



City of Minneola

"Discover the Possibilities"

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August 17, 2015

Via Email to cfwiwater@sfwmd.gov

South Florida Water Management District
C.F.W.I. Comments
ATTN: Dean Powell
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, FL 33406

Re: Draft C.F.W.I. Water Supply Planning Documents
City of Minneola Comments on Draft 2035 Regional Water Supply Plan

Dear Mr. Powell:

I am submitting the following comments regarding the draft Central Florida Water Initiative (C.F.W.I.) water supply planning documents on behalf of the City of Minneola. The City owns and operates a public water supply utility serving a rapidly growing customer base of over 10,000 citizens in southern Lake County, which over the next twenty years has the potential to expand to a customer base of 50,000 residents. The City has participated in and closely monitored the C.F.W.I. process, including the development of the C.F.W.I. Regional Water Supply Plan (R.W.S.P.) and the Solutions Plan. The City commends the efforts of the water management districts, and all those individuals who have contributed to the C.F.W.I. R.W.S.P. We believe a coordinated regional effort to protect our water resources and to ensure adequate water is available to meet the region's needs is essential to the continued prosperity and growth of the communities in southern Lake County, especially the City.

In the spirit of continued collaboration, the City has identified several areas of concern in the C.F.W.I. R.W.S.P. documents with regards to its existing and projected water supply needs, which may result in poor planning to meet the demands of anticipated growth. In particular, the City believes the draft R.W.S.P. significantly understates both the growth in population and water demands expected for City's service area during the planning period.

We understand that the draft R.W.S.P.'s demand projections for public suppliers located in the St. Johns River Water Management District were prepared by multiplying the average 2006-2010 unadjusted gross per capita rate, a period of economic downturn, for each public supplier

by a projected service area population derived from a proprietary model that incorporates 2011 University of Florida Bureau of Economic and Business Research (B.E.B.R.) medium county permanent population projections. Additionally, it is our understanding that the draft R.W.S.P. indicates a second public supply demand projection was prepared using the 2011 B.E.B.R. high population projections, which resulted in a projected public supply water demand that is fourteen percent (14%) higher than in the B.E.B.R. medium scenario. The City's concern is that in the case of its service area, both the B.E.B.R. medium and high methodologies do not take in to account known and approved housing and roadway improvement projects, and therefore grossly underestimate the projected growth in population and water demands for the City's 2015 to 2035 planning period.

Table A-1 in Appendix A to the draft R.W.S.P. contains the projected population and demand projections for public suppliers, derived using the B.E.B.R. medium scenario:

CFWI Draft RWSP Public Supply Population and Water Demand Projections for the City of Minneola: BEBR Medium Scenario											
Population Projections						Demand Projections (5 in 10)(mgd)					
2010	2015	2020	2025	2030	2035	2010	2015	2020	2025	2030	2035
9,535	10,480	11,619	12,876	14,251	15,868	1.48	1.62	1.80	2.00	2.21	2.46

As stated above, the City believes these projections drastically understate the growth in population and water demand that will occur within its service area between 2015 and 2035, based on several factors. First, the gross per capita demand amount does not take documented new development characteristics into account. Unlike new developments, the majority of the City's current customer base has mature landscaping, most of which has historically not been irrigated. In addition, new home construction typically includes in-ground automatic irrigation systems and requirements for upkeep of lawns and landscaping, which results in a higher water demand than what has historically been realized; therefore, there is a significant difference in water use patterns for new home construction compared the City's existing customer base. Second, the projection methodology uses proprietary modeling, applied using data extracted from a period of low growth during an economic downturn, that has not been updated in over four years, and thus does not take into account more recent changes in growth drivers and inhibitors within the census block levels used in the model.

Population and water demand projection concerns are particularly acute in the case of the City, where utility service lines have been extended and new and already vested and approved residential and mixed-use developments have begun construction. In addition, new roadways are going in and transportation access will result in greater growth rates than previously recognized. More specifically, within the City's service area, eight vested developments have been approved, which on buildout will comprise 9,694 new residences, 9,141 of which are single family units. The City anticipates that 8,990 of these new homes will be built within the 20-year planning period of the draft R.W.S.P. This reflects a significant increase in both its projected population growth rate and the estimated water demand projected in the draft

R.W.S.P. This new development will also use more water on a per capita basis than is currently the case due to development characteristics associated with new home construction, mainly irrigation demands. This per capita increase is a reflection of water demands associated with new home construction, not a reflection of the inefficient use of water, and is similar to new home construction demands and gallons per capita realized by other C.F.W.I. municipalities.

The following table reflects what the City believes will be the projected increase in population and water demand for the 2015 to 2035 planning period, based upon already approved and currently occurring residential growth:

City of Minneola's Service Area Population and Water Demand Projections											
Population Projections						Demand Projections (5 in 10)(mgd)					
2014	2015	2020	2025	2030	2035	2010	2015	2020	2025	2030	2035
10,870	11,150	19,107	29,599	39,939	50,596	1.48	2.08	4.12	7.00	9.82	12.73

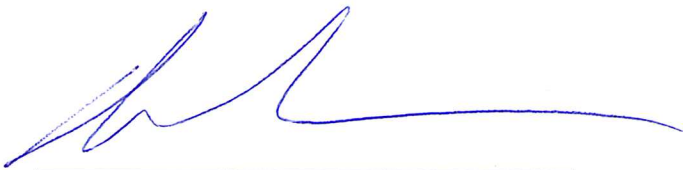
We believe this table reflects the most representative projections of the expected growth in population and water demand within the City's service area. Our confidence in these projections is based on several factors. As explained above, the projected growth is based on development that has already been vested and approved. Furthermore, the Florida Department of Transportation has begun construction on a new interchange in the City for the Florida Turnpike north of State Road 50 and south of U.S. Highway 27, which was approved based on the Hills of Minneola Development of Regional Impact, which is located within the City's service area. In conjunction with this Turnpike project, Lake County has approved construction of an extension to Hancock Road to serve this new development. These projects will significantly improve the City's accessibility to the Greater Orlando market, which will be a significant driver of growth during the planning period. Finally, the City's water use projections for these new developments are based on actual water use by developments within Lake County, which are comparable in terms of persons per household, lot size, irrigable area, irrigation requirements. This water use data provides a more reliable guide regarding expected future water use within the City's service area than the existing water use estimates that are the basis for the C.F.W.I. R.W.S.P. water use projections.

Minneola recognizes that the primary purpose of the public supply population and water demand projections prepared in the C.F.W.I. 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 Minneola found in the draft R.W.S.P. have significant implications for the City's own planning obligations. For example, planning for future water demands in the next draft of the City's Water Facilities Plan, based on the City's water use projections rather than the water use projections contained in the C.F.W.I. R.W.S.P., could be used by the Department of Economic Opportunity to find that the Water Facilities Plan is not in compliance because it is not financially feasible. Furthermore, to the extent that projections contained in the R.W.S.P. may be later used in the

consumptive use permitting process, reliance on unrealistically low population of water demand projections could result in a permitted allocation that is wholly inadequate to meet the City's actual water needs. These consequences, and the fact that the City's own projections differ so significantly from the projections contained in the R.W.S.P., compel us to express our concerns and request that the information outlined above be acknowledged and taken into consideration before the R.W.S.P. is finalized.

We appreciate the opportunity to provide comments on the draft R.W.S.P., 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 if you have any questions.

Sincerely,



Mark E. Johnson, City Manager
City of Minneola

cc: Sarah Whitaker, S.M.W. Geosciences, Inc.
Edward P. de la Parte, de la Parte & Gilbert, P.A.