comment continued from previous page. more than 50% of its groundwater withdrawals. Compare this 50+% in the NTB WUCA to the 7.5% proposed in the draft 2020 CFWI RWSP. If the 2020 CFWI RWSP projected a goal of 25% for conservation, the total demand or public supply would be reduced from 907.59 mgd to 680.69 mgd for a total reduction of 226.90 mgd. Based on SWFWMD's experiences, a 25% goal for conservation in the draft 2020 CFWI RWSP is very conservative and realistic.	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Paul Owens, 1000 Friends of Florida	5/15/2020 69.2 Section 373.0465(2)(d), F.S., goes into detail as to how the Florida Department of Environmental Protection (DEP) is to adopt uniform rules for the CFWI area, which are to be utilized by the three water management districts in their consumptive use permitting process. The current proposal in the CRWI RWSP to achieve a reduction of 7.5% is unacceptable and unrealistic in this day and age. DEP should insist on a more acceptable conservation target. Among the subject matter of the uniform rules are: (1) a single method for calculating per capita water use; (2) a goal for residential per capita water use for each consumptive use permit; and (3) an annual conservation goal for each consumptive use permit consistent with the RWSP. Section 373.0465(d), F.S., requires that the uniform rules also include recovery strategies within the CFWI and that rulemaking of these rules be adopted before December 31, 2016. To the best of our knowledge these rules have not been proposed. DEP has had three plus years to initiate these rules and it appears that DEP has done nothing but ignore the legislative mandate. This will only prolong the water supply problems in the CFWI. There are other critical questions that need to be addressed in the uniform rules for the CFWI area or the CFWI RWSP. For example, how will the water management districts reduce the permitted groundwater allocations from 1064 mgd to projected groundwater availability of 760 mgd, which is a reduction of approximately 400 mgd? Again, an SWFWMD experience is instructive: It permitted substantially more groundwater withdrawals than the projected amount of groundwater available. This occurred in the NTB WUCA and the Southern Water Use Caution Area. The required reduction in the Southern Water Use Caution Area was almost twice as much as Comment continued on next page.	Please refer to Comments #50 and #54 responses.

	Comment continued from previous page. what is required in CFWI, so it is possible to address and correct the over permitting of groundwater withdrawals. We believe that the best and most practical way to achieve an equitable reduction of the groundwater withdrawals is to have all three water management districts have all the large consumptive use permits renewed at the same time. That way all the major water users will be afforded the opportunity to ensure that all the reductions are equitable among the groundwater users, not only among the water users, but among the water management districts.	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Paul Owens, 1000 Friends of Florida	5/15/2020 69.3 Also, whether water conservation projects or alternative water supply projects are proposed, neither can be constructed without substantial costs, which are typically beyond the capability of public utilities. Based on our reading of the draft 2020 CFWI RWSP, it appears that a majority, if not all, of the total costs associated with the proposed projects will fall on the public utilities. This has not worked in the past, and we don't think it will work in the future. The CFWI RWSP needs to identify specific sources of funding for each of the projects included in the RWSP. Inasmuch as the water management districts bear some responsibility for the current water problems in Central Florida, it seems reasonable to have the water management districts participate in providing funding for these new projects. The water management districts have approved permits for ground water withdrawals of 1064 mgd, which is approximately 300 mgd more than is available.	Chapter 8 identifies potential funding sources. Between Fiscal Year 2015 and 2019 the Districts have contributed over $50 million dollars for alternative water supply and water conservation projects.
Paul Owens, 1000 Friends of Florida	5/15/2020 69.4 We strongly recommend that prior to the St. Johns River Water Management District (SJRWMD) authorizing any withdrawals from the St. Johns River, the SJRWMD would adopt meaningful minimum flows and levels for each location where surface water withdrawals are proposed. This should ensure that neither the St. Johns River nor its related natural systems are adversely impacted by the withdrawals.	The proposed St. Johns River withdrawal location near Yankee Lake, and the withdrawal location near SR46 are both close to the adopted MFLs at Lake Monroe. The Lake Monroe MFLs are approximately 1.6 miles upstream from the Yankee Lake location and approximately 4 miles downstream from the SR 46 location. Water level and flow analysis using surface water models and available measured data at these withdrawal locations and the St. Johns River at Lake Monroe, will be performed to assess the effects of these withdrawals on the Lake Monroe MFLs.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Paul Owens, 1000 Friends of Florida	5/15/2020 69.5 As to large groundwater withdrawals in the CFWI area, monitor wells with minimum levels should be adopted to ensure that the cumulative impacts of the actual withdrawals: (1) are consistent with the impacts projected with the CFWI model; and (2) do not cause short-term or long-term environmental impacts or adverse impacts to the Floridan Aquifer or springs impacted by the withdrawals.	Please refer to the CFWI DMIT Hydrogeologic Work Plan which includes extensive information on data collection and monitoring available at www.cfwiwater.com.
Paul Owens, 1000 Friends of Florida	5/15/2020 69.6 In summary, the CFWI RWSP is no different than any other plan. In order to be successful, it must be properly implemented and it must have proper financing. At this time neither of these items have been included. In their absence, we believe the CFWI RWSP is doomed to fail. That is unacceptable.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 Letter from STOPR+2 (5/15/2020) 70.1 The City of St. Cloud, Toho Water Authority, Orange County Utilities, Polk County Utilities, Reedy Creek Improvement District, Orlando Utilities Commission, and Seminole County (STOPR+2 Group) appreciate the opportunity to review and comment on the draft 2020 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) and commend the water management districts (Districts) on their efforts. Below please find general comments applicable to the overall RWSP. However, given the inherent limitations of the website format for those stakeholders wishing to provide more detailed information, we opted not to attempt to submit the lengthier, more specific comments herein. Instead, the STOPR+2 Group has submitted a separate letter detailing our requested changes to the RWSP, which include the general comments below together with additional detailed and specific modifications directed to identified sections of the RWSP and changes that would correct specific information contained in the RWSP. a) The estimated groundwater availability presented in the RWSP was based on the evaluation of a narrow range of future operational conditions and did not include consideration of all future increased recharge, potential alternative withdrawal distributions, projects to offset the effects of pumping, or other mitigative measures that would have potentially resulted in a higher estimate of groundwater availability. Because these management strategies represent real options for stakeholders in the region to meet future water supply needs, and because the Districts are currently issuing permits for such strategies, the RWSP should more clearly indicate that additional groundwater may be available through application of management strategies that are based on site-specific evaluations.	Based on the groundwater availability evaluation, it was estimated that regionally, the CFWI Planning Area could potentially sustain up to 760 mgd of fresh groundwater withdrawals, but local management strategies will be needed (e.g., wellfield optimization, aquifer recharge, and natural system enhancement) to address unacceptable impacts. Additional fresh groundwater withdrawals, beyond 760 mgd, are limited by water resource and natural system constraints. Based on the 2040 groundwater demand projections (855 mgd), the resulting groundwater shortfall is approximately 95 mgd.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.2 b) The RWSP is ambiguous with regard to the classification of groundwater from the Lower Floridan aquifer (LFA) as a "traditional" supply source or "non-traditional" alternative water supply (AWS) source. Currently the RWSP presents both fresh and brackish LFA groundwater supply projects as future water supply options to meet projected demands beyond the estimated availability of fresh groundwater. The stakeholders need clearer direction on the parameters that will classify a LFA groundwater project as a non-traditional AWS project so the further development of this potential supply source can be planned accordingly.	The Districts understand that there are areas of the LFA that are fresh and others that are brackish. The DMIT Hydrogeologic Work Plan has identified additional monitoring and continued investigations to further develop the understanding of the hydrogeology and water quality in this area.
Todd Swingle, STOPR+2 Group	5/15/2020 70.3 c) The groundwater availability estimate for the region was based in large part on adopted minimum flows and levels (MFLs) in the region. The CFWI teams performing the technical evaluations in support of the RWSP rightly elected to not include MFL re-evaluations and new MFLs being developed because these MFLs are incomplete and subject to change. However, the RWSP notes the status of and fully acknowledges that these future MFLs could affect the results of the RWSP once adopted. The current discussion in the RWSP on future MFLs is sufficient and has been agreed upon through a significant consensus-based process. Therefore, additional preliminary and incomplete information regarding future or re-evaluated MFLs should not be released for public comment or incorporated into the RWSP without undergoing the established CFWI peer review process.	The groundwater availability for the CFWI Planning Area was based on the number, location, and magnitude of impact on MFLs and MFL-related criteria, water bodies without MFLs, and groundwater quality, along with the quantities and spatial distribution of potential acres of stressed wetlands. Any reevaluated or approved MFLs will be included in future updates to the CFWI RWSP. All establishment or reevaluation of MFLs will follow the required public review and comment process.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.4 d) The Florida Department of Environmental Protection (FDEP), the Districts and public supply utilities worked diligently as a team to develop an estimate of potential future conservation water savings considering the significant savings and associated reduction in per capita use already achieved by public water suppliers. However, the RWSP repeatedly caveats that additional conservation savings beyond that estimated by the CFWI Conservation Team can be achieved without the research to substantiate this statement and without consideration of the cost required to achieve additional savings. The conservation sections of the RWSP should not overstate the potential for expanded conservation programs to achieve additional water savings without the research to corroborate these statements and should include consideration of the potential substantive costs that could be required to implement expanded conservation programs.	The CFWI Water Conservation Team worked collaboratively with all stakeholders over a four-plus year timeframe to develop the Conservation Implementation Strategy that was approved by the CFWI Steering Committee and used to develop Chapter 5 of this 2020 CFWI RWSP. The Districts look forward to further collaboration to quantify additional water conservation measures to achieve additional water savings.
Todd Swingle, STOPR+2 Group	5/15/2020 70.5 e) The RWSP does not capture the urgency set forth in the statute regarding the development of MFL recovery and prevention strategies and should include a commitment by the Water Management Districts to expeditiously adopt recovery or prevention strategies where determined necessary.	The Districts believe the CFWI RWSP correctly captures the requirements of Florida Statutes regarding MFL prevention and recovery strategies.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.6 f) The funding chapter of the RWSP does not sufficiently meet statutory requirements to analyze the funding needs and possible funding sources for the water supply, water conservation and water resource development projects identified in the RWSP for all existing and future reasonable and beneficial uses for all projected use types.	This 2020 CFWI RWSP meets the requirements of Section 373.709(2), F.S., because it includes an analysis of the funding needs (see Appendix E) and funding sources (see Chapter 8). See also Comment #70.53.
Todd Swingle, STOPR+2 Group	5/15/2020 70.7 g) The FDEP and Districts should prioritize efforts required by statute to develop consistent rules for the CFWI area, including reinitiating and holding additional meetings with interested stakeholders. We appreciate the Districts' consideration of these comments and those provided in the separate letter. The STOPR+2 Group will also e-mail a Microsoft Word electronic version of our comments to you for convenience in editing the RWSP.	In 2016, the legislature required rulemaking by FDEP to provide uniform rules for consumptive/water use permitting for the CFWI Planning Area. We anticipate that this ongoing rulemaking effort will result in consistent rules that continue to protect water resources.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.8 2020 CFWI RWSP Main Document - Comments 1) General: The RWSP is ambiguous with regard to the classification of groundwater from the Lower Floridan aquifer (LFA). Groundwater from the LFA can be fresh or brackish in central Florida, depending on the location. Fresh groundwater from the LFA has been used in central Florida for decades. Brackish groundwater from the LFA is beginning to be implemented as an alternative water supply (AWS) source in central Florida. In the previous RWSP, brackish groundwater was considered a non-traditional or AWS source, and fresh groundwater was considered a traditional source. In this RWSP, fresh groundwater from the LFA appears to sometimes be considered a traditional source and sometimes considered a non-traditional source, depending on the water supply project option. The stakeholders need clearer direction on the parameters that will classify a LFA groundwater project as a non-traditional AWS project so the further development of this potential supply source can be planned accordingly. Please clarify this ambiguity in the RWSP, which appears in the following locations: a. Chapter 2, Figure 3, Page 13 b. Chapter 7, Figure 23, Page 68 c. Chapter 7, Table 20, Page 69 d. Chapter 7, Water Supply Project Options and Initiatives, Third Paragraph, First Sentence e. Chapter 7, Brackish/non-traditional Groundwater section f. Chapter 9, Page 87, Third Paragraph, Second Sentence g. Chapter 9, Conclusions, Page 88, Third Full Paragraph h. Chapter 9, Conclusions, Page 90, Brackish/non-traditional Groundwater section	Figures have been updated in the document. Please refer to Comment #70.2 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.9 2) General: The groundwater availability estimate for the region was based in large part on adopted minimum flows and levels (MFLs) in the region. The CFWI teams performing the technical evaluations in support of the RWSP rightly elected to not include MFL re-evaluations and new MFLs being developed unless these future MFLs were through the peer review and public review processes and were approved by the Groundwater Availability Team (GAT) for use in the RWSP. However, the RWSP notes the status of these future MFLs and fully acknowledges that they could affect the results of the RWSP once adopted. The current discussions in the RWSP on future MFLs are sufficient and have been agreed upon through a significant consensus-based process. Therefore, additional preliminary and incomplete information regarding future or re-evaluated MFLs should not be released for public comment or incorporated into the RWSP without undergoing the established CFWI peer review process.	Please refer to Comment #70.3 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.10 3) General: The groundwater availability estimate and supporting analyses developed in support of the RWSP are based on the results of a single future groundwater flow model demand scenario evaluated in five-year increments through 2040. That scenario did not include all future increases in recharge (e.g., reclaimed water irrigation and aquifer recharge), alternative spatial withdrawal distributions, projects to offset the effects of groundwater withdrawals, or other mitigative measures. As such, there is uncertainty associated with the various analyses results and groundwater availability estimate presented in the RWSP and it should be acknowledged that the RWSP presents "potential", "predicted", or "simulated" results, as appropriate depending on the context of the text. This qualification should be added in numerous locations throughout the document. For example, the second sentence of the third paragraph of the Executive Summary (Page i) should read, "…this 2020 CFWI RWSP concludes that traditional resources alone cannot meet future water demands or currently permitted allocations without resulting in <u>potential</u> unacceptable impacts…"	This 2020 CFWI RWSP is a regional planning level effort and not a regulatory approach to define specific management strategies and project benefits. Please refer to the ECFTX Model Documentation Report for further information regarding the ECFTX model. After consideration no changes were made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.11 4) General: In numerous places throughout the RWSP, the terms "sustainable", "sustainable limit", and "sustainable yield" are used when discussing groundwater availability. The term groundwater availability was agreed upon and used in the analyses performed in support of this RWSP. Please replace any references to "sustainable", "sustainable limit" or "sustainable yield" with the term "groundwater availability" for consistency throughout the document.	Where appropriate, the change has been made throughout this 2020 CFWI RWSP.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.12 5) Executive Summary, Page iii, Water Resources and Natural Systems, Third Paragraph, Fifth Sentence: The RWSP does not define the term "adverse impact" with regards to wetlands, nor was it used by the EMT in their assessment of the predicted wetland changes. The EMT utilized the term "stress". In this sentence and elsewhere in the report, replace "adverse impacts" with "stress" when referencing wetlands.	The term 'adverse impacts' refers to existing documentation of wetlands and what has occurred. Stress is used to describe predicted future withdrawals conditions of wetlands based on the ECFTX modeling.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.13 6) Executive Summary, Page iv, Groundwater Assessment, Second Paragraph, Third Sentence: This sentence states, "Additional fresh groundwater withdrawals, beyond 760 mgd, are limited by water resource and natural system constraints." As previously noted, the analyses performed to reach the conclusions of the RWSP did not include consideration of all future increased recharge, changes in evapotranspiration associated with future changes in water table elevations, alternative spatial withdrawal distributions, projects to offset the effects of pumping, or other mitigative measures that would have potentially resulted in a higher estimate of groundwater availability. In fact, the Districts continue to issue permits for increased groundwater withdrawals within the CFWI, often with consideration of these types of measures. We respectfully request, as supported by recent and proposed District actions, that this sentence be modified to acknowledge the imprecise nature of the groundwater availability estimate as follows, "Additional fresh groundwater withdrawals, beyond 760 mgd <u>may be available based on site-specific evaluations and through the application of mitigating measures, but</u> are limited by water resource and natural system constraints." This change should also be made in the following locations. a. Executive Summary, Page 5, Conclusions and Summary of Key Findings, First Bullet after First Paragraph. b. Chapter 4, Groundwater Availability, Page 46, Second Paragraph after Table, Last Sentence. c. Chapter 7, Introduction, Page 69, First Paragraph, Third Sentence. d. Chapter 9, Conclusions, Page 88, Second Full Paragraph, Second Sentence	Please refer to Comment #70.10 response; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.14 7) Executive Summary, Page iv, Water Supply Options Projects, Third Paragraph, First Sentence: The following text from the previous draft of the RWSP was deleted from the end of this sentence, "…but there is no legal requirement for these project options to be implemented. Laws and rules limit the scope of regulatory actions that can be taken to impose specific solutions on users." Please add this text back into the RWSP.	In the Executive Summary, 'in accordance with Section 373.709(7) F.S.' has been added for additional context.
Todd Swingle, STOPR+2 Group	5/15/2020 70.15 8) Executive Summary, Page v, Water Supply Options Projects: The Governance Structure Options was deleted from the previous draft. Please add this section back into the RWSP.	Thank you for your comment; however, after consideration no change was made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.16 9) Executive Summary, Page v, Conclusions and Summary of Key Findings, Second Bullet after First Paragraph, Last Sentence: This sentence says “Additional savings could be possible through higher participation rates and the implementation of other water conservation measures not factored into the existing estimates (.e.g., educational and outreach programs).” The conclusions of this sentence were not studied by the conservation subteam and have not been proven. This statement also does not consider or acknowledge the cost feasibility of additional conservation measures. Please change this sentence to read, “While additional savings may be possible through other conservation measures such as education and outreach programs, such savings will be more costly and require targeted implementation and assistance through State funding.”	Please refer to Comment #70.4 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.17 10) Executive Summary, Page vi, Recommendations, Expanded Implementation of Water Conservation Programs, First Paragraph: It may not be technically or economically feasible for all permittees to expand their conservation programs further. Change this paragraph as follows, "Effective water conservation programs rely on the participation of local governments, residents, the agricultural community, and other users. Comprehensive water conservation programs should continue to be implemented and if feasible, ~~be~~ expanded ~~and~~to include voluntary and incentive-based initiatives, research, education and outreach initiatives, and regulatory initiatives to achieve savings including prioritization of allocated funding to meet or potentially exceed the estimated 2020 CFWI RWSP water conservation savings."	This language was submitted by the collaborative CFWI Water Conservation Team during the Full Internal Draft review process.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.18 11) Executive Summary, Page vi., Recommendations, Develop Specific Prevention or Recovery Strategies: This language does not capture the urgency set forth in statute regarding development of recovery and prevention strategies. Section 373.709(2)(c) requires that RWSP's include "The recovery and prevention strategy described in s. 373.0421(2)." Section 373.0421(2) provides that if a MFL has been established and the existing flow or water level in the water body falls below, or is projected to fall below within 20 years, the WMD shall "expeditiously adopt a recovery or prevention strategy". This provision should include a commitment by the WMDs to expeditiously adopt these strategies. Change the second sentence of this paragraph as follows, "The Districts are currently developing and will expeditiously adopt MFL prevention or recovery strategies for MFLs currently or projected to fall below their minimum flow or level within 20 years and will continue to monitor, study, and evaluate…"	Please refer to Comment #70.5 response.
Todd Swingle, STOPR+2 Group	5/15/2020 70.19 12) Executive Summary, Page vii, Recommendations: Chapter 9 (Conclusions and Recommendations) includes "continued development of consistent rules and regulations" and "pursue funding" as recommendations of the RWSP. Please add these recommendations to the Executive Summary.	Please refer to Comment #70.7 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.20 13) Chapter 1, Page 3, Goal and Guiding Principles, Page 3, Fourth Bullet after First Paragraph: Change this sentence as follows, "Protecting ~~and enhancing~~ the environment, including the natural resource areas and systems." The goals and guiding principles contained in the CFWI Guiding Document approved by the Steering Committee do not discuss enhancing the environment.	Thank you for your comment; however, after consideration no change was made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.21 14) Chapter 1, Page 7, Water Supply Sources, Groundwater, Second Sentence: Change this sentence as follows, "The ~~Upper~~ Floridan aquifer ~~(UFA)~~ has historically been the primary source of water supply throughout the CFWI Planning Area."	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.22 15) Chapter 2: Add descriptions of the PRWC Peace Creek Project and the PRWC Peace River Surface Water Project as surface water AWS projects that have received funding from the Districts over the past five years to this chapter. The STOPR+2 group previously provided suggested write-ups for these projects.	The following descriptions have been added to Chapter 2: PWRC Peace River Land Use Transition Treatment Facility and Reservoir Project – This project involves the development of an AWS source from the upper Peace River in southern Polk County. A feasibility study is underway to develop a conceptual potable water supply plan that identifies potential project capacity, treatment, storage, and permitability. Conceptual quantity estimates identify a potential for development of up to 11 mgd of surface water from the upper Peace River. The project also includes a land use transition evaluation of industrial or agricultural WUPs on lands in the vicinity that may have retired uses in the future, presenting an opportunity for additional quantities for public supply. PRWC Peace Creek Project – This project involves the development of a water supply or recharge project utilizing water from the Peace Creek. A feasibility study is underway to determine viable options to increase water supply. The study will look at several potential aquifer recharge and water storage sites to increase groundwater recharge. Conceptual quantity estimates identify a potential for development of up to 10 mgd of surface water from the Peace Creek, although quantities may be revised based on analysis and results of ongoing modeling.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.23 16) Chapter 2, Figure 3, Page 13: Add the Cypress Lake Wellfield Project, the PRWC Peace Creek Project, and the PRWC Peace River Surface Water Project to this figure.	The Districts used the official FDEP Master Project file as of March 2019. The PRWC Peace Creek project is included on Figure 3. The Cypress Lakes Wellfield project (2015_3,4,5) and the Peace River Surface Water Project (2020_54) are included in Appendix E, Figure E-1.
Todd Swingle, STOPR+2 Group	5/15/2020 70.24 17) Chapter 3, Page 25, Stakeholder Review, Third Sentence: Please change this sentence as follows, "Changes and comments were incorporated at the Districts' discretion~~where appropriate~~, and all comments…"	Thank you for your comment.
Todd Swingle, STOPR+2 Group	5/15/2020 70.25 18) Chapter 4, Environmental Measures, Page 40, Third Paragraph: Add the following sentence from the previous draft of the RWSP back at the end of this paragraph, "However, increased groundwater pumping is associated with other factors such as changes in land use and drainage that also may affect groundwater levels and wetland conditions." This was an accurate statement from the previous draft that should be acknowledged.	After review, it was noted that similar language was included in the Executive Summary and Appendix C. The following text was added in the paragraph before Table 14: 'Some existing wetlands adverse impacts and predicted future stress may be the result of multiple factors, including groundwater withdrawals, construction of drainage ditches, and other alterations to drainage basins.'
Todd Swingle, STOPR+2 Group	5/15/2020 70.26 19) Chapter 4, Environmental Measures, Page 40, Table 14: Add the percentage increase in parentheses after the increase in acreage throughout Table 14 to provide additional context to the results.	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.27 20) Chapter 4, Groundwater Availability, Page 46, First Paragraph after Table, First Sentence: Please change this sentence as follows, "Given that there are existing impacts under the 2014 RC, it was established for the purposes of this plan~~determined~~ that the planning-level…"	Thank you for your comment; however, after consideration no change was made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.28 21) Chapter 4, Groundwater Availability, Page 46, First Paragraph after Table, Fourth Sentence: Please change this sentence as follows, "Limiting the planning-level groundwater availability to this volume takes into consideration that the Wekiva Springs and Rock Springs, both OFSs, are ~~shown as not meeting~~predicted to not meet their currently adopted MFLs under groundwater withdrawal volumes exceeding 800 mgd and 825 mgd, respectively."	Thank you for your comment; however, after consideration no change was made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.29 22) Chapter 5, Active Water Conservation Projection Methodology, Page 51: Add the following paragraph at the end of this section in order to include a consideration of cost feasibility with regard to increased conservation, "The costs required to achieve this level of water conservation were not directly quantified in the development of the potential water conservation estimates. However, for the 2015 RWSP the estimated cost of future water conservation was over $122 million for an estimated 27.9 mgd of savings. It is anticipated that the costs required for the currently projected level of water conservation are similar. Increased funding from the Districts will likely be needed to achieve the estimated level of water conservation savings."	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.30 23) Chapter 5, Future Public Supply Water Conservation Opportunities, Pages 51 and 52: Change this paragraph as follows, "The projected water conservation savings for the PS water use category ~~are~~may be conservative, as they are based on quantified water conservation measures implemented within the CFWI Planning Area. There is potential for increased water conservation savings beyond the projected water conservation savings. ~~with increased participation rates and implementation of other water conservation measures not factored into the existing estimates, including more educational and outreach programs.~~ While some current conservation measures may not have the conservation savings previously anticipated or may be approaching the maximum conservation savings potential for specific measures, additional water conservation savings may be possible through the implementation of new or expansion of current measures." This revised language was agreed upon by consensus of the Water Conservation Subteam but was not included in the RWSP by the Districts. These changes also serve to more accurately reflect the analyses performed by the team.	Please refer to Comment #70.17 response. Also refer to the Conservation Implementation Strategy and its associated Appendices for cost per thousand gallons per implementation of various water conservation measures.
Todd Swingle, STOPR+2 Group	5/15/2020 70.31 24) Chapter 5, Summary, Page 54, Second Paragraph, First Two Sentences: Change these sentences as follows, "The projected water conservation savings for all water use categories in this 2020 CFWI RWSP ~~are~~may be conservative. There ~~is~~may be potential for increased water conservation savings beyond the projected water conservation savings with ~~increased participation rates~~funding for and implementation of additional water conservation measures or expansion of existing measures, including more educational and outreach programs."	Please refer to Comment #70.17 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.32 25) Chapter 8: Chapter 8 does not meet statutory requirements. Sections 373.709(2)(a)3.c and 373.709(2)(b)2.c, F.A.C. require an analysis of funding needs and funding sources of possible funding options for water supply and water resource development projects identified in a RWSP. Section 373.709(2)(k), F.A.C. specifically requires an assessment of how these projects support recovery and prevention strategies, while ensuring that sufficient water will be available for all existing and future reasonable beneficial uses and natural systems, and that the adverse effects of competition for water supplies will be avoided. Chapter 8 currently does not contain this assessment. In addition, a majority of the identified water supply options in the RWSP are for public water supply. It is not clear that future sources have been identified to meet the projected increase in demand for each use type contained in the RWSP, and that funding sources have been identified to implement the water supply options identified for each use type. Chapter 8 should be expanded to more directly meet the requirements of Section 373.709, F.A.C.	Please refer to Comment #70.6 response.
Todd Swingle, STOPR+2 Group	5/15/2020 70.33 26) Chapter 9, Water Conservation, Page 90, First Paragraph: Please change the first and third sentences of this paragraph as follows, “Water conservation by all water use categories will continue to be a priority to meet <u>a portion of</u> the CFWI Planning Area’s future water demands. … While water conservation efforts have been implemented in the CFWI Planning Area, additional water conservation <u>will play an important role in meeting future water demands</u>~~ is critical~~.	Please refer to Comment #70.17 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.34 27) Chapter 9, Water Conservation, Page 90, Second Paragraph, First Two Sentences: Changes these two sentences as follows, "The projected water conservation savings for all water use categories in this 2020 CFWI RWSP may be~~are~~ conservative. There is potential for increased water conservation savings beyond the projected water conservation savings ~~with increased participation rates and implementation of additional water conservation measures, including more educational and outreach programs.~~ While some current conservation measures may not have the conservation savings previously anticipated or may be approaching the maximum conservation savings potential for specific measures, additional water conservation savings may be possible through the implementation of new or expansion of current measures. "	Please refer to Comment #70.17 response.
Todd Swingle, STOPR+2 Group	5/15/2020 70.35 28) Chapter 9, Brackish/Non-Traditional Groundwater, Page 90, Second Sentence: Change this sentence as follows, "The LFA appears to be a viable alternative source for additional potable water and additional hydrogeologic data to better characterize this aquifer will facilitate the expanded use of the LFA as a supply source~~but little is known about long-term water quality impacts and drawdowns in the UFA due to sustained withdrawals from this aquifer~~."	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.36 29) Chapter 9, Stormwater, Page 92: Please modify the text to clarify what the following bullet means, "Address required treatment levels for SAS recharge, conjunctive use opportunities with reclaimed water, and direct injection to the FAS." Recharging the SAS with stormwater is equivalent to a stormwater retention pond, which already has regulations. If conjunctive use opportunities with stormwater and reclaimed water is in reference to public access irrigation, those regulations are also already established. It is unclear what this bullet means.	The bullet has been modified to state: 'Ensure required treatment levels for SAS recharge, conjunctive use opportunities with reclaimed water, and direct injection to the FAS.'
Todd Swingle, STOPR+2 Group	5/15/2020 70.37 30) Chapter 9, Intergovernmental, Stakeholder, and Public Coordination, Page 94, Bullet List: Add the following text as a new bullet, "Prioritize efforts required by statute to develop consistent rules for the CFWI area, including holding additional meetings with interested stakeholders."	As noted in the Regulatory section of Chapter 9, rulemaking is currently underway by FDEP. The Districts will continue a coordinated approach to CUP/WUPs in the CFWI Planning Area.
Todd Swingle, STOPR+2 Group	5/15/2020 70.38 <u>2020 CFWI RWSP Main Document - Corrections</u> 1) Executive Summary, Page iv, Water Supply Options Projects, First Paragraph, Last Sentence: Please confirm the estimated reuse quantity of 212 mgd. The RWSP later references this quantity being 215 mgd.	The number has been corrected to 212 mgd.
Todd Swingle, STOPR+2 Group	5/15/2020 70.39 2) Chapter 4, Page 37, Figure 11: Change the figure title as follows, "~~Projected drawdown~~ <u>Changes in Simulated Mean Water Levels</u> in the Upper Floridan aquifer…" The legend indicates both drawdown and rebound are shown in the figure.	Requested change has been made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.40 3) Chapter 4, Environmental Measures, Page 43, Figure 14: There are MFL symbols missing in the Wekiva Area in this figure.	Figures have been corrected in the document.
Todd Swingle, STOPR+2 Group	5/15/2020 70.41 4) Chapter 5, Public Supply, Page 49, Figure 16: Delete this figure. The figure gives the impression that no water conservation was occurring prior to 2015, which is inaccurate. This figure is also inconsistent with the statement on the following page indicating, “Projected water conservation savings may not directly reduce total water demands.”	Thank you for your comment; however, after consideration no change was made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.42 5) Chapter 6, Seawater, Page 65, Second Paragraph, First Sentence: Add the capacity of Tampa Bay Water’s treatment plant where it is missing.	The following has been added: 'seawater desalination facility with up to 20 million gallons per day' to the sentence.
Todd Swingle, STOPR+2 Group	5/15/2020 70.43 <u>2020 CFWI RWSP Appendices - Comments</u> 1) Appendix B, Public Supply – Active Water Conservation, Page B-3, Bullet List: Please add back in the following bullet from the previous draft version of the RWSP, “In both methods, historical water savings rates were based on data submitted from 12 PS utilities and was applied to all remaining PS utilities. The high range was reduced for demand reductions due to higher efficiency new construction savings that are reflected in the passive projection to avoid duplication with the projected passive water conservation savings.”	Thank you for your comment; however, after consideration no change was made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.44 2) Appendix C, General: The MFL results are based on multiple predictive models. Insert the word "predicted" before the words "freeboard", "change", "flow", "head", etc., throughout this appendix.	The word "predicted" and phrases that indicate the analyses and results associated with use of MFLs and MFL-related environmental criteria were based on ECFTX model output or simulations are included numerous times throughout Appendix C. Additional insertions of the word "predicted" in the appendix are not considered necessary.
Todd Swingle, STOPR+2 Group	5/15/2020 70.45 3) Appendix C, General: The MFL results show both increases and decreases in freeboard at specific MFLs. As such, this section should not be written to only indicate decreases in freeboard. Replace the word "impacts" to "predicted changes in freeboard" or "predicted water level and flow changes" throughout this appendix. The word "predicted" should be used as a qualifier when discussing changes in freeboard, water levels, and flows.	The presentation of changes in freeboard or deficit for modeled withdrawal conditions in Appendix C notes that most, but not all MFLs and MFL-related criteria exhibited no change, decreases in freeboard, or increases in deficit for simulations associated with increasing withdrawal rates. The term, "impact" is considered sufficient for the characterization of predicted changes to the MFLs and MFLs-related environmental criteria discussed in Appendix C and elsewhere in the CFWI RWSP. The word "predicted" and phrases that indicate the analyses and results associated with use of MFLs and MFL-related environmental criteria were based on ECFTX model output or simulations are included throughout Appendix C. Additional insertions of the word "predicted" in the appendix are not considered necessary.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.46 4) Appendix C, General: The MFL results show both increases and decreases in freeboard at specific MFLs. As such, this section should not be written to only indicate “drawdowns” and “flow reductions”. Change “drawdown” to “change in head” or “change in level” and “flow reduction” to “change in flow” throughout this appendix. The word “predicted” should be used as a qualifier when discussing changes in heads, levels, and flows.	The presentation of changes in freeboard or deficit for modeled withdrawal scenarios in Appendix C notes that most, but not all MFLs and MFL-related criteria exhibited no change, decreases in freeboard, or increases in deficit for simulations associated with increasing withdrawal rates. Use of more lengthy phrases such as “change in head”, “change in level” or “change in flow” rather than “drawdown” or “rebound” is not considered necessary, given that the two latter terms and their use are described in the methods section portion of Appendix D. The word “predicted” and phrases that indicate the analyses and results associated with use of MFLs and MFL-related environmental criteria were based on ECFTX model output or simulations are included throughout Appendix C. Additional insertions of the word “predicted” in the appendix are not considered necessary.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.47 5) Appendix D, General: In numerous places throughout the RWSP, the terms “sustainable”, “sustainable limit”, and “sustainable yield” are used when discussing groundwater availability. The term groundwater availability was agreed upon and used in the analyses performed in support of this RWSP. Please replace any references to “sustainable”, “sustainable limit” or “sustainable yield” with the term “groundwater availability” for consistency throughout this appendix.	After consideration, the change has been made throughout the RWSP, where appropriate.
Todd Swingle, STOPR+2 Group	5/15/2020 70.48 6) Appendix D, General: Change “impacts to” to “effects on” or “changes to” throughout this appendix. Not all changes in head or flows to the various criteria were negative/reductions. The word “predicted” should be used as a qualifier when discussing changes in freeboard, water levels, and flows.	Where appropriate, the requested change has been made. As noted throughout the document impacts are already occurring and additional impacts are anticipated without appropriate actions. Additional insertions of the word “predicted” in the appendix are not considered necessary.
Todd Swingle, STOPR+2 Group	5/15/2020 70.49 7) Appendix D, Table D-7 and Table D-8, Page D-47: Add the percent change in parenthesis after the increase in acres throughout these tables to provide additional context to the results.	Thank you for your comment; however, after consideration no change was made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.50 8) Appendix D, Figures D-33 and D-34, Pages D-57 and D-58: Add “Predicted” before “Increased Vertical Flow…” in the titles of these figures.	Requested change has been made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.51 9) Appendix D, Planning Level Groundwater Availability, Page D-59, First Paragraph, Third Sentence: This sentence states, "Additional fresh groundwater withdrawals, beyond 760 mgd, are limited by water resource and natural system constraints." As previously noted, the analyses performed to reach the conclusions of the RWSP did not include consideration of all future increased recharge, changes in evapotranspiration associated with future changes in water table elevations, alternative spatial withdrawal distributions, projects to offset the effects of pumping, or other mitigative measures that would have potentially resulted in a higher estimate of groundwater availability. In fact, the Districts continue to issue permits for increased groundwater withdrawals within the CFWI, often with consideration of these types of measures. We respectfully request, as supported by recent and proposed District actions, that this sentence be modified to acknowledge the imprecise nature of the groundwater availability estimate as follows, "Additional fresh groundwater withdrawals, beyond 760 mgd may be available based on site-specific evaluations and through the application of mitigating measures, but are limited by water resource and natural system constraints."	Thank you for your comment; however, after consideration no change was made. Please refer to Comment #70.1 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.52 10) Appendix E, General: The RWSP is ambiguous with regard the classification of groundwater from the LFA. Groundwater from the LFA can be fresh or brackish in central Florida, depending on the location. Fresh groundwater from the LFA has been used in central Florida for decades. Brackish groundwater from the LFA is beginning to be implemented as an AWS source in central Florida. In the previous RWSP, brackish groundwater was considered a non-traditional or AWS source, and fresh groundwater was considered a traditional source. In this RWSP, fresh groundwater from the LFA appears to sometimes be considered a traditional source and sometimes considered a non-traditional source, depending on the project. The ambiguity is present in numerous locations within Appendix E and should be clarified.	Please refer to Comment #70.2 response.
Todd Swingle, STOPR+2 Group	5/15/2020 70.53 11) Appendix E, General: Provide a general description of each cost element presented in the tables (e.g., define unit production cost and how it is calculated). Also, tally the total cost for presentation in the main RWSP document, introduction of Appendix E, and at the end of each table in Appendix E.	The majority of the unit production costs were provided by the Cooperating Entity. Each table in Appendix E includes a total row. The Water Supply Options Teams was a collaborative effort with stakeholders who reviewed the information reflected in Appendix E.
Todd Swingle, STOPR+2 Group	5/15/2020 70.54 12) Appendix E, Table E-2, Page E-31: Change the status of Project 2020_53 (TCR Improvement Project) to “Planning”. The project partners working with the District on this project respectfully request this change as the project partners and the District are actively working to further this project. The project partners do not consider a project that is delayed due to a protracted regulatory process to be “On Hold” if the involved parties are actively working on the project.	Requested change has been made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.55 2020 CFWI RWSP Appendices - Corrections 1) Appendix A, Table A-13e, Page A-126: During development of the RWSP, the Reclaimed Water Subteam agreed to present reclaimed water projections as a single line item for Orange County Utilities' (OCU's) entire service area. This was due to the complexities of OCU's system, which has four service areas but only three water reclamation facilities (WRFs), and reuse distribution system which do not always coincide with the limits of a single service area or with the general extent of the wastewater collection system of a specific WRF. The Districts have implemented this by presenting OCU's combined service area reclaimed water projections as occurring at the South Water Reclamation Facility (SWRF), and no reclaimed water projections at the Northwest Water Reclamation Facility (NWRF) and Eastern Water Reclamation Facility (EWRF), which is not accurate. Please combine the three-line items representing OCU's WRFs in Table A-13e into a single line item. The "Facility Name and ID" for this line item can be "OCU South WRF (FLA107972), OCU Eastern WRF (FL0038849), and OCU Northwest WRF (FLA010798)".	Table A-13e has been updated as follows: OCUD - South WRF FLA107972 has been changed to OCUD WRFs – South (FLA107972), Eastern (FL0038849), Northwest (FLA010798) and the 2 blank data lines in SJRWMD for Eastern and Northwest have been deleted from the tables.
Todd Swingle, STOPR+2 Group	5/15/2020 70.56 2) Appendix C, Figure C-5, Page C-21: The figure has orange squares and orange circles, but the legend only has orange squares. Update the figure to include all symbols in the legend.	Figures have been corrected in the document.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.57 3) Appendix D, Criteria for Groundwater-Dominated Lakes/Wetlands Without MFLs, Page D-17, First Paragraph, Second Sentence: Insert the word "other" as follows: "The focus of the wetland risk assessment was on those wetlands that are primarily groundwater dominated systems (20 percent of the total wetland acreage) since these types of wetlands are generally considered as being more sensitive to changes in groundwater levels than other (e.g., riverine) systems (Figure D-3)."	The sentence has been modified as follows: The focus of the wetland risk assessment was on those wetlands that are primarily groundwater-dominated systems (20 percent of the total wetland acreage) since these types of wetlands are generally considered as being more sensitive to changes in groundwater levels as compared to systems that are substantially influenced by surface water levels (e.g., riverine systems) (Figure D-3).
Todd Swingle, STOPR+2 Group	5/15/2020 70.58 4) Appendix D, Criteria for Groundwater-Dominated Lakes/Wetlands Without MFLs, Statistical Analysis, Page D-24, Second Paragraph, Second & Third Sentences: Modify the sentences as follows: "~~Water levels~~ The water level equaled or exceeded 80 percent of the time, ~~e.g.~~ i.e., the P80~~s~~ water level, ~~were~~ was calculated for several date ranges for each Class 1 wetland. A series of date ranges for P80 water levels, all starting with 2006 and ending in 2011 through 2017, were graphed as ~~line charts~~ time series."	Requested change has been made with the exception of the line charts to time series. These were graphed as line charts with a series of date ranges.
Todd Swingle, STOPR+2 Group	5/15/2020 70.59 5) Appendix D, Criteria for Groundwater-Dominated Lakes/Wetlands Without MFLs, Statistical Analysis, Page D-24, Third Paragraph, Last Sentence: Modify the sentence as follows: "The Class 1 wetland ~~statistics~~ θ value distribution moments (~~e.g.,~~ mean, standard deviation, kurtosis, skew) for each wetland group (Stressed and Not Stressed) and each physiographic province (Plains and Ridge) were evaluated for fit to the normal distributions."	Requested change has been made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.60 6) Appendix D, Table D-6, Page D-30: Add "within the CFWI" to the title of this table.	Requested change has been made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.61 7) Appendix D, Figure D-22 and Figure D-23, Pages D-44 and D-45: The figures are presented in reversed order. Fig. D-22 has a caption of "The changes of simulated mean water levels in Model Layer 3…", but the figure shows changes of water levels in Model Layer 9. Conversely, Fig. D-23 has a caption of "The changes of simulated mean water levels in Model Layer 9…", but the figure shows changes of water levels in Model Layer 3. Please swap the two figures so that they match the figure captions.	Figures have been corrected in the document.
Todd Swingle, STOPR+2 Group	5/15/2020 70.62 8) Appendix E, Table E-1, Page E-8: Change the County of Project 102 to Seminole. The City of Altamonte Springs is located in Seminole County in lieu of Osceola County.	Requested change has been made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.63 9) Appendix E, Table E-2, Page E-10: Change the estimated completion date of Project 2015_3, 4, 5 (Cypress Lake Wellfield Project) from 2020 to 2026.	Requested change has been made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.64 10) Appendix E, Table E-2, Page E-19: Change the status of Project2015_61 (TWA Lake Marion WRF Expansion) to "Construction/Underway".	Requested change has been made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Todd Swingle, STOPR+2 Group	5/15/2020 70.65 11) Appendix E, Table E-1, Page E-5, Project 40: Change the Implementing Agency Name to Orlando Utilities Commission and delete "(7 WPS)".	Requested change has been made.
Todd Swingle, STOPR+2 Group	5/15/2020 70.66 12) Appendix E, Table E-1, Page E-5, Project 48: Change the Implementing Agency name from OUC to Orlando Utilities Commission for consistency with other projects.	Requested change has been made.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.1 Letter submitted by Michael Cliburn Letter from Friends of the Wekiva River (5/15/2020) Dear Mr. Blalock: Thank you for providing this opportunity to comment on the draft 2020 Regional Water Supply Plan (RWSP) for the Central Florida Water Initiative (CFWI). Members of the Friends of the Wekiva River (FOWR) are intensely interested in the well-being of the Wekiva River Basin and all activities that may impact that system, and we have been following the CFWI water supply planning process. One of our members served as a member of the Solutions Team and the Groundwater Sub team for the 2015 CFWI RWSP. We have reviewed the Draft 2020 CFWI RWSP and have serious concerns about its ability to maintain minimum flows in the Wekiva River basin springs and the Wekiva River. Our major concerns include: 1. The Draft 2020 CFWI RWSP determined that flow from Wekiwa Springs could decline another 1.8 cfs from the 2014 Reference Condition (RC) without dropping below its MFL (Appendix C, Table C-8, page C-34). SJRWMD spring flow data, as depicted in the attached graph (see Figure 1) indicate that the average annual spring flow from Wekiwa Springs dropped below its current MFL between 2006 and 2008 and again between 2011 and 2016. The current MFL for Wekiwa Springs is 62 cfs, which is defined as the "minimum annual mean spring flow" (Chapter 40C-8.031, FAC). What data analysis and rationale were used to support the Draft 2020 CFWI RWSP conclusion that Wekiwa Springs is meeting its MFL for the 2014 RC? Is there a minimum number of consecutive years the annual mean flow of Wekiwa Springs must be less than 62 cfs before it would be determined to not be meeting its MFL?	The 2015 CFWI RWSP assessment was used as the basis for this 2020 CFWI RWSP MFL evaluations. The 2015 CFWI RWSP estimated 2.3 cfs of available water for Wekiwa springs, representing 2005 reference condition. Using the ECFTX model, it was estimated the additional groundwater pumping from 2005 to 2014 reduced this by 0.5 cfs resulting in 1.8 cfs of available water. The current freeboard (mentioned above) for Wekiwa Springs was determined based on the flow reduction allowed by the original MFLs for the Wekiva River at SR46, located from 8 to 10 miles away. The current reevaluation of Wekiwa Springs (and the other spring MFLs sites upstream of SR46) will instead be based on ecological and recreational criteria that are much closer to the spring. The assessment of the reevaluated Wekiwa Springs MFLs will supersede the assessment in this 2020 CFWI RWSP. Any recovery or prevention strategy needed to protect this system will be based on the reevaluated MFLs and updated freeboard/deficit calculations.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.2 2. The Draft 2020 CFWI RWSP states that Palm Springs is not currently meeting its current MFL (Appendix C, Table C-2, Page C-7) and that Palm and Starbuck Springs would not meet their MFLs under the 2014 RC withdrawals (Appendix C, Table C-8, Page C-34). What data analysis and rationale were used to support the Draft 2020 CFWI RWSP conclusion that additional groundwater withdrawals within the CFWI area beyond the 2014 withdrawal rates can be allowed? The FOWR believes that the 2020 CFWI RWSP should recommend that groundwater withdrawals be reduced so that Palm and Starbuck Springs will meet their current MFLs under the 2014 RC.	The MFLs for Palm and Starbuck Springs are currently under re-evaluation. Upon completion of that process, any necessary prevention or recovery strategy will be adopted as required section 373.0421, F.S. Please also refer to Comments #70.1 and #70.3 responses

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.3 3. The Draft 2020 CFWI RWSP states that the minimum spring flows for the 10 modeled Wekiva River basin springs were set "to cumulatively maintain the minimum flows in the Wekiva River system (Appendix C, Table C-8, page C-35, footnote e). What were the minimum spring flows of the 10 springs for the 2030 withdrawal condition in which the Wekiva River was projected to not meet its current MFL? The RWSP should identify the minimum flows for those springs that allow the Wekiva River at SR 46 to meet its MFL. The report further states that the assumption was made that these minimum spring flows would be sufficient to protect the ecology of the individual spring (Footnote e to Table C-8). What data analysis and rationale were used to support this assumption, given that Palm and Starbuck Springs would not meet their current MFLs under the baseline 2014 RC?	The 2015 CFWI RWSP assessment was used as the basis for this 2020 CFWI RWSP MFL evaluations. The Wekiva river MFLs were assessed by analyzing groundwater pumping impacts using the ECFTX model as described in the Methods section of Appendix C. The following language: "Although minimum spring flows were set primarily to cumulatively maintain minimum flows in the Wekiva River System, the assumption was also made that these flows would be sufficient to protect the ecology of individual springs." refers to the original, adopted MFLs for the Wekiva River at SR46 and the individual contributing springs with adopted minimum flows. Minimum flows for the springs (Palm, Sanlando, Starbuck, Miami, Wekiwa and Rock) upstream of SR46, were set based on the cumulative flow needed to protect the flows and levels adopted for the Wekiva River at SR46. An assumption was made at the time, that the flow reduction percentage (not volume) allowable at SR46 would also protect the functions and values at the small springs. The Wekiva River MFL is currently under reevaluation and will supersede the assessment in this 2020 CFWI RWSP. Any recovery or prevention strategy needed to protect this system will be based on the reevaluated MFLs and updated freeboard/deficit calculations.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.4 4. The 2015 CFWI RWSP estimated the remaining freeboards in Wekiwa and Rock Springs based on spring flow data thru 2006 (2015 CFWI RWSP, Vol 1A, Table B-11, page B-61). Between 2006 and 2014, the average annual flow in Wekiwa and Rock Springs continued to decline (See attached Figures 1 and 2). Why weren't the spring flows and freeboards for these springs updated based on the more recent flow data available when the draft 2020 RWSP was prepared? If the 2015 freeboard analysis were updated to include the spring flow data from 2006 - 2014, wouldn't the fact that the actual spring flows had declined since 2006 indicate that the freeboard for Rock Springs and Wekiwa Springs would be reduced for the 2014 conditions?	Although spring flows declined from 2006 to 2014, they rebounded after 2014. The average annual spring flows in 2019 are similar to the flows before 2006. This is not unexpected because spring flows fluctuate due to climatic cycles. The Districts assess MFLs using long-term flows and estimate freeboard by analyzing the impacts from groundwater pumping. For additional information refer to Comment #71.1 response.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.5 5. The Draft 2020 CFWI RWSP states that the sustainable groundwater withdrawal is 760 mgd (page 46). The Draft 2020 RWSP also notes that current water use permits within the CFWI area have allocated 1,064 mgd of groundwater (Appendix D, Table D-9, page D-60). The Draft 2020 CFWI RWSP also estimated that the MFL for the Wekiva River at S.R. 46 would not be met in 2026 and that the MFL for Wekiva Springs would not be met in 2027 (Appendix C, Table C-10, page C-49). Given that only six to seven year lead times are available to implement alternative water supply projects, what specific strategies will the WMD implement to ensure that groundwater withdrawals under current Consumptive Use Permits (CUPs) will not exceed the 760 mgd before 2026?	In 2016, the legislature required rulemaking by FDEP to provide uniform rules for consumptive/water use permitting for the CFWI Planning Area. We anticipate that this ongoing rulemaking effort will result in consistent rules that continue to protect water resources.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.6 6. The 2015 CFWI RWSP determined that the sustainable groundwater withdrawal was 850 mgd. And now the Draft 2020 CFWI RWSP has reduced that to 760 mgd. What progress has been made since the 2015 CFWI RWSP in reducing the CUP/WUP groundwater allocations in the CFWI area to more closely match the sustainable yield determined for the 2015 CFWI RWSP? How many permits have had their groundwater withdrawal allocations reduced within the CFWI area and within the SJRWMD portion of the CFWI area since the 2015 CFWI RWSP was adopted? How much reduction in groundwater withdrawals has been achieved by implementation of alternative water supplies within the CFWI area and the SJRWMD portion of the CFWI area since the 2015 CFWI RWSP was adopted? How much additional groundwater withdrawal has been authorized by new CUP/WUPs in the CFWI area and the SJRWMD CFWI area since the 2015 CFWI RWSP was adopted? All this information should be included in the 2020 CFWI RWSP.	The most recent permit tracking sheet (May 2019) has been uploaded to the cfwiwater.com site. For additional information refer to Comments #71.5 and #71.7 responses. In addition, public records requests may be submitted to the respective Districts for permit allocations.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.7 7. The Draft 2020 CFWI RWSP states that under Florida law, the RWSP cannot require the alternative water supply projects to be implemented (Appendix E, page E-1). As long as utilities can continue to withdraw water under their existing CUPs, how can the WMDs ensure that implementation of the alternative water supplies will not be delayed beyond 2026 and that more groundwater will be withdrawn than the 760 mgd sustainable yield? Strategies that address this concern should be included in the 2020 CFWI RWSP.	As noted in the Regulatory section of Chapter 9, rulemaking is currently underway by FDEP. The Districts will continue a coordinated approach to CUP/WUPs in the CFWI Planning Area. For additional information refer to Comment #71.5 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.8 8. Both the 2015 CFWI RWSP and the Draft 2020 CFWI RWSP stated that Palm Springs in the Wekiva Basin fell below its established MFL. We are not aware of any recovery plan developed for Palm Springs. FOWR has been following the progress of the District's efforts to update the MFLs for the river and springs. However, the currently adopted MFLs are being used for the 2020 CFWI RWSP. FOWR believes that the goal of the SJRWMD should be to allow all Wekiva Basin springs and the Wekiva River to meet their MFLs.	As noted in this 2020 CFWI RWSP, the MFLs within the Wekiva Basin, including Palm Springs, are under reevaluation. Any recovery or prevention strategy needed to protect these systems will be based on the reevaluated MFLs and updated freeboard/deficit calculations. Any reevaluated or approved MFLs will be included in future updates to the CFWI RWSP. All establishment or re-evaluation of MFLs will follow the required public review and comment process.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.9 9. FOWR strongly recommends that the SJRWMD expand cost share and funding for existing water conservation programs and create and fund additional incentives for utilities and other water users to increase or expand their water conservation programs, particularly in the PS and AG categories. Water conservation is generally the least expensive option for reducing water withdrawals. In addition to the above comments and questions, we have identified a list of questions from our review of the appendices. FOWR requests written responses to all these questions prior to finalizing the 2020 CFWI RWSP.	Please refer to Comments #8 and #37 responses.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.10 Appendix A: Population and Water Demand Predictions Page A-7: What crops are expected to be grown on the additional 7,200 acres in the Osceola North Sector in 2040?	Tables 6-3 and 6-4 of the North Ranch Sector Plan, which has been incorporated into the Osceola County Comprehensive Plan, lists the crops and water demands anticipated. These include pasture, livestock, citrus, sod, row crops, and nursery.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.11 Page A- 8: How was the ECFTX model calibration dataset used in estimating the County specific L/R average gpcd?	Please refer to Appendix A for water demand projection methodologies. The 2011-2015 water use data contained in the ECFTX model calibration dataset was used for the basis of the 5-year average. For additional information on the model calibration data set refer to the ECFTX Model Documentation Report (www.cfwiwater.com).
John Pottinger, Friends of the Wekiva River	5/15/2020 71.12 Page A-12 states "The Districts did not attempt to identify where future reclaimed water flows or beneficial use would occur." Did the model account for groundwater recharge by existing reclaimed water used for landscape irrigation? If so, how was the reclaimed water distributed within the study area?	The ECFTX model did account for existing recharge associated with reclaimed water, landscape, and agricultural irrigation. Please refer to Appendix D and the ECFTX Model Documentation Report for details and methodologies.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.13 Table A-13e (page A-127): Why isn't beneficial reuse shown for OCUD – Easterly WWTF or Northwest WWTF? Both provide beneficial reuse for residential irrigation and groundwater recharge. Was the effluent flow to Lake Marden counted as recharging the surficial aquifer in the ECFTX model?	The Hydrologic Assessment Team (HAT), a collaborative team of all stakeholders, agreed to the recharge and values in the ECFTX model. Please refer to Comment #71.12, Appendix D, and the ECFTX Model Documentation Report for details and methodologies. Spatial data is also available upon request.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.14 Table A-13e (page A-131): Was the wetlands portion of the Iron Bridge Reuse counted as a recharge input to the groundwater model?	The HAT, a collaborative team of all stakeholders, agreed to the recharge and values in the ECFTX model. Please refer to Appendix D and the ECFTX Model Documentation Report for details and methodologies. Spatial data is also available upon request.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.15 Table A-13e (page A-131): How can the Sanford North WWTF have 11.04 mgd of Beneficial Reuse? The sum of Sanford North and South do not total to 11.04 mgd.	As noted in Appendix A, there are anticipated supplemental flows to some of the reclaimed water flows in the CFWI Planning Area. As identified in the Table A13e, Sanford is anticipating 2 mgd in supplemental flows.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.16 Appendix B: Water Conservation • Page B-2: What was the basis for increasing the water volume savings from new showerheads from 5-6 gpd to 16.4 gpd? Industry standards reduced flow rates from 5.5 gpm for showerheads installed before 1992 to 2.5 gpm after 1992, a 55% reduction.	This increase was a collaborative decision by the Water Conservation Team, which consisted of the Districts, utilities, FDEP, FDACS, environmental, and other stakeholders. To ensure consistency between the documents, 16.4 gpd was used as the measured savings from the 2035 Water Resources Protection and Water Supply Strategies Plan & Appendices documents.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.17 • Page B-3, Table B-2: What is the basis for the assumption that Active Conservation programs would continue to reduce demand by 0.98 mgd per year? Isn't it more likely that the annual rate of conservation will decline given that the larger utilities (i.e., the low hanging fruit) have already implemented Active Conservation programs? Is funding available to continue or expand the Active Conservation program?	The basis of 0.98 mgd per year was derived from the regional document savings from the Conservation Implementation Strategy and increased to account for the projected increase in water demand. The 0.98 mgd took into account participants of an anonymous survey that was conducted. The 0.98 mgd only accounted for the quantified BMPs identified during the Conservation Implementation Strategy effort. It is noted that more BMPs will come online and more BMPs will be able to be quantified over the planning horizon. Please refer to Chapter 5 and Appendix B of this 2020 CFWI RWSP and the Conservation Implementation Strategy and Appendices documents on the cfwiwater.com.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.18 • Page B-3: What is the basis for the assumption that Active Conservation will increase in proportion to water demand growth?	The Water Conservation Team recognized that additional water conservation could be achieved in conjunction with increased water demand. Refer to the Conservation Implementation Strategy.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.19 • Page B-4: What percentage of the large AG users has already implemented the Mobile Irrigation Lab conservation measures? How likely is it that AG conservation will continue to increase by 0.17 mgd per year (i.e., what percentage of the low hanging fruit for AG conservation has already been implemented)?	The Water Conservation Team reviewed MIL data and BMPs implemented noting that a large majority of AG have implemented BMPs in the CFWI Planning Area. It is important to recognize the implementation of BMPs does not necessarily result in a reduction of water use for AG due to crop intensification. The Team did recognize that additional BMPs could be implemented by AG users not captured.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.20 • Page B-5: Once implemented, how can the SJRWMD track and confirm that smart controllers are being used properly? Isn't 15% reduction of L/R too aggressive for replacement of sprinkler heads and smart controllers?	As noted in the Conservation Implementation Strategy the 15% reduction was based on documented savings. The Districts rely on their stakeholders to be environmental stewards to successfully implement water conservation projects and programs ensuring that our natural systems are protected into the future.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.21 Appendix C: Minimum Flows and Levels and Water Reservations • Table C-2, page C-7 indicates that the MFL for Palm Springs was not met in 2017. Was this determination based on calculating the mean annual spring flows for the entire period of record or from a limited number of recent years? What data analysis supported the conclusion that Wekiwa and Rock Springs met their MFL?	The 2015 CFWI RWSP concluded Palm Springs was not met as of 2005 with a deficit of 1.8 cfs. Because we estimated additional impact from 2005 to 2014 using the ECFTX model, we concluded that Palm Springs was still not met as of 2014. Wekiwa and Rock Springs were assessed the same way. For additional information refer to Comment #71.1 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.22 • Page C-15: The Draft 2020 CFWI RWSP used a "2014 Reference Condition (RC)" to determine the available "freeboard." The draft RWSP states that the 2014 RC represents the "aquifer conditions that would be expected if 2014 water demands (619 mgd) were repeatedly realized over the 12-year simulation period" (2003-2014), and further states "given the rainfall that occurred over the period 2003 to 2014." As we understand, this means that the transient model was run for 12 consecutive years with the monthly rainfall patterns that occurred from 2003 thru 2012. Then the 2014 monthly withdrawals were repeated each year of the simulation. Is this correct? If so, were the monthly withdrawal patterns for each of the 2025, 2030, 2035 and 2040 withdrawal conditions simulated over a 12 year with the same rainfall patterns as 2003-2014 and with the projected withdrawal conditions repeated year to year?	While the simulations of future conditions were each based on a single long-term average withdrawal estimate, the calibration and verification period (2003-2014) show varying trends in different types of water use consistent with changes in the distribution of population factors, such as changes and declines in differing rural and urban market segments instead of a stable, constant long-term average. In order to compare the past condition and the future withdrawal scenarios directly, we needed to represent a past reference condition in the same way as the future conditions: a stable long-term average withdrawal that represented a stable level of population and development, with variation being driven only by weather effects. To create this Reference Condition (RC), the year 2014 was used as the reference basis for population distribution and urban development. For this reference development condition, a corresponding long-term average groundwater withdrawal rate was calculated with monthly variations in withdrawals driven by weather conditions and groundwater withdrawal responses that were observed during the calibration and verification period (2003-2014). Separate trend periods were developed for these variable population factors to help normalize peaking factor multipliers (monthly) for water use values and provide the long-term, stable average withdrawal values needed for use in the 2014 RC

		that could be considered representative of a relatively stable population. Developing a long-term average reference condition groundwater withdrawal rate and the appropriate pattern of monthly variations is a complex multi-step process and is described in Appendix D in this 2020 CFWI RWSP.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.23 • Page C-16/17 states that 14 potential criteria were excluded from the assessment of groundwater availability including " MFLs yet to be developed that will, as necessary, replace existing, adopted MFLs for … one river segment (Wekiva River at State Road 46), six springs (Miami, Palm, Rock, Sanlando, Starbuck, and Wekiwa) were also excluded." However, page 46 of the draft RWSP states that the currently adopted MFL for the Wekiva River at SR 46 was the basis for determining that groundwater withdrawal should be limited to 760 mgd. Please explain this discrepancy.	As noted in this 2020 CFWI RWSP, more than one MFL (in addition to wetlands, etc.) was used in the groundwater availability analysis. The adopted MFLs for Wekiva River at State Road 46 and six springs (Miami, Palm, Rock, Sanlando, Starbuck, and Wekiwa) are currently under reevaluation. The adopted MFLs of these water bodies were used to support the groundwater availability analysis, because the reevaluations of these MFLs water bodies were not completed at the time of the groundwater availability analysis.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.24 Appendix D: Evaluation of Water Resources Page D-10: How was downward leakage from the surficial aquifer to the UFA estimated?	The ECFTX Model development was a collaborative process that underwent several years of review including an independent Peer Review Panel. Please refer to Appendix D and the ECFTX Model Documentation Report for specific information regarding calculations. The raw data files for the ECFTX Model are available on www.cfwiwater.com.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.25 • Page D-10: How was increased hydraulic conductivity near springs input into the ECFTX groundwater model? Was hydraulic conductivity only adjusted for the cell that contains the springs or also for adjacent cells? What is the basis for determining how many cells are adjusted? What typical conductivity values are used for cells near springs? What conductivity values were used for cells that are not near springs? Were the same conductivity values used near all springs? Did spring magnitude or the number of cells where conductivity was adjusted affect selection of conductivity?	Refer to Comment #71.24 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.26 • Page D-11 states that limited historical AG withdrawal data were available during the scenario period. What historical AG withdrawal data were available in the CFWI areas of SJRWMD during the 2003-2014 periods?	As noted in Appendix D, reported data varied permit by permit. Where reported data was not available, estimates were made using the best available data (e.g., AFSIRS). Permit data is available upon request to the respective District.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.27 • Page D-11: If the AFSRIS program was used to estimate AG withdrawals in the SJRWMD CFWI area, what is the date of the crop data?	For each year in the calibration data set, if an AFSIRS or other agricultural estimate was necessary, the Districts used permit issuance data, land coverage data, parcel data, FSAID data, etc. to estimate the irrigated acreage and crop type. In addition to FSAID, SJRWMD has a field verified irrigated AG coverage for 2000, 2005, 2010, and 2015.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.28 • Page D-11 states that AG withdrawals were estimated based on CUP data for crop type, acreage and irrigation efficiency. How recent are those data? How were AG withdrawals estimated for withdrawals with no CUP?	The calibration data set is from 2003-2014. Data was as recent as 2014, which is the reference condition. FDACS' FSAID has an irrigated lands geodatabase, that identifies all irrigated agricultural crops regardless of whether or not there is a consumptive use permit. In addition, SJRWMD has a field verified irrigated AG coverage for 2000, 2005, 2010, and 2015. These data sources were used to estimate the crop and irrigated acreage for AFSIRS.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.29 • Page D-11: How were inflows to the aquifer from Lake Marden and the drainage wells simulated?	The HAT team recognizes that Lake Marden is not a Rapid Infiltration Basin, however, it provides direct recharge to the UFA, and therefore was simulated using the well package, similar to RIBs. Inflows for Lake Marden in the 2014RC were developed in collaboration with OUC. Refer to Comment #71.25 response for additional information.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.30 • Page D-13: How do the spring and well level calibration criteria compare to other aquifer modeling studies?	As noted by the independent Peer Review and the collaborative team effort and professional expertise, the ECFTX Model's achieved calibration is superior to that achieved for previous versions of the model as well as other regional models in the area.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.31 • Table D-2: Why are the residual means for the CFWI area higher than those for the ECFTX area? What does that imply?	Refer to Comment #71.24 response.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.32 • Table D-4 indicates that Wekiva River watershed Deviation Volume is -56.5%. How was this calculated? The criterion for is DV < 15%. Does this mean that the model always significantly underestimates the flow in the Wekiva River watershed? At what location or station in the river is that Deviation Volume calculated?	Refer to Comment #71.24 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.33 • Table D-6, page D-30: o Why is there such a difference between the CFWI RWSP Demand Projections from 2014 to 2015 (20% increase)?	As noted in Appendix D, the 2014 reference condition was modified with peaking factors to represent average rainfall conditions over the 2003 to 2014 calibration period. 2015 in this 2020 CFWI RWSP is actual data where reported and estimated where CUP data was not available and did not incorporate modeling peaking factors. For additional information regarding peaking factors in the 2014 RC, refer to the Calculation of Peaking Factors section of Appendix D and the ECFTX Model Documentation Report.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.34 • Table D-6, page D-30: o Why is there a difference of 89 mgd between the 2014 ECFTX modeled groundwater withdrawal (619 mgd) and the CFWI RWSP demand projection (530 mgd)? Should this have been 590 mgd (See Table 13 of the RWSP)? Why isn't the 2014 RC based on the actual 2014 withdrawals?	Refer to comment #71.33 response.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.35 • Table D-6, page D-30: o Did the estimated 2040 groundwater demand of 855 mgd assume no new alternative water supplies and that all future demand would be withdrawn from groundwater?	As noted in this 2020 CFWI RWSP, all future water demands were assumed to be from groundwater unless alternative water sources were permitted. Also as noted, the modeling of alternative water supplies will occur during any needed prevention and recovery strategies and/or during the CUP/WUP issuance process.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.36 • Page D-30: How were changing population densities, such as changes in rural vs urban densities, considered in the future withdrawal scenarios?	As discussed in Chapter 3 and Appendix A, Bureau of Economic and Business Research (BEBR) developed a population model and provided parcel level projections. Please see the BEBR population methodology on www.cfwiwater.com.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.37 • Figure D-17a: were the monthly PS demands for 2003-2014 taken from the Trend Line or the "unaltered"?	As discussed in Appendix D, the method and codes are fully defined in the Calculation of Peaking Factors section. Individual peaking factor graphs for public supply are available upon request.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.38 • Figures 17b & c: Same question for non-PS. Which of these lines were used for DSS, AG, CII, L/R and PG?	As discussed in Appendix D, the method and codes are fully defined in the Calculation of Peaking Factors section.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.39 • Figures D-22 and D-23 appear to be reversed.	Figures have been corrected in the document.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.40 • In Figure D-21, what is the explanation for the -10 to <5 ft reduction in the SAS level in SE Lake County near Orange County line? What are the withdrawals from the SAS at that location?	This area was simulated with 2.88 mgd in return flow to the SAS (Model Layer 1) in Ref2014 and zero mgd in the 2040 future scenario. For additional information refer to Comment #71.24 response.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.41 • In Figure D-22, what is the explanation for the -10 to <5 ft reduction in the LFA potentiometric level just west of I-4 and south of the FL Turnpike? What are the withdrawals from the LFA at that location?	The reduction in the LFA potentiometric level at that location is due to an increase in simulated withdrawals from the LFA by SJRWMD CUP 3159 (OUC). For additional information refer to Comment #71.24 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.42 • Figures D-28 & D-30, using Model Layers 1 & 3, why would the wetlands east of Johns Lake in west Orange Co. be more stressed for the 2025 & 2030 conditions than for the 2040 conditions (see Fig. D-32)?	Figures have been corrected in the document.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.43 • Table D-9: o What strategies will be implemented by the SJRWMD to reduce the currently permitted groundwater withdrawal of 1,064 mgd to the 760 mgd "sustainable" withdrawal? o For the Wekiwa and Rock Springs springshed, please provide a list of the CUP holders and their permitted withdrawals, the 2014 actual withdrawals, the estimated 2014RC and 2020 withdrawals, and the projected 2025, 2030, 2035 and 2040 withdrawals. Thjis information should be included in the 2020 CFWI RWSP.	This 2020 CFWI RWSP identifies project options that far exceed those necessary to meet the projected shortfall of 95 mgd. Projects likely to be implemented will have the most benefit to the CFWI Planning Area after further analysis is conducted.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.44 • Page 61 states "… the sustainable limit is not anticipated to be reached until after next update in 2025 …" and "…the MFL water bodies in the Wekiva Basin, including Wekiwa and Rock Springs, are scheduled for re-evaluation in 2020." If the MFL re-evaluation determines that groundwater withdrawal should be reduced below the "sustainable" limit of 760 mgd, what strategies would the SJRWMD require the CUP holders to implement to achieve the required reduction?	The most recent permit tracking sheet (May 2019) and the well data files are available at www.cfwiwater.com. In addition, public records requests may be submitted to the respective Districts for permit allocations.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Pottinger, Friends of the Wekiva River	5/15/2020 71.45 Appendix E: Recommendations • Page 88 states that "In accordance with Section 373.0361(6), Florida Statutes (F.S.), nothing contained in the water supply component of a RWSP should be construed as a requirement for local governments, public or privately owned utilities, special districts, self-suppliers, multi-jurisdictional entities, and other water suppliers to select that identified project…" What strategies will the SJRWMD use to reduce the currently allowable withdrawals of 1064 mgd under their existing CUPs to avoid exceeding the 760 mgd sustainable yield? Will the SJRWMD reduce existing groundwater withdrawal allocations in CUPs to achieve the "sustainable" withdrawal rate for the CFWI area?	Please refer to comments #71.5 and #71.7 responses.
John Pottinger, Friends of the Wekiva River	5/15/2020 71.46 Attaining a sustainable yield is the critical component of the 2020 CFWI RWSP. Given that there are no "requirements" for local governments, public or privately owned utilities, special districts, etc., to comply with meeting the sustainable yield, FOWR believes that it is critical for the 2020 CFWI RWSP to identify specific strategies that can be implemented to avoid withdrawals exceeding the sustainable yield within the next six to seven years. FOWR requests your prompt attention to these concerns. We are available to discuss your written responses to these questions and concerns at your convenience. Please let us know when you would be available to discuss them. Friends of the Wekiva River, Inc. is a 501(c) (3) nonprofit organization dedicated to the promotion and protection of the unique environmental and recreational values of the Wekiva River and its tributaries, the ecological integrity of the Wekiva Basin and the restoration and continuation of the Wekiva River system in its natural state. Sincerely, John Pottinger, President, Friends of the Wekiva River	SJRWMD staff held a teleconference with FOWR on May 12, 2020 to discuss preliminary comments concerning the SJRWMD MFLs. The CFWI Technical Writing Team held a teleconference with FOWR on June 30, 2020 to discuss the submitted comment letter.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Emily Floore, General Public	5/15/20 72.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Dana Negaran, General Public	5/15/20 73.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Deirdre Beck, General Public	5/15/20 74.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. And furthermore I can't believe we're still flushing with drinking water!	Please refer to Comments #8 and #37 responses.
Cynthia Burrows, General Public	5/15/2020 75.0 As a native Floridan who has lived along or near the St. Johns River for the entirety of my 59 years, and in Central Florida for the past 32, I am asking you to: STOP - LISTEN - PROTECT - CONSERVE Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth. Comments continued on next page.	Please refer to Comments #8 and #37 responses.

	Comments continued from previous page. CFWI 2020 Regional Water Supply Plan: Are these plans & proposed actions fulfilling your mission: The mission of the St. Johns River Water Management District is “to protect our natural resources and support Florida’s growth by ensuring the sustainable use of Florida’s water for the benefit of the people of the District and the state", and have you taken an honest & thorough assessment of the long term impacts? This plan does not prioritize water conservation, does not incorporate sustainable growth practices and relies heavily on surface water withdrawals instead of proven, cost-effective conservation strategies. I have serious concerns that at minimum, the proposed withdrawals would: * Worsen existing pollution problems, * Increase the frequency of toxic algae blooms, * Further reduce flow and increase salinity levels farther upstream, and * Adversely impact the fisheries, wildlife, and submerged vegetation in and along the St. Johns and its tributaries. I urge the CFWI to remove surface water withdrawal projects from the water supply plans and prioritize living within our water means with conservation and sustainable growth. No time like the present to Chart a New Course, one that makes conservation and sustainability as the top priority and will have long-lasting positive results for generations now and in the future. Thank you for hearing my voice, Cindy	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Tom Harding, General Public	5/15/2020 76.0 Continued draw of fresh water will alter native habitat and allow salt water to intrude farther up the SJR. This not only impacts the ecology, but leads to salt water intrusion into fresh water aquifers. Trying to solve water demand in one area, while creating damage and decline in another is poor management and conservation.	Please refer to Comments #87.3 and #87.4 responses.
Anne Corpora, General Public	5/15/2020 77.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.
Ellen Doran, General Public	5/15/2020 78.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
William Roberson, General Public	5/15/2020 79.0 If we destroy the ecosystems that support us, where will we live? Take a good look at where we're going and where we've come from. Give the land a chance to recover and don't over build/over-promise our shared resources. Please don't do this. Thank you.	Thank you for your comment.
Gail Rich, General Public	5/15/2020 80.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.
Sarah Whitaker, SMW GeoSciences, Inc.	5/15/2020 81.0 As I have previously indicated at several workshops, CFWI water demands for the City of Minneola are significantly less than that needed for water supply planning by the City of Minneola, the SJRWMD, and the CFWI. The City's potable water demands are currently at the year 2030 CFWI projections identified in Table A-5b. The CFWI projections should acknowledge current water demand conditions and the influx in population which has occurred over the last 5 years. Like other cities in South Lake County, the City of Minneola is rapidly growing and the population and water demand projections in the document do not reflect the rate at which this is occurring. Continued development and new home construction in the area is further supported by the newly opened Minneola Interchange on the Florida Turnpike.	Please refer to Comments #50 and #54 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Gary Reed, General Public	5/15/2020 82.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.
Heidi Graves, General Public	5/15/2020 83.0 Why spend billions of dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by using our water resources more responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater, and finally get serious about addressing the root causes of our water use problems and unbridled growth.	Please refer to Comments #8 and #37 responses.
Mary Johnson, General Public	5/15/2020 84.0 Please do not allow this to go forward. We need to conserve our river water to protect the wetlands. We need to think of the herons, the manatees, the turtles, and all of the vast wildlife that inhabit our river. These animals have a right to a clean, safe environment as much as we do. Please go out and observe nature. Take some time to appreciate the spectacular creatures that make the St John's River their home.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Edward McDonald General Public	5/15/2020 85.0 The following are comments to the 2020 CFWI RWSP (the plan). The word "sustainable" is used very frequently within the text of the plan, but it is never really defined. It's my opinion that the following is a good, working definition of "sustainable water": Sustainable water systems should provide adequate water quantity and appropriate water quality for a given need, without compromising the future ability to provide this capacity and quality. It requires that both quantity and quality of water cannot be compromised. It is also my understanding that the entire reason for the development of the plan is that future water demand will cause the traditional (the upper Floridan aquifer) to be unsustainable. This unsustainability of the upper Floridan aquifer is why alternative water projects are needed. It follows that each and every alternative water project must be sustainable on its own and also they cannot cause any water source to be unsustainable. Assuming that all of the above is true, do all of the projects listed as possible alternative water projects meet the above criteria? The answer is no. The Polk County lower Floridan aquifer (brackish water) projects are not acceptable as they contribute to the unsustainability of the upper Floridan aquifer. The source of water that replenishes all withdrawals from the lower Floridan aquifer is the overlying (upper) Floridan aquifer. No exploratory well or any test or model run has shown otherwise. There is one other major problem with using the lower Floridan aquifer in Polk County and that it is a very wasteful source of potable water. The chart doesn't show it, but 25 percent of the water withdrawn is wasted via a deep waste water injection well. For the 45 MGD shown in the Water Supply and Water Development Options slide, 56.25 MGD must be withdrawn. Who in their right mind would agree that "wasting" 11.25 MGD of water was acceptable? Let's hope that the other proposed alternative water projects are not as bad as using the lower Floridan aquifer in Polk County.	Any alternative water supply project(s) that are selected for implementation by the Cooperating Entity will undergo a rigorous evaluation of economic, technical, and environmental feasibility prior to project construction and permitting as needed.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
John Steinmeyer, General Public	5/15/2020 86.0 Please do not allow this to go forward. We need to conserve our river water to protect the wetlands. We need to think of the herons, the manatees, the turtles, and all of the vast wildlife that inhabit our river. These animals have a right to a clean, safe environment as much as we do. Please go out and observe nature. Take some time to appreciate the spectacular creatures that make the St John's River their home.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lisa Rinaman, St. Johns Riverkeeper and Florida Springs Council	5/15/2020 87.1 ***Letter from St. Johns Riverkeeper & Florida Springs Council (5/15/2020)*** Dear Mr. Blalock: As Floridians are preoccupied with trying to protect our families and keep our economy going during the COVID-19 Crisis, water planners in Central Florida are busy paving the way for the withdrawal of millions of gallons of water from the St. Johns River to fuel unbridled growth. On behalf of St. Johns Riverkeeper's (SJRK) and Florida Springs Council (FSC) members, we respectfully submit public comments to identify potential errors and call out the shortcomings of the Central Florida Water Initiative (CFWI) 2020 Water Supply Plan that put our river, our springs and Florida's future at risk. In addition, we request additional information that is necessary for public dialogue and transparency. The St. Johns River is a treasured watershed that provides ecological, recreational, economic and aesthetic benefits. Approximately 100 springs found largely in the Middle Basin of the St. Johns in Central Florida, provide up to 30% of the St. Johns' natural flow. Fortunately, the State of Florida, the St. Johns River Water Management District (SJRWMD) and local governments throughout the watershed have invested millions of public dollars in an attempt to mitigate the damage to the St. Johns. However, those efforts have fallen short as evidenced by the current state of the River. Every effort must be made to avoid undermining significant public investment and the health of Florida's only American Heritage River. To do so, state agencies must focus on cumulative impacts and holistic solutions to protect the St. Johns and springs today and for future generations. Unfortunately, the health and integrity of the St. Johns River system is threatened due to years of neglect and the cumulative impacts of a growing population. Comments continued on next page.	Thank you for your comment.

	Comments continued from previous page. • Overuse of the Floridan Aquifer in Central Florida has reduced spring flow and freshwater flows to the St. Johns River. • Development and overuse of the Floridan Aquifer has led to a loss of wetlands. • Increase nutrient loads from reclaimed water, sewage sludge and runoff from new development has undermined the health of the St. Johns and public investment. • Dredging at the mouth of the St. Johns has increased saltwater intrusion further damaging wetlands and submerged vegetation. • Sea level rise has driven saltwater intrusion further up river. • Increasing temperatures will increase the frequency of algal blooms and rate of evapotranspiration (ET), resulting in ecological degradation, and lower surface water levels. Clean, fresh water is the lifeblood of the St. Johns River, its springs and tributaries. Our wetlands, forests, riparian zones, and aquatic plants provide the habitat and food sources that sustain healthy plant, fish, and wildlife populations. The St. Johns also sustains nearly 5 million people who live within its watershed. It is our collective duty to protect this natural treasure. 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, its springs and its tributaries. SJRK challenges the need and viability of water withdrawals and questions the societal benefits in light of the enormous economic and environmental costs. Why spend billions of public dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by allocating and using our current water supply resources more judiciously, responsibly and efficiently? The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution. Let's keep the straws out of the St. Johns, quit over-allocating our groundwater to feed unbridled growth, and finally get serious about addressing the root causes of our water use problems.	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lisa Rinaman, St. Johns Riverkeeper and Florida Springs Council	5/15/2020 87.2 On behalf of the St. Johns Riverkeeper and Florida Springs Council members, we respectfully ask the CFWI Steering Committee to consider the following recommendations: **Stimulate Sustainable Growth**, Not Unbridled Growth at our river and our springs' expense. Plan for Florida's population growth to better protect natural lands, promote livable communities, and save taxpayer dollars. Protective growth standards should be based on available water supply and protection of clean water for human consumption and natural systems.	The CFWI RWSP identifies reasonable options for developing sources, provides planning level technical and environmental analysis, plus conceptual cost estimates. Section 163.3177(6)(c) F.S. indicates within 18 months after Governing Board approval of a RWSP, local governments in the region must update their comprehensive plans to account for future growth. The Districts do not have the authority to manage growth; ultimately, local governments are responsible for the planning and approval of development related land uses, including those water supply facilities required to meet projected population growth. See Regional and Local Planning Coordination in Chapter 1 for additional information. The Department of Economic Opportunity is responsible for overseeing the state of Florida's growth management directives.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lisa Rinaman, St. Johns Riverkeeper and Florida Springs Council	5/15/2020 87.3 **Prioritize Water Conservation**, efficiency, and reuse strategies instead of expensive, harmful water withdrawals. Water conservations strategies in the CFWI RWSP are wholly insufficient and exclude even the most obvious and cost-effective water conservation measures in favor of unsustainable, expensive, unnecessary, and damaging surface water projects.	The CFWI RWSP identifies reasonable options for developing sources, provides planning level technical and environmental analysis, plus conceptual cost estimates. Section 163.3177(6)(c) F.S. indicates within 18 months after Governing Board approval of a RWSP, local governments in the region must update their comprehensive plans to account for future growth. The Districts do not have the authority to manage growth; ultimately, local governments are responsible for the planning and approval of development related land uses, including those water supply facilities required to meet projected population growth. See Regional and Local Planning Coordination in Chapter 1 for additional information. The Department of Economic Opportunity is responsible for overseeing the state of Florida's growth management directives.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lisa Rinaman, St. Johns Riverkeeper and Florida Springs Council	5/15/2020 87.4 **Protect the St. Johns River and Florida Springs** from the inevitable harmful impacts of overuse of our Aquifer and surface water withdrawals. A holistic approach, which balances the District's mission to provide water for consumptive use and protect Florida's water resources must be adopted. The current Draft Plan only addresses one side of the equation and therefore is fundamentally unsound. Safeguards must be in place to protect our aquifer, our springs and our river and to provide safe drinking water.	A holistic approach of MFLs, recovery and prevention strategies, and other resource protection measures are discussed in Chapter 4, Appendix C, and Appendix D. Chapter 7 and Appendix E identifies a suite of water supply and water resource development project options that stakeholders can pick from to implement to help meet the future water demands of the CFWI Planning Area. With respect to the St. Johns River as a potential source, the Water Supply Impact Study (WSIS), was a four-year study which provided a comprehensive and scientifically rigorous analysis of the potential environmental effects to the St. Johns River. The WSIS was peer-reviewed by the National Research Council and confirmed the findings of earlier investigations indicating that the St. Johns River can be used as an alternative water supply source with minimal to negligible environmental effects. The WSIS was endorsed by the Academy of Sciences; as part of the SJRWMD's ongoing planning efforts and to reflect the most recent conditions and data and comments received, SJRWMD is in the process of updating the WSIS.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lisa Rinaman, St. Johns Riverkeeper and Florida Springs Council	5/15/2020 87.5 **Genuine Participation with Stakeholders and Local Governmental** officials must occur throughout the area of impact including throughout the Middle and Lower Basins of the St. Johns River.	This 2020 CFWI RWSP was developed in a dynamic and collaborative public process, in coordination and cooperation with the Districts, FDEP, FDACS, water supply authorities, local government utilities, agricultural and industrial communities, environmental organizations, and other interested parties. Various methods and forums were used to notify and solicit input from stakeholders, including a technical methods workshop and two online webinars. The webinar recordings are available on the cfwiwater.com site.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Lisa Rinaman, Waterkeepers Florida	5/15/2020 88.0 ***Letter from Waterkeepers Florida (5/15/2020)*** Dear Mr. Blalock: On behalf of Waterkeepers Florida, we appreciate the opportunity to submit comments as part of the Central Florida Water Initiative (CFWI) 2020 Water Supply Plan. Waterkeepers Florida unites 13 Waterkeeper organizations working in the state of Florida to protect and restore our water resources. Our priorities include water conservation, stopping pollution at its source and sea level rise readiness. Clean, abundant water is critical for Florida's future. Water is the linchpin of our environment and our economy, sustaining natural systems, public health, tourism, recreational and commercial fishing, agriculture, and development. Making bad water-use decisions now will only result in costlier and more contentious challenges in the future. With population estimated to grow by 49% between now and 2040 with the CFWI area, a balanced approach to water supply planning must assure the sufficient availability of water for natural systems and beneficial consumptive uses which serve the public interest. Unfortunately, CFWI only projects that less than 7.5% of the projected demand will be met with water conservation savings. A growing body of research shows that water conservation has numerous significant advantages over alternative water supply including: ● lower capital and incremental costs; ● reduced energy consumption which minimizes greenhouse gas emissions; ● improved water quality by reducing runoff from inefficient irrigation practices;	Please refer to Comments #87.2, #87.3, #87.4, and #87.5 responses.

	● increased flow and levels in springs, rivers, lakes, and aquifers; ● greater predictability and sustainability for all water resource users. Additionally, surface waters, identified as the primary "alternative water source" by CFWI are dependent upon adequate rainfall. By relying upon surface water withdrawals to meet Florida's future water needs, policymakers are locking our state into an unavoidable clash between the needs of our natural systems and the needs of consumptive water users during times of decreased rainfall. For instance, during a drought, when our rivers and lakes will most need to maintain their flows and levels for sustaining wetlands, fisheries, and estuarine systems and to reduce saltwater intrusion, water users (particularly agricultural and residential users), will need to withdraw the greatest amounts of water. The Florida-Georgia water wars and the dramatic decline of Apalachicola Bay serve as a vivid reminder of the devastating impacts to our waterbodies, fisheries, and downstream communities that can result from and the mismanagement of water resources and the reliance on unsustainable sources of supply to meet unmitigated demand. The bottom line is that relying on surface water withdrawals to meet Florida's future water needs is unsustainable in the long-term and unwise in the short-term. Therefore, we recommend that policymakers focus more attention on decreasing demand through conservation and increased efficiency. In order to ensure a clean and abundant water supply for Florida's communities and agricultural sector, we recommend policymakers take these actions: ● Water conservation must be established as a statewide priority as it is the most cost-effective way to secure Florida's water supply. All consumptive use permit applicants should be required to have measurable and enforceable goal-based water conservation plans. ● Price water to promote conservation. Placing a reasonable price on the quantity of water used would incentivize water conservation and direct water towards higher value uses. ● Expedite the establishment and adoption of Minimum Flows and Levels and incorporate them into water supply planning statewide.	

	Water policy must include statutory consequences for failing to meet regulatory standards to ensure that restoration will not become more difficult and more costly for future generations. ● Planning to meet the water supply needs of the future requires knowing how much water is being used today. All groundwater withdrawals of more than 100,000 gallons per day should be monitored. ● Water policy should minimize and regulate the amount of public money transferred to private interests through capital expenditures, especially in cases where there is no assurance of the cost effectiveness of projects. ● Water policy must not allow unilateral inter-basin transfers of water. For example, water management districts should not make water allocation decisions beyond their jurisdictional boundaries. ● Implement water-use planning and effective, monitored water conservation best management practices in the agricultural sector. ● Moratorium on consumptive use permits until robust water conservation protects Florida's limited water resources and natural systems. Prioritizing water conservation reduces the need for expensive, unsustainable water withdrawals while protecting downstream users and ecosystems. Responsible demand management will ensure that the needs of reasonable and beneficial water users are met today and into the future. Florida needs bold leadership from policymakers on water issues to ensure the long-term environmental health of our natural resources and economic well-being of our communities in the years to come.	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.1 Letter submitted by Chris Farrell (Letter from Audubon of Florida (5/15/2020) Audubon Florida appreciates the opportunity to comment on the Draft Central Florida Water Initiative Regional Water Supply Plan (Plan). We appreciate the wide variety of detailed information provided and applaud the efforts of all staff and partners involved. Since the 2015 plan, many positive forward-looking steps have been taken to improve planning and coordination in the region. These improvements must now translate into meaningful actions that conserve Florida's water and safeguard our great natural heritage. A critical aspect of water supply planning is to ensure the health of our natural systems. Florida's environment supports our daily lives and is a critical component of our recreational and tourism-based economy. Sustainability in all aspects of water supply, including environmental demands, should be the guiding principle for developing and implementing water supply plans. With this in mind, please review our comments on the draft plan below.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.2 The plan clearly describes the growing water crisis we face in the CFWI region, and unfortunately throughout Florida. The CFWI Planning Area remains listed as a Water Resource Caution Area, a designation shared by almost the entire peninsula of Florida. The plan projects a 36% increase in water demand from 2015 (an additional 240.47 million gallons per day by 2040). It also states 13 water bodies are currently not meeting their minimum flows and levels (MFLs) and 5 more could be added by 2040. Within this time frame, groundwater withdrawals could stress an additional 6,100 acres of wetlands in the region beyond the 36,000 acres already stressed in the 2014 reference condition. This stark environmental outlook shows the potential for deteriorating conditions in a region already experiencing harm.	Thank you for your comment.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.3 Quantitative information is needed on requirements to meet environmental needs, including Water Reservations and recovery of Minimum Flows and Levels. One requirement of the plan is, to "include a list of water supply options sufficient to meet the water needs of all existing and future reasonable-beneficial uses." This includes meeting environmental needs such as Minimum Flows and Levels (MFLs) and fulfilling all required water reservations, yet these items are not represented in any of the demand projections. Conservation measures and water supply projects clearly state their water supply benefit in terms of demand reductions or water supplied (in mgd). Some estimate of the water required to meet environmental needs should also be provided, including flows required for the health of downstream systems. Environmental needs may vary depending on which projects are selected for implementation (e.g., additional groundwater withdrawals may increase volumes needed to recover MFLs), but this is valuable and relevant information that should be provided in the plan. Quantification of environmental needs will assist districts as they consult with local governments and other partners on project prioritization and plan implementation.	This 2020 CFWI RWSP is a planning level effort; MFLs are recognized as resource constraints on the development of water sources. Also included are a variety of water supply and water resource development project options that can assist in the recovery or maintenance of MFLs.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.4 Additional groundwater withdrawals in the CFWI Planning Area should be avoided. The section on groundwater availability should be revised to state that any additional withdrawal of groundwater is not advisable as it will negatively impact the recovery of MFLs in the region and hasten harmful water levels in the Wekiva River and two Outstanding Florida Springs (Wekiwa Springs and Rock Springs). The 2014 Reference Condition begins with 36,000 acres of stressed wetlands and 11 of 39 MFLs evaluated not being met. The wetland assessment only covered about 20% of the wetlands in the region; it is likely some impacts were not captured by this effort. As described in the plan, modeling results show a "corresponding predicted increase in hydrologic stress on environmental systems" as withdrawals increased. Unfortunately, instead of reaching the conclusion that further groundwater withdrawals should be avoided, the plan states "it was determined that the planning-level groundwater availability should be limited to no more than the volume of groundwater under which no additional MFLs would be exceeded." It is not clear why an action that has been demonstrated to harm natural systems in the region should be continued, especially to the point at which another river is on the brink of significant harm. Any additional groundwater withdrawal is ill-advised; the plan should emphasize that withdrawals increase hydrologic stress in the area and detract from MFL recovery efforts.	Please refer to Comment #70.7 response.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.5 The plan should more clearly detail a sustainable approach for managing and meeting water demands in the CFWI The plan includes water supply projects, water resource development projects, and conservation measures that more than double the anticipated increase in water demands. These efforts vary in effectiveness and should not be considered equivalent to one another (i.e., not any combination of projects that meets demand projections will actually meet all needs in the area – particularly environmental needs). Audubon recommends a strategy that prioritizes demand reduction and increasing the beneficial use of reclaimed water. With proper treatment and project design, reclaimed water can help meet water supply and water quality objectives. The storage and beneficial use of stormwater runoff should also be considered for water that is truly excess (i.e., water that can be diverted without impacting the needs of receiving bodies). Least preferred strategies include the use of surface water and additional groundwater pumping (including brackish water from the LFA), and should only be considered after all other strategies have been exhausted.	Please refer to Comments #8 and #37 responses.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.6 Conservation measures that reduce water demands should be the plan's first priority. The section on conservation captures a combination of active and passive measures that can help reduce water demand in the CFWI. Conservation eliminates the need for costly projects that remove water from the environment and therefore contribute greatly towards the goal of a sustainable water supply. Notably, the plan has produced a suite of measures larger than the 37 mgd established in the 2015 plan. We commend all involved for their efforts, especially those from utilities or non-governmental organizations who participated in this process. Though conservation measures have great value, implementation rates have been consistently low. As noted in the plan, "water conservation measures are influenced by several factors including, but not limited to, voluntary user actions, level of education and financial incentives, passive savings, and participation rates." Water management districts and their partners should continue to explore methods for increasing the adoption and implementation of these beneficial practices. While it may be outside the scope of the plan, DEP and water management districts have a responsibility to evaluate and propose potential legislative or regulatory mechanisms to help protect Florida's water resources. Early efforts from the CFWI's Regulatory Team were primarily aimed at making regulations consistent within the planning area. A new focus on regulations to help reduce water demands in the CFWI area is warranted. Of particular importance is the role of high-intensity irrigation in residential development – a topic that unfortunately is not addressed in the plan. Irrigation of residential lawns is likely a significant portion of the 592 mgd projected demand for public supply in 2040. In suburban residential areas like those common in the	Please refer to Comments #8 and #37 responses.

	CFWI area, 50% or more of water demand is for irrigation (a value that can exceed 80% during drought). The continued propagation of landscapes requiring high-intensity irrigation should be re-evaluated considering the documented environmental harm from overuse of water, the cost to build and maintain water supply projects, and the availability of alternative, attractive, wildlife-friendly landscaping practices.	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.7 Reclaimed water and reuse can help solve water quality challenges and meet demands. Wastewater is a large and growing source of water that will play an integral role in solving our water supply challenges. Further, many reclaimed water projects can help meet water supply demands while also reducing water quality impacts associated with the disposal of wastewater. We recommend regular coordination between DEP and WMD water-related program staff, as recommended in Section 2.7.2.7 of DEP's Report on Expansion of Beneficial Use of Reclaimed Water, Stormwater and Excess Surface Water (Senate Bill 536), with the goal of identifying and prioritizing projects that benefit water quality and water supply goals. Reclaimed water has played a significant role in Florida's water supply and must continue to play an ever-growing role. SB 712, the Clean Waterways Act passed by the legislature in March 2020, includes a provision for DEP to initiate rulemaking for the potable use of reclaimed water, an indication that our leaders in government believe reclaimed water can be used efficiently and effectively to conserve potable-quality water and augment available water supplies. Treatment wetlands are increasing in use throughout the state due to their relatively low cost and diverse benefits. Treatment wetlands efficiently remove a wide variety of constituents and provide habitat for wildlife as well as recreational, educational, and tourism opportunities. Water managers should proactively examine existing wastewater treatment facilities for opportunities to add treatment wetlands and expand reuse options made possible by their water quality improvements. In areas with limited opportunities for land acquisition, conversion of spray fields can be considered. Moving forward, all new treatment facilities should be required to consider treatment wetlands	The Districts recognize that reclaimed water is a beneficial use and have funded a multitude of projects within the CFWI Planning Area. As noted in this 2020 CFWI RWSP, the CFWI Planning Area is a national leader of beneficial use of reclaimed water with over 95 percent being reused.

	in their design alternatives and exceed traditional secondary treatment levels in order to broaden potential applications of their reclaimed water. Irrigation is listed as a beneficial use, but this deserves deeper consideration. While it is beneficial to use reclaimed water over treated, potable water on residential landscapes, labelling the maintenance of resource-intensive and pollution-generating lawns a beneficial use distracts from consideration of beneficial uses that are more essential (i.e., those that supply water for the needs of people, businesses, and the environment). The continued replacement of native landscaping with irrigation and nutrient-dependent lawns is one of the single largest contributors to the ongoing water supply and water quality problems facing Florida. If the need for irrigation is reduced, large amounts of reclaimed water will be available to meet other demands (given adequate levels of treatment).	

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.8 Excess stormwater can be captured for beneficial use; natural surface waters and groundwater should be sources of last resort. Surface waters include Florida's wetlands, lakes, and rivers, and deserve the highest level of protection and scrutiny during water supply decisions. In general, water supply projects that withdraw from natural water bodies should be avoided given their immense value in sustaining Florida's ecology and economy. Healthy watersheds and wetlands are also key to resilience against droughts and supply deficits, flooding, catastrophic wildfire, plus declining water quality and harmful algal blooms. Surface water projects that should be considered are ones that capture stormwater runoff that has no value to or could potentially harm natural systems, i.e., water accurately described as "excess" water. Often, any flows or levels above a threshold relating to harm (e.g., MFL conditions) are labelled by some as excess. This is a dangerous policy for water management that will lead to widespread harm in surface water systems. It is important to consider the ecological values associated with the full range of natural high and low-water events, and lowering surface water levels may detract from the groundwater recharge function of some water bodies. The use of brackish water, as stated in the plan, requires costly, energy-intensive treatment to meet drinking water standards. It also has costs and challenges in dealing with disposal of concentrate from the desalination process. Withdrawing brackish water from the Lower Floridan Aquifer (LFA) has the potential to impact other aquifers and surface waters. This impact will increase as more projects and locations are brought online. For currently permitted projects, appropriate research and planning is needed to ensure withdrawals from the LFA prevent unintended impacts to other waters, including possible harm to water users in southwest Florida using the FAS for alternative water supply. Moving forward, districts and partners should prioritize more beneficial alternatives to groundwater use such as conservation and reclaimed water use.	The Districts recognize the importance of stormwater projects (e.g., AFIRST). Please refer to Appendix E for a list of water supply and water resource development project options.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Julie Wraithmell, Audubon Florida	5/15/2020 89.9 Additional considerations for the plan The CFWI Planning Area is located at the junction of three watersheds. Some proposed projects, like those considering removal of water from the St Johns River, will influence hydrologic conditions in connected and downstream systems. Also, any loss of water in the headwaters of the Everglades could impede restoration efforts for the entire downstream system including the Kissimmee River and Lake Okeechobee. To help guide water supply decisions and to avoid unintended consequences, the plan needs a more thorough discussion of how different water supply options could impact hydrologically connected areas. As mentioned earlier, the water supply plan effectively documents the potential for continued environmental harm in the planning area, including the loss of wetlands and failing MFLs. Absent is a discussion of the state's ongoing water quality restoration plans (Basin Management Action Plans, in particular) as well as water quality impairments within the CFWI. These include the Basin Management Action Plans for the Wekiwa and Rock Springs, Lakes Harney and Monroe, Jessup, and Lake Okeechobee. As increasing demands are placed on these waterbodies as a result of growing water supply needs, restoration of these waterbodies will remain a distant dream, or even worse, we could see further degradation of these waterbodies. The plan will benefit from a section that evaluates the requirements of these restoration plans and the effects of water supply demand within the CFWI on the waterbodies undergoing restoration. Thank you for considering our comments. Please contact us if you have any questions.	Please refer to the Southern Water Use Caution Area Recovery Strategy, Comprehensive Everglades Restoration Plan projects, the draft Kissimmee River Water Reservation, as well as other efforts the Districts have underway or completed to protect our water resources.

Table 1. Comments to the 2020 CFWI RWSP with Responses from the CFWI Team (continued).

Commenter Name/ Entity Represented	Date Received, Comment Number, and Comment	CFWI Response
Telsula Morgan, LLW on behalf of Seminole Tribe of Florida	5/15/2020 90.0 Below are the Seminole Tribes' comments regarding the Central Florida Water Initiatives Water Supply Plan. In the process of inputting the information into your portal, I was kicked out and unable to re-enter the information. The Seminole Tribe of Florida ("Seminole Tribe") is in receipt of the Central Florida Water Initiative Regional Water Supply Plan (CFWI RWSP). The Seminole Tribe appreciates the opportunity to comment on the CFWI WSP and is therefore submitting this letter in order to document some of the Tribes initial concerns. The survival of the Seminole Tribe and its environmental resources depends on sufficient fresh water supply. The Seminole Tribe's waters rights/entitlements have been formalized in the Water Rights Compact Among the Seminole Tribe of Florida, the State of Florida, and the South Florida Water Management District ("Water Rights Compact"), ratified by both the United States Congress and the Florida Legislature. As federal and state law, the Seminole Tribe's water rights cannot be adversely impacted. At this point, it is unclear how the CFWI RWSP may impact the Seminole Tribe's water entitlements; however, the Tribe has noted that the CFWI RWSP has identified several sources of water and storage options to address future water demand, particularly aquifer, storage and recovery wells and reservoirs. The Seminole Tribe's is concerned with the impact of withholding water from the Kissimmee River and ultimately Lake Okeechobee, which the Tribe ultimately relies upon. The Seminole Tribe appreciates the hard work and commitment the South Florida Water Management District, St. Johns River Water Management District the Southwest Florida Water Management District, and the CFWI technical team have applied to these efforts. The Seminole Tribe of Florida reserves the right to revise our comments after a more thorough technical review, and as more information become available. If you have any questions or concerns, please feel free to contact me. The Tribe intends to participate in future workshops concerning this initiative.	Aquifer Storage and Recovery systems have been successfully used throughout the U.S. and the State of Florida for several decades. ASR represents a valuable tool to capture and store stormwater, reclaimed water and wet-weather flows that can be used during high demands in the dry season. ASR is regulated by the FDEP through the Underground Injection Control program and the water must meet appropriate water quality standards. Similarly, reservoirs are widely used and are considered a valuable tool to capture and store stormwater for use during the dry season, which also reduces the need for wet-weather discharges to coastal estuaries. Conceptually, the FDEP and water management districts support use of these technologies as an alternative water supply. Specific projects proposing the use of these technologies will have to address potential impacts of the project. The draft water reservation rules for the Kissimmee River and Chain of Lakes requires applicants to demonstrate that they are not adversely impacting the restoration project or downstream existing legal users. In addition, any permits issued for such projects are subject to Chapter 120, Florida Statutes.

List of letters and other correspondence from Stakeholders

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Email from M. Minton 4/7/2020

From: Michael Minton <MMinton@deanmead.com>
Sent: Tuesday, April 7, 2020 1:21:12 PM
To: Ann Shortelle <ashortelle@sjrwmd.com>
Cc: Ronald L. Edwards (redwards@evansprop.com) <redwards@evansprop.com>; Doug C. Bournique (info@ircitrusleague.org) <info@ircitrusleague.org>; Debra Mercer <DMercer@deanmead.com>; Patsy Plemmons <PPlemmons@deanmead.com>
Subject: Comments for CFWI Regional Water Supply Plan -2020

Dr. Shortelle,

I hope this e-mail finds you well and enduring these strange circumstances in which we now find ourselves.

One advantage of having this time to reflect, is that I have finally had time to review the draft Regional Water Supply Plan (RWSP) for CFWI. As you are aware, I have been involved with the development of the Grove Land Reservoir & Stormwater Treatment Area (GLRSTA) since its inception almost 20 years ago and it holds great promise for CFWI.

Thanks to the foresight shown by SJRWMD & SFWMD which jointly underwrote:
(i) the first Engineering Report prepared by PBS&J regarding the C-25 Reconnect between SFWMD & SJRWMD (which report also highlighted the amount of fresh water lost to tide by the current system because it was not constructed with water storage facilities as originally designed in the C&SF Project); and
(ii) the HDR Engineering Report that further quantified the amount of water lost to tide at **approximately 450-500,000 A. ft.** annually from just the C-canals (C-23.24,&25) and identified the GLRSTA site as the best and most economical place for the proposed reconnection,
GLRSTA was conceived to provide an environmental benefit of reducing harmful discharges along the Upper East Coast region of SFWMD and **reclaiming almost 30% of this otherwise lost fresh water**.

This project has received broad support from almost all governmental entities and NGO's in the Treasure Coast Region. When one includes the significant fresh water supply needs identified by CFWI, GLRSTA now is truly a super-regional project that can help two regions address very serious fresh water issues. The St. Johns River, through which much of this fresh water would have flowed but for the C&SF Project and the construction of the Florida Turnpike, is perfectly situated to provide a natural conveyance system.

In the main body of the draft CFWI RWSP, the 100MGD of fresh water GLRSTA generates makes up about 1/3 of the proposed increase from surface water of 324MGD and about 20% of all the increased water supply of 532MGD for all of CFWI– see footnote #1 in Table 20 on p 69 (inserted at the end of this e-mail below) – and additional ref. on p 73, but there is no earlier references to this important project within the RWSP.

I propose that we are missing an opportunity to highlight the progress made on GLRSTA since 2015 if we don't include some reference in **Chapter 2** entitled– **Progress Since 2015 CFWI RWSP**, either on p.11 after TCR Partnership discussion or p.18 included with the **Water Storage And Restoration Projects**, as follows:

- Grove Land Reservoir & Stormwater Treatment Area - Since its inclusion in the 2015 CFWI Regional Water Supply Plan, with support via a grant issued through the Florida Department of Environmental Protection, the Grove Land Reservoir and Stormwater Treatment Area (GLRSTA) has been advanced through the Project Development and Environment (PD&E) Study phase. The GLRSTA Project is an approximately 5,000-acre reservoir capable of storing 75,000 ac-ft of water and a 2,000-acre stormwater treatment area to improve water quality. The GLRSTA is a super- regional project which is designed to keep in excess of 112,000 ac.ft. of runoff from this basin (which constitutes approximately 25-30% of the average annual runoff from the C-23,24 & 25 basins) from damaging coastal estuaries and deliver up to 100 mgd via the St. Johns River to the CFWI region. The project is currently in the regulatory process as both Environmental Resource Permit and Consumptive Use Permit applications have been submitted.

I would sure appreciate your thoughts and comments as to the best way to effectuate this addition to the draft RWSP?
Michael

This suggests that AWS, in an amount
future water demands. The project o
meet and exceed current and projecte
water users.

Table 20. Summary of 2020 – 2040 n
options by county and cate

County	Brackish/ Nontraditional Groundwater	Management Strategies
Lake	13.70	0.00
Orange	24.00	5.00
Osceola	30.00	0.00
Polk	45.00	6.00
Seminole	1.00	0.00
Total	**113.70**	**11.00**

[1]Includes the Grove Land Reservoir Project located in Oke
mgd = million gallons per day

WATER SUPPLY PROJECT

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We value your opinion. Please take a few minutes to share your comments on the service you received from the District by clicking this link

Notices
• Emails to and from the St. Johns River Water Management District are archived and, unless exempt or confidential by law, are subject to being made available to the public upon request. Users should not have an expectation of confidentiality or privacy.
• Individuals lobbying the District must be registered as lobbyists (§112.3261, Florida Statutes). Details, applicability and the registration form are available at http://www.sjrwmd.com/lobbyist/

Email from M Minton (4/14/2020)

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April 14, 2020

Adam Blalock, Chair of the Steering Comm. for
Central Florida Water Initiative (CFWI)
adam.blalock@floridadep.gov

Re: **Comments to CFWI 2020 Regional Water Supply Plan and Appendices**

Dear Chairman Blalock:

Please consider the following comments and inserts to the CFWI 2020 Regional Water Supply Plan and Appendices:

1. In the main body of the draft CFWI RWSP, one important project - **Grove Land Reservoir & Stormwater Treatment Area (GLRSTA)** generates 100 MGD of fresh water which makes up about 1/3 of the proposed increase from surface water of 324 MGD and about 20% of all the increased water supply of 532 MGD **for all of CFWI**– (see footnote #1 in Table 20 on p 69 and additional ref. on p 73), but there are no other references to this important project within the body of the draft RWSP.

I propose that we are missing an opportunity to highlight the progress made on GLRSTA since 2015 if we don't include some reference in **Chapter 2** entitled– **Progress Since 2015 CFWI RWSP.** Please consider including either on p.11 after the bullet for **St Johns River/Taylor Creek Reservoir (TCR) Partnership** or p.18 with the **Water Storage And Restoration Projects**, the following:

- Grove Land Reservoir & Stormwater Treatment Area - Since its inclusion in the 2015 CFWI Regional Water Supply Plan, with support via a grant issued through the Florida Department of Environmental Protection, the Grove Land Reservoir and Stormwater Treatment Area (GLRSTA) has been advanced through the Project Development and Environment (PD&E) Study phase. The GLRSTA Project is an approximately 5,000-acre reservoir capable of storing

75,000 ac-ft of water and a 2,000-acre stormwater treatment area to improve water quality. The GLRSTA is a super- regional project that is designed to keep in excess of 112,000 ac.ft. of runoff from this basin (which constitutes approximately 25-30% of the average annual runoff from the C-23,24 & 25 basins) from damaging coastal estuaries and deliver up to 100 mgd via the St. Johns River to the CFWI region. The project is currently in the regulatory process as both Environmental Resource Permit and Consumptive Use Permit applications have been submitted.

2. P. 60 - In the discussion of **Surface Water**, at the end of the paragraph reference is made to the Hillsborough River as not being discussed in this plan, but it may be worth noting that the CFWI planners should study the use of the Hillsborough River by the City of Tampa and Tampa Bay Water as a conduit for surface water deliver and water quality mitigation. Rivers in CFWI such as the St. Johns River could serve a similar role and much could be learned from the Tampa Bay Water experience.

3. P. 62 – Please consider including at the end of the section entitled **St. Johns River System,** the following:

Additional supplemental surface water supply (and/or environmental mitigation for withdrawals) could be achieved by diverting additional flows to the St Johns River upstream of existing or proposed withdrawals such as the TCR Partnership. This additional water could be provided from water stored in offstream reservoirs (similar to the Peace River Manasota Regional Water Supply Authority discussed below) within the St Johns River basin or outside of the basin by projects such as the GLRSTA. Much of the water generated by GLRSTA would have flowed naturally up the St. Johns River but for the C&SF Project and the construction of the Florida Turnpike. Any additional nutrients associated with the augmentation could be offset by wetlands treatment prior to discharge and the downstream withdrawals. The use of water withdrawals to offset nutrient loads to an impaired water body from upstream water augmentation was investigated by Tampa Bay Water and conceptually approved by the FDEP for additional water to be provided by the Hillsborough River/Tampa Bypass Canal system.

4. P. 65 – Please consider inclusion of the following at the end of the second paragraph of the **Stormwater section-**

FDOT through the Florida Turnpike Authority should undertake planning for stormwater augmentation of flows to the St. Johns River through GLRSTA.

5. P. 66 – Please insert at end of the second bullet of the **Storage Capacity- ASR and Reservoirs** Section –

Another regional reservoir just outside the CFWI Planning Area in Okeechobee & Indian River Counties but which will provide water supply augmentation through the St. Johns River is Grove Land Reservoir & Stormwater Treatment Area discussed above.

6. P. 74- Please insert in the Section entitled **Surface Water Storage Projects**, the following –

Another example is **Grove Land Reservoir & Stormwater Treatment Area.** Since its inclusion in the 2015 CFWI Regional Water Supply Plan, with support via a grant issued through the Florida Department of Environmental Protection, GLRSTA has been advanced through the Project Development and Environment (PD&E) Study phase. The GLRSTA Project is an approximately 5,000-acre reservoir capable of storing 75,000 ac-ft of water and a 2,000-acre stormwater treatment area to improve water quality. The GLRSTA is a super- regional project that is designed to keep in excess of 112,000 ac.ft. of runoff from this basin (which constitutes approximately 25-30% of the average annual runoff from the C-23,24 & 25 basins) from damaging coastal estuaries and deliver up to 100 mgd via the St. Johns River to the CFWI region. The project is currently in the regulatory process as both Environmental Resource Permit and Consumptive Use Permit applications have been submitted.

7. Appendix E - Please edit Appendix E which shows GLRSTA as Project 2015-144 at E-8 and is included in a Chart with a now dated cost per 1000gal of $.82 at E-30. Based on updated cost estimates and changes since the 2015 version of the RWSP, the GLRSTA cost has gone from $0.82/kgal to $0.91/kgal.

If you have any questions or need further information please feel free to contact me.

Very truly yours,

Michael D. Minton

MDM:dm
cc: Todd Swingle
Benjamin Butler
James Murphy
Susan Dolan
Christopher Petit
Dr. Ann Shortelle w/SJRWMD
Drew Bartlett w/SFWMD
Brian Armstrong w/SWFWMD
Ronald L. Edwards w/GLRSTA

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Letter from City of Groveland (5/12/2020)

Groveland
FLORIDA

MIKE HEIN
City Manager

352-429-2141 ext. 2001
mike.hein@groveland-fl.gov

156 S. Lake Avenue • Groveland, FL 34736 • www.Groveland-FL.gov

Via Electronic Mail and US Mail

May 15, 2020

Tammy Bader-Gibbs, Technical Program Manager
Division of Water Supply Planning & Assessment
Bureau of Water Supply Planning - St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429

Re: Central Florida Water Initiative Regional Water Supply Plan 2020
Public Supply Population and Demand Projections for City of Groveland, Lake County, Florida

Dear Ms. Bader-Gibbs:

The purpose of this letter is to comment on the Draft Central Florida Water Initiative (CFWI) Regional Water Supply Plan 2020 (RWSP 2020). The City of Groveland (City) owns a public water supply utility serving a rapidly growing customer base of over 21,000 residents in south Lake County. Groveland has grown from a population of 8,729 in 2010 to approximately 21,000 today, or 140% growth in 10 years. Based on trends the last decade, the next 20 years has the potential to expand to a customer base of nearly 50,000 residents. The City acknowledges the efforts of the Water Management Districts and all those who have contributed to the development of the CFWI RWSP. We believe a coordinated regional effort (Water Management District, Department of Environmental Protection, adjacent communities/purveyors, Lake County Water Authority, and others) is necessary to protect and to responsibly manage the region's water resources as it relates to continued prosperity and managed growth of the communities in south Lake County. The City is in the process of developing a Comprehensive Utilities Master Plan for drinking water, wastewater, and reclaim to responsibly manage the City's infrastructure and water resources. This planning effort and the City's water conservation efforts are intended to optimize water use to support future growth. This approach also integrates stormwater master planning into a "one water" conservation approach.

Review of the RWSP Public Supply Population and Demand Projections

In the spirit of continued collaboration, the City believes the RWSP 2020 understates both the growth in population and water demands expected for the City's service area during the planning period. The Public Supply Population and Demand Projections for City of Groveland, Lake County, Florida found in Appendix A of the RWSP 2020 are shown in the following tables.

Table A-5a. in Appendix A of the RWSP 2020 contains the population projections for public suppliers:

CFWI Draft RWSP Public Supply Population Projections for the City of Groveland						
Population Served	Public Supply Population Projections					Buildout
2015	2020	2025	2030	2035	2040	
16,315	19,660	21,808	32,890	26,008	28,085	80,934

Table A-5b. in Appendix A of the RWSP 2020 contains the demand projections for public suppliers:

CFWI Draft RWSP Public Supply Demand Projections for the City of Groveland							
Water Use (MGD)	Demand Projections MGD (5-in-10)					2011-2015 Average Gross GPCD	Demand Projections (1-in-10)
2015	2020	2025	2030	2035	2040		2040
2.34	2.38	2.64	2.89	3.15	3.40	121	3.60

PAGE 2 - Central Florida Water Initiative Regional Water Supply Plan 2020

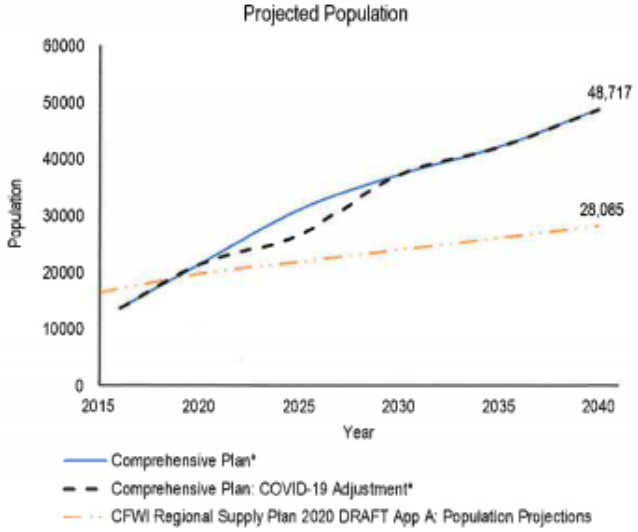
We understand that the RWSP 2020 demand projections for public suppliers located in the St. Johns River Water Management District (SJRWMD) were calculated by multiplying the average gross water demand in gallons per capita day (gpcd) from 2011-2015 for each public supplier by a projected service area population. The projected service area population was determined with the University of Florida Bureau of Economic and Business Research's (BEBR) Geospatial Small-Area Population and Forecasting Model, which predicted residential population at the parcel level and normalized the projections to BEBR's medium county-level forecasts. The City's concern is that the BEBR methodology does not consider known and approved developments and the absorption rate by developers within the City's service area. The methodology uses proprietary modeling that has not been updated in over four years, and thus does not consider more recent changes in growth drivers and inhibitors within the census block levels used in the model, nor does it consider the developments already vested and approved. The model therefore underestimates the projected growth in population and water demands for the City's 2020-2040 planning period.

City of Groveland's Public Supply Population Projections

In the 2018 Comprehensive Plan, the City projected their population for the 2020-2040 planning period in five-year increments based on population projections from the University of Florida Shimberg Center for Affordable Housing, the UF Bureau of Business & Economic Research (BEBR), and the US Census American Community Survey. Modifications were made to these projections for the years 2025, 2030, 2035, and 2040. The modifications were based on the three prior years of growth, approved developments, and the absorption rate by developers, which significantly increased the estimated population in the City.

The City has recently adjusted the population projection to account for the economic uncertainty resulting from COVID-19, which is expected to reduce the growth previously estimated between 2020 and 2025. The figure on the next page depicts the RWSP projections, the Comprehensive Plan projections, and the COVID-19 adjusted projections for the City's population. Population projection concerns are particularly acute in the case of the City, where there are already many vested and approved developments. More specifically, when completing the population projection, the City analyzed all un-built but vested development including residential development on vacant parcels of record and residential development where the infrastructure has not been completed (e.g., Wilson Lake Parkway).

Additionally, the City has potential for the development of various annexed and entitled properties that have City land use designations and zoning where the City expects further development within the 20-year planning period of the draft RWSP. For example, the un-built Villa City Planned Unit Development (PUD) zoning document allows approximately 8,000 housing units to be added to the City's service area. Furthermore, the City completed a generalized gross density projection of all the developable acres within the service area memorialized via an Interlocal Service Boundary Agreement with Lake County and neighboring municipalities. This included properties that have not yet been annexed but are legally eligible for Groveland to annex and serve. Finally, a five-year trend of single-family residential building permits ranged between 500-650 permits per year and inquiries about the absorption rate with local builders were incorporated into the City's Comprehensive Plan population projections.



**2020 population adjusted from the Comprehensive Plan based on April 2020 utility billing account level data*

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PAGE 3 - Central Florida Water Initiative Regional Water Supply Plan 2020

The robust nature of the market at the time and the number of prepared lots that were targeted for building indicated a spike in population during the 2020-2025 timeframe with a slight slowing into 2030. The 2030-2040 timeframe predominantly reflects the development potential of Villa City and other large land holdings in the northern sector of the City. The City anticipates a slowing in the short-term growth rate from 2020-2025, as shown in the figure above, as a result of the market changes due to the COVID-19 pandemic, but anticipates the growth and economic development will recover by the end of 20-year planning period of the draft RWSP.

City of Groveland's Public Supply Projections

The City also reviewed its realized water demands from all sources and updated the five-year average gross gallons per capita day (gpcd). The average realized gross gpcd of years 2015 and 2020 is 141. Future water demands in the City are based upon the updated population projections and a constant gpcd of 141.

This increase in the water use per capita is a reflection of water demands in the region associated with new home construction, not necessarily a reflection of the inefficient use of water, and is similar to new home construction demands and increased gallons per capita day realized by other CFWI municipalities. The City is aware of this challenge regarding future demand from new developments and will continue to focus on water conservation measures to responsibly manage per capita demand.

The following table reflects what the City believes will be the projected increase in population and water demand for the 2020 to 2040 planning period, based upon already approved and currently occurring residential growth:

City population projections for public supply:

Population Served	Public Supply Population Projections				
2015	Current April 2020	2025	2030	2035	2040
16,315*	21,399**	26,833	37,214	42,105	48,717

*Same as in CWFI Draft RWSP Table A-5a
**Based upon utility billing account level data

City demand projections for public supply:

Public Supply Demand Projections for the City of Groveland						
Water Use (MGD)	Demand Projections MGD					Average Gross GPCD
2015	2020	2025	2030	2035	2040	
2.34*	2.95**	3.78	5.25	5.94	6.87	141

*Same as in CWFI Draft RWSP Table A-5b
**Based upon utility billing account level data

Population and water use values identified in the draft RWSP are based upon 2015 data. The City agrees with the draft RWSP population and gross water demand estimates for 2015; however, based upon the City's review of account level data for April 2020, the current population served already exceeds the RWSP 2025 projections for the City. Therefore, the City's predictions reflect a significant increase in both its projected population growth rate and the estimated gross water demand projected in the draft RWSP.

The City believes these tables reflect the most representative projections of the expected growth in population and water demand within the service area. Our confidence in these projections is based on several factors. As explained above, the projected growth is based on three prior years of growth, approved developments, and the absorption rate by developers. These projections also take into consideration the recent economic situation as a result of the COVID-19 pandemic slowing the growth anticipated by the City from 2020 to 2025. This water use data provides a more reliable guide regarding expected future water use within the City's service area compared to the existing water use estimates that are the basis for the CFWI RWSP water use projections.

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Closing

The City recognizes that the primary purpose of the public supply population and water demand projections prepared in the CFWI process is to evaluate changes in water use on a regional basis in order to assure that our water resources are protected and that regional water supply needs are met. However, the utility-specific projections for Groveland found in the draft RWSP have significant implications for the City's own planning obligations and the overall demand for the region. To the extent that water demand projections used in the RWSP may be later used in the consumptive use permitting process, this could result in a permitted allocation that is wholly inadequate to meet the City's actual water needs even with aggressive conservation measures. These consequences and the fact that the City's own projections differ so significantly from the projections in the RWSP compels the City to express concern and to request that the information outlined above be acknowledged and taken into consideration before the RWSP is finalized.

We appreciate the opportunity to provide comments on the draft RWSP and look forward to continuing to work with the Water Management Districts on the important water supply issues in our region. Thank you for your consideration, and please do not hesitate to contact me or T.J. Fish if you have any questions or would like additional information.

Sincerely,

Michael Hein
City Manager

T.J. Fish
Director of Public Works & Transportation

cc: Sarah Whitaker, SMW Geosciences, Inc.
Justin deMello, Woodard & Curran, Inc.

City with Natural Charm

FDACS Memo (5/13/2020)

Office of Agricultural Water Policy
(850) 617-1700

The Mayo Building
407 South Calhoun Street
Tallahassee, Florida 32399-0800

Florida Department of Agriculture and Consumer Services
Commissioner Nicole "Nikki" Fried

MEMORANDUM

DATE: May 13, 2020

TO: Tammy Bader-Gibbs, Technical Program Manager, Division of Water Supply Planning & Assessment, St. Johns River Water Management District

FROM: Angela Chelette, Environmental Administrator, Office of Agricultural Water Policy, Florida Department of Agriculture and Consumer Services
Phone: 850-617-1719

SUBJECT: Review of CFWI 2020 Draft Regional Water Supply Plan

The Florida Department of Agriculture and Consumer Services (FDACS) appreciates the efforts of all cooperating agencies and stakeholders to implement the requirements of Section 373.0465, F.S. We have reviewed the draft regional water supply plan and note that brackish water is recognized as a current ground water source but is also identified as an alternative supply source. Eleven brackish/nontraditional water resource development project options are identified in the plan with a total potential 113.7 mgd available for water supply. Currently there are several agricultural producers utilizing brackish groundwater as their primary source of supply which have not been adequately identified in the draft plan. FDACS urges the Department of Environmental Protection and the water management districts to carefully consider potential impacts to existing legal users when evaluating permit applications for alternative water supply so as to prevent the brackish source from becoming unusable for existing agricultural purposes.

cc: Kristine Morris, CFWI Facilitator, Florida Department of Environmental Protection

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Letter from Audubon of Florida (5/15/2020)

Audubon | FLORIDA

Conservation Office
308 North Monroe
Tallahassee, FL 32301

850.222.2473
fl.audubon.org

May 15, 2020

Tammy Bader-Gibbs
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178
Via email: tbader@sjrwmd.com

RE: Comments in response to the *Draft Central Florida Water Initiative Regional Water Supply Plan*

Dear Ms. Bader-Gibbs:

Audubon Florida appreciates the opportunity to comment on the *Draft Central Florida Water Initiative Regional Water Supply Plan* (Plan). We appreciate the wide variety of detailed information provided and applaud the efforts of all staff and partners involved. Since the 2015 plan, many positive forward-looking steps have been taken to improve planning and coordination in the region. These improvements must now translate into meaningful actions that conserve Florida's water and safeguard our great natural heritage.

A critical aspect of water supply planning is to ensure the health of our natural systems. Florida's environment supports our daily lives and is a critical component of our recreational and tourism-based economy. Sustainability in all aspects of water supply, including environmental demands, should be the guiding principle for developing and implementing water supply plans. With this in mind, please review our comments on the draft plan below.

The plan clearly describes the growing water crisis we face in the CFWI region, and unfortunately throughout Florida.

The CFWI Planning Area remains listed as a Water Resource Caution Area, a designation shared by almost the entire peninsula of Florida. The plan projects a 36% increase in water demand from 2015 (an additional 240.47 million gallons per day by 2040). It also states 13 water bodies are currently not meeting their minimum flows and levels (MFLs) and 5 more could be added by 2040. Within this time frame, groundwater withdrawals could stress an additional 6,100 acres of wetlands in the region beyond the 36,000 acres already stressed in the 2014 reference condition. This stark environmental outlook shows the potential for deteriorating conditions in a region already experiencing harm.

Quantitative information is needed on requirements to meet environmental needs, including Water Reservations and recovery of Minimum Flows and Levels.

One requirement of the plan is, to "include a list of water supply options sufficient to meet the water needs of all existing and future reasonable-beneficial uses." This includes meeting environmental needs such as Minimum Flows and Levels (MFLs) and fulfilling all required water reservations, yet these items are not represented in any of the demand projections. Conservation measures and water supply projects clearly state their water supply benefit in terms of demand reductions or water supplied (in mgd). Some estimate of the water required to meet environmental needs should also be provided, including flows required for the health of downstream systems. Environmental needs may vary depending on which projects are selected for implementation (e.g., additional groundwater withdrawals may increase volumes needed to recover MFLs), but this is valuable and relevant information that should be provided in the plan. Quantification of environmental needs will assist districts as they consult with local governments and other partners on project prioritization and plan implementation.

Additional groundwater withdrawals in the CFWI Planning Area should be avoided.

The section on groundwater availability should be revised to state that any additional withdrawal of groundwater is not advisable as it will negatively impact the recovery of MFLs in the region and hasten harmful water levels in the Wekiva River and two Outstanding Florida Springs (Wekiwa Springs and Rock Springs). The 2014 Reference Condition begins with 36,000 acres of stressed wetlands and 11 of 39 MFLs evaluated not being met. The wetland assessment only covered about 20% of the wetlands in the region; it is likely some impacts were not captured by this effort. As described in the plan, modeling results show a "corresponding predicted increase in hydrologic stress on environmental systems" as withdrawals increased. Unfortunately, instead of reaching the conclusion that further groundwater withdrawals should be avoided, the plan states "it was determined that the planning-level groundwater availability should be limited to no more than the volume of groundwater under which no additional MFLs would be exceeded." It is not clear why an action that has been demonstrated to harm natural systems in the region should be continued, especially to the point at which another river is on the brink of significant harm. Any additional groundwater withdrawal is ill-advised; the plan should emphasize that withdrawals increase hydrologic stress in the area and detract from MFL recovery efforts.

The plan should more clearly detail a sustainable approach for managing and meeting water demands in the CFWI

The plan includes water supply projects, water resource development projects, and conservation measures that more than double the anticipated increase in water demands. These efforts vary in effectiveness and should not be considered equivalent to one another (i.e., not any combination of projects that meets demand projections will actually meet all needs in the area – particularly environmental needs). Audubon recommends a strategy that prioritizes demand reduction and increasing the beneficial use of reclaimed water. With proper treatment and project design, reclaimed water can help meet water supply and water quality objectives. The storage and beneficial use of stormwater runoff should also be considered for water that is truly excess (i.e., water that can be diverted without impacting the needs of receiving bodies). Least preferred strategies include the use of surface water and additional groundwater pumping (including brackish water from the LFA), and should only be considered after all other strategies have been exhausted.

Conservation measures that reduce water demands should be the plan's first priority.

The section on conservation captures a combination of active and passive measures that can help reduce water demand in the CFWI. Conservation eliminates the need for costly projects that remove water from the environment and therefore contribute greatly towards the goal of a sustainable water supply. Notably, the plan has produced a suite of measures larger than the 37 mgd established in the 2015 plan. We commend all involved for their efforts, especially those from utilities or non-governmental organizations who participated in this process.

Though conservation measures have great value, implementation rates have been consistently low. As noted in the plan, "water conservation measures are influenced by several factors including, but not limited to, voluntary user actions, level of education and financial incentives, passive savings, and participation rates." Water management districts and their partners should continue to explore methods for increasing the adoption and implementation of these beneficial practices.

While it may be outside the scope of the plan, DEP and water management districts have a responsibility to evaluate and propose potential legislative or regulatory mechanisms to help protect Florida's water resources. Early efforts from the CFWI's Regulatory Team were primarily aimed at making regulations consistent within the planning area. A new focus on regulations to help reduce water demands in the CFWI area is warranted. Of particular importance is the role of high-intensity irrigation in residential development – a topic that unfortunately is not addressed in the plan. Irrigation of residential lawns is

likely a significant portion of the 592 mgd projected demand for public supply in 2040. In suburban residential areas like those common in the CFWI area, 50% or more of water demand is for irrigation (a value that can exceed 80% during drought). The continued propagation of landscapes requiring high-intensity irrigation should be re-evaluated considering the documented environmental harm from overuse of water, the cost to build and maintain water supply projects, and the availability of alternative, attractive, wildlife-friendly landscaping practices.

Reclaimed water and reuse can help solve water quality challenges and meet demands.

Wastewater is a large and growing source of water that will play an integral role in solving our water supply challenges. Further, many reclaimed water projects can help meet water supply demands while also reducing water quality impacts associated with the disposal of wastewater. We recommend regular coordination between DEP and WMD water-related program staff, as recommended in Section 2.7.2.7 of DEP's *Report on Expansion of Beneficial Use of Reclaimed Water, Stormwater and Excess Surface Water (Senate Bill 536)*, with the goal of identifying and prioritizing projects that benefit water quality and water supply goals. Reclaimed water has played a significant role in Florida's water supply and must continue to play an ever-growing role. SB 712, the Clean Waterways Act passed by the legislature in March 2020, includes a provision for DEP to initiate rulemaking for the potable use of reclaimed water, an indication that our leaders in government believe reclaimed water can be used efficiently and effectively to conserve potable-quality water and augment available water supplies.

Treatment wetlands are increasing in use throughout the state due to their relatively low cost and diverse benefits. Treatment wetlands efficiently remove a wide variety of constituents and provide habitat for wildlife as well as recreational, educational, and tourism opportunities. Water managers should proactively examine existing wastewater treatment facilities for opportunities to add treatment wetlands and expand reuse options made possible by their water quality improvements. In areas with limited opportunities for land acquisition, conversion of spray fields can be considered. Moving forward, all new treatment facilities should be required to consider treatment wetlands in their design alternatives and exceed traditional secondary treatment levels in order to broaden potential applications of their reclaimed water.

Irrigation is listed as a beneficial use, but this deserves deeper consideration. While it is beneficial to use reclaimed water over treated, potable water on residential landscapes, labelling the maintenance of resource-intensive and pollution-generating lawns a beneficial use distracts from consideration of beneficial uses that are more essential (i.e., those that supply water for the needs of people, businesses, and the environment). The continued replacement of native landscaping with irrigation and nutrient-dependent lawns is one of the single largest contributors to the ongoing water supply and water quality problems facing Florida. If the need for irrigation is reduced, large amounts of reclaimed water will be available to meet other demands (given adequate levels of treatment).

Excess stormwater can be captured for beneficial use; natural surface waters and groundwater should be sources of last resort.

Surface waters include Florida's wetlands, lakes, and rivers, and deserve the highest level of protection and scrutiny during water supply decisions. In general, water supply projects that withdraw from natural water bodies should be avoided given their immense value in sustaining Florida's ecology and economy. Healthy watersheds and wetlands are also key to resilience against droughts and supply deficits, flooding, catastrophic wildfire, plus declining water quality and harmful algal blooms. Surface water projects that should be considered are ones that capture stormwater runoff that has no value to or could potentially harm natural systems, i.e., water accurately described as "excess" water. Often, any flows or levels above a threshold relating to harm (e.g., MFL conditions) are labelled by some as excess. This is a dangerous policy for water management that will lead to widespread harm in surface water systems. It is important to consider the ecological values associated with the full range of natural high and low-water events, and lowering surface water levels may detract from the groundwater recharge function of some water bodies.

The use of brackish water, as stated in the plan, requires costly, energy-intensive treatment to meet drinking water standards. It also has costs and challenges in dealing with disposal of concentrate from the desalination process. Withdrawing brackish water from the Lower Floridan Aquifer (LFA) has the potential to impact other aquifers and surface waters. This impact will increase as more projects and locations are brought online. For currently permitted projects, appropriate research and planning is needed to ensure withdrawals from the LFA prevent unintended impacts to other waters, including possible harm to water users in southwest Florida using the FAS for alternative water supply. Moving forward, districts and partners should prioritize more beneficial alternatives to groundwater use such as conservation and reclaimed water use.

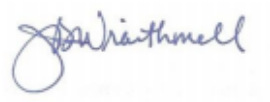
Additional considerations for the plan

The CFWI Planning Area is located at the junction of three watersheds. Some proposed projects, like those considering removal of water from the St Johns River, will influence hydrologic conditions in connected and downstream systems. Also, any loss of water in the headwaters of the Everglades could impede restoration efforts for the entire downstream system including the Kissimmee River and Lake Okeechobee. To help guide water supply decisions and to avoid unintended consequences, the plan needs a more thorough discussion of how different water supply options could impact hydrologically connected areas.

As mentioned earlier, the water supply plan effectively documents the potential for continued environmental harm in the planning area, including the loss of wetlands and failing MFLs. Absent is a discussion of the state's ongoing water quality restoration plans (Basin Management Action Plans, in particular) as well as water quality impairments within the CFWI. These include the Basin Management Action Plans for the Wekiwa and Rock Springs, Lakes Harney and Monroe, Jessup, and Lake Okeechobee. As increasing demands are placed on these waterbodies as a result of growing water supply needs, restoration of these waterbodies will remain a distant dream, or even worse, we could see further degradation of these waterbodies. The plan will benefit from a section that evaluates the requirements of these restoration plans and the effects of water supply demand within the CFWI on the waterbodies undergoing restoration.

Thank you for considering our comments. Please contact us if you have any questions.

Sincerely,



Julie Wraithmell
VP and Executive Director
Audubon Florida

Beth Alvi
Director of Policy
Audubon Florida

CC: Drew Bartlett, Executive Director, SFWMD
Ann Shortelle, Executive Director, SJRWMD
Brian Armstrong, Executive Director, SWFWMD

Letter from Friends of the Wekiva River (5/15/2020)

FRIENDS OF THE WEKIVA RIVER, INC.

P.O. Box 6196
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FriendsOfWekiva.org

FriendsWekivaRiver@gmail.com

May 15, 2020

Adam Blalock, Director
Office of Water Policy
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Draft 2020 CFWI Regional Water Supply

Dear Mr. Blalock:

Thank you for providing this opportunity to comment on the draft 2020 Regional Water Supply Plan (RWSP) for the Central Florida Water Initiative (CFWI). Members of the Friends of the Wekiva River (FOWR) are intensely interested in the well-being of the Wekiva River Basin and all activities that may impact that system, and we have been following the CFWI water supply planning process. One of our members served as a member of the Solutions Team and the Groundwater Sub team for the 2015 CFWI RWSP.

We have reviewed the Draft 2020 CFWI RWSP and have serious concerns about its ability to maintain minimum flows in the Wekiva River basin springs and the Wekiva River. Our major concerns include:

1. The Draft 2020 CFWI RWSP determined that flow from Wekiwa Springs could decline another 1.8 cfs from the 2014 Reference Condition (RC) without dropping below its MFL (Appendix C, Table C-8, page C-34). SJRWMD spring flow data, as depicted in the attached graph (see Figure 1) indicate that the average annual spring flow from Wekiwa Springs dropped below its current MFL between 2006 and 2008 and again between 2011 and 2016. The current MFL for Wekiwa Springs is 62 cfs, which is defined as the "minimum annual mean spring flow" (Chapter 40C-8.031, FAC). What data analysis and rationale were used to support the Draft 2020 CFWI RWSP conclusion that Wekiwa Springs is meeting its MFL for the 2014 RC? Is there a minimum number of consecutive years the

annual mean flow of Wekiwa Springs must be less than 62 cfs before it would be determined to not be meeting its MFL?

2. The Draft 2020 CFWI RWSP states that Palm Springs is not currently meeting its current MFL (Appendix C, Table C-2, Page C-7) and that Palm and Starbuck Springs would not meet their MFLs under the 2014 RC withdrawals (Appendix C, Table C-8, Page C-34). What data analysis and rationale were used to support the Draft 2020 CFWI RWSP conclusion that additional groundwater withdrawals within the CFWI area beyond the 2014 withdrawal rates can be allowed? The FOWR believes that the 2020 CFWI RWSP should recommend that groundwater withdrawals be reduced so that Palm and Starbuck Springs will meet their current MFLs under the 2014 RC.

3. The Draft 2020 CFWI RWSP states that the minimum spring flows for the 10 modeled Wekiva River basin springs were set "to cumulatively maintain the minimum flows in the Wekiva River system (Appendix C, Table C-8, page C-35, footnote *e*). What were the minimum spring flows of the 10 springs for the 2030 withdrawal condition in which the Wekiva River was projected to not meet its current MFL? The RWSP should identify the minimum flows for those springs that allow the Wekiva River at SR 46 to meet its MFL. The report further states that the assumption was made that these minimum spring flows would be sufficient to protect the ecology of the individual spring (Footnote *e* to Table C-8). What data analysis and rationale were used to support this assumption, ***given that*** Palm and Starbuck Springs would not meet their current MFLs under the baseline 2014 RC?

4. The 2015 CFWI RWSP estimated the remaining freeboards in Wekiwa and Rock Springs based on spring flow data thru 2006 (2015 CFWI RWSP, Vol 1A, Table B-11, page B-61). Between 2006 and 2014, the average annual flow in Wekiwa and Rock Springs continued to decline (See attached Figures 1 and 2). Why weren't the spring flows and freeboards for these springs updated based on the more recent flow data available when the draft 2020 RWSP was prepared? If the 2015 freeboard analysis were updated to include the spring flow data from 2006 - 2014, wouldn't the fact that the actual spring flows had declined since 2006 indicate that the freeboard for Rock Springs and Wekiwa Springs would be reduced for the 2014 conditions?

5. The Draft 2020 CFWI RWSP states that the sustainable groundwater withdrawal is 760 mgd (page 46). The Draft 2020 RWSP also notes that current water use permits within the CFWI area have allocated 1,064 mgd of groundwater

(Appendix D, Table D-9, page D-60). The Draft 2020 CFWI RWSP also estimated that the MFL for the Wekiva River at S.R. 46 would not be met in 2026 and that the MFL for Wekiva Springs would not be met in 2027 (Appendix C, Table C-10, page C-49). Given that only six to seven year lead times are available to implement alternative water supply projects, what specific strategies will the WMD implement to ensure that groundwater withdrawals under current Consumptive Use Permits (CUPs) will not exceed the 760 mgd before 2026?

6. The 2015 CFWI RWSP determined that the sustainable groundwater withdrawal was 850 mgd. And now the Draft 2020 CFWI RWSP has reduced that to 760 mgd. What progress has been made since the 2015 CFWI RWSP in reducing the CUP/WUP groundwater allocations in the CFWI area to more closely match the sustainable yield determined for the 2015 CFWI RWSP? How many permits have had their groundwater withdrawal allocations reduced within the CFWI area and within the SJRWMD portion of the CFWI area since the 2015 CFWI RWSP was adopted? How much reduction in groundwater withdrawals has been achieved by implementation of alternative water supplies within the CFWI area and the SJRWMD portion of the CFWI area since the 2015 CFWI RWSP was adopted? How much additional groundwater withdrawal has been authorized by new CUP/WUPs in the CFWI area and the SJRWMD CFWI area since the 2015 CFWI RWSP was adopted? All this information should be included in the 2020 CFWI RWSP.

7. The Draft 2020 CFWI RWSP states that under Florida law, the RWSP cannot require the alternative water supply projects to be implemented (Appendix E, page E-1). As long as utilities can continue to withdraw water under their existing CUPs, how can the WMDs ensure that implementation of the alternative water supplies will not be delayed beyond 2026 and that more groundwater will be withdrawn than the 760 mgd sustainable yield? Strategies that address this concern should be included in the 2020 CFWI RWSP.

8. Both the 2015 CFWI RWSP and the Draft 2020 CFWI RWSP stated that Palm Springs in the Wekiva Basin fell below its established MFL. We are not aware of any recovery plan developed for Palm Springs. FOWR has been following the progress of the District's efforts to update the MFLs for the river and springs. However, the currently adopted MFLs are being used for the 2020 CFWI RWSP. FOWR believes that the goal of the SJRWMD should be to allow all Wekiva Basin springs and the Wekiva River to meet their MFLs.

9. FOWR strongly recommends that the SJRWMD expand cost share and funding for existing water conservation programs and create and fund additional incentives for utilities and other water users to increase or expand their water conservation programs, particularly in the PS and AG categories. Water conservation is generally the least expensive option for reducing water withdrawals.

In addition to the above comments and questions, we have identified a list of questions from our review of the appendices. FOWR requests written responses to all these questions prior to finalizing the 2020 CFWI RWSP.

Appendix A: Population and Water Demand Predictions

- Page A-7: What crops are expected to be grown on the additional 7,200 acres in the Osceola North Sector in 2040?
- Page A- 8: How was the ECFTX model calibration dataset used in estimating the County specific L/R average gpcd?
- Page A-12 states "The Districts did not attempt to identify where future reclaimed water flows or beneficial use would occur." Did the model account for groundwater recharge by **existing** reclaimed water used for landscape irrigation? If so, how was the reclaimed water distributed within the study area?
- Table A-13e (page A-127): Why isn't beneficial reuse shown for OCUD – Easterly WWTF or Northwest WWTF? Both provide beneficial reuse for residential irrigation and groundwater recharge. Was the effluent flow to Lake Marden counted as recharging the surficial aquifer in the ECFTX model?
- Table A-13e (page A-131): Was the wetlands portion of the Iron Bridge Reuse counted as a recharge input to the groundwater model?
- Table A-13e (page A-131): How can the Sanford North WWTF have 11.04 mgd of Beneficial Reuse? The sum of Sanford North and South do not total to 11.04 mgd.

Appendix B: Water Conservation

- Page B-2: What was the basis for increasing the water volume savings from new showerheads from 5-6 gpd to 16.4 gpd? Industry standards reduced flow rates from 5.5 gpm for showerheads installed before 1992 to 2.5 gpm after 1992, a 55% reduction.
- Page B-3, Table B-2: What is the basis for the assumption that Active Conservation programs would continue to reduce demand by 0.98 mgd per year? Isn't it more likely that the annual rate of conservation will decline given that the larger utilities (i.e., the low hanging fruit) have already implemented Active Conservation programs? Is funding available to continue or expand the Active Conservation program?

- Page B-3: What is the basis for the assumption that Active Conservation will increase in proportion to water demand growth?
- Page B-4: What percentage of the large AG users has already implemented the Mobile Irrigation Lab conservation measures? How likely is it that AG conservation will continue to increase by 0.17 mgd per year (i.e., what percentage of the low hanging fruit for AG conservation has already been implemented)?
- Page B-5: Once implemented, how can the SJRWMD track and confirm that smart controllers are being used properly? Isn't 15% reduction of L/R too aggressive for replacement of sprinkler heads and smart controllers?

Appendix C: Minimum Flows and Levels and Water Reservations

- Table C-2, page C-7 indicates that the MFL for Palm Springs was not met in 2017. Was this determination based on calculating the mean annual spring flows for the entire period of record or from a limited number of recent years? What data analysis supported the conclusion that Wekiwa and Rock Springs met their MFL?
- Page C-15: The Draft 2020 CFWI RWSP used a "2014 Reference Condition (RC)" to determine the available "freeboard." The draft RWSP states that the 2014 RC represents the "aquifer conditions that would be expected if 2014 water demands (619 mgd) were repeatedly realized over the 12-year simulation period" (2003-2014), and further states "given the rainfall that occurred over the period 2003 to 2014." As we understand, this means that the transient model was run for 12 consecutive years with the monthly rainfall patterns that occurred from 2003 thru 2012. Then the 2014 monthly withdrawals were repeated each year of the simulation. Is this correct? If so, were the monthly withdrawal patterns for each of the 2025, 2030, 2035 and 2040 withdrawal conditions simulated over a 12 year with the same rainfall patterns as 2003-2014 and with the projected withdrawal conditions repeated year to year?
- Page C-16/17 states that 14 potential criteria were excluded from the assessment of groundwater availability including " MFLs yet to be developed that will, as necessary, replace existing, adopted MFLs for … one river segment (Wekiva River at State Road 46), six springs (Miami, Palm, Rock, Sanlando, Starbuck, and Wekiwa) were also excluded." However, page 46 of the draft RWSP states that the currently adopted MFL for the Wekiva River at SR 46 was the basis for determining that groundwater withdrawal should be limited to 760 mgd. Please explain this discrepancy.

Appendix D: Evaluation of Water Resources

- Page D-10: How was downward leakage from the surficial aquifer to the UFA estimated?
- Page D-10: How was increased hydraulic conductivity near springs input into the ECFTX groundwater model? Was hydraulic conductivity only adjusted for

the cell that contains the springs or also for adjacent cells? What is the basis for determining how many cells are adjusted? What typical conductivity values are used for cells near springs? What conductivity values were used for cells that are not near springs? Were the same conductivity values used near all springs? Did spring magnitude or the number of cells where conductivity was adjusted affect selection of conductivity?

- Page D-11 states that limited historical AG withdrawal data were available during the scenario period. What historical AG withdrawal data were available in the CFWI areas of SJRWMD during the 2003-2014 periods?
- Page D-11: If the AFSRIS program was used to estimate AG withdrawals in the SJRWMD CFWI area, what is the date of the crop data?
- Page D-11 states that AG withdrawals were estimated based on CUP data for crop type, acreage and irrigation efficiency. How recent are those data? How were AG withdrawals estimated for withdrawals with no CUP?
- Page D-11: How were inflows to the aquifer from Lake Marden and the drainage wells simulated?
- Page D-13: How do the spring and well level calibration criteria compare to other aquifer modeling studies?
- Table D-2: Why are the residual means for the CFWI area higher than those for the ECFTX area? What does that imply?
- Table D-4 indicates that Wekiva River watershed Deviation Volume is -56.5%. How was this calculated? The criterion for is DV < 15%. Does this mean that the model always significantly underestimates the flow in the Wekiva River watershed? At what location or station in the river is that Deviation Volume calculated?
- Table D-6, page D-30:
    - Why is there such a difference between the CFWI RWSP Demand Projections from 2014 to 2015 (20% increase)?
    - Why is there a difference of 89 mgd between the 2014 ECFTX modeled groundwater withdrawal (619 mgd) and the CFWI RWSP demand projection (530 mgd)? Should this have been 590 mgd (See Table 13 of the RWSP)? Why isn't the 2014 RC based on the actual 2014 withdrawals?
    - Did the estimated 2040 groundwater demand of 855 mgd assume no new alternative water supplies and that all future demand would be withdrawn from groundwater?
- Page D-30: How were changing population densities, such as changes in rural vs urban densities, considered in the future withdrawal scenarios?
- Figure D-17a: were the monthly PS demands for 2003-2014 taken from the Trend Line or the "unaltered"?
- Figures 17b & c: Same question for non-PS. Which of these lines were used for DSS, AG, CII, L/R and PG?
- Figures D-22 and D-23 appear to be reversed.
- In Figure D-21, what is the explanation for the -10 to <5 ft reduction in the SAS level in SE Lake County near Orange County line? What are the withdrawals from the SAS at that location?

- In Figure D-22, what is the explanation for the -10 to <5 ft reduction in the LFA potentiometric level just west of I-4 and south of the FL Turnpike? What are the withdrawals from the LFA at that location?
- Figures D-28 & D-30, using Model Layers 1 & 3, why would the wetlands east of Johns Lake in west Orange Co. be more stressed for the 2025 & 2030 conditions than for the 2040 conditions (see Fig. D-32)?
- Table D-9:
    - What strategies will be implemented by the SJRWMD to reduce the currently permitted groundwater withdrawal of 1,064 mgd to the 760 mgd "sustainable" withdrawal?
    - For the Wekiwa and Rock Springs springshed, please provide a list of the CUP holders and their permitted withdrawals, the 2014 actual withdrawals, the estimated 2014RC and 2020 withdrawals, and the projected 2025, 2030, 2035 and 2040 withdrawals. Thjis information should be included in the 2020 CFWI RWSP.
- Page 61 states "… the sustainable limit is not anticipated to be reached until after next update in 2025 …" and "…the MFL water bodies in the Wekiva Basin, including Wekiwa and Rock Springs, are scheduled for re-evaluation in 2020." If the MFL re-evaluation determines that groundwater withdrawal should be reduced below the "sustainable" limit of 760 mgd, what strategies would the SJRWMD require the CUP holders to implement to achieve the required reduction?

Appendix E: Recommendations

- Page 88 states that "In accordance with Section 373.0361(6), Florida Statutes (F.S.), nothing contained in the water supply component of a RWSP should be construed as a requirement for local governments, public or privately owned utilities, special districts, self-suppliers, multi-jurisdictional entities, and other water suppliers to select that identified project…" What strategies will the SJRWMD use to reduce the currently allowable withdrawals of 1064 mgd under their existing CUPs to avoid exceeding the 760 mgd sustainable yield? Will the SJRWMD reduce existing groundwater withdrawal allocations in CUPs to achieve the "sustainable" withdrawal rate for the CFWI area?

Attaining a sustainable yield is the critical component of the 2020 CFWI RWSP. Given that there are no "requirements" for local governments, public or privately owned utilities, special districts, etc., to comply with meeting the sustainable yield, FOWR believes that it is critical for the 2020 CFWI RWSP to identify specific strategies that can be implemented to avoid withdrawals exceeding the sustainable yield within the next six to seven years.

FOWR requests your prompt attention to these concerns. We are available to discuss your written responses to these questions and concerns at your convenience. Please let us know when you would be available to discuss them.

Friends of the Wekiva River, Inc. is a 501(c) (3) nonprofit organization dedicated to the promotion and protection of the unique environmental and recreational values of the Wekiva River and its tributaries, the ecological integrity of the Wekiva Basin and the restoration and continuation of the Wekiva River system in its natural state.

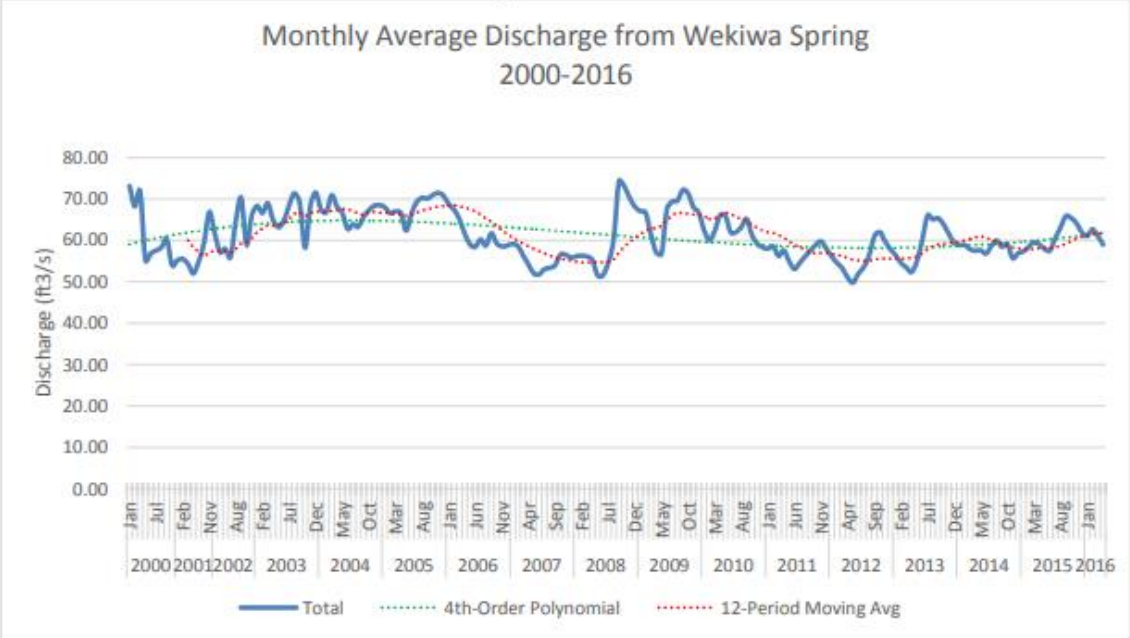
Sincerely,

John Pottinger, President
Friends of the Wekiva River

Attachments: Figures 1 and 2

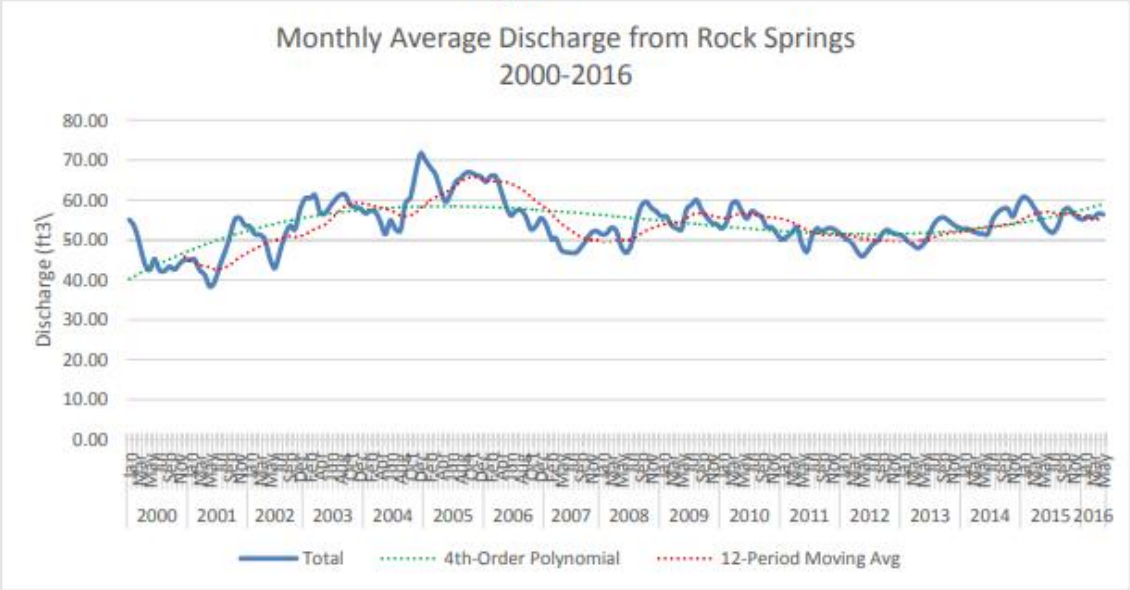
Cc: Tammy Bader-Gibbs

Figure 1



Source: SJRWMD Website

Figure 2



Source: SJRWMD Website

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Letter from St. Johns Riverkeeper and Florida Springs Council (5/15/2020)

May 15, 2020

Adam Blalock, Director
Office of Water Policy
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

VIA EMAIL: adam.blalock@floridadep.gov

RE: Draft 2020 Central Florida Water Initiative Regional Water Supply Plan

Dear Mr. Blalock:

As Floridians are preoccupied with trying to protect our families and keep our economy going during the COVID-19 Crisis, water planners in Central Florida are busy paving the way for the withdrawal of millions of gallons of water from the St. Johns River to fuel unbridled growth.

On behalf of St. Johns Riverkeeper's (SJRK) and Florida Springs Council (FSC) members, we respectfully submit public comments to identify potential errors and call out the shortcomings of the Central Florida Water Initiative (CFWI) 2020 Water Supply Plan that put our river, our springs and Florida's future at risk. In addition, we request additional information that is necessary for public dialogue and transparency.

The St. Johns River is a treasured watershed that provides ecological, recreational, economic and aesthetic benefits. Approximately 100 springs found largely in the Middle Basin of the St. Johns in Central Florida, provide up to 30% of the St. Johns' natural flow.

Fortunately, the State of Florida, the St. Johns River Water Management District (SJRWMD) and local governments throughout the watershed have invested millions of public dollars in an attempt to mitigate the damage to the St. Johns. However, those efforts have fallen short as evidenced by the current state of the River. Every effort must be made to avoid undermining significant public investment and the health of Florida's only American Heritage River. To do so,

state agencies must focus on cumulative impacts and holistic solutions to protect the St. Johns and springs today and for future generations.

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

- Overuse of the Floridan Aquifer in Central Florida has reduced spring flow and freshwater flows to the St. Johns River.
- Development and overuse of the Floridan Aquifer has led to a loss of wetlands.
- Increase nutrient loads from reclaimed water, sewage sludge and runoff from new development has undermined the health of the St. Johns and public investment.
- Dredging at the mouth of the St. Johns has increased saltwater intrusion further damaging wetlands and submerged vegetation.
- Sea level rise has driven saltwater intrusion further up river.
- Increasing temperatures will increase the frequency of algal blooms and rate of evapotranspiration (ET), resulting in ecological degradation, and lower surface water levels.

Clean, fresh water is the lifeblood of the St. Johns River, its springs and tributaries. Our wetlands, forests, riparian zones, and aquatic plants provide the habitat and food sources that sustain healthy plant, fish, and wildlife populations. The St. Johns also sustains nearly 5 million people who live within its watershed. It is our collective duty to protect this natural treasure.

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, its springs and its tributaries. SJRK challenges the need and viability of water withdrawals and questions the societal benefits in light of the enormous economic and environmental costs.

Why spend billions of public dollars and jeopardize the health of our rivers with massive surface water withdrawals when we can meet our future supply needs by allocating and using our current water supply resources more judiciously, responsibly and efficiently?

The bottom line is that water conservation does work and is without question a much more sustainable, cost-effective and environmentally-responsible solution.

Let's keep the straws out of the St. Johns, quit over-allocating our groundwater to feed unbridled growth, and finally get serious about addressing the root causes of our water use problems.

On behalf of the St. Johns Riverkeeper and Florida Springs Council members, we respectfully ask the CFWI Steering Committee to consider the following recommendations:

Stimulate Sustainable Growth, Not Unbridled Growth at our river and our springs' expense. Plan for Florida's population growth to better protect natural lands, promote livable communities, and save taxpayer dollars. Protective growth standards should be based on available water supply and protection of clean water for human consumption and natural systems.

Prioritize Water Conservation, efficiency, and reuse strategies instead of expensive, harmful water withdrawals. Water conservations strategies in the CFWI RWSP are wholly insufficient and exclude even the most obvious and cost-effective water conservation measures in favor of unsustainable, expensive, unnecessary, and damaging surface water projects.

Protect the St. Johns River and Florida Springs from the inevitable harmful impacts of overuse of our Aquifer and surface water withdrawals. A holistic approach, which balances the District's mission to provide water for consumptive use and protect Florida's water resources must be adopted. The current Draft Plan only addresses one side of the equation and therefore is fundamentally unsound. Safeguards must be in place to protect our aquifer, our springs and our river and to provide safe drinking water.

Genuine Participation with Stakeholders and Local Governmental officials must occur throughout the area of impact including throughout the Middle and Lower Basins of the St. Johns River.

CENTRAL FLORIDA WATER INITIATIVE ERRORS PUT FLORIDA WATERS AT RISK

Overview

Central Florida has reached the sustainable limits of its predominant source of water, the Floridan Aquifer, As a result, The St. Johns River, South Florida and Southwest Florida Water Management Districts created the Central Florida Water Initiative (CFWI) to identify strategies to meet the projected demand.

The CFWI Planning Area consists of all of Orange, Osceola, Seminole, and Polk counties and a portion of southern Lake County, covering approximately 5,268 square miles.

The CFWI Planning Area is currently home to approximately 2.9 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 4.4 million by 2040, which is a 49 percent increase from the 2015 estimate.

With the current pumping of approximately 659 million gallons of water a day (MGD) within CFWI's 5-county area, signs of significant stress to the Floridan Aquifer, wetlands and springs are evident that are being downplayed within the CFWI 2020 Water Supply Plan.

In addition, current permit allocations, more than 1 billion gallons of water a day (1064 MGD), outpace available water supply putting our springs, our river and our drinking water at risk. It is primarily the Water Management Districts failure to responsibly regulate water use through the Consumptive Use Permitting process that has harmed our most valuable waterways and put Floridians on the hook for expensive water development projects. The CFWI fails by doubling-down on this already failed policy, instead of funding aggressive water conservation measures and requiring reductions in existing permits.

Unfortunately, CFWI does not encourage sustainable growth practices, prioritize water conservation, or reign in existing permit allocations. Instead, the Water Supply Plan relies heavily on unsustainable surface water withdrawals to meet the projected demand, saddling Floridians with unnecessary environmental and economic costs.

Central Florida Water Initiative – Fueling Sprawl

Florida's future is threatened by unbridled growth.

> *As Florida returns to its historic growth rate of a thousand new residents a day – another City of Tampa each year – development pressures intensify, as do impacts to our lands and water supply. The pressures of dynamic population growth combined with rising seas comes at a time when Florida's state process to manage growth has been eviscerated. How Florida's future governor, legislators and other state and local leaders respond to these increasing challenges will determine the quality of our communities and the ecological health of our natural lands for future generations. – Trouble in Paradise, presented by 1,000 Friends of Florida*

CFWI simply accepts a 49% population increase and a 53% increase in public water supply demand without questioning if Central Florida can handle such dramatic growth.

- Is a 49% increase in population within the 5-county CFWI sustainable?
- What State agency is responsible for addressing long-term sustainability?
- Did CFWI consider protective growth standards based on available water supply?

CFWI accepts unsustainable growth without question and takes no responsibility to fully evaluate what level of growth protects the vitality of Central Florida's economy and water supply and the health of our natural systems.

1. **Stimulate Sustainable Growth**, Not Unbridled Growth at our river and our springs' expense. Plan for Florida's population growth to better protect natural lands, promote livable communities, and save taxpayer dollars. Protective growth standards should be based on available water supply and protection of clean water for human consumption and natural systems.

CFWI Fails to Make Water Conservation a Priority

According to the SJRWMD, **"Considerably greater potential for water conservation exists if more incentives are provided, stricter regulation is required, or the cost of new water supplies rises sharply."**

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

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

While the 2020 CFWI Water Supply Plan did increase water conservation savings from its 2015 projection of 37 MGD, the 2020 projection of ***50.32 to 55.83 MGD of water conservation*** savings only meets 5.5% - 6.2% of the projected 907.59 MGD total water demand.

It is clear that there is much greater opportunity for water conservation savings if CFWI included reasonable, responsible regulations to ensure CFWI counties live within their water means.

Unfortunately, CFWI assumed *current* levels of water conservation to continue until 2040 instead of prioritizing responsible water use reductions:

> *Appendix A For this 2020 CFWI RWSP it is assumed that current levels of water conservation and use of reclaimed water will continue through the year 2040 planning horizon; additional conservation and the use of reclaimed water will be effective in reducing future water demands.*

The CFWI's myopic focus on developing alternative water supplies misses even the most obvious, cost-effective, and beneficial water conservation projects. For example, the Plan projects agricultural water use demand to be 163.49 MGD in 2040 but only anticipates a savings of 4.19 MGD from water conservation, a measly 2.5 percent reduction. Not only does this paltry projection not include future technological advancements, it ignores potential savings from currently available technologies like soil moisture sensors. According to scientists at the University of Florida's Institute of Food and Agricultural Sciences (UF/IFAS) the instillation and utilization of soil moisture sensors can save between 30 percent and 60 percent depending on current water practices, crop type, and land characteristics. The absence of such cost-effective water conservation projects brings into question the approach, seriousness, and utility of the CFWI RWSP.

In addition, it is not clear how much groundwater is currently being used and projected for outdoor irrigation.

- What percentage of public supply is residential?
- What percentage of residential use is for irrigation?
- What amount is used for irrigation by businesses serviced by public supply?
- What percentage of the 21.56 MGD used by Domestic self-supply/small public self-supply is for irrigation?
- What percentage of Commercial/Industrial/Institutional (53.5 MGD) is used for irrigation?
- Did CFWI quantify potential water saving yields of reasonable, responsible water conservation regulations instead of relying on voluntary measures?
- What percentage of agricultural producers utilize soil moisture sensors?

2. **Prioritize Water Conservation**, efficiency, and reuse strategies instead of expensive, harmful water withdrawals. Water conservations strategies in the CFWI RWSP are wholly insufficient and exclude even the most obvious and cost-effective water conservation measures in favor of unsustainable, expensive, unnecessary, and damaging surface water projects.
    a. Water conservation must be the top priority in meeting future water demands. CFWI's focus should create a reasonable demand based on living within our water means. To do so, CFWI should develop a 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.
    b. 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.
    c. The State of Florida needs bold leadership to craft statewide water policy that prioritizes water conservation, sustainable building and planning practices, incentives and policies that encourage and/or mandate the efficient use of water, and market solutions, such as aggressive- tiered rate structures and quantity-based fees for CUP withdrawals.

CFWI Fails to Protect the St. Johns River and Florida Springs

The CFWI 2020 Water Supply Plan continues to allow unsustainable use of our aquifer, downplays existing environmental harm within the 5-county CFWI area, ignores downstream impacts to the St. Johns River from harmful **water withdrawals.**

CFWI Downplays environmental impact to our aquifer and springs within CFWI area -

The CFWI 2020 Water Supply Plan does not provide a full accounting of existing environmental harm within its 5-county area. Sink holes, damage to wetlands, reduction of spring flow, upward migration of poor groundwater quality, and dropping lake levels are all indicators of overuse of our aquifer.

CFWI estimates that there are more than 1 million acres of wetlands within CFWI Planning Area, but limited their focus on groundwater-dominated wetlands that make up less than 20% of total wetland acreage. Within that 20%, only 47 of the existing 107 were actually analyzed leaving a more than 90% of wetlands within the CFWI area out of the equation.

CFWI reports that several communities within the CFWI area are known to have poor quality water. Yet, CFWI concluded that the additional drawdown of the aquifer will not lead to "unacceptable additional water quality degradation" even though CFWI did not model this known problem.

Mean annual flows of Wekiwa Springs dropped below acceptable levels after 2006 and are not in compliance with its Minimum Flow & Level. However, the 2020 CFWI Plan allows for the additional reduction in flow for both Wekiwa Springs and the St. Johns River. Spring flow contributes approximately 30% to the overall St. Johns River water budget. Where there are spring flow decreases, those decreases are mirrored by downstream flow declines in the St. Johns.

CFWI Ignores Downstream Impacts to the St. Johns River -

The CFWI 2020 Water Supply Plan **incorrectly states** that the SJRWMD 2012 Water Supply Impact Study (WSIS) "***confirms*** that the St. Johns River is a viable alternative water supply source, with combined withdrawals of up to 155 MGD from three locations, would result in minimal to negligible environmental impacts to both surface and groundwater resources."

The WSIS does not "confirm" or give a green light to withdraw water from the St. Johns River.

CFWI is justifying risky surface water withdrawals based on the findings of a flawed, incomplete study by SJRWMD. A group of independent scientists and experts from the National Research Council (NRC) conducted a peer review[1] of the St. Johns River Water Supply Impact Study (WSIS), identifying significant shortcomings in the study and expressing concerns regarding many of the conclusions. **According to the NRC, "the WSIS operated within a range of**

[1] https://www.sjrwmd.com/documents/water-supply/#nrc-reports

constraints that ultimately imposed both limitations and uncertainties on the study's overall conclusions."

The WSIS came to the conclusion that:

> "Sea level rise, land use changes, and completion of regional water projects in the Upper St. Johns River Basin project would reduce or eliminate the effects of water withdrawals. "
>
> "Intensification of land uses would increase runoff and river flows. Sea level rise will cause saline water to move farther upstream and will raise water levels in the lower and middle reaches."

WSIS failed to fully evaluate the water quality impacts of the resulting saltwater intrusion and increased pollution loads due to increased runoff:

> "Although increases in runoff associated with the intensification of land uses would significantly reduce the effects of water withdrawals, they could increase pollutant loadings. This important factor was not evaluated by the WSIS, and this limitation was a concern raised by the National Research Council during peer review."

Based on the WSIS conclusions and the NRC's review, it is clear that is significant risks that water quality degradation will be a direct impact of surface water withdrawals that has not been adequately studied or accounted for.

The NRC also raised concerns about the lack of regulatory safeguards and the ability of SJRWMD's Minimum Flows and Levels (MFLs) ability to protect the St. Johns River during times of low flow and drought:

> "Finally, insofar as the MFL regulations limit the withdrawal allowable during low flow periods, these conclusions may be technically correct, but th**e Committee maintains substantial concern as to whether MFLs will be rigidly enforced in the future. If there is an extended drought in the future, when increased water supply demands have led to surface withdrawals, water suppliers might not be able to withdraw water from the river for months or even years on end. It is not obvious that this would be socially acceptable**."

St. Johns Riverkeeper has serious concerns that these proposed withdrawals would:

- Worsen existing pollution problems,
- Increase the frequency of toxic algal blooms,
- Further reduce freshwater flow and increase salinity levels farther upstream, and
- Adversely impact the fisheries, wildlife and submerged vegetation in and along the St. Johns and its tributaries.

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

- How will CFWI address the identified NRC shortcomings of the WSIS?
    - "….the workgroups **did not appear to consider the possibility of back-to-back extreme events** in their analyses, e.g., two or three years of extreme drought in a row, which the Committee considers to be reasonably likely future situations."
    - **Several critical issues that are beyond the control of the District or were considered to be outside the boundaries of the WSIS limit the robustness of the conclusions.** These issues include **future sea-level rises and increased stormwater runoff and changes in surface water quality** engendered by future population growth and land-use changes.
    - "Committee maintains **substantial concern as to whether MFLs will be rigidly enforced in the future**."

- What is the status of the SJRWMD WSIS update including model enhancements and much needed Water Quality Analysis?
- How did CFWI factor in climate change and sea level rise impacts to surface water sources? "Increasing temperatures could increase evapotranspiration (ET), resulting in lower surface water levels, and increased irrigation demand, as well as impacts to stormwater runoff, soil moisture, aquifer recharge, and water quality." (pg. 8 2020 CFWI)
- How is CFWI addressing water quality impacts outside the CFWI area? Did CFWI review MFLs outside CFWI area?
- What is the current status of the St. Johns River MFL at DeLand?

We continue to urge the CFWI to remove surface water withdrawal projects from the water supply plans and prioritize planning within our water means through water conservation and sustainable growth.

3. **Protect the St. Johns River and Florida Springs** from the inevitable harmful impacts of overuse of our Aquifer and surface water withdrawals. A holistic approach, which balances the District's mission to provide water for consumptive use and protect Florida's water resources must be adopted. The current Draft Plan only addresses one side of the equation and therefore is fundamentally unsound. Safeguards must be in place to protect our aquifer, our springs and our river and to provide safe drinking water.
    a. **Must Conduct Full-Accounting of Existing Environmental Harm within CFWI Area**
    b. **Must Fix WSIS Shortcomings Prior to Water Withdrawals/Ensure Safeguards**
        - Full/Transparent/Peer Reviewed Update to WSIS to include Water Quality Element
            - Fully incorporate water quality degradation risks associated with increased run-off due to development and saltwater intrusion

- Amend CFWI language acknowledging shortcomings of the WSIS and unexamined risks to the St. Johns River that must be addressed. The WSIS does not "**confirm**" SJR as viable AWS source.
- Fully explain how St. Johns River MFLs will be enforced to provide much needed safeguard for the St. Johns

Lack of Public Participation in Areas at Risk

CFWI has not adequately engaged the public outside the CFWI five county area. In 2015, Jacksonville Mayor Lenny Curry submitted the following in his official comments:

> *The official positon 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.*

There is no mention within the 2020 CFWI Water Supply Plan of any attempt to address Northeast Florida's concerns.

Stakeholders throughout the SJRWMD, SFWMD and SWFWMD have little chance of participating in important water policy discussions. This ongoing 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, St. Johns River or Florida Springs.

At a time when elected officials across the state are dealing with the threats of Coronavirus, it is critical that the CFWI planning team make every effort to reach out to the municipalities impacted by the CFWI projects, not just those within the CFWI Project area. With significant impacts outside the CFWI area, it is critical that CFWI engages citizens and elected leaders throughout the St. Johns River watershed in the SJRWMD area.

4. **Genuine participation with stakeholders and local governmental** officials must occur throughout the area of impact including throughout the Middle and Lower Basins of the St. Johns River.

Conclusion

On behalf of the St. Johns River and the St. Johns Riverkeeper members, as well as the Florida Springs Council, we submit these comments for your consideration. We 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.

St. Johns Riverkeeper and Florida Springs Council Recommendations

1. **Stimulate Sustainable Growth**, Not Unbridled Growth at our river and our springs' expense. Plan for Florida's population growth to better protect natural lands, promote livable communities, and save taxpayer dollars. Protective growth standards should be based on available water supply and protection of clean water for human consumption and natural systems.
2. **Prioritize Water Conservation**, efficiency, and reuse strategies instead of expensive, harmful water withdrawals. Water conservations strategies in the CFWI RWSP are wholly insufficient and exclude even the most obvious and cost-effective water conservation measures in favor of unsustainable, expensive, unnecessary, and damaging surface water projects.
    a. Water conservation must be the top priority in meeting future water demands. CFWI's focus should create a reasonable demand based on living within our water means. To do so, CFWI should develop a 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.
    b. 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.
    c. The State of Florida needs bold leadership to craft statewide water policy that prioritizes water conservation, sustainable building and planning practices, incentives and policies that encourage and/or mandate the efficient use of water, and market solutions, such as aggressive- tiered rate structures and quantity-based fees for CUP withdrawals.

3. **Protect the St. Johns River and Florida Springs** from the inevitable harmful impacts of overuse of our Aquifer and surface water withdrawals. A holistic approach, which balances the District's mission to provide water for consumptive use and protect Florida's water resources must be adopted. The current Draft Plan only addresses one side of the equation and therefore is fundamentally unsound. Safeguards must be in place to protect our aquifer, our springs and our river and to provide safe drinking water.

a. **Must Conduct Full-Accounting of Existing Environmental Harm within CFWI Area**

b. **Must Fix WSIS Shortcomings Prior to Water Withdrawals/Ensure Safeguards**

- Full/Transparent/Peer Reviewed Update to WSIS to include Water Quality Element
  - Fully incorporate water quality degradation risks associated with increased run-off due to development and saltwater intrusion
- Amend CFWI language acknowledging shortcomings of the WSIS and unexamined risks to the St. Johns River that must be addressed. The WSIS does not "**confirm**" SJR as viable AWS source.
- Fully explain how St. Johns River MFLs will be enforced to provide much needed safeguard for the St. Johns

4. **Genuine participation with stakeholders and local governmental** officials must occur throughout the area of impact including throughout the Middle and Lower Basins of the St. Johns River.

For Florida Waters,

Lisa Rinaman
Riverkeeper
St. Johns Riverkeeper

Ryan Smart
Executive Director
Florida Springs Council

Letter from STOPR+2 (5/15/2020)

May 15, 2020

VIA EMAIL
TBader@sjrwmd.com

Mrs. Tammy Bader-Gibbs
Central Florida Water Initiative Regional Water Supply Plan Team Lead
St. Johns River Water Management District
4049 Reid Street
Palatka, FL 32177

Re: Comments on draft 2020 CFWI Regional Water Supply Plan

Dear Mrs. Bader-Gibbs,

The City of St. Cloud, Toho Water Authority, Orange County Utilities, Polk County Utilities, Reedy Creek Improvement District, Orlando Utilities Commission, and Seminole County (STOPR+2 Group) appreciate the opportunity to review and comment on the draft 2020 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) and commend the water management districts (Districts) on their efforts.

Per the Districts' established process, we provided general comments applicable to the overall RWSP via the public comment webform on the CFWI website (https://cfwiwater.com/planning.html). These general comments are also listed below. However, given the inherent limitations of the website format for those stakeholders wishing to provide more detailed information, we opted not to attempt to submit the lengthier, more specific comments using that platform. Instead, we submit herewith in the enclosed Attachment 1 our requested changes to the RWSP, which include: the aforementioned general comments; additional detailed and specific modifications directed to identified sections of the RWSP; and changes that would correct specific information contained in the RWSP.

a) The estimated groundwater availability presented in the RWSP was based on evaluation of a narrow range of future operational conditions and did not include consideration of all future increased recharge, potential alternative withdrawal distributions, projects to offset the effects of pumping, or other mitigative measures that would have potentially resulted in a higher estimate of groundwater availability. Because these management strategies represent real options for stakeholders in the region to meet future water supply needs, and because the Districts are currently issuing permits for such strategies, the RWSP should more clearly indicate that additional groundwater may be available through application of management strategies that are based on site-specific evaluations.

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b) The RWSP is ambiguous with regard to the classification of groundwater from the Lower Floridan aquifer (LFA) as a "traditional" supply source or "non-traditional" alternative water supply (AWS) source. Currently the RWSP presents both fresh and brackish LFA groundwater supply projects as future water supply options to meet projected demands beyond the estimated availability of fresh groundwater. The stakeholders need clearer direction on the parameters that will classify a LFA groundwater project as a non-traditional AWS project so the further development of this potential supply source can be planned accordingly.

c) The groundwater availability estimate for the region was based in large part on adopted minimum flows and levels (MFLs) in the region. The CFWI teams performing the technical evaluations in support of the RWSP rightly elected to not include MFL re-evaluations and new MFLs being developed because these MFLs are incomplete and subject to change. However, the RWSP notes the status of and fully acknowledges that these future MFLs could affect the results of the RWSP once adopted. The current discussion in the RWSP on future MFLs is sufficient and has been agreed upon through a significant consensus-based process. Therefore, additional preliminary and incomplete information regarding future or re-evaluated MFLs should not be released for public comment or incorporated into the RWSP without undergoing the established CFWI peer review process.

d) The Florida Department of Environmental Protection (FDEP), the Districts and public supply utilities worked diligently as a team to develop an estimate of potential future conservation water savings considering the significant savings and associated reduction in per capita use already achieved by public water suppliers. However, the RWSP repeatedly caveats that additional conservation savings beyond that estimated by the CFWI Conservation Team can be achieved without presenting any research to substantiate this statement and without consideration of the cost required to achieve additional savings. The conservation sections of the RWSP should not overstate the potential for expanded conservation programs to achieve additional water savings without the research to corroborate these statements and should include consideration of the potential substantive costs that could be required to implement expanded conservation programs.

e) The RWSP does not capture the urgency set forth in the statute regarding the development of MFL recovery and prevention strategies and should include a commitment by the Water Management Districts to expeditiously adopt recovery or prevention strategies where determined necessary.

f) The funding chapter of the RWSP does not sufficiently meet statutory requirements to analyze the funding needs and possible funding sources for the water supply, water conservation and water resource development projects identified in the RWSP for all existing and future reasonable and beneficial uses for all projected use types.

g) The FDEP and Districts should prioritize efforts required by statute to develop consistent rules for the CFWI area, including reinitiating and holding additional meetings with interested stakeholders.

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We appreciate the Districts' consideration of these comments and those which are provided as Attachment 1 of this letter. The STOPR+2 Group will also e-mail a Microsoft Word electronic version of our comments to you for convenience in editing the RWSP.

If you have any questions or would like to discuss any of the comments further, please feel free to contact us.

Submitted on behalf of the STOPR+2 Group:

By:

Todd P. Swingle, P.E.
Executive Director
Toho Water Authority

cc: Mrs. Kristine Morris, Florida Department of Environmental Protection
Dr. Ann Shortelle, Executive Director, St. Johns River Water Management District
Mr. Drew Bartlett, Executive Director, South Florida Water Management District
Mr. Brian Armstrong, Executive Director, Southwest Florida Water Management District
Mr. Douglas Burnett, Chairman, St. Johns River Water Management District
Mr. Chauncey Goss, Chairman, South Florida Water Management District
Mr. Mark Taylor, Chairman, Southwest Florida Water Management District

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ATTACHMENT 1

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Central Florida Water Initiative (CFWI)
Regional Water Supply Plan (RWSP) March 2020
STOPR+2 Review Comments

2020 CFWI RWSP Main Document - Comments

1) *General*: The RWSP is ambiguous with regard to the classification of groundwater from the Lower Floridan aquifer (LFA). Groundwater from the LFA can be fresh or brackish in central Florida, depending on the location. Fresh groundwater from the LFA has been used in central Florida for decades. Brackish groundwater from the LFA is beginning to be implemented as an alternative water supply (AWS) source in central Florida. In the previous RWSP, brackish groundwater was considered a non-traditional or AWS source, and fresh groundwater was considered a traditional source. In this RWSP, fresh groundwater from the LFA appears to sometimes be considered a traditional source and sometimes considered a non-traditional source, depending on the water supply project option. The stakeholders need clearer direction on the parameters that will classify a LFA groundwater project as a non-traditional AWS project so the further development of this potential supply source can be planned accordingly. Please clarify this ambiguity in the RWSP, which appears in the following locations:
    a. Chapter 2, Figure 3, Page 13
    b. Chapter 7, Figure 23, Page 68
    c. Chapter 7, Table 20, Page 69
    d. Chapter 7, Water Supply Project Options and Initiatives, Third Paragraph, First Sentence
    e. Chapter 7, Brackish/non-traditional Groundwater section
    f. Chapter 9, Page 87, Third Paragraph, Second Sentence
    g. Chapter 9, Conclusions, Page 88, Third Full Paragraph
    h. Chapter 9, Conclusions, Page 90, Brackish/non-traditional Groundwater section
2) *General*: The groundwater availability estimate for the region was based in large part on adopted minimum flows and levels (MFLs) in the region. The CFWI teams performing the technical evaluations in support of the RWSP rightly elected to not include MFL re-evaluations and new MFLs being developed unless these future MFLs were through the peer review and public review processes and were approved by the Groundwater Availability Team (GAT) for use in the RWSP. However, the RWSP notes the status of these future MFLs and fully acknowledges that they could affect the results of the RWSP once adopted. The current discussions in the RWSP on future MFLs are sufficient and have been agreed upon through a significant consensus-based process. Therefore, additional preliminary and incomplete information regarding future or re-evaluated MFLs should not be released for public comment or incorporated into the RWSP without undergoing the established CFWI peer review process
3) *General*: The groundwater availability estimate and supporting analyses developed in support of the RWSP are based on the results of a single future groundwater flow model demand scenario evaluated in five-year increments through 2040. That scenario did not include all future increases in recharge (e.g., reclaimed water irrigation and aquifer

end of this sentence, "…but there is no legal requirement for these project options to be implemented. Laws and rules limit the scope of regulatory actions that can be taken to impose specific solutions on users." Please add this text back into the RWSP.

8) *Executive Summary, Page v, Water Supply Options Projects*: The Governance Structure Options was deleted from the previous draft. Please add this section back into the RWSP.

9) *Executive Summary, Page v, Conclusions and Summary of Key Findings, Second Bullet after First Paragraph, Last Sentence*: This sentence says "Additional savings could be possible through higher participation rates and the implementation of other water conservation measures not factored into the existing estimates (.e.g., educational and outreach programs)." The conclusions of this sentence were not studied by the conservation subteam and have not been proven. This statement also does not consider or acknowledge the cost feasibility of additional conservation measures. Please change this sentence to read, "While additional savings may be possible through other conservation measures such as education and outreach programs, such savings will be more costly and require targeted implementation and assistance through State funding."

10) *Executive Summary, Page vi, Recommendations, Expanded Implementation of Water Conservation Programs, First Paragraph*: It may not be technically or economically feasible for all permittees to expand their conservation programs further. Change this paragraph as follows, "Effective water conservation programs rely on the participation of local governments, residents, the agricultural community, and other users. Comprehensive water conservation programs should continue to be implemented and if feasible,~~be~~ expanded ~~and~~to include voluntary and incentive-based initiatives, research, education and outreach initiatives, and regulatory initiatives to achieve savings including prioritization of allocated funding to meet or potentially exceed the estimated 2020 CFWI RWSP water conservation savings."

11) *Executive Summary, Page vi., Recommendations, Develop Specific Prevention or Recovery Strategies:* This language does not capture the urgency set forth in statute regarding development of recovery and prevention strategies. Section 373.709(2)(c) requires that RWSP's include "The recovery and prevention strategy described in s. 373.0421(2)." Section 373.0421(2) provides that if a MFL has been established and the existing flow or water level in the water body falls below, or is projected to fall below within 20 years, the WMD shall "expeditiously adopt a recovery or prevention strategy". This provision should include a commitment by the WMDs to expeditiously adopt these strategies. Change the second sentence of this paragraph as follows, "The Districts are currently developing and will expeditiously adopt MFL prevention or recovery strategies for MFLs currently or projected to fall below their minimum flow or level within 20 years and will continue to monitor, study, and evaluate…"

12) *Executive Summary, Page vii, Recommendations*: Chapter 9 (Conclusions and Recommendations) includes "continued development of consistent rules and regulations" and "pursue funding" as recommendations of the RWSP. Please add these recommendations to the Executive Summary.

13) *Chapter 1, Page 3, Goal and Guiding Principles, Page 3, Fourth Bullet after First Paragraph:* Change this sentence as follows, "Protecting ~~and enhancing~~ the environment, including the natural resource areas and systems." The goals and guiding principles

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contained in the CFWI Guiding Document approved by the Steering Committee do not discuss enhancing the environment.

14) *Chapter 1, Page 7, Water Supply Sources, Groundwater, Second Sentence*: Change this sentence as follows, "The ~~Upper~~ Floridan aquifer ~~(UFA)~~ has historically been the primary source of water supply throughout the CFWI Planning Area."

15) *Chapter 2*: Add descriptions of the PRWC Peace Creek Project and the PRWC Peace River Surface Water Project as surface water AWS projects that have received funding from the Districts over the past five years to this chapter. The STOPR+2 group previously provided suggested write-ups for these projects.

16) *Chapter 2, Figure 3, Page 13*: Add the Cypress Lake Wellfield Project, the PRWC Peace Creek Project, and the PRWC Peace River Surface Water Project to this figure.

17) *Chapter 3, Page 25, Stakeholder Review, Third Sentence*: Please change this sentence as follows, "Changes and comments were incorporated at the Districts' discretion~~where appropriate~~, and all comments…"

18) *Chapter 4, Environmental Measures, Page 40, Third Paragraph*: Add the following sentence from the previous draft of the RWSP back at the end of this paragraph, "However, increased groundwater pumping is associated with other factors such as changes in land use and drainage that also may affect groundwater levels and wetland conditions." This was an accurate statement from the previous draft that should be acknowledged.

19) *Chapter 4, Environmental Measures, Page 40, Table 14*: Add the percentage increase in parentheses after the increase in acreage throughout Table 14 to provide additional context to the results.

20) *Chapter 4, Groundwater Availability, Page 46, First Paragraph after Table, First Sentence*: Please change this sentence as follows, "Given that there are existing impacts under the 2014 RC, it was established for the purposes of this plan~~determined~~ that the planning-level…"

21) *Chapter 4, Groundwater Availability, Page 46, First Paragraph after Table, Fourth Sentence*: Please change this sentence as follows, "Limiting the planning-level groundwater availability to this volume takes into consideration that the Wekiva Springs and Rock Springs, both OFSs, are ~~shown as not meeting~~predicted to not meet their currently adopted MFLs under groundwater withdrawal volumes exceeding 800 mgd and 825 mgd, respectively."

22) *Chapter 5, Active Water Conservation Projection Methodology, Page 51*: Add the following paragraph at the end of this section in order to include a consideration of cost feasibility with regard to increased conservation, "The costs required to achieve this level of water conservation were not directly quantified in the development of the potential water conservation estimates. However, for the 2015 RWSP the estimated cost of future water conservation was over $122 million for an estimated 27.9 mgd of savings. It is anticipated that the costs required for the currently projected level of water conservation are similar. Increased funding from the Districts will likely be needed to achieve the estimated level of water conservation savings."

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23) *Chapter 5, Future Public Supply Water Conservation Opportunities, Pages 51 and 52*: Change this paragraph as follows, "The projected water conservation savings for the PS water use category ~~are~~may be conservative, as they are based on quantified water conservation measures implemented within the CFWI Planning Area. There is potential for increased water conservation savings beyond the projected water conservation savings. ~~with increased participation rates and implementation of other water conservation measures not factored into the existing estimates, including more educational and outreach programs.~~ While some current conservation measures may not have the conservation savings previously anticipated or may be approaching the maximum conservation savings potential for specific measures, additional water conservation savings may be possible through the implementation of new or expansion of current measures." This revised language was agreed upon by consensus of the Water Conservation Subteam but was not included in the RWSP by the Districts. These changes also serve to more accurately reflect the analyses performed by the team.

24) *Chapter 5, Summary, Page 54, Second Paragraph, First Two Sentences*: Change these sentences as follows, "The projected water conservation savings for all water use categories in this 2020 CFWI RWSP ~~are~~may be conservative. There ~~is~~may be potential for increased water conservation savings beyond the projected water conservation savings with ~~increased participation rates~~funding for and implementation of additional water conservation measures or expansion of existing measures, including more educational and outreach programs."

25) *Chapter 8*: Chapter 8 does not meet statutory requirements. Sections 373.709(2)(a)3.c and 373.709(2)(b)2.c, F.A.C. require an analysis of funding needs and funding sources of possible funding options for water supply and water resource development projects identified in a RWSP. Section 373.709(2)(k), F.A.C. specifically requires an assessment of how these projects support recovery and prevention strategies, while ensuring that sufficient water will be available for all existing and future reasonable beneficial uses and natural systems, and that the adverse effects of competition for water supplies will be avoided. Chapter 8 currently does not contain this assessment. In addition, a majority of the identified water supply options in the RWSP are for public water supply. It is not clear that future sources have been identified to meet the projected increase in demand for each use type contained in the RWSP, and that funding sources have been identified to implement the water supply options identified for each use type. Chapter 8 should be expanded to more directly meet the requirements of Section 373.709, F.A.C.

26) *Chapter 9, Water Conservation, Page 90, First Paragraph*: Please change the first and third sentences of this paragraph as follows, "Water conservation by all water use categories will continue to be a priority to meet a portion of the CFWI Planning Area's future water demands. … While water conservation efforts have been implemented in the CFWI Planning Area, additional water conservation will play an important role in meeting future water demands ~~is critical~~.

27) *Chapter 9, Water Conservation, Page 90, Second Paragraph, First Two Sentences*: Changes these two sentences as follows, "The projected water conservation savings for all water use categories in this 2020 CFWI RWSP may be~~are~~ conservative. There is potential for increased water conservation savings beyond the projected water conservation savings ~~with increased participation rates and implementation of additional water conservation~~

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~~measures, including more educational and outreach programs.~~ While some current conservation measures may not have the conservation savings previously anticipated or may be approaching the maximum conservation savings potential for specific measures, additional water conservation savings may be possible through the implementation of new or expansion of current measures. "

28) *Chapter 9, Brackish/Non-Traditional Groundwater, Page 90, Second Sentence*: Change this sentence as follows, "The LFA appears to be a viable alternative source for additional potable water and additional hydrogeologic data to better characterize this aquifer will facilitate the expanded use of the LFA as a supply source~~but little is known about long-term water quality impacts and drawdowns in the UFA due to sustained withdrawals from this aquifer~~."

29) *Chapter 9, Stormwater, Page 92*: Please modify the text to clarify what the following bullet means, "Address required treatment levels for SAS recharge, conjunctive use opportunities with reclaimed water, and direct injection to the FAS." Recharging the SAS with stormwater is equivalent to a stormwater retention pond, which already has regulations. If conjunctive use opportunities with stormwater and reclaimed water is in reference to public access irrigation, those regulations are also already established. It is unclear what this bullet means.

30) *Chapter 9, Intergovernmental, Stakeholder, and Public Coordination, Page 94, Bullet List*: Add the following text as a new bullet, "Prioritize efforts required by statute to develop consistent rules for the CFWI area, including holding additional meetings with interested stakeholders."

2020 CFWI RWSP Main Document - Corrections

1) *Executive Summary, Page iv, Water Supply Options Projects, First Paragraph, Last Sentence*: Please confirm the estimated reuse quantity of 212 mgd. The RWSP later references this quantity being 215 mgd.

2) *Chapter 4, Page 37, Figure 11*: Change the figure title as follows, "~~Projected drawdown~~ Changes in Simulated Mean Water Levels in the Upper Floridan aquifer…" The legend indicates both drawdown and rebound are shown in the figure.

3) *Chapter 4, Environmental Measures, Page 43, Figure 14*: There are MFL symbols missing in the Wekiva Area in this figure.

4) *Chapter 5, Public Supply, Page 49, Figure 16*: Delete this figure. The figure gives the impression that no water conservation was occurring prior to 2015, which is inaccurate. This figure is also inconsistent with the statement on the following page indicating, "Projected water conservation savings may not directly reduce total water demands."

5) *Chapter 6, Seawater, Page 65, Second Paragraph, First Sentence*: Add the capacity of Tampa Bay Water's treatment plant where it is missing.

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2020 CFWI RWSP Appendices - Comments

1) *Appendix B, Public Supply – Active Water Conservation, Page B-3, Bullet List*: Please add back in the following bullet from the previous draft version of the RWSP, "In both methods, historical water savings rates were based on data submitted from 12 PS utilities and was applied to all remaining PS utilities. The high range was reduced for demand reductions due to higher efficiency new construction savings that are reflected in the passive projection to avoid duplication with the projected passive water conservation savings."

2) *Appendix C, General*: The MFL results are based on multiple predictive models. Insert the word "predicted" before the words "freeboard", "change", "flow", "head", etc., throughout this appendix.

3) *Appendix C, General:* The MFL results show both increases and decreases in freeboard at specific MFLs. As such, this section should not be written to only indicate decreases in freeboard. Replace the word "impacts" to "predicted changes in freeboard" or "predicted water level and flow changes" throughout this appendix. The word "predicted" should be used as a qualifier when discussing changes in freeboard, water levels, and flows.

4) *Appendix C, General*: The MFL results show both increases and decreases in freeboard at specific MFLs. As such, this section should not be written to only indicate "drawdowns" and "flow reductions". Change "drawdown" to "change in head" or "change in level" and "flow reduction" to "change in flow" throughout this appendix. The word "predicted" should be used as a qualifier when discussing changes in heads, levels, and flows.

5) *Appendix D, General*: In numerous places throughout the RWSP, the terms "sustainable", "sustainable limit", and "sustainable yield" are used when discussing groundwater availability. The term groundwater availability was agreed upon and used in the analyses performed in support of this RWSP. Please replace any references to "sustainable", "sustainable limit" or "sustainable yield" with the term "groundwater availability" for consistency throughout this appendix.

6) *Appendix D, General*: Change "impacts to" to "effects on" or "changes to" throughout this appendix. Not all changes in head or flows to the various criteria were negative/reductions. The word "predicted" should be used as a qualifier when discussing changes in freeboard, water levels, and flows.

7) *Appendix D, Table D-7 and Table D-8, Page D-47*: Add the percent change in parenthesis after the increase in acres throughout these tables to provide additional context to the results.

8) *Appendix D, Figures D-33 and D-34, Pages D-57 and D-58*: Add "Predicted" before "Increased Vertical Flow…" in the titles of these figures.

9) *Appendix D, Planning Level Groundwater Availability, Page D-59, First Paragraph, Third Sentence*: This sentence states, "Additional fresh groundwater withdrawals, beyond 760 mgd, are limited by water resource and natural system constraints." As previously noted, the analyses performed to reach the conclusions of the RWSP did not include consideration of all future increased recharge, changes in evapotranspiration associated with future changes in water table elevations, alternative spatial withdrawal distributions, projects to

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offset the effects of pumping, or other mitigative measures that would have potentially resulted in a higher estimate of groundwater availability. In fact, the Districts continue to issue permits for increased groundwater withdrawals within the CFWI, often with consideration of these types of measures. We respectfully request, as supported by recent and proposed District actions, that this sentence be modified to acknowledge the imprecise nature of the groundwater availability estimate as follows, "Additional fresh groundwater withdrawals, beyond 760 mgd may be available based on site-specific evaluations and through the application of mitigating measures, but are limited by water resource and natural system constraints."

10) *Appendix E, General:* The RWSP is ambiguous with regard the classification of groundwater from the LFA. Groundwater from the LFA can be fresh or brackish in central Florida, depending on the location. Fresh groundwater from the LFA has been used in central Florida for decades. Brackish groundwater from the LFA is beginning to be implemented as an AWS source in central Florida. In the previous RWSP, brackish groundwater was considered a non-traditional or AWS source, and fresh groundwater was considered a traditional source. In this RWSP, fresh groundwater from the LFA appears to sometimes be considered a traditional source and sometimes considered a non-traditional source, depending on the project. The ambiguity is present in numerous locations within Appendix E and should be clarified.

11) *Appendix E, General*: Provide a general description of each cost element presented in the tables (e.g., define unit production cost and how it is calculated). Also, tally the total cost for presentation in the main RWSP document, introduction of Appendix E, and at the end of each table in Appendix E.

12) *Appendix E, Table E-2, Page E-31*: Change the status of Project 2020_53 (TCR Improvement Project) to "Planning". The project partners working with the District on this project respectfully request this change as the project partners and the District are actively working to further this project. The project partners do not consider a project that is delayed due to a protracted regulatory process to be "On Hold" if the involved parties are actively working on the project.

2020 CFWI RWSP Appendices - Corrections

1) *Appendix A, Table A-13e, Page A-126*: During development of the RWSP, the Reclaimed Water Subteam agreed to present reclaimed water projections as a single line item for Orange County Utilities' (OCU's) entire service area. This was due to the complexities of OCU's system, which has four service areas but only three water reclamation facilities (WRFs), and reuse distribution system which do not always coincide with the limits of a single service area or with the general extent of the wastewater collection system of a specific WRF. The Districts have implemented this by presenting OCU's combined service area reclaimed water projections as occurring at the South Water Reclamation Facility (SWRF), and no reclaimed water projections at the Northwest Water Reclamation Facility (NWRF) and Eastern Water Reclamation Facility (EWRF), which is not accurate. Please combine the three-line items representing OCU's WRFs in Table A-13e into a single line item. The "Facility Name and ID" for this line item can be "OCU South WRF

(FLA107972), OCU Eastern WRF (FL0038849), and OCU Northwest WRF (FLA010798)".

2) *Appendix C, Figure C-5, Page C-21*: The figure has orange squares and orange circles, but the legend only has orange squares. Update the figure to include all symbols in the legend.

3) *Appendix D, Criteria for Groundwater-Dominated Lakes/Wetlands Without MFLs, Page D-17, First Paragraph, Second Sentence*: Insert the word "other" as follows: "The focus of the wetland risk assessment was on those wetlands that are primarily groundwater dominated systems (20 percent of the total wetland acreage) since these types of wetlands are generally considered as being more sensitive to changes in groundwater levels than other (e.g., riverine) systems (**Figure D-3**)."

4) *Appendix D, Criteria for Groundwater-Dominated Lakes/Wetlands Without MFLs, Statistical Analysis, Page D-24, Second Paragraph, Second & Third Sentences*: Modify the sentences as follows: "~~Water levels~~ The water level equaled or exceeded 80 percent of the time, ~~e.g.~~ i.e., the P80~~s~~ water level, ~~were~~ was calculated for several date ranges for each Class 1 wetland. A series of date ranges for P80 water levels, all starting with 2006 and ending in 2011 through 2017, were graphed as ~~line charts~~ time series."

5) *Appendix D, Criteria for Groundwater-Dominated Lakes/Wetlands Without MFLs, Statistical Analysis, Page D-24, Third Paragraph, Last Sentence*: Modify the sentence as follows: "The Class 1 wetland ~~statistics~~ θ value distribution moments (~~e.g.,~~ mean, standard deviation, kurtosis, skew) for each wetland group (Stressed and Not Stressed) and each physiographic province (Plains and Ridge) were evaluated for fit to the normal distributions~~.~~"

6) *Appendix D, Table D-6, Page D-30*: Add "within the CFWI" to the title of this table.

7) *Appendix D, Figure D-22 and Figure D-23, Pages D-44 and D-45*: The figures are presented in reversed order. Fig. D-22 has a caption of "The changes of simulated mean water levels in Model Layer 3…", but the figure shows changes of water levels in Model Layer 9. Conversely, Fig. D-23 has a caption of "The changes of simulated mean water levels in Model Layer 9…", but the figure shows changes of water levels in Model Layer 3. Please swap the two figures so that they match the figure captions.

8) *Appendix E, Table E-1, Page E-8*: Change the County of Project 102 to Seminole. The City of Altamonte Springs is located in Seminole County in lieu of Osceola County.

9) *Appendix E, Table E-2, Page E-10*: Change the estimated completion date of Project 2015_3, 4, 5 (Cypress Lake Wellfield Project) from 2020 to 2026.

10) *Appendix E, Table E-2, Page E-19*: Change the status of Project2015_61 (TWA Lake Marion WRF Expansion) to "Construction/Underway".

11) *Appendix E, Table E-1, Page E-5, Project 40*: Change the Implementing Agency Name to Orlando Utilities Commission and delete "(7 WPS)".

12) *Appendix E, Table E-1, Page E-5, Project 48*: Change the Implementing Agency name from OUC to Orlando Utilities Commission for consistency with other projects.

13) *Appendix E, Table E-2, Page E-10, Project No. 2020_1*: Change the Implementing Agency name from OUC to Orlando Utilities Commission for consistency with other projects.

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Letter from Waterkeepers Florida (5/15/2020)

May 15, 2020

Adam Blalock, Director
Office of Water Policy
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

VIA EMAIL: adam.blalock@floridadep.gov

RE: Draft 2020 Central Florida Water Initiative Regional Water Supply Plan

Dear Mr. Blalock:

On behalf of Waterkeepers Florida, we appreciate the opportunity to submit comments as part of the Central Florida Water Initiative (CFWI) 2020 Water Supply Plan.

Waterkeepers Florida unites 13 Waterkeeper organizations working in the state of Florida to protect and restore our water resources.

Our priorities include water conservation, stopping pollution at its source and sea level rise readiness.

Clean, abundant water is critical for Florida's future. Water is the linchpin of our environment and our economy, sustaining natural systems, public health, tourism, recreational and commercial fishing, agriculture, and development. Making bad water-use decisions now will only result in costlier and more contentious challenges in the future.

With population estimated to grow by 49% between now and 2040 with the CFWI area, a balanced approach to water supply planning must assure the sufficient availability of water for natural systems and beneficial consumptive uses which serve the public interest.

Unfortunately, CFWI only projects that less than 7.5% of the projected demand will be met with water conservation savings.

A growing body of research shows that water conservation has numerous significant advantages over alternative water supply including:

- lower capital and incremental costs;
- reduced energy consumption which minimizes greenhouse gas emissions;
- improved water quality by reducing runoff from inefficient irrigation practices;
- increased flow and levels in springs, rivers, lakes, and aquifers;
- greater predictability and sustainability for all water resource users.

Additionally, surface waters, identified as the primary "alternative water source" by CFWI are dependent upon adequate rainfall. **By relying upon surface water withdrawals to meet Florida's future water needs, policymakers are locking our state into an unavoidable clash between the needs of our natural systems and the needs of consumptive water users during times of decreased rainfall.** For instance, during a drought, when our rivers and lakes will most need to maintain their flows and levels for sustaining wetlands, fisheries, and estuarine systems and to reduce saltwater intrusion, water users (particularly agricultural and residential users), will need to withdraw the greatest amounts of water.

The Florida-Georgia water wars and the dramatic decline of Apalachicola Bay serve as a vivid reminder of the devastating impacts to our waterbodies, fisheries, and downstream communities that can result from and the mismanagement of water resources and the reliance on unsustainable sources of supply to meet unmitigated demand.

The bottom line is that relying on surface water withdrawals to meet Florida's future water needs is unsustainable in the long-term and unwise in the short-term. Therefore, we recommend that policymakers focus more attention on decreasing demand through conservation and increased efficiency.

In order to ensure a clean and abundant water supply for Florida's communities and agricultural sector, we recommend policymakers take these actions:

- Water conservation must be established as a statewide priority as it is the most cost-effective way to secure Florida's water supply. All consumptive use permit applicants should be required to have measurable and enforceable goal-based water conservation plans.
- Price water to promote conservation. Placing a reasonable price on the quantity of water used would incentivize water conservation and direct water towards higher value uses.
- Expedite the establishment and adoption of Minimum Flows and Levels and incorporate them into water supply planning statewide. Water policy must include statutory

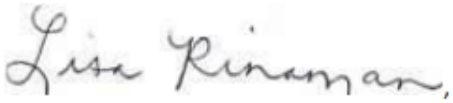
consequences for failing to meet regulatory standards to ensure that restoration will not become more difficult and more costly for future generations.

- Planning to meet the water supply needs of the future requires knowing how much water is being used today. All groundwater withdrawals of more than 100,000 gallons per day should be monitored.
- Water policy should minimize and regulate the amount of public money transferred to private interests through capital expenditures, especially in cases where there is no assurance of the cost effectiveness of projects.
- Water policy must not allow unilateral inter-basin transfers of water. For example, water management districts should not make water allocation decisions beyond their jurisdictional boundaries.
- Implement water-use planning and effective, monitored water conservation best management practices in the agricultural sector.
- Moratorium on consumptive use permits until robust water conservation protects Florida's limited water resources and natural systems.

Prioritizing water conservation reduces the need for expensive, unsustainable water withdrawals while protecting downstream users and ecosystems. Responsible demand management will ensure that the needs of reasonable and beneficial water users are met today and into the future.

Florida needs bold leadership from policymakers on water issues to ensure the long-term environmental health of our natural resources and economic well-being of our communities in the years to come.

For Florida Waters,



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A collaborative regional
water supply endeavor
to protect, conserve, and restore
our water resources.

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