



Outlook

Wekiva River MFL Recovery Plan

From Mike Cliburn <cliburn1947@gmail.com>**Date** Wed 4/2/2025 4:34 PM**To** Callie Register <cregister@sjrwmd.com>; John Fitzgerald <JFitzgerald@sjrwmd.com>; Clay Coarsey <CCoarsey@sjrwmd.com>**Cc** Nancy Prine <npla@aol.com>; Jay Exum <jay.h.exum@gmail.com>; Cindy Newton <cindynewton01@gmail.com> 1 attachment (20 KB)

2025 Draft CFWI RWSP Comments3.docx;

Hi Callie, John, and Clay - Nancy Prine, Cindy Newton, Jay Exum, and I would like to schedule a meeting with you to discuss the Draft 2025 CFWI Regional Water Supply Plan. Attached is a list of our questions about the plan. We would also like to learn about which projects in the draft RWSP are likely to be incorporated into the Wekiva River System MFL Recovery Plan.

Would you have time to meet via zoom or teams on any of the following dates - April 9th, 10th (AM), 22nd (PM), 25th, 29th or 30th?

Thank you!

Mike Cliburn
Friends of the Wekiva River
407.620.1497

2025 CFWI Regional Water Supply Plan – FOWR Questions – Revised 04-02-2025

Water Use:

1. Why has the projected 2045 Public Supply demand increased by 58% over the 2020 demand (642 mgd vs 407 mgd) when population is only projected to increase by 40%? Doesn't this mean the overall average per capita use is increasing? Figure 5 shows that per capita use is declining.
2. Why has the 2025 conservation forecast declined to 45 - 52 mgd by 2045 from 53 - 56 mgd by 2040 in the 2020 RWSP?
3. What is the definition of water resources benefit?
4. How is the water resource benefit calculated for reclaimed water? How much will reclaimed water projects offset water supplied by Floridan Aquifer wells in the Wekiva River basin?

Project List:

1. Taylor Creek Reservoir (2015-126): (Regional Project to construct intake structure, reservoir, treatment, storage & transmission facilities for Taylor Creek Reservoir)? Who is the lead agency for Project 2015-126?
2. Taylor Creek Reservoir (2020-53): When will construction of this project be completed?
3. How much will the following projects offset the current negative freeboard in the flows of the Wekiva River, Wekiwa Springs and/or Rock Springs?
 - a. Project 2015-1: South Lake County's LFA Fresh Groundwater wellfield project (Groveland, Minneola, Clermont & Utilities Inc). Also, who has the lead on this project and why is completion date TBD when the 2020 RWSP showed it being done in 2022?
 - b. Project 2020-1: OUC's SE Brackish WTP & Wellfield. Also, will this project allow OUC to reduce pumping from their wellfield at the Pine Hills WTP? If not, how does OUC propose to offset or reduce its impact to the Wekiva River & the springs?
 - c. Project 2020-2: Sanford's LFA Wellfield. Does Sanford's CUP require this project to be completed by a specific date? Why was substantial completion changed from 2026 to TBD?
 - d. Does Seminole County's Markham WTP wellfield impact Wekiva River & springs? Do any other Seminole County wellfields affect the river & springs? Has the County proposed any projects to offset their impact on the river & springs other than the recharge well that is being constructed?
 - e. Has Apopka proposed any non-traditional/brackish groundwater projects or surface water projects to offset their impacts on the springs and river?

4. Which of the projects (or combination of projects) listed in the 2025 Draft RWSP must be implemented to allow the Wekiva River, Wekiwa Springs, and Rock Springs to meet their MFLs?
5. Will the Recovery Plan include other projects that are not listed in the 2025 Draft CFWI RWSP?
6. How much would capping the artesian well at Wekiva Falls Resort reduce the negative freeboard in the Wekiva River?
7. What is the SJRWMD's target date for meeting the MFLs in the Wekiva River system?
8. We noted that the project list includes 6 Polk County brackish/nontraditional groundwater projects moving forward toward completion by 2027/8. Are there any differences between the consumptive use permit conditions in Polk County and those required in the Wekiva River Basin? Are there lessons that can be learned from consumptive use permitting in Polk County and the SWUCA that would help expedite implementation of projects in the Wekiva Recovery Plan? We understand that the entire CFWI is designated as a Water Use Caution Area, but why can't the Wekiva River system be designated as a special Water Use Caution Area to help raise public awareness that the river and its springs are not meeting their MFLs?



Outlook

RE: CFWI RWSP water supply options table

From Sarah Whitaker <swhitaker@smwgeosciences.com>**Date** Wed 4/2/2025 11:32 AM**To** Callie Register <cregister@sjrwmd.com>**Cc** Justin deMello <jdemello@woodardcurran.com>; tj fish <tj.fish@groveland-fl.gov> 1 attachment (31 KB)

Copy of Copy of CFWI_AppndxE-to Sarah with instructions.xlsx;

Callie,

Please call me if you have any questions. I put in the project (source) coordinates for Howey owned property on Lake Harris. Don't know where else to put it at this time. Source will be distributed upgradient from the source to utilities in south Lake County's CFWI and CSEC Regional Water Supply Planning areas and will offset Floridan aquifer groundwater withdrawals – benefiting the entire south Lake area and the aquifer in that region.

Thank you,



Sarah M. Whitaker, P.G.

President

SMW GeoSciences, Inc.
1028 W. New Hampshire Street
Orlando, FL 32804

P 407.426.2836 M 407.234.4675
swhitaker@smwgeosciences.com
www.smwgeosciences.com
<http://www.linkedin.com/in/smwhitaker>

Please note: As of June 1, 2024, my work hours are 9:00 am to 5:00 pm Monday, Wednesday, and Friday.
For anything urgent outside of these days and times, you may always call me on my mobile number.

From: Callie Register <cregister@sjrwmd.com>**Sent:** Tuesday, April 1, 2025 8:31 AM**To:** Sarah Whitaker <swhitaker@smwgeosciences.com>**Cc:** Justin deMello <jdemello@woodardcurran.com>**Subject:** Re: CFWI RWSP water supply options table

Sarah, please try to fill in the yellow highlighted cells in the attached. I also provided the DEP instructions page under a separate tab. If you don't know, please put tbd or N/A, as appropriate.

Thank you,

Callie Register

SJRWMD

Regional Water Supply Planning Coordinator

321-863-0011

From: Sarah Whitaker <swhitaker@smwgeosciences.com>

Sent: Monday, March 31, 2025 3:58 PM

To: Callie Register <cregister@sjrwmd.com>

Cc: Justin deMello <jdemello@woodardcurran.com>

Subject: FW: CFWI RWSP water supply options table

Callie,

Please give me a call to discuss the attached.



Sarah M. Whitaker, P.G.

President

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<http://www.linkedin.com/in/smwhitaker>

Please note: As of June 1, 2024, my work hours are 9:00 am to 5:00 pm Monday, Wednesday, and Friday.
For anything urgent outside of these days and times, you may always call me on my mobile number.

From: Sarah Whitaker

Sent: Thursday, February 27, 2025 12:44 PM

To: tj.fish@groveland-fl.gov

Cc: Justin deMello <jdemello@woodardcurran.com>

Subject: FW: CFWI RWSP water supply options table

Importance: High

Good afternoon,

Following up on our call yesterday, I contacted Clay Corsey at the District this morning because he has been instrumental in the push for Howey-in-the-Hills to develop a surface water source. Clay is also in charge of ALL Regional Water Supply Plans (RWSP) for the SJRWMD and is Callie Register's boss. Callie oversees the CFWI RWSP. He was very enthusiastic about the inclusion of the project in to the draft CFWI plan and I assume he spoke with Callie this morning and asked her to send the attached spreadsheet.

I also took the liberty of adding the line item for this project in the attached spreadsheet (bold text). I recommend whomever is put in charge of this, that they work with Callie on how to fill out the missing data. Callie is aware of the project, as I first reached out to her yesterday afternoon about how to get the project included, if the South Lake group were in agreement on its inclusion. Clay also recommended sharing the TAC agreement(?) to include Howey in the South Lake group with Callie and Clay.

Please let me know if I can help. Preferably this would be assigned to others (WC?), but I have made the first steps and am here to help. I highly recommend that this project be included in the CFWI RWSP 2025 update.

Thank you,



Sarah M. Whitaker, P.G.

President

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swhitaker@smwgeosciences.com
www.smwgeosciences.com
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Please note: As of June 1, 2024, my work hours are 9:00 am to 5:00 pm Monday, Wednesday, and Friday.
For anything urgent outside of these days and times, you may always call me on my mobile number.

From: Callie Register <cregister@sjrwmd.com>
Sent: Thursday, February 27, 2025 11:19 AM
To: Sarah Whitaker <swhitaker@smwgeosciences.com>
Cc: Clay Coarsey <Ccoarsey@sjrwmd.com>
Subject: CFWI RWSP water supply options table

Hi Sarah, for your reference, attached is a spreadsheet with the information we gather for water supply options that was used for the draft 2025 CFWI RWSP and one of the projects as an example. Please don't hesitate to reach out if you have any questions.

Thank you!

Callie Register, P.E.
Regional Water Supply Planning Coordinator
Bureau of Water Supply Planning
St. Johns River Water Management District
Palm Bay Service Center
525 Community College Pkwy SE • Palm Bay, FL 32909
Office: (321) 473-1328 • Cell: (321) 863-0011
Email: cregister@sjrwmd.com
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www.sjrwmd.com/ePermit

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](#)

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 - 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/>
- 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](#)

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- 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/>



Outlook

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>
Date Sun 4/20/2025 4:58 PM
To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning
Submitted at 04/20/25 4:58 PM

Name: Angel Martin

Email: amartin217@tampabay.rr.com

Date: Apr 20, 2025

Entity/Organization : Public

Comments :

1. The major rivers and streams and springs are simulated in the model. These are surface-water components that are simulated in the model. Not correct to say that no surface-water components are simulated in the model.

2. Page vi—Some additional specific information should be added about the need for additional monitoring wells and wetland monitoring sires are needed in certain areas. Besides additional groundwater monitoring and wetland sites that are mentioned in the last paragraph, some Page iii—There is a sentence that surface water is not included in the model simulations. Aren’t additional text is needed describing the possible need for additional aquifer performance tests and geologic data collection (for example, coring) to

improve the ECFTXv2.0 model.

3. Figure 2—Not easy to determine the delineation of the nine regional wetlands.
4. Figure 4—Hard to tell the different category as given in the legend and on the actual figure.
5. Figure 7—Should have a heading for the model layers the hydrostratigraphic units. Should have three column headings.
6. Figure 8—Specify that the changes are the reference condition minus the 2045 condition on either in the Explanation or the figure caption for this and subsequent figures 9-11. Suggest placing the aquifer name first and the model layer in parenthesis following in both the text, figures and tables.
7. Page 38—Define what is meant by brackish water in terms of dissolved solids concentrations.
8. Figure 12—Add groundwater-dominated before wetlands in the figure caption.
9. Table 15—More explanation is needed concerning the environmental criteria not being met. Give an example of such an environmental criteria. Add more description to the degree that an MFL status may vary from the STAR. Does this mean that an MFL status can change from met to non-met>
10. Figures 13-14—Can the purple and green areas just be designated as the ridge locations instead of regulatory wells? Should define in the Explanation the meaning of the numbered and lettered brackets around the circumference of the maps.
11. The areas in the figure are dashed, whereas these areas are solid in the Explanation.
12. Page 51—last paragraph in Introduction—should specify that the levels of funding and participation relate to entities described in the previous paragraph.
13. Figure 16--Should be ticks on the x-axis where the years are given. Hard to see the passive and active low line as it is covered partly by the yellow line.
14. Page 53—Can a reference be given for the Alliance for Water Efficiency's Water Conservation Tool? Can give a Web reference.
15. Figure 18—Should state that this is a

perspective diagram not to scale underlying the CFWI area. The labels on the land surface are small—difficult to see.

16. Figure 19—Should give a scale ratio and add Elevation above and below sea level or the datum. Add a scale to the index map.

17. Page 62—Give a figure reference to where the reader can see the Lake Wales Ridge to see where the SAS is primarily present.

18. Figure 2—Label some of the major lakes in the basins. The road lines look like the lines for the rivers. All the surface-water features towns mentioned in the text should be shown on a map.

19. Page 65—The three withdrawal locations mentioned for the St. Johns System should be shown on a figure. More description of the unreliability of the Peace River System should be given. Give a flow that makes this system unreliable. Be consistent with terminology. Sometimes the term river watershed is used and other times the term river watershed is used. Assume that these mean the same?

20. Figure 21—In the Explanation, add an example identifier from the map and change it to Structures and Identifier.

21. Page 68—Seawater--Give a reference for the seawater desalination facility for the Tampa Bay area.

22. Figure 22—For this and all figures with photos—give the view direction—view looking north, for example.

23. Figure 23—Define that the identifiers are listed in Appendix E.

24. Page 74—Add the area of freshwater in the LFA on a map as described in the Fresh Groundwater section. Can more information on the wells that are underway on when they will be finished?

25. Page 76—Define what is meant by high flow conditions for Peace Creek.

26. Page 77—Stormwater—Any discussion concerning stormwater capture on golf courses?

27. Page 79—Groundwater Modeling—Would some density data be collected from samples from present wells to possibly use with a density-dependent MODFLOW version? Incorporate

aquifer and confining bed parameters from new aquifer tests performed in the CFWI area? Could aquifer tests be performed as part of CFWI activities particularly in areas where data are lacking? Suggest exploring the use of parameter estimation techniques in future model calibration efforts and some model uncertainty analyses. Further analysis of aquifer/spring interaction is warranted in sensitive areas and where appreciable increases in groundwater withdrawals are expected. Suggest using the particle-tracing module in MODFLOW 6 to simulate possible flow from the lower Floridan aquifer upward to the upper Floridan aquifer.

28. Page 80—Give a reference for the new, updated lake-level methods.

29. Throughout the text the term currently is used—does this mean 2025 or some other date?

30. Page 89—Is the Springs Restoration Funding divided among the Water Management Districts in developing high-level project types? Is the funding divided by the districts or by individual projects?

31. Page 89-- Environmental Quality Incentive Program expected to continue as previous and not be eliminated because of funding cutbacks at—Is the the U.S. Department of Agriculture? What about other agriculture programs in terms of Federal funding?

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Outlook

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>
Date Wed 4/23/2025 12:01 PM
To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning
Submitted at 04/23/25 12:01 PM

Name: Angel Martin

Email: amartin217@tampabay.rr.com

Date: Apr 23, 2025

Entity/Organization : Public

Comments : A couple of additional comments after attending the CFWI 2025 Regional Water Supply Plan Steering and Public conference call are below.

1. Additional information is needed concerning what is meant by optimizing groundwater withdrawals in the CFWI area. For example, does this mean additional analysis of reviewing different pumping locations and amounts for 2045? There are groundwater management models available that can be used to optimize groundwater pumpage and minimize the effects from pumpage.

2. Additional information is needed concerning the possible use of different models for

simulating variable density. The Groundwater Flow Transport (GFT) model for MODFLOW 6 can simulate three-dimensional transport of a single species in flowing groundwater. SUTRA can be used to simulate variable density in groundwater with solute or energy transport in 2 or 3 dimensions in saturated/unsaturated conditions.

Please contact me if any additional information or clarification is needed. Thank you for the opportunity to provide comments.

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Outlook

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>
via sendgrid.net
Date Wed 4/30/2025 6:35 PM
To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning
Submitted at 04/30/25 6:35 PM

Name:	Thomas Mattiacci
Email:	mattiacci.work@frontier.com
Date:	Apr 30, 2025
Entity/Organization :	Independent Consultant
Comments :	1. General Comments to all maps, add the Polk County Parkway to all for better locations. 2. Page 12, if you only have 20,000 subscribers, you must do more public outreach and education. 3. Page 16, for water conservation, I know for a fact that many builders are still using St. Augustine grass as a standard. Florida-friendly landscaping should be required to lessen the irrigation burden on potable water. 4. Page 19, Lake Hancock, while I understand the need to impound water in Lake Hancock to release into the Peace River during dry periods. However, more must be said and determined about the effect this will have upstream,

especially in Saddle Creek and the City of Lakeland.

5. Page 23, I think you are just using standard Berber population projections. Please note that the 1000 Friends of Florida has stated that when Climate Change (warming) kicks in that people are going to move from South Florida and the coasts to the inland counties in central and north Florida, has this been considered?

6. Page 23, the domestic supply listed in Table 3 should be based on the population projections in Table 2.

7. Page 24, Figure 5, From 1995 to 2020, Florida gained over 7 million people. Please state how you account for the domestic supply going down during the same period, but will be significantly increasing through 2045.

8. Page 25, Table 6 and Table 7, please express on a County basis as presented for population in Table 2 on Page 23.

9. Page 25, Table 8, along with expressing this on a County basis as Table 2 on page 23 look at my comment No. 3 where I discussed builders using non-Florida-friendly landscaping.

10. Page 26, top of page. You mention four areas contributing to Commercial/Industrial/Institutional resulting in Table 9. Please break out and discuss all four areas and also express by County as in Table 2 on Page 23.

11. Page 27, Table 11. Please revise and express by County as in Table 2 on Page 23.

12. Page 32 Figure 7. Would be nice if you expressed elevations from surface on this graphic also.

13. Page 53, Figure 16. Did you forget to add the gray line for Water Demand with Passive and Active low?

14. Page 61, Brackish/Nontraditional Groundwater. Please comment whether or not the Lower Floridan Aquifer is a sustainable water source over long periods and discuss the Lower Floridan capacity. Also state how the CFWI and the Water Management Districts will be managing the Lower Floridan Aquifer.

15. Page 63, Indirect and Direct Potable Reuse.

Please describe what is being done to foster public acceptance of this water source. Please comment on how to overcome the chlorite levels in wastewater.

16. Page 65, Peace River. Indicate when the MFLs on the Peace River will be reassessed and how it will affect the upper Peace.

17. Hillsborough River, you pretty much discounted the Hillsborough River; this source may have some availability for West and Northwest Polk and should be addressed.

18. Page 68, Stormwater. The FDOT once proposed connecting retention ponds along the interstates and directing to a surface water plant. This water source should be studied.

19. Page 68, Seawater. The Gulf of America may be a viable use for Polk County, but it would require land along the Gulf and constructing a seawater plant. There will also have to be pipeline leases to get it back to Polk County. At the very least, this would be a fascinating study to perform.

20. Page 80, Lower Floridan Aquifer Investigations. See my comment for Item 14; this begs the question of whether the Lower Floridan Aquifer is sustainable over the long haul.

21. Page 83, Funding Options. No matter how many grants are available, the rate payers are going to pay the lion's share of the cost for the capital improvements. The funding option of non ad valorem assessments should be considered because under this option all water users in the mix pay for the fix because it will run with the land.

22. Some of this report could be worded better. I tried to save it as a word version so I could make comments in markup mode, but that didn't go well.



330 W. Church Street
PO Box 9005
Drawer CA01
Bartow, FL 33831

Providing clean, safe water for Polk County now and for future generations.

May 6, 2025

Callie Register, P.E.
Regional Water Supply Planning Coordinator
Bureau of Water Supply Planning
St. Johns River Water Management District
525 Community College Parkway SE
Palm Bay, FL 32909

Submitted through electronic mail to cregister@sjrwmd.com and floridaswater.formstack.com/forms/cfwi_planning

Subject: Draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP)
Polk Regional Water Cooperative (PRWC) Comments

Dear Ms. Register:

Thank you for the opportunity to review and provide feedback on the Draft 2025 CFWI RWSP. This letter outlines corrections to inaccurate information presented in Table E-2 and offers suggestions to enhance the clarity of project details.

PRWC Project Status Updates

The PRWC Southeast Water Production Facility and Transmission project is permitted to provide up to 30 MGD of finished water to communities in Polk County upon full buildout. Currently, Phase 1 is under construction and will deliver 7.5 MGD.

Similarly, the PRWC West Polk Water Production Facility is permitted to supply up to 10 MGD at full buildout. Phase 1 is currently in the design stage and will provide 2.5 MGD.

To more accurately reflect the status of these projects, we recommend the following revisions to the main document:

- **Page 14:** The description of PRWC Projects should read: "As noted above...the Southeast Polk Wellfield is now being constructed to deliver 7.5 MGD of Phase 1 finished water supply, with a buildout capacity of up to 30 MGD. The West Polk Wellfield Project is being designed to provide 2.5 MGD in Phase 1 and is anticipated to develop up to 10 MGD at full buildout."
- **Page 75** (first paragraph): The revised wording should state: "The PRWC's Southeast Polk Wellfield project was permitted by the SFWMD to provide 30 MGD at full buildout. It is anticipated to deliver 7.5 MGD of new water supply in Phase 1 for PRWC members."

Clarification of Project Cost Representation in Table E-2

Public water suppliers utilize RWSP documents as a tool for long-term infrastructure planning and cost comparisons. To ensure clarity and prevent misinterpretation of affordability differences among projects, we recommend adjustments to the presentation of costs in Table E-2.

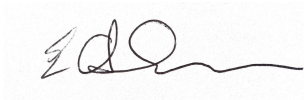
Certain projects—2015_28, 2015_141, and 2020_5—appear inconsistent with other brackish water projects. For example:

Project 2015_3_4_5 (Cypress Lake) appears to list its permitted withdrawal as “Project Capacity” and its finished, buildout capacity “Generated or Water Resource Benefit.” Project 2020_1 (OUC Wellfield) presents both values as 10 MGD, even though it is permitted to withdraw 11.8 MGD for a finished water supply of 10 MGD.

The PRWC projects do not clearly distinguish between permitted and phased capacities but are instead structured around the cofunding agreement. To improve clarity, we propose the following adjustments:

- Project 2015_28 (Polk Southeast Wellfield Water Production Facility): “Project Capacity” should reflect 37.5 MGD (permitted withdrawal) to align with how the Cypress Lake project is presented. The 12.5 MGD “Generated or Water Resource Benefit” can remain as shown in the SWFWMD Cofunding Agreement Project Plan, but should correlate to a value of **\$247.5M**, not \$481M. The presented unit costs do not reflect currently projected values; to date, unit costs have only been computed based on the Phase 1 capacity of 7.5 MGD.
- Project 2020_1 (West Polk Wellfield): “Project Capacity” should reflect 13.3 MGD (finished, permitted withdrawal). “Generated or Water Resource Benefit” should indicate 10 MGD, aligning with the \$214M capital cost detailed in the Cofunding Agreement.

Thanks again for the opportunity to provide comments. If there are questions or clarifications, please don’t hesitate to reach out to me.



Eric DeHaven
Executive Director
Polk Regional Water Cooperative
EricDeHaven@PRWCwater.com
813-323-7061

CC: Mark Addison, PRWC
Tom Mattiacci, PRWC

Providing clean, safe water for Polk County now and for future generations.

I



Outlook

2025 CFWI Regional Water Supply Plan FDACS Comments

From Escribano, Yesenia <Yesenia.Escribano@fdacs.gov>

Date Mon 5/12/2025 4:34 PM

To Callie Register <cregister@sjrwmd.com>

Cc Gregory, West <West.Gregory@fdacs.gov>; Seward, Megan <Megan.Seward@fdacs.gov>; Hart, Madeline <Madeline.Hart@fdacs.gov>

 1 attachment (511 KB)

20250512 2025 CFWI Regional Water Supply Plan Comments signed.pdf;

Good Afternoon Callie,

Please see the attached our comment letter regarding the 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP). FDACS appreciates the opportunity to provide input on this plan.

If you have any questions about our comments or would like to discuss them further, please let us know.

Sincerely,

Yesenia Escribano

Office of Agricultural Water Policy (OAWP)

Florida Department of Agriculture and Consumer Services (FDACS)

(850) 617-1732 Office

(850) 755-8446 Cell

Yesenia.Escribano@fdacs.gov

Physical Address:

315 South Calhoun Street

Tallahassee, Florida 32301-1843

Mailing Address:

407 South Calhoun Street, Mailstop AX2

Tallahassee, Florida 32399

"There is never enough science, if there is no political will"

<https://www.fdacs.gov/Divisions-Offices/Agricultural-Water-Policy>

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From: Callie Register <cregister@sjrwmd.com>

Sent: Friday, March 14, 2025 8:40 AM

To: Chelette, Angela <Angela.Chelette@fdacs.gov>; Beth Alvi <balvi@audubon.org>; Bryan Gongre <bkgongre@uiwater.com>; Charles Parker <Charles.Parker2@ocfl.net>; Charles Shinn <charles.Shinn@ffbf.org>;

Christine Doan <Christine.Doan@ocfl.net>; Clay Coarsey <CCoarsey@sjrwmd.com>; Daniel Rutland <Daniel.Rutland@jacobs.com>; Darrin Herbst <Darrin.Herbst@swfwmd.state.fl.us>; Smith, Edward C. <edward.c.smith@dep.state.fl.us>; Ilia G. Balcom <ilia.Balcom@duke-energy.com>; James Kinzler <jkinzler.kinzconsulting@gmail.com>; Jamie Zivich <jamie.zivich@tetrattech.com>; Janet Llewellyn <water@jgllewellyn.com>; Jason Herrick <jason.d.herrick@disney.com>; Jay Hoecker <jay.hoecker@swfwmd.state.fl.us>; Jennifer Adams <Jennifer.G.Adams@dep.state.fl.us>; Thera, Jennifer <Jennifer.Thera@fdacs.gov>; Jo Ann Jackson <JacksonJA@BV.com>; Joe P. Quinn <Joe.Quinn@swfwmd.state.fl.us>; Jon Fox <Jon.Fox@tetrattech.com>; Kris Esterson <kesterso@sfwmd.gov>; Morris, Kristine P. <kristine.p.morris@dep.state.fl.us>; Krystal Azzarella <KrystalAzzarella@polk-county.net>; Larry Walker <larry.walker@cityofmascotte.com>; Lori Burklew <lburklew@sjrwmd.com>; Mack McKinley <mack.mckinley@sanfordfl.gov>; Hart, Madeline <Madeline.Hart@fdacs.gov>; Elsner, Mark <melsner@sfwmd.gov>; Matt Doan <matt.doan@disney.com>; Mike Register <MREGISTE@sjrwmd.com>; Rebecca Elliott <relliott@sfwmd.gov>; Rob Denis <rdenis@liquidsolutionsgroup.com>; Robert Pelham <rpelham@tohowater.com>; Robyn Felix <robyn.felix@watermatters.org>; Ryan Pearson <ryan.pearson@swfwmd.state.fl.us>; Sarah Whitaker <swhitaker@smwgeosciences.com>; Steven Memberg <steven@gmawater.com>; Susan Davis <sdavis@sjrwmd.com>; TJ Fish <tj.fish@groveland-fl.gov>; Todd Swingle <tswingle@tohowater.com>; Colios, Thomas <tcios@sfwmd.gov>; Cassidy Hampton <Cassidy.Hampton@swfwmd.state.fl.us>; Wanvestraut, Robert <rowanves@sfwmd.gov>; Seung Park <Seung.Park@swfwmd.state.fl.us>; rmay@sfwmd.gov; Min Aung Myat Ko <MKo@sjrwmd.com>; Smith, Edward C. <Edward.C.Smith@FloridaDEP.gov>; Robyn O. Felix <Robyn.Felix@swfwmd.state.fl.us>; Chelette, Angela <Angela.Chelette@fdacs.gov>; Adams, Jennifer G <Jennifer.G.Adams@FloridaDEP.gov>; abyrneescribano <AByrneEscribano@ouc.com>; Fred Miller <fmiller@minneola.us>; Bryan Gongre <Bryan.Gongre@SunshineWater.com>; Mark Johnson <mjohnson@minneola.us>; Doug Hearn <DHearn@sjrwmd.com>; Clint Brown <CMBrown@sjrwmd.com>; John Fitzgerald <JFitzgerald@sjrwmd.com>; Brian Megic <bmegic@liquidsolutionsgroup.com>; Jariz, Alice <ajariz@casselberry.org>; Lamoureux, Tara <tlamoureux@casselberry.org>; Josh Schmitz <JSchmitz@woodardcurran.com>; sshannon@woodardcurran.com; Hart, Madeline <Madeline.Hart@fdacs.gov>; Febrina, Eka <efebriana@seminolecountyfl.gov>; Ornberg, Kim <kornberg@seminolecountyfl.gov>; Timothy Perkins <TPerkins@sjrwmd.com>; Jewell, Brad <BJewell@ouc.com>; Newell, Quyen <QNewell@ouc.com>; Filippi, Alyssa <AFilippi@ouc.com>; Cory Hulsman <CHulsman@woodardcurran.com>; Kym Holzwart <kym.holzwart@swfwmd.state.fl.us>; Rich Niles <RNiles@woodardcurran.com>; Justin deMello <jdemello@woodardcurran.com>; Chris Zajac <Chris.Zajac@swfwmd.state.fl.us>; charles.drake@tetrattech.com; Escribano, Yesenia <Yesenia.Escribano@fdacs.gov>; Schmutz, Dan <dschmutz@gpinet.com>; Wei Jin <WJin@sjrwmd.com>; Cindy C. Rodriguez <Cindy.Rodriguez@swfwmd.state.fl.us>; Obeysekera, Anushi <aobeysek@sfwmd.gov>; Max Storms <MStorms@woodardcurran.com>; Gabbie Milch <gabbie@stjohnsriverkeeper.org>; Rothenberg, Chris <chris.rothenberg@floridadep.gov>; Schlutermann, George <SchlutermannGA@bv.com>; Jordan, Coleen <cojordan@sfwmd.gov>; Jan McLean <Jan.McLean@gray-robinson.com>; Brent.White@swfwmd.state.fl.us; Mary Thomas <mthomas@carollo.com>; Gary Hubbard <ghubbard@mywinterhaven.com>; Jessica Cardigan <JRCardig@sjrwmd.com>; Terry McCue <mccuetm@gmail.com>; Sarah Malone <sarah.malone@lakelandgov.net>; Dale Helms <dhelms@carollo.com>; Mark Griffin <mgriffin@clermontfl.org>; Wright, David <dwright@agroservas.com>; Antonio Trevino <atrevino@minneola.us>; Long, Jolie <jolong@deseretranches.com>; Ragsdale, David <david.ragsdale@floridadep.gov>; mparker@oaklandfl.gov; jbolling <jbolling@ocoe.org>; michelle.hopkins@swfwmd.state.fl.us; Dawson B. Hall <DBHall@sjrwmd.com>; Payseno, Stacey <spayseno@sfwmd.gov>; Joyce Heffington <jheffington@minneola.us>; Patterson, Jason <jpatters@sfwmd.gov>; White, Bill <wwhite@seminolecountyfl.gov>; drobertson@cciwater.com; Gonzalez, Roberto (P.E. <rgonzalez@cphcorp.com>; Charres, Jiovani <jcharres@casselberry.org>; Woodson, AnnaLee <AnnaLee.Woodson@tetrattech.com>; Paul Stout <PStout@jlageosciences.com>; Andrew Sutherland <asutherl@sjrwmd.com>; Oneal, Tommy W <Tommy.ONeal@duke-energy.com>; Joseph.Costine@lakelandgov.net; ed.torres@ocfl.net; bdoig@altamonte.org; jwalsh@cocoafl.org; gbrooks@apopka.net; dkoury@lakemaryfl.com; Tammy Bader <TBader@sjrwmd.com>; Pam Flores <Pamela.Flores@floridadep.gov>; csaunier@winterspringsfl.org; Alan Oyler <Alan.oyler@gmail.com>; dwhipple@deseretranches.com

Subject: Draft 2025 CFWI Regional Water Supply Plan Available for Review and Comment

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) is now available on the CFWI website for review and comment by stakeholders and the public. The plan identifies existing and projected water needs as well as projects and funding sources to meet those needs in the CFWI Planning Area over the next 20 years.

The draft 2025 CFWI RWSP was jointly developed by the St. Johns River Water Management District (SJRWMD), South Florida Water Management District (SFWMD), and the Southwest Florida Water Management District (SWFWMD) (collectively referred to as Districts) in coordination with the Florida Department of Environmental Protection (FDEP), the Florida Department of Agriculture and Consumer Services (FDACS), representatives from utilities, agricultural, environmental, industry, other stakeholder groups, and the public. The CFWI Planning Area consists of all Orange, Osceola, Seminole, and Polk counties and southern Lake County, covering approximately 5,300 square miles.

The draft plan is a 5-year update to the 2020 CFWI RWSP. Since 2020, the Districts, FDEP, FDACS, utilities, and other stakeholders collaboratively implemented numerous water supply initiatives to meet regional goals. These initiatives have significantly enhanced the knowledge, analytical abilities, and data available for development of the draft 2025 CFWI RWSP.

The draft 2025 CFWI RWSP concludes that current and future water demands can be met through the 2045 planning horizon, while sustaining the water resources and related natural systems, through water conservation, implementation of management strategies, and development of identified project options.

A virtual meeting is scheduled for April 23, 2025, to present the draft conclusions and recommendations to the CFWI RWSP Steering Committee and the public. The draft 2025 CFWI RWSP and a link to provide public comment are available on the [CFWI website](#). All public comments and feedback are taken into consideration and the draft 2025 CFWI RWSP may be modified to incorporate changes related to the public comments. The comment period ends on May 16, 2025, at 4 p.m.

The final plan will be presented to the governing boards of the respective Districts for anticipated approval in November 2025.

The draft 2025 CFWI RWSP is not compliant with the American Disabilities Act. If you need assistance, please contact one of the following water management districts:

SJRWMD 386-329-4500 or 800-451-7106

SFWMD 561-686-8800 or 800-432-2045

SWFWMD 352-796-7211 or 800-423-1476

Callie Register, P.E.

Regional Water Supply Planning Coordinator

Bureau of Water Supply Planning

St. Johns River Water Management District

Palm Bay Service Center

525 Community College Pkwy SE • Palm Bay, FL 32909

Office: (321) 473-1328 • Cell: (321) 863-0011

Email: cregister@sjrwmd.com

Website: www.sjrwmd.com

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www.sjrwmd.com/ePermit

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- 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/>



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES COMMISSIONER WILTON SIMPSON

May 12, 2025

Callie Register
Regional Water Supply Planning Coordinator
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429

RE: Draft 2025 CFWI Regional Water Supply Plan

Dear Ms. Register:

The Florida Department of Agriculture and Consumer Services (FDACS) welcomes the opportunity to provide comments on the draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP).

FDACS appreciates the draft 2025 CFWI RWSP use of the Florida Statewide Agricultural Irrigation Demand (FSAID IX) geodatabase to represent current and future agricultural water use demands, and the recognition that not all water conservation achieved by agriculture will result in reduced water use. However, FDACS remains concerned that the proposed language about brackish nontraditional water, agriculture self-supply water conservation, and water supply project options create regulatory and financial uncertainty for the agricultural stakeholders within the CFWI. The comments provided herein address these concerns regarding the agricultural language only and should not be construed as addressing the portions of the plan applicable to other water uses. Our detailed comments are as follows:

Brackish/Nontraditional Groundwater

As mentioned in the 2020 CFWI RWSP comments, there are several agricultural producers utilizing brackish groundwater as their primary water source which remain inadequately identified in the draft plan. Brackish water is recognized as a current ground water source but is also identified as an alternative water supply source. There are now fifteen brackish/nontraditional water resource development project options identified in the plan with a total potential 95 mgd available for water supply. FDACS urges the Florida Department of Environmental Protection (FDEP), and the water management districts (WMDs) to carefully consider potential impacts to existing legal users when evaluating permit applications for alternative water supply to prevent the brackish source from becoming unusable for existing agricultural purposes.

Water Conservation Projections – Agriculture Self Supply

The CFWI RWSP's language is vague regarding agriculture potentially achieving increased water conservation savings beyond the projected amounts with increased participation and implementation of other practices that were not assessed in this 2025 CFWI plan. For the 2030 CFWI RWSP update, FDACS recommends a water conservation technical team be formed and that one of our Policy Planning and Coordination (PPC) staff be a member thereof. This water conservation technical team should be tasked with evaluating the then current participation rates in the different agriculture cost share programs, and identifying other water conservation measures agricultural producers could implement that were not assessed in the 2025 CFWI RWSP. A more detailed and comprehensive analysis of potential agricultural water conservation measures in the CFWI will provide a more realistic agricultural water conservation volume for the next update. FDACS also requests that the 2030 CFWI RWSP update include a general summary of the current water conservation measures existing agricultural legal users are implementing (e.g., irrigation conversion, precision irrigation, Mobile Irrigation Lab evaluations) and the expected conservation amounts based on existing conditions.

Water Supply Project Options

Although agricultural water use constitutes the second largest portion of the water use in the CFWI, there are limited water supply development projects that benefit agriculture. Buying into or creating a water supply development project may pose an uncertain, significant expense on agricultural producers. This is due in large part to the disparity between public supply and other permittees with a rate-paying customer base and treatment options, and agricultural permittees with a very limited or non-existent ability to access, develop, and utilize alternative water supply project options. The 2025 CFWI RWSP should be revised to reflect this discrepancy. More importantly, agricultural production must adhere to food safety requirements that can prevent the use of reuse and some surface water sources. Traditional fresh water sources are usually the only source that meets crop requirements for water quality. FDACS looks forward to working with FDEP and the WMDs in developing feasible water supply project options for existing agricultural users to implement and locating funding to alleviate the financial burden that agricultural producers may face.

Thank you again for the opportunity to provide these comments. FDACS supports the return of the technical teams, specifically the water conservation team, with FDACS' PPC staff participating, to assist with the development of the 2030 CFWI RWSP. FDACS looks forward to working with FDEP and the WMDs further on the next CFWI RWSP. If you have any questions regarding our comments, please contact Yesenia Escribano, (850) 617-1724 or Yesenia.Escribano@fdacs.gov.

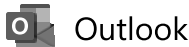
Sincerely,



N. West Gregory

Director, Office of Agricultural Water Policy

Florida Department of Agriculture and Consumer Services



Outlook

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>
Date Mon 5/12/2025 2:12 PM
To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning
Submitted at 05/12/25 2:11 PM

Name:	Michael Stripling
Email:	mstripling@mydavenport.org
Date:	May 12, 2025
Entity/Organization :	City of Davenport
Comments :	I would like to add the project for the City of Davenport into the regional supply plan. the project consists of a lower Floridan well that has been constructed and plans for the treatment process that is in design. The amount of alternative water available from this supply is still to be determined however early indications are that the well could support 1500 GPM. There are other documents in support of this project that can be supplied as necessary.

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Wed 5/14/2025 2:50 PM

To cfwicomments@sfwmd.gov <cfwicommments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/14/25 2:50 PM

Name:	David Gore
Email:	dgorergore@gmail.com
Date:	May 13, 2025
Entity/Organization :	Speaking up for our water and natural systems
Comments :	This plan is based on misleading water science ideas about the only source of all the fresh water flow and storage action any were on earth and the most basic idea of water science. I met with the SWFWMD staff responsible for the science of the 2025 plan May 8 2025 who thinks using the words alternate and traditional change the fact that the storage and flow of all freshwater withdrawals from beneath the freshwater table on earth empties space at the water table elevation. There are no exceptions. The elevation of the water table at any location in the CFWI land area determines amount of water available and well being of natural systems in the CFWI land area.

The staff knows that the pressure in all the wells they monitor at any depth in the CFWI area is lower than the water table and higher than sea level pressure. This is how we know the potential of water to flow up or down relative to the water table of any wells they monitor at the moment. This is the only way to know the source of water flow from a well is from the water table and not from rerom nmisinfonterface or sea level at the moment. The staff told me that the age and quality of of wc the soure of the flow from any well is from the freshwater table and not lateral from the sea iater withdrawn affects thier ability to determine the source of the water from a well that is t eas of the location of the source of flow and storage action in CFWI is the base of the plans very costly ideas to increase fresh water availability in the CFWI land area.

The plans misleading false deceptive science id

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Wed 5/14/2025 3:43 PM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/14/25 3:43 PM

Name:	David Gore
Email:	dgorergore@gmail.com
Date:	May 14, 2025
Entity/Organization :	Speaking up for our water and natural systems
Comments :	This plan is based on misleading water science ideas about the only source of all the fresh water flow and storage action any were on earth and the most basic idea of water science. I met with the SWFWMD staff responsible for the science of the 2025 plan May 8 2025 who thinks using the words alternate and traditional change the fact that the storage and flow of all freshwater withdrawals from beneath the freshwater table on earth empties space at the water table elevation. There are no exceptions. The elevation of the water table at any location in the CFWI land area determines amount of water available and well being of natural systems in the CFWI land area.

The staff knows that the pressure in all the wells they monitor at any depth in the CFWI area is lower than the water table and higher than sea level pressure. This is how we know the potential of water to flow up or down relative to the water table of any wells they monitor at the moment. This is the only way to know the source of water flow from a well is from the water table and not lateral from the sea interface. The staff told me they think the age and route of water withdrawn affects their ability to determine the source of the water flow from a well. That false idea is used as the base of the plans very costly ideas to increase fresh water availability in the CFWI land area.

The plans misleading false science ideas of the location of the source and storage action in the CFWI land area is deceptive

David Gore
Speaking up for our water and natural systems

2025 CFWI Project Table

From Tomlinson, T'Jean <TTomlinson@ocoe.org>

Date Wed 5/14/2025 5:18 PM

To Callie Register <cregister@sjrwmd.com>

Cc jbolling <jbolling@ocoe.org>

 1 attachment (115 KB)

Ocoee CFWI Table.pdf;

Good Afternoon Callie,

Thank you again for taking the time to discuss the project table with me today for the 2025 CFWI. Please see the completed table attached for your review. Please let me know if you have any questions or concerns. Hope you have a wonderful rest of your day.

Best Regards,

T'Jean Tomlinson, P.E.
Engineering Manager



Utilities Department

1800 A.D. Mims Road
Ocoee, FL 34761-4001

Office: 407.905.3159

Extension: 4301

Fax: 407.877.5899

Mobile: 407.427.3061

Project #	County	Project Name	Implementing Agency	Latitude (decimal degrees)	Longitude (decimal degrees)	Project Type	Land Acquisition Componenet	Project Description	Project Capacity (MGD)	Est. Water Generated or Water Resource Benefit (MGD)	Total Capital (\$M)	Production (\$/1,000 gallons)	Estimated Completion Date
2025 CFWI RWSP													
2025-01	Orange	City of Ocoee Northwest Reuse Re-Pump Station and Interconnection Mains	Ocoee	28.59946949	-81.52617223	Reclaimed Water	No	Increase availability of reclaimed water for landscape irrigation in Ocoee and vicinity. Includes construction of reclaimed water transmission pipelines and pump stations. As the North Service Area matures, additional storage and high service pumping will be required to meet demand and transfer flow to other storage facilities. When this project is constructed it will pump up to 1 MGD of RW from Orange County NWRf.	1.2	0.6	\$2.87	\$0.55	2026
2025-02	Orange	City of Ocoee Northwest Reuse Re-Pump Station and Interconnection Mains	Ocoee	28.59520134	-81.52358055	Reclaimed Water	No	Phase 1: 1.4 million gallon storage tank and pump station at the Ocoee WWTP property and reclaimed water transmission main from the OCU connection point to the new tank	1	1.0	\$7.0	\$0.87	2026
				28.61050234	-81.53196112	Reclaimed Water	No	Phase 2: Includes construction of reclaimed water transmission loop across Forest lake Golf Course, 2 million gallon storage tank,and pump station. As the North Reclaim Service Area matures, additional storage and high service pumping will be required to meet demand and transfer flow to other storage facilities. Project will limit quantity needed for a reclaim backup supply and allow City to accept additional alternative water supply sources	2	N/A	\$10.0	N/A	2030
2025-03	Orange	Admiral Pointe Neighborhood Retrofit	Ocoee	28.56765693	-81.52886268	Reclaimed Water	No	Admiral Pointe consists of One Hundred Sixty Six (166) Homes with a Monthly Gallons Per Capita Offset of 9,931. This project will include a transmission interconnection to Lake Olympia Club.	0.06	0.06	\$2.77	\$5.34	2029
2025-04	Orange	A.D. Mims Road/North Johio Shores Road Transmission Extension (Design)	Ocoee	28.58475622	-81.50918649	Reclaimed Water	No	The design of the North Johio 16" Reclaimed Water Main to extend from the existing reclaimed water main on A.D. Mims towards the Waterside Subdiviion entrance on New Victor Road.	N/A	N/A	\$0.15	N/A	2028
2025-05	Orange	A.D. Mims Road/North Johio Shores Road Transmission Extension (Construction)	Ocoee	28.58475622	-81.50918649	Reclaimed Water	No	The construction of the North Johio 16" Reclaimed Water Main to extend from the existing reclaimed water main on A.D. Mims towards the Waterside Subdivision entrance on New Victor Road. .	N/A	N/A	\$2.84	N/A	2030
2025-06	Orange	Wellington Place Reclaim Connection Project	Ocoee	28.58839911	-81.50783226	Reclaimed Water	No	Wellington Place Subdivision consists of Seventy Six (76) homes with a Monthly Gallons Per Capita Offset of 2,152. This Subdivision has existing reclaimed lines and will need an 8" extension to obtain conveyance from Clarke Rd	0.01	0.01	\$0.34	\$4.41	2031
2025-07	Orange	Richfield Neighborhood Retrofit	Ocoee	28.58024805	-81.50686005	Reclaimed Water	No	The Richfield Subdivision consists of Seventy One (71) homes with a Monthly Gallons Per Capita Offset of 6,156 and Million Gallons Per Day Offset of 0.015. Interconnection capacity will be from 16" Reclaimed Water Main on Johio Shores Rd.	0.02	0.02	\$1.08	\$6.41	2032
2025-08	Orange	South Lake Johio Road Transmission Extension (Design)	Ocoee	28.57629889	-81.50913808	Reclaimed Water	No	The design of the South Johio 16" Reclaimed Water Main to extend the reclaimed water main from the North Johio Project towards the existing reclaimed water main located on Rachels Ridge Loop .	N/A	N/A	\$0.16	N/A	2028
2025-09	Orange	South Lake Johio Road Transmission Extension (Construction)	Ocoee	28.57629889	-81.50913808	Reclaimed Water	No	The construction of the South Johio 16" Reclaimed Water Main to extend the reclaimed water main from the North Johio Project towards the existing reclaimed water main located on Rachels Ridge Loop .	N/A	N/A	\$3.07	N/A	2030
2025-10	Orange	Silver Bend Neighborhood Retrofit	Ocoee	28.57223134	-81.50910948	Reclaimed Water	No	The Silver Bend Subdivision consists of One Hundred Eighty Two (182) homes with a Monthly Gallons Per Capita Offset of 4,521.	0.03	0.03	\$2.13	\$8.24	2033
2025-11	Orange	Cross Creek Neighborhood Retrofit	Ocoee	28.53374128	-81.53659054	Reclaimed Water	No	The Cross Creek Subdivision consists of Three Hundred Twenty Two (322) homes with a Monthly Gallons Per Capita Offset of 4,964.	0.04	0.04	\$4.43	\$12.74	2035
2025-12	Orange	E & W Harbour Ct Neighborhood Retrofit	Ocoee	28.56196034	-81.52880416	Reclaimed Water	No	The E & W Harbour Subdivision consists of Twenty Six (26) homes with a Monthly Gallons Per Capita Offset of 6,250.	0.01	0.01	\$0.44	\$5.58	2038
2025-13	Orange	Shoal Creek I Neighborhood Retrofit	Ocoee	28.5613108	-81.5305257	Reclaimed Water	No	Phase I of the Shoal Creek Subdivision consists of Fifty Five (55) homes with a Monthly Gallons Per Capita Offset of 4,895.	0.01	0.01	\$1.22	\$14.46	2037
2025-14	Orange	Shoal Creek II Neighborhood Retrofit	Ocoee	28.55863735	-81.53127977	Reclaimed Water	No	Phase II of the Shoal Creek Subdivision consists of Thirty Four (34) homes with a Monthly Gallons Per Capita Offset of 5,193.	0.01	0.01	\$0.60	\$7.38	2039

RE: 2025 CFWI Project Table

From Tomlinson, T'Jean <TTomlinson@occoee.org>

Date Thu 5/15/2025 9:58 AM

To Callie Register <cregister@sjrwmd.com>

Cc jbolling <jbolling@occoee.org>; Keith T. Pari <KTPari@sjrwmd.com>

 2 attachments (140 KB)

Ocoee CFWI Table_Updated 2025-05-15.pdf; Ocoee CFWI.xlsx;

Good Morning Callie,

Please see the updated table and spreadsheet. I left the numbers blank for the additional projects not included on the draft. Please let me know if you need anything else.

Thank you for all your help!

Best Regards,

T'Jean Tomlinson, P.E.
Engineering Manager



Utilities Department

1800 A.D. Mims Road

Ocoee, FL 34761-4001

Office: 407.905.3159

Extension: 4301

Fax: 407.877.5899

Mobile: 407.427.3061

From: Callie Register <cregister@sjrwmd.com>

Sent: Thursday, May 15, 2025 8:21 AM

To: Tomlinson, T'Jean <TTomlinson@occoee.org>

Cc: Bolling, Jen <JBolling@occoee.org>; Keith T. Pari <KTPari@sjrwmd.com>

Subject: Re: 2025 CFWI Project Table

Thanks T'Jean, at first glance, it appears many of these are already in the draft 2025 CFWI RWSP? If you are just providing updates, please use the project # already assigned to that project (as listed in the draft 2025 CFWI RWSP).

Also, can you please provide the spreadsheet format? Please give me a call if you have any questions.

Thank you,

Callie Register

SJRWMD

Regional Water Supply Planning Coordinator

321-863-0011

From: Tomlinson, T'Jean <TTomlinson@ocoe.org>

Sent: Wednesday, May 14, 2025 5:18 PM

To: Callie Register <cregister@sjrwmd.com>

Cc: jbolling <jbolling@ocoe.org>

Subject: 2025 CFWI Project Table

Good Afternoon Callie,

Thank you again for taking the time to discuss the project table with me today for the 2025 CFWI. Please see the completed table attached for your review. Please let me know if you have any questions or concerns. Hope you have a wonderful rest of your day.

Best Regards,

T'Jean Tomlinson, P.E.
Engineering Manager



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- Individuals lobbying the District must be registered as lobbyists (§112.3261, Florida Statutes). Details, applicability and the registration form are available at

<https://link.edgepilot.com/s/5a017cdd/ABw2UirNGk24Uaq5WSq7hg?u=http://www.sjrwmd.com/lobbyist/>

Audubon Florida CFWI RWSP Comments

From Cox, Kelly <kelly.cox@audubon.org>
Date Wed 5/14/2025 5:35 PM
To Callie Register <cregister@sjrwmd.com>
Cc Alvi, Beth <beth.alvi@audubon.org>

 2 attachments (302 KB)

Audubon Florida CFWI RWSP Comments.pdf; 2021 AudubonFlorida Comments on CFWI Rule 2021.pdf;

Hi Callie,

I hope this email finds you well. On behalf of Audubon Florida, I'm writing to submit our comments on the Central Florida Water Initiative Regional Water Supply Plan. I am also attaching our comments from 2021 on the CFWI Rule which we reference in our letter.

We appreciate your team's work on this important effort and we are grateful for the opportunity to weigh in as a part of this process.

Thank you for your consideration of our remarks.

Very best,

Kelly Cox, Esq.
Director of Everglades Policy
O: (786) 542-8077

Audubon Florida
Everglades Science Center
115 Indian Mound Trail
Tavernier, FL 33070
www.fl.audubon.org

May 14, 2025

Re: 2025 Central Florida Water Initiative Regional Water Supply Plan

Dear Steering Committee Members,

Audubon Florida appreciates the opportunity to provide comments on the 2025 Central Florida Water Initiative (CFWI) Planning Document Public Draft of the Regional Water Supply Plan (the Plan). We commend the coordinated effort by agency staff and partners reflected in the document's comprehensive scope. Since the release of the 2015 Plan, important progress has been made, but growing water demands and environmental degradation across the region make it essential that planning efforts keep pace with these intensifying pressures.

We understand that the Plan is a non-regulatory, planning-level document. Nevertheless, it is a powerful tool to identify regional priorities, frame investment decisions, and set expectations for coordination across utilities, local governments, and state agencies. The Plan must go beyond listing project options; it should actively promote strategies that avoid environmental harm, reduce demand, and build resilience.

We remain concerned about the 2021 settlement of a rule challenge brought by utilities against Rule 62-41.300, F. A. C., which weakened the enforceability of key CFWI requirements by eliminating the presumption that existing permits would be modified to meet uniform standards. We urge the CFWI agencies to reexamine the implications of the 2021 settlement and take steps to strengthen this rule moving forward. For reference, we have attached our 2021 comment letter outlining those concerns.

Additional issues with the 2025 draft that Audubon believes must be addressed include:

1. Groundwater Withdrawals Already Exceed Sustainable Limits

The Plan estimates that 760 million gallons per day (mgd) of groundwater is sustainably available, yet current withdrawals are already causing brackish water intrusion and ecological harm. The projected 2045 demand of 856 mgd is unsustainable by the Plan's own overly generous standards. Damage from brackish water intrusion is difficult to reverse, and water availability estimates are subject to uncertainty (e.g., the Plan acknowledges that "vertical conduits that can lead to potential upward movement of brackish water could not be explicitly modeled"). The Plan should adopt a precautionary approach and reassess the safety of long-term withdrawals, incorporating safety margins to protect aquifer integrity.

2. Quantify and Prioritize Environmental Water Needs

The Plan is required to address all reasonable-beneficial uses of water, including the needs of natural systems. However, it does not quantify the volumes required to meet environmental goals such as Minimum Flows and Levels (MFLs) or water reservations. Including these estimates is essential for informed project planning and prioritization. The number of water bodies failing to meet MFLs has increased from 13 in 2015 to 16 today, with another projected to fall below standards by 2045. Wetlands experiencing hydrologic stress have more than doubled since 2014. Harm to these wetlands ultimately reduces the region's water recharge and cleaning capacity. The

Plan should clearly identify recovery priorities and communicate to local partners that projects worsening these trends must be avoided or offset with commensurate restoration.

3. Water Conservation Must Be a Primary Strategy

By 2045, public supply demand is projected at 642 mgd, with 50–70% (321–450 mgd) used for lawn irrigation alone, far more than the 96 mgd supply gap identified in the Plan. This makes outdoor water use the most promising conservation opportunity. Yet, the Plan projects only 5–6% in conservation savings. Utilities and local governments must adopt ordinances, incentives, and project designs that reduce irrigation and promote drought-tolerant or native landscaping. The Plan should establish shared conservation goals, such as a regional targets to reduce outdoor irrigation and reporting mechanisms to track progress and accountability.

4. Prioritize Stormwater and Reuse Opportunities for Environmental and Supply Benefits

Stormwater and reclaimed water projects offer valuable opportunities to enhance supply and restore ecosystems. However, reuse should not be directed toward non-essential uses like lawn irrigation, serving to subsidize water-intensive development patterns. Instead, reclaimed water should support aquifer recharge, wetland restoration, or potentially potable reuse, in alignment with SB 536 and SB 712 directives. The Plan should prioritize multi-benefit reuse projects and include coordination mechanisms between the Florida Department of Environmental Protection and the water management districts.

5. Protect Recharge Areas from Urban Development

Development of former citrus lands, especially in high-recharge areas like the Lake Wales Ridge, risks reducing aquifer recharge. The Plan should emphasize land use strategies and stormwater retention policies that protect these recharge zones to ensure long-term water availability.

6. Regional Decisions Must Consider Downstream Impacts

The CFWI region sits at the top of three watersheds, and decisions made here affect downstream ecosystems and communities. Projects like the proposed St. Johns River withdrawal, which would transfer water across basins, can exacerbate shortages elsewhere. The Plan should acknowledge and assess these risks, promoting regional self-sufficiency.

7. Integrate Water Supply and Water Quality Planning

The Plan lacks adequate integration with Florida's water quality restoration programs, such as Basin Management Action Plans (BMAPs) for impaired waterbodies like Wekiwa Springs, Lake Jesup, and Lake Okeechobee. A dedicated section should identify relevant BMAPs, assess how proposed supply strategies may affect them, and promote alignment to avoid conflicting objectives.

Conclusion

The choices made in this Plan will shape the region's resilience, water security and economy for decades to come. We urge the districts to revise this draft to prioritize conservation, protect natural systems, and align with statewide restoration goals, guided by science. By embracing integrated planning and precautionary action now, the CFWI could be a model for sustainable water management. We are committed to working alongside agencies and partners to realize this vision.

Sincerely,
Julie Wraithmell
Executive Director – Audubon Florida

April 15, 2021

Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, FL 32399

RE: Central Florida Water Initiative, Rules, Notice of Change Published March 26, 2021, 62-41.300, et seq.

Dear Secretary Valenstein:

Audubon Florida hereby comments upon, and requests reconsideration of the actions of the Department of Environmental Protection with regard to the Notice of Change/Withdrawal regarding Rule 62-41.301 (4) "Central Florida Water Initiative Area, Uniform Conditions for Issuance of permits: published on March 26, 2021 in the Florida Administrative Register.

The major changes in this proposed rule made under this notice are as follows:

62-41.301 (4) Nothing in these rules shall create a presumption with regards to modification of any existing Consumptive Use Permit within the CFWI pursuant to Section 1.2 of the Supplemental Applicant's Handbook. Across the CFWI Area, cumulative harm to on the water resources exists and is expected to increase because of groundwater withdrawals from the Upper Floridan aquifer. The cumulative uses of the Upper Floridan aquifer across the CFWI Area has caused detrimental effects to other users and the water resources of the state. Following the effective date of these rules, each District shall modify all applicable existing Consumptive Use Permits with withdrawal points within the CFWI to be consistent with Rules 62-41.301 through 62-41.305, F.A.C., and applicable permit conditions specified in Section 5.0, of the Supplemental Applicant's Handbook, incorporated by reference in rule 62-41.302 F.A.C., are incorporated into all CUPs within the CFWI pursuant to Section 1.2 of the Supplemental Applicant's Handbook.

In addition to the above fundamental change to the rule, numerous conforming changes to the Supplemental Applicant's Handbook were also made through that notice.

Audubon Florida objects to these changes. We believe that they are inherently contrary to the 2016 legislation that established the Central Florida Water Initiative in the Florida Statutes as Section 373.0465. These changes also appear to be contrary to the most basic intent of the Central Florida Water Initiative as it has been under development over the last twelve years.

The changes in the rule noticed on March 26, 2021 primarily apply to potable water suppliers, which constitute the largest source of increases in withdrawals from the Upper Floridan Aquifer, and which are certain to constitute the largest source of future demands for expanded withdrawals from this aquifer.

With regard to potable water suppliers, there are a number of major withdrawal sites with Consumptive Use Permits previously issued with limits significantly in excess of the actual amount of water currently

used. There are also a number of potable water suppliers that are providing water at a rate indicative of exorbitant and wasteful levels of use, in excess of 200 gallons per day per capita.

The architecture of the Central Florida Water Initiative is dependent upon a structure that examines water use in the urban areas of Central Florida collectively, with the goal of limiting potable water supply use to a 115 gpd gross per capita water use rate goal or the 100 gpd functional per capita water use goal.

The overarching presumption necessary to make the Central Florida Water Initiative work was that modification of existing Consumptive Use Permits would be necessary in order to require the permittees to achieve the 115 gpd gross per capita water use rate goal or the 100 gpd functional per capita water use goal.

The notice of change eliminates the presumption that a change to meet these goals is needed, and requires the department and water management districts instead to demonstrate on a case-by case basis that a "...permittee's allocation is detrimental, individually or cumulatively with other permitted allocations, to other water users or to the water resources of the state."

Because each permittee's contribution to the problem of depletion in the Upper Floridan Aquifer is small, and damage from such small individual amounts of water withdrawn is difficult to prove, the changed rule leaves the department and the water management districts in a distinctly disadvantaged position to manage the resource, and invites a return to permit-by-permit litigation; the very situation that the Central Florida Water Initiative was created to avoid.

Audubon Florida submits that the changes to the rule published on November 19, 2020, (as changed in minor form published on February 9, 2021) are entirely unnecessary if the goal is to allow individual potable water supply permit holders to seek relief in the form of extensions of time for compliance with the overall direction of the rule.

Section 62-41.303 "Central Florida Water Initiative Area, Variances to the Uniform Rules" provides a process for existing permittees or to obtain relief by demonstrating that "...unique circumstances or hydrogeological factors that make application of the uniform rules unrealistic or impractical."

Audubon Florida submits that the variance process established in 62-41.303 is the appropriate mechanism to assure fairness and relief, and believes that the changes to the rule noticed on March 26th are unnecessary, imprudent and damaging to the water resources of Central Florida.

We recognize that the Notice of Change published on March 26th results from a stipulated settlement in a case before the Division of Administrative Hearings, 21-000791RP. This case reflects rule challenges brought by some 18 petitioners and interveners, primarily potable water suppliers. While the Division of Administrative Hearings has no requirement for a "Fairness Hearing" regarding the outcome of a proposed settlement, the "Fairness Hearing" as a proceeding is a widely used requirement in Federal Court and many other jurisdictions to assure that settlements are fair, reasonable, adequate, and in the overall public interest.

The Central Florida Water Initiative was created in 2009, and since that time there have been literally hundreds of public meetings, workshops, and other opportunities for public comment that thousands of people have participated in, including the environmental and conservation organizations (such as Audubon) in Central Florida.

The effect of the Notice of Change published on March 26th so fundamentally shifts the direction and outcome of the Central Florida Water Initiative that we strongly believe that the Department of

Environmental Protection and the water management districts owe the people of Central Florida an opportunity for further public input (such as a “Fairness Hearing”) on the settlement before the proposed rules in the form noticed on March 26th goes into effect.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie Wraithmell". The signature is fluid and cursive, with a large initial "J" and "W".

Julie Wraithmell
VP and Executive Director
Audubon Florida

CC:
Executive Directors,
St. Johns, South Florida and Southwest Florida Water Management Districts

SLRTAC CFWI RWSP Proposed Projects

From James Kinzler <jkinzler.kinzconsulting@gmail.com>

Date Thu 5/15/2025 7:22 AM

To Callie Register <cregister@sjrwmd.com>

 2 attachments (55 KB)

CFWI_AppndxE-SLRTAC Project 1.xlsx; CFWI_AppndxE-SLRTAC Project 2.xlsx;

Good Morning Callie,

Please find attached 2 proposed projects from the SLRTAC for the CFWI RWSP.
Please confirm receipt and let me know if you have any questions.

Thank you for your efforts and patience throughout this process.

Thank you,

James

James Kinzler, EA, CPM
President
Kinz Consulting LLC
235 Harbour Cove Way
Clermont, FL 34711
(352) 223-9397

Appendix A		2021 CWRP		CWRP Sub-Region		RWSP		County		Project Name		Implementing Agency or Entity (Sponsoring Entity - Column 6)		Latitude (Decimal Degree) (Column 1)		Longitude (Decimal Degree) (Column 1)		Project Type per Entity/WRMgt District		Project Type (Invited for CWRP RWSP tables)		Project Type (Invited for Column C - Statewide MASTER List)		Land Acquisition Requirement (Invited for Column D - Statewide MASTER List)		Project Description (Column 9)		Short Description (Column 10 - must be less than 250 characters inclusive of spaces)		Project Status		Project Status (Column C - MASTER List)		Estimated Completion Date (RWSP)		Estimated Completion Date (CWRP)		Waterbody		RWSP Region		Primary MFL		Secondary MFL		Project Category		Water		Quantity		Reason for date		Reason for date		Distribution		Total Cost (Column A and prior total funding, Statewide Master List)		Unit Cost (\$/2000 gallons)		Entity Notes or Explanation of Changes since last RWSP		District Notes		Comments (Column AF Statewide Master List)		Water Supply or Water Resource		Project Category																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
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1-700	Figure 1-701	Figure 1-702	Figure 1-703	Figure 1-704	Figure 1-705	Figure 1-706	Figure 1-707	Figure 1-708	Figure 1-709	Figure 1-710	Figure 1-711	Figure 1-712	Figure 1-713	Figure 1-714	Figure 1-715	Figure 1-716	Figure 1-717	Figure 1-718	Figure 1-719	Figure 1-720	Figure 1-721	Figure 1-722	Figure 1-723	Figure 1-724	Figure 1-725	Figure 1-726	Figure 1-727	Figure 1-728	Figure 1-729	Figure 1-730	Figure 1-731	Figure 1-732	Figure 1-733	Figure 1-734	Figure 1-735	Figure 1-736	Figure 1-737	Figure 1-738	Figure 1-739	Figure 1-740	Figure 1-741	Figure 1-742	Figure 1-743	Figure 1-744	Figure 1-745	Figure 1-746	Figure 1-747	Figure 1-748	Figure 1-749	Figure 1-750	Figure 1-751	Figure 1-752	Figure 1-753	Figure 1-754	Figure 1-755	Figure 1-756	Figure 1-757	Figure 1-758	Figure 1-759	Figure 1-760	Figure 1-761	Figure 1-762	Figure 1-763	Figure 1-764	Figure 1-765	Figure 1-766	Figure 1-767	Figure 1-768	Figure 1-769	Figure 1-770	Figure 1-771	Figure 1-772	Figure 1-773	Figure 1-774	Figure 1-775	Figure 1-776	Figure 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1-854	Figure 1-855	Figure 1-856	Figure 1-857	Figure 1-858	Figure 1-859	Figure 1-860	Figure 1-861	Figure 1-862	Figure 1-863	Figure 1-864	Figure 1-865	Figure 1-866	Figure 1-867	Figure 1-868	Figure 1-869	Figure 1-870	Figure 1-871	Figure 1-872	Figure 1-873	Figure 1-874	Figure 1-875	Figure 1-876	Figure 1-877	Figure 1-878	Figure 1-879	Figure 1-880	Figure 1-881	Figure 1-882	Figure 1-883	Figure 1-884	Figure 1-885	Figure 1-886	Figure 1-887	Figure 1-888	Figure 1-889	Figure 1-890	Figure 1-891	Figure 1-892	Figure 1-893	Figure 1-894	Figure 1-895	Figure 1-896	Figure 1-897	Figure 1-898	Figure 1-899	Figure 1-900	Figure 1-901	Figure 1-902	Figure 1-903	Figure 1-904	Figure 1-905	Figure 1-906	Figure 1-907	Figure 1-908	Figure 1-909	Figure 1-910	Figure 1-911	Figure 1-912	Figure 1-913	Figure 1-914	Figure 1-915	Figure 1-916	Figure 1-917	Figure 1-918	Figure 1-919	Figure 1-920	Figure 1-921	Figure 1-922	Figure 1-923	Figure 1-924	Figure 1-925	Figure 1-926	Figure 1-927	Figure 1-928	Figure 1-929	Figure 1-930	Figure 1-931	Figure 1-932	Figure 1-933	Figure 1-934	Figure 1-935	Figure 1-936	Figure 1-937	Figure 1-938	Figure 1-939	Figure 1-940	Figure 1-941	Figure 1-942	Figure 1-943	Figure 1-944	Figure 1-945	Figure 1-946	Figure 1-947	Figure 1-948	Figure 1-949	Figure 1-950	Figure 1-951	Figure 1-952	Figure 1-953	Figure 1-954	Figure 1-955	Figure 1-956	Figure 1-957	Figure 1-958	Figure 1-959	Figure 1-960	Figure 1-961	Figure 1-962	Figure 1-963	Figure 1-964	Figure 1-965	Figure 1-966	Figure 1-967	Figure 1-968	Figure 1-969	Figure 1-970	Figure 1-971	Figure 1-972	Figure 1-973	Figure 1-974	Figure 1-975	Figure 1-976	Figure 1-977	Figure 1-978	Figure 1-979	Figure 1-980	Figure 1-981	Figure 1-982	Figure 1-983	Figure 1-984	Figure 1-985	Figure 1-986	Figure 1-987	Figure 1-988	Figure 1-989	Figure 1-990	Figure 1-991	Figure 1-992	Figure 1-993	Figure 1-994	Figure 1-995	Figure 1-996	Figure 1-997	

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Thu 5/15/2025 6:29 PM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/15/25 6:29 PM

Name:	David Gore
Email:	dgorergore@gmail.com
Date:	May 15, 2025
Entity/Organization :	Speaking up for our water and natural systems
Comments :	Hello CEWI Comments May 15 2025 The staff should rethink the interpretation of all the monitoring well data it provides. Each of the wells at any depth or locations tell us, is whether the Potential [POT] source of water flow and pressure comes from the higher water table elevation above or laterally from the lower sea surface interface elevation at that moment. There are no other water sources any place on earth. Otherwise it tells us the POT direction for water to flow between each of the wells at the moment. The source of all well withdrawals or water movement anywhere or depth is determined by knowing the relative head levels of the freshwater table and sea level gradients.

The 2025 CFWI WSP promotes a FALSE DECEPTIVE idea of what the well data tells us is the location of the source of some well withdrawals by calling them alternate or traditional sources. The plan also promotes the false idea we can store and have more available water supply by injecting water at the water table elevation into lower lying water filled geologic space that is never emptied or refilled.

Does any one in WMD's know water flow at any location on earth is only by the gravitational hydraulic head force gradient of the earths water table? False ideas are used as the bases to spend hugely cost actions that do little or nothing to make more water available without creating greater harm to our water and natural resources. We need smarter science backed people and leaders managing our water resources!

David Gore
Speaking up for our water and natural systems

Draft 2025 CFWI RWSP - STOPR Group Comments

From Brian Megic <bmegic@liquidsolutionsgroup.com>

Date Fri 5/16/2025 12:03 AM

To Callie Register <cregister@sjrwmd.com>

Cc Joe P. Quinn <Joe.Quinn@swfwmd.state.fl.us>; kester@sfwmd.gov <kester@sfwmd.gov>; KrystalAzzarella <krystalazzarella@polk-county.net>; Bryant, Brandon C <brandon.bryant@ocfl.net>; Anthony Cotter <acotter@tohowater.com>; Todd Swingle <tswingle@tohowater.com>; Deborah Beatty <dbeatty@tohowater.com>; Cannata, Marc <marc.cannata@ocfl.net>; Doan, Christine <christine.doan@ocfl.net>; Parker, Tad <charles.parker2@ocfl.net>; Siemen, Iulia R <iulia.siemer@ocfl.net>; Holmes, Georgiana <georgiana.holmes@ocfl.net>; Traexler, Kathy A <kathy.traexler@ocfl.net>; tamararichardson@polk-county.net <tamararichardson@polk-county.net>; Addison, Mark <markaddison@polk-county.net>; Gassaway, Lyudmila <lyudmila.gassaway@ocfl.net>; John Fogarty <jfogarty@tohowater.com>; Torres, Ed <ed.torres@ocfl.net>; Yoakum, Benjamin A <benjamin.yoakum@ocfl.net>; Matthew Doan <mdoan@tohowater.com>

 2 attachments (489 KB)

Draft 2025 CFWI RWSP - STOPR Group Comments - Final 051525.pdf; Draft 2025 CFWI RWSP - STOPR Group Comments - Final 051525.docx;

Ms. Register,

The City of St. Cloud (whose utility is now managed and operated by Toho Water Authority), Toho Water Authority, Orange County, Polk County, and the Central Florida Tourism Oversight District (previously known as the Reedy Creek Improvement District), collectively referred to as the STOPR Group, appreciate the opportunity to review the draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) and commend the water management districts (Districts) on their efforts.

Attached please find the STOPR Group's comments on the draft 2025 CFWI RWSP. We appreciate the Districts' consideration of these comments.

The STOPR Group has also attached a Microsoft Word electronic version of our comments for convenience in editing the RWSP.

Per the Districts' established process, we also provided our comments via the public comment webform on the CFWI website (https://floridaswater.formstack.com/forms/cfw_i_planning). These comments are also listed below.

If you have any questions, please let us know.

Thanks!

Brian

Brian J. Megic, P.E.

Liquid Solutions Group, LLC
407-416-3398

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 12:35 AM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 12:34 AM

Name: Brian Megic

Email: bmegic@liquidsolutionsgroup.com

Date: May 16, 2025

Entity/Organization : Water Cooperative of Central Florida

Comments : The Water Cooperative of Central Florida (WCCF) is a unit of local government created by interlocal agreement between the City of St. Cloud, Toho Water Authority, Orange County and Polk County and is the regional utility collaborative implementing the Cypress Lake Wellfield Project. The Cypress Lake Wellfield Project is a brackish Lower Floridan aquifer (LFA) groundwater alternative water supply (AWS) project. The WCCF appreciates the opportunity to review and comment on the draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) and commends the water management districts (Districts) on their efforts.

Per the Districts' established process, we also provided our comments via the public comment webform on the CFWI website

(https://floridaswater.formstack.com/forms/cfwi_planning). These comments are also listed below.

a) Support for Continued Manner of Review for New Projects. The RWSP generally classifies groundwater from the Lower Floridan aquifer (LFA) as a "traditional", "non-traditional", or "brackish" supply source, depending on the project. Non-traditional and brackish LFA groundwater projects are presented as potential future water supply options in the RWSP. The distinction between a non-traditional and brackish LFA project as set out in the RWSP is unclear. Please provide definitions for these various classifications.

Independent of these classifications, as the use of the LFA as a supply source increases in the future, we support the Districts' continued approach of evaluating each new project to develop groundwater from the LFA (or to convert existing UFA withdrawals to the LFA withdrawals).

b) Updated to Cypress Lake Wellfield Project Status: Please update the text on Page 14 related to the Cypress Lake Wellfield Project as follows:

"Since 2020, Concentrate Disposal Well #2 and the associated monitoring well have been installed. Concentrate Disposal Well #1 is under construction. ,Three production wells have been installed. The initial raw water main installation and deepening of an existing production well are underway, and the RO Water Treatment Plant (WTP) is currently under design."

c) Proposed Change to General Narrative Description of Predicted Changes in Groundwater Levels: On Page 33/34 and Page D-25, a list of general areas of predicted changes in groundwater levels associated with projected groundwater withdrawals is provided. This list sets forth generalized descriptions, except in the case of Cypress Lake Wellfield Project, which is identified as being associated with the change in the LFA. The WCCF respectfully suggests that singling out the Cypress Lake Wellfield Project overemphasizes the project's contribution to the overall changes, since there are numerous existing and proposed projects contributing to changes in LFA groundwater levels. For that reason, we request the Districts keep the narrative consistent and

either list all projects contributing to the change in LFA groundwater levels or keep the description general and remove the reference to the Cypress Lake Wellfield Project.

d) Updated to Cypress Lake Wellfield Project Status:
Please update the text on Page 74 related to the Cypress Lake Wellfield Project as follows:

"One notable example of a regional project, the Cypress Lake Wellfield project, is being developed in central Osceola County by the WCCF with TWA as the lead agency. This project (included in the AWS estimates above) was permitted by the SFWMD and is anticipated to provide new potable supply up to 30 mgd through development of the LFA. Concentrate disposal well #2 and the associated monitoring well have been installed. Concentrate Disposal Well #1 is under construction. Three production wells have been installed. The initial raw water main installation and deepening of an existing production well are underway. The RO WTP is currently under design. Construction of the RO plant (30 mgd capacity) is being planned in two phases with each phase delivering 15 mgd of finished water."

Callie Register, P.E.
Regional Water Supply Planning Coordinator
Bureau of Water Supply Planning
St. Johns River Water Management District
525 Community College Parkway SE
Palm Bay, FL 32309

May 16, 2025

via email: cregister@sjrwm.com

**Re: Draft 2025 Central Florida Water Initiative Regional Water Supply Plan
Water Cooperative of Central Florida Comments**

Dear Mrs. Register:

The Water Cooperative of Central Florida (WCCF) is a unit of local government created by interlocal agreement between the City of St. Cloud, Toho Water Authority, Orange County and Polk County and is the regional utility collaborative implementing the Cypress Lake Wellfield Project. The Cypress Lake Wellfield Project is a brackish Lower Floridan aquifer (LFA) groundwater alternative water supply (AWS) project. The WCCF appreciates the opportunity to review and comment on the draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP) and commends the water management districts (Districts) on their efforts.

Per the Districts' established process, we also provided our comments via the public comment webform on the CFWI website (https://floridaswater.formstack.com/forms/cfwi_planning). These comments are also listed below.

- a) **Support for Continued Manner of Review for New Projects**. The RWSP generally classifies groundwater from the Lower Floridan aquifer (LFA) as a "traditional", "non-traditional", or "brackish" supply source, depending on the project. Non-traditional and brackish LFA groundwater projects are presented as potential future water supply options in the RWSP. The distinction between a non-traditional and brackish LFA project as set out in the RWSP is unclear. Please provide definitions for these various classifications.

Independent of these classifications, as the use of the LFA as a supply source increases in the future, we support the Districts' continued approach of evaluating each new project

to develop groundwater from the LFA (or to convert existing UFA withdrawals to the LFA withdrawals).

- b) **Updated to Cypress Lake Wellfield Project Status:** Please update the text on Page 14 related to the Cypress Lake Wellfield Project as follows:

“Since 2020, Concentrate Disposal Well #2, and the associated monitoring well have been installed. Concentrate Disposal Well #1 is under construction. ~~Three~~ production wells have been installed. The initial raw water main installation and deepening of an existing production well are underway, and the RO Water Treatment Plant (WTP) is currently under design.”

- c) **Proposed Change to General Narrative Description of Predicted Changes in Groundwater Levels:** On Page 33/34 and Page D-25, a list of general areas of predicted changes in groundwater levels associated with projected groundwater withdrawals is provided. This list sets forth generalized descriptions, except in the case of Cypress Lake Wellfield Project, which is identified as being associated with the change in the LFA. The WCCF respectfully suggests that singling out the Cypress Lake Wellfield Project overemphasizes the project’s contribution to the overall changes, since there are numerous existing and proposed projects contributing to changes in LFA groundwater levels. For that reason, we request the Districts keep the narrative consistent and either list all projects contributing to the change in LFA groundwater levels or keep the description general and remove the reference to the Cypress Lake Wellfield Project.

- d) **Updated to Cypress Lake Wellfield Project Status:** Please update the text on Page 74 related to the Cypress Lake Wellfield Project as follows:

“One notable example of a regional project, the Cypress Lake Wellfield project, is being developed in central Osceola County by the WCCF with TWA as the lead agency. This project (included in the AWS estimates above) was permitted by the SFWMD and is anticipated to provide new potable supply up to 30 mgd through development of the LFA. Concentrate disposal well #2, and the associated monitoring well have been installed. Concentrate Disposal Well #1 is under construction. ~~and Three~~ production wells have been installed. The initial raw water main installation and deepening of an existing production well are underway. The RO WTP is currently under design. Construction of the RO plant (30 mgd capacity) is being planned in two phases with each phase delivering 15 mgd of finished water.”

Please note that the above comments represent the WCCF's comments. The members of the WCCF are also members of the St. Cloud-Toho Water Authority-Orange County-Polk County-Reedy Creek Improvement District (now called the Central Florida Tourism Oversight District) Group (STOPR Group). The WCCF's comments are in addition to the comments issued by the STOPR Group separately by a letter dated May 15, 2025, which is incorporated by reference. The individual members of the WCCF may also comment separately on aspects of the RWSP that relate directly to their utility.

We appreciate the Districts' consideration of these comments. The WCCF 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.

By:



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



Ed Torres, M.S., P.E., LEED AP
Director
Orange County Utilities

By:



Krystal J. Azzarella
Manager, Environmental Affairs
Polk County Utilities

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 5:38 AM

To cfwicomments@sfwmd.gov <cfwicommments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 5:38 AM

Name: Jake Fojtik

Email: jake.fojtik@ffbf.org

Date: May 16, 2025

Entity/Organization : Florida Farm Bureau Federation

Comments : Florida Farm Bureau Federation comments on the Draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP)

On behalf of the Florida Farm Bureau Federation and our 132,000 member families, many of whom live and farm within the boundaries of the CFWI, I appreciate the opportunity to comment on the Draft 2025 Regional Water Supply Plan, and comment on the present and future water supply needs for agriculture within this critically important region. Agricultural water use is unique and different. When there is adequate and above average rainfall, agriculture acts as a major source of recharge and storage, and during dry periods, irrigation is critical. Please find our general

comments below.

An area of concern for many of us is the assumption that water supply demands within the boundaries of the CFWI are sufficient to meet the needs of the end users into the future. While there may be a decrease in overall irrigated acres, primarily due to citrus greening and urbanization, the diversification of agriculture in the region could result in changes in land use from citrus to other agricultural commodities such as vegetable production which would result in changes in water needs for the industry. Many of the agricultural lands in the CFWI area are fallow, with the ability to go back into agricultural production at any time. For this reason, we believe there has been an underestimation of the water supply needs for agriculture through 2045.

With this in mind the ability of agriculture to utilize surface water and surficial ground water will be important given the high chlorides within the Floridan Aquifer, especially in the restricted allocation areas. As such, it is important to understand that allocations for the use of the Floridan may not be helpful in meeting agricultural irrigation needs because of high chlorides. Consequently, surface water and surficial groundwater supplies are even more critical in sustaining future industry needs throughout the area. Certainly, continued implementation of the conservation practices and regional stormwater projects could assist with any potential increased demands. Unfortunately, implementation of a lot of these types of projects is much farther out on the horizon.

While brackish water is inadequate in many instances due to a variety of circumstances, management decisions, and implemented practices, many agricultural operations utilize it as a primary water source. Additionally, brackish water is recognized as a current ground water source but is also identified as an alternative water supply source. There should be careful consideration of the effects to existing legal users when identifying and evaluating alternative water supply.

Water Conservation Projections

We support the availability and use of Mobile Irrigation Labs for agricultural producer use and irrigation efficiency improvements. However, a vast majority of the farmers and ranchers in the CFWI are already implementing a whole host of irrigation management best management practices to address water conservation. More specificity within the Agriculture Self-Supply section would be appreciated.

Water Supply Project Options

As mentioned before, agricultural commodities can change at any moment, for a number of reasons, and commodity types have different water quality needs. Reuse water can cause significant food safety issues for row crop farmers.

Technical Team

Additionally, Farm Bureau would like to express our desire and support for the reinstatement of a technical review team.

Thank you for the opportunity to work with the Districts and various stakeholders to improve the CFWI RWSP. I look forward to our continued collaboration.

Sincerely,

Jake Fojtik

Assistant Director of Government & Community Affairs

Florida Farm Bureau Federation

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 12:08 PM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 12:08 PM

Name: Lisa Rinaman

Email: lisa@stjohnsriverkeeper.org

Date: May 16, 2025

Entity/Organization
: St. Johns Riverkeeper

Comments :
May 16, 2025

RE: 2025 Central Florida Water Initiative (CFWI)
Regional Water Supply Plan DRAFT

Downstream protection for a river requires actions to ensure water quality and the integrity of downstream waters to remain healthy despite activities occurring upstream. This includes regulations, restoration efforts, and community actions to minimize pollution, preserve habitat, and protect the overall ecosystem.

Unfortunately, the term "downstream protection" does not appear once despite ongoing watershed

wide concern about the downstream impacts of the CFWI to the St. Johns River.

Nor does any actions listed in Chapter 2: Progress Since the 2020 CFWI Regional Water Supply Plan (CFWI RWSP) address our ongoing concerns regarding degrading conditions in the St. Johns River and the unintended consequences of the CFWI resulting from the lack of due diligence of downstream impact outside of the CFWI area.

While the DRAFT 2025 CFWI RWSP does commit to “Conduct analyses to identify potential quantities of surface water while ensuring hydrologic functions of lakes and downstream environmental needs are maintained, including MFLs and water reservations,” the plan does not provide any evidence that this critical work to achieve this commitment is under way.

Our River Deserves Protection

On behalf of St. Johns Riverkeeper’s (SJRK) members, we respectfully request the Central Florida Water Initiative (CFWI) Steering Committee, Florida Department of Environmental Protection (FDEP) and the St. Johns River Water Management District (SJRWMD) identify safeguards to protect the St. Johns River and its 100-mile estuary from the growing threat of saltwater intrusion, water quality degradation, fish habitat loss and surface water withdrawals and CFWI/FDEP/SJRWMD actions dedicated to protecting the physical, chemical, and biological characteristics of the St. Johns River.

Salinity continues to rise in the Lower St. Johns shifting the mixing zone between freshwater and saltwater further south, upriver negatively impacting submerged aquatic vegetation and the aquatic life that depends upon it. The estuary’s ecology is changing due to saltwater intrusion at a concerning rate undermining its health and the estuary’s commercial and recreational fisheries.

CFWI’s heavy reliance on St. Johns River surface water withdrawals as alternative water supply (AWS) will only exacerbate this unfortunate trend.

CFWI'S recommendation of augmenting this loss with reclaimed water without the much-needed water quality assessment adds more excess nutrient loading resulting in more harmful algal blooms that are already plaguing our river.

Increasing concentrations of phosphorous from the land disposal of sewage sludge also known as "biosolids" is fueling harmful algal blooms that block sunlight to submerged grasses and make our river unusable for recreation. Growing concerns of high phosphorous from reclaimed or reuse water warrants more careful analysis.

These significant water quality impacts have not been addressed within the CFWI planning documents.

CFWI continues to use the Water Supply Impact Study (WSIS) to justify up to 155 MGD of fresh water to be withdrawn from the St. Johns as the draft plan states on page 65:

The Water Supply Impact Study (WSIS) assessed the potential environmental impacts associated with increased surface water withdrawals along the SJR (SJRWMD 2012). The study confirmed that the SJR is a viable AWS source, with a possibility of combined withdrawals of up to 155 mgd from three locations, which would result in minimal to negligible environmental impacts to both surface and groundwater resources.

Unfortunately, CFWI/SJRWMD continues to ignore the National Research Council (NRC) WSIS Peer Review that raised significant concerns regarding shortcomings of the study and made recommendations for enhanced review specific to water quality issues.

Outstanding National Research Council WSIS Concerns:

- According to the NRC, "the WSIS operated within a range of constraints that ultimately imposed both limitations and uncertainties on the study's overall conclusions." P. 101
- "...data needed to understand surface water–groundwater interactions and for the environmental impact analyses were not as readily available. In some cases data were very

limited.... the lack of data impeded the progress of some workgroups and led to uncertainties about some of the WSIS conclusions." P. 101

- "...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." P. 10

- "...runoff resulting from increases in urban/suburban land area in the basin was assumed to affect watershed hydrology only....The modeling conducted by the District did not have a water quality component, and the District considered the potential ecological effects of significant increases in degraded stormwater runoff, as well as changes in the frequency distribution of stream flows in urbanized areas, to be outside the scope of the WSIS." P. 102

- "Uncertainties about future conditions over which the District has no control (e.g., climate change, sea level rise, land use) also lead to concerns about the reliability of the conclusions." P. 101

- "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." P. 101

- "The Committee is not convinced that several statements made by the workgroup are justified by its analyses. For example, more work on the direct effects of salinity on epifauna needs to be completed before epifaunal impacts can be dismissed. In addition, potential impacts on infaunal and epifaunal benthic organisms of salinity increases and coupled low DO levels, which could occur periodically in the lower river, should receive further study." P.79

CFWI must address this outstanding threat to downstream waters before there is irreparable harm to Florida's only American Heritage River.

It appears that CFWI is recommending future

actions to address some of these outstanding concerns, within the 2025 CFWI RWSP's recommendations on page 95:

There are opportunities for development of surface water supplies from lakes and rivers in or near the CFWI Planning Area. The following actions could enhance the use of surface water:

- Evaluate potential storage options, including locations (e.g., reservoirs and ASR systems)
- Investigate opportunities for conjunctive use of surface water with other water sources (e.g., stormwater or reclaimed water)
- Conduct analyses to identify potential quantities of surface water while ensuring hydrologic functions of lakes and downstream environmental needs are maintained, including MFLs and water reservations

• Continue implementing each District's annual priority list for MFLs and water reservations

Sadly, there are no downstream St. Johns River MFLs, water reservations or comprehensive assessments to determine the environmental needs to protect the hydrologic function, water quality and fish habitat of the St. Johns River.

Formal Request

On behalf of the St. Johns River and the St. Johns Riverkeeper members, we formally request a response to these comments and outstanding concerns to fully understand the intent of the CFWI Rulemaking and how the St. Johns River and its 100-mile Estuary will be protected including:

- Response to the Outstanding National Research Council WSIS Concerns
- Full scope and timeline of the analysis to "ensuring hydrologic functions of lake and downstream environmental needs are maintained, including MFLs and water reservations
- Detailed analysis of the consideration of protecting the St. Johns River with a water reservation in Chapter 372, Florida Statue as a regulatory tool that sets water aside for the protection of fish and wildlife or the public health and safety. Reserved water is not available to

allocate for consumptive use purposes.

Floridians deserve a balanced approach to Florida's water needs and the protection of Florida's natural treasures for future generations. We hope the above are addressed in order for CFWI to deliver that much needed balance.

For the River,
Lisa Rinaman
St. Johns Riverkeeper
lisa@stjohnsriverkeeper.org
904-509-3260

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Formstack, 11671 Lantern Road, Suite 300, Fishers, IN 46038

Minneola Project CFWI_AppndxE WWTF Reuse Pumps and piping.xlsx

From Sarah Whitaker <swhitaker@smwgeosciences.com>

Date Fri 5/16/2025 12:16 PM

To Callie Register <cregister@sjrwmd.com>

Cc Fred Miller <fmiller@minneola.us>; Mark Johnson <mjohnson@minneola.us>; Dariush Dashtaki <ddashtaki@Minneola.US>; Joyce Heffington <jheffington@minneola.us>

 1 attachment (30 KB)

Minneola Project CFWI_AppndxE WWTF Reuse Pumps and piping.xlsx;

Callie,

Please see the attached project for Minneola. This is required for the City to implement reuse and offset groundwater withdrawals with reclaimed.

Thank you,



Sarah M. Whitaker, P.G.

President

SMW GeoSciences, Inc.
1028 W. New Hampshire Street
Orlando, FL 32804

P 407.426.2836 M 407.234.4675
swhitaker@smwgeosciences.com
www.smwgeosciences.com
<http://www.linkedin.com/in/smwhitaker>

Please note: As of June 1, 2024, my work hours are 9:00 am to 5:00 pm Monday, Wednesday, and Friday.
For anything urgent outside of these days and times, you may always call me on my mobile number.



Outlook

Re: Minneola Project CFWI_AppndxE WWTF Reuse Pumps and piping.xlsx

From Dariush Dashtaki <ddashtaki@Minneola.US>

Date Mon 5/19/2025 7:57 AM

To Callie Register <cregister@sjrwmd.com>; Sarah Whitaker <swhitaker@smwgeosciences.com>

Cc Fred Miller <fmiller@minneola.us>; Mark Johnson <mjohnson@minneola.us>; Joyce Heffington <jheffington@minneola.us>

Good Morning Callie,

Please accept this email as authorization for the subject submittal.

Regards,

Dan Dashtaki, P.E.

City of Minneola

Public Works Manager

18340 Scrub Jay Lane

Minneola, FL 34715

M: 352-536-4162 T: 352-394-3598 Ext: 302 F: 352-242-6164

W: www.minneola.us



From: Callie Register <cregister@sjrwmd.com>

Sent: Sunday, May 18, 2025 1:05 PM

To: Sarah Whitaker <swhitaker@smwgeosciences.com>

Cc: Fred Miller <fmiller@minneola.us>; Mark Johnson <mjohnson@minneola.us>; Dariush Dashtaki <ddashtaki@Minneola.US>; Joyce Heffington <jheffington@minneola.us>

Subject: Re: Minneola Project CFWI_AppndxE WWTF Reuse Pumps and piping.xlsx

****CAUTION:** This email originated from outside the organization. DO NOT CLICK links or open attachments unless you recognize the sender and know the content is safe.

Sarah, thank you for the submittal. We will need authorization from the City to act on their behalf for this request. An email from the utilities director or other representative of the city would suffice.

Thank you,

Callie Register

SJRWMD

Regional Water Supply Planning Coordinator
321-863-0011

From: Sarah Whitaker <swhitaker@smwgeosciences.com>
Sent: Friday, May 16, 2025 12:15 PM
To: Callie Register <cregister@sjrwmd.com>
Cc: Fred Miller <fmiller@minneola.us>; Mark Johnson <mjohnson@minneola.us>; Dariush Dashtaki <ddashtaki@Minneola.US>; Joyce Heffington <jheffington@minneola.us>
Subject: Minneola Project CFWI_Appndx E WWTF Reuse Pumps and piping.xlsx

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Thank you,



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President

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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

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- 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/>



Outlook

RE: Minneola Project CFWI_Appndx E WWTF Reuse Pumps and piping.xlsx

From Fred Miller <fmiller@minneola.us>

Date Mon 5/19/2025 9:42 AM

To Callie Register <cregister@sjrwmd.com>; Sarah Whitaker <swhitaker@smwgeosciences.com>

Cc Mark Johnson <mjohnson@minneola.us>; Dariush Dashtaki <ddashtaki@Minneola.US>; Joyce Heffington <jheffington@minneola.us>

Good morning Callie,

I'm sending you this email as authorization for Sarah Whitaker to act on the city's behalf for Minneola's CFWI project list. Please let me know if have any questions, thank you.

Fred Miller

From: Callie Register <cregister@sjrwmd.com>

Sent: Sunday, May 18, 2025 1:06 PM

To: Sarah Whitaker <swhitaker@smwgeosciences.com>

Cc: Fred Miller <fmiller@minneola.us>; Mark Johnson <mjohnson@minneola.us>; Dariush Dashtaki <ddashtaki@Minneola.US>; Joyce Heffington <jheffington@minneola.us>

Subject: Re: Minneola Project CFWI_Appndx E WWTF Reuse Pumps and piping.xlsx

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Thank you,

Callie Register

SJRWMD

Regional Water Supply Planning Coordinator

321-863-0011

From: Sarah Whitaker <swhitaker@smwgeosciences.com>

Sent: Friday, May 16, 2025 12:15 PM

To: Callie Register <cregister@sjrwmd.com>

Cc: Fred Miller <fmiller@minneola.us>; Mark Johnson <mjohnson@minneola.us>; Dariush Dashtaki <ddashtaki@Minneola.US>; Joyce Heffington <jheffington@minneola.us>

Subject: Minneola Project CFWI_AppndxE WWTF Reuse Pumps and piping.xlsx

Callie,

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Thank you,



Sarah M. Whitaker, P.G.

President

SMW GeoSciences, Inc.
1028 W. New Hampshire Street
Orlando, FL 32804

P 407.426.2836 M 407.234.4675
swhitaker@smwgeosciences.com
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<http://www.linkedin.com/in/smwhitaker>

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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](#)

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CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 12:49 PM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 12:49 PM

Name: Brian Megic

Email: bmegic@liquidsolutionsgroup.com

Date: May 16, 2025

Entity/Organization
: Toho Water Authority

Comments : Toho Water Authority (Toho) appreciates the opportunity to review and comment on the draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP). Below please find Toho's comments on the draft 2025 CFWI RWSP.

a) Change Acronym for Toho Water Authority. Please change the acronym for Toho Water Authority from "TWA" to "Toho" everywhere in the RWSP. Though it may have at one time been referred to as TWA, it has come to be known regionally as Toho in recent years. You can address the usage transition by adding after the first mention, "previously referred to as TWA."

b) Clarification Regarding Toho Reservoir Project (Page 15). The Toho Reservoir was designed and constructed to not discharge (except under emergency overflow circumstances). Please update the third sentence of this paragraph as follows:

"The reservoir and impoundment is expected to capture and treat stormwater runoff resulting in an overall nutrient reduction in Lake Tohopekaliga (Lake Toho), the Kissimmee River, and other downstream areas."

c) Clarification Regarding Figures 8 through 10 and Associated Groundwater Flow Modeling Results. There is a discrete area of change in simulated mean water levels along the Polk County and Osceola County boundary just south of the "Four Corners" area in Figures 8 through 10. This appears to be near Toho facilities, particularly the proposed 160-Acre Site Project. The groundwater flow model files associated with Figures 8 through 10 were not posted along with the draft 2025 CFWI RWSP, so Toho was not able to determine what this area of water level change is associated with.

Toho wants to confirm that if Toho's proposed 160-Acre Site Project is included in the model in that area, the aquifer recharge associated with that project is also included in the model in that area as requested in Toho's comments to the Districts dated May 26, 2023.

While we understand and agree that the Districts assumed that loading to aquifer recharge projects such as rapid infiltration basins (RIBs) remain constant through 2045 in the CFWI RWSP geodatabase and groundwater flow modeling, the 160-Acre Site groundwater supply project cannot be included without also including the associated increase in aquifer recharge via Toho's RIBs. By special condition of Toho's South Florida Water Management District (SFWMD) Water Use Permit (WUP), the flow Toho is authorized to withdraw from the 160-Acre Site Project

groundwater wells is directly related to the amount of increased recharge Toho applies to the 160-Acre Site RIBs. As such, withdrawals from this project cannot be included in the evaluation without the associated increase in aquifer recharge.

If the aquifer recharge associated with the 160-Acre Site Project is not included, any model simulated drawdowns in this area are significantly overpredicted.

Toho still agrees that all other aquifer recharge sites should not be increased in future simulations.

d) St. Cloud Service Area Population Projections (Table A-5-1a). Toho understands the population and demand projections are not going to be modified any further as part of the 2025 CFWI RWSP. However, Toho requests to be able to work with the Districts early in the development of the projections for 2030 CFWI RWSP, or other District planning efforts. As Toho stated during the development of the projections for the 2025 CFWI RWSP, the projections for the portion of Toho's service area associated with the City of St. Cloud are significantly lower than what is actually occurring. In the 2025 CFWI RWSP, the Districts applied a growth rate of 3,580 and 3,985 people per year through 2045. However, over the past four years (2021-2024) Toho estimates the growth rate in this area has been over 7,000 people per year on average. Toho would like to assure this is adjusted in future planning efforts.

e) Sunbridge Service Area Population and Demand Projections (Table A-5-1a and Table A-5-1b). The population projections for Toho's Sunbridge area begin in 2025 and increase through 2045. The water demand projections for the Sunbridge area start in 2020 and increase through 2040. As such, the population and water demand projects for Toho's Sunbridge area appear to be offset from one another by 5-years. Based on connections to date, the water demand

projections more closely reflect actual conditions. Similar to the previous comments, Toho would like to work with the Districts early in the development of the projections for the 2030 CFWI RWSP, or other planning efforts, to more accurately align the population and water demand projections for the Sunbridge area.

f) Residential Per Capita Request (Table A-6b-1a through Table A-6b-1c). The residential per capita for Toho under SFWMD WUP 49-00103-W appears high. Toho would like to work with the Districts to review how this calculation was made and to make any necessary adjustments.

g) Shingle Creek Potable Water Supply Project Change in Cost (Table E-5). Please increase the cost of this project to \$120M and change the completion date to TBD.

h) Toho Reservoir 6.0 mgd Reclaimed Water Augmentation Project – Surface/Stormwater Treatment Facility and Pump Station Change in Cost and Completion Date (Table E-5). Please increase the cost of this project to \$135M and change the completion date to 12/31/2027.

FW: CFWI RWSP Comments Letter 2025-05-16

From Clay Coarsey <CCoarsey@sjrwmd.com>
Date Fri 5/16/2025 2:59 PM
To Callie Register <cregister@sjrwmd.com>
Cc Michelle Hopkins <michelle.hopkins@swfwmd.state.fl.us>

 1 attachment (1 MB)
2025 CFWI RWSP Comments Letter 2025-05-16_Signed.pdf;

Callie,

We received the following letter from Winter Haven.

Thanks,
Clay

From: Amy Jenkins <ajenkins@mywinterhaven.com>
Sent: Friday, May 16, 2025 2:48 PM
To: Clay Coarsey <CCoarsey@sjrwmd.com>
Cc: Gary Hubbard <ghubbard@mywinterhaven.com>; 'David MacIntyre' <dfm@aquascitech.com>; 'Brian Wheeler' <captsludge71@gmail.com>; Mark Bombard <mbombard@mywinterhaven.com>
Subject: CFWI RWSP Comments Letter 2025-05-16

Dear Mr. Coarsey,

Please find attached comments on the 2025 Central Florida Water Initiative Regional Water Supply Plan. This letter is being transmitted on behalf of Gary Hubbard, P.E., Director of the Winter Haven Water Department.

Mr. Hubbard would be grateful if you would give the attached document your attention at your earliest convenience.

Thank you for your time and consideration of these comments.

Sincerely,



Amy Jenkins

EXECUTIVE ASSISTANT

P 863.291.5853 x3151

ajenkins@mywinterhaven.com

Please note: Under Florida's public records law, emails to or from the City of Winter Haven concerning public business are public records subject to disclosure, including to media, upon a public records request unless a specific legal exemption applies. This includes your email address and the contents of the message.

May 16, 2025

St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429
Attn: Mr. Clay Coarsey
Director, Division of Water Supply Planning and Assessment

Re: Comments on the 2025 Central Florida Water Initiative Regional Water Supply Plan

Dear Mr. Coarsey;

The 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RSP) development process has issued draft plan documents developed by the Water Management Districts (WMDs), and has provided an opportunity for public comment. Unfortunately, the form on the CFWI website for submission of comments is not well suited to submission of multiple comments from a single source. The City of Winter Haven is therefore submitting this letter instead.

Stakeholder Participation

The development of the 2025 RWSP has proceeded with significantly less opportunities for stakeholders to participate, comment, and provide input than the 2015 and 2020 RWSP processes. In previous RWSP efforts, the various technical committees were open to participation from stakeholders and a number participated. For the 2025 RWSP this was not the case. For the next CFWI RWSP, The City of Winter Haven believes the WMDs should return to the participation model of the previous efforts.

Beneficial Reuse

Under Current Reuse, the RWSP Plan Document states:

In 2020, there were 81 wastewater treatment plants (WWTP) in the CFWI Planning Area with permitted capacities over 0.1 mgd. These providers generated 214 mgd of treated wastewater collectively (Tables A-13a through A-13f). From that flow, 228 mgd of reclaimed water was reused, which includes 12 mgd of supplemental flow, for beneficial purposes. Of the total reused, 126 mgd was for irrigation uses, 28 mgd for industrial uses, 68 mgd for aquifer recharge and environmental benefit, and 6 mgd for other uses.

This is slightly confusing in that 214 mgd of treated wastewater plus 12 mgd of supplemental flow would appear to generate 226 mgd of available reclaimed water rather than the stated quantity of 228 mgd.

It is notable that 30% of the reclaimed water is used for aquifer recharge and environmental benefit, and that this is considered to be beneficial reuse under FDEP rules (e.g., Ch. 62-610, F.A.C.). It also appears that this form of reuse is likely to increase in future because it is one of the few remaining ways to secure additional water supply from the Upper Floridan aquifer (UFA) under the constraints of the CFWI UFA 2025 potentiometric baseline rule. We believe it is inappropriate for the WMDs to exclude aquifer recharge from categorization as beneficial reuse, as stated in Appendix A:

For this CFWI RWSP, beneficial reuse was considered only those uses in which reclaimed water takes the place of an existing or potential use of higher quality water for which reclaimed water is suitable, such as water used for landscape irrigation. The delivery of reclaimed water to other types of reclaimed water facilities such as rapid infiltration basins (RIBs) located in recharge areas and wetland hydration projects is considered beneficial reuse by the FDEP.

However, these types of beneficial reuse do not directly replace groundwater withdrawals and were therefore classified separately as part of this plan. Generally delivery of reclaimed water to spray fields and absorption fields are not considered beneficial reuse.

As noted in the text, the WMD definition of beneficial reuse conflicts with the definition of beneficial reuse used in FDEP rules, which creates unnecessary conflict of terms. If the WMDs wish to draw a distinction between beneficial reuse types that are used to substitute reclaimed water in place of higher quality water uses vs. those that do not, the WMDs should create new terms for this classification system (e.g., “substitution beneficial reuse”, “impact mitigation beneficial reuse,” and “disposal” [noting that “disposal” is also a defined term in Ch. 62-610, F.A.C.]).

Potable Reuse

The potable reuse section of the RWSP is outdated. The discussion of the Florida Potable Reuse Commission process and recommendations should be updated to reflect the adoption of Ch. 62-565, F.A.C., for potable reuse systems, effective 2/26/2025. This provides a current basis for implementation of potable reuse, and the economics of alternative water supply development appear likely to favor direct potable reuse in many areas.

On a minor note, the text uses mixed FPRC and PRC acronyms when referring to the Florida Potable Reuse Commission.

Cooperative Funding

The RWSP discussion of cooperative funding by the Water Management Districts lacks the overall context of the total projected cost of future water supplies. It would better serve the citizens of Florida and their elected representatives to be able to understand the enormous future costs of continuing to expand the public water supply, and the limitations of current funding sources relative to that future need.

Wetland Impacts

The Water Resources and Related Natural Systems section of the RWSP states:

Some wetland impacts may be the result of multiple factors, including groundwater withdrawals, construction of drainage ditches, and other alterations to drainage basins.

Urban development is conspicuously lacking from this list. In prior RWSP analyses it was shown that urbanization of surrounding areas was by far the strongest statistical predictor of wetland stress.

Water Supply Project Options

The list of Water Supply and Water Resource Development Project Options in Appendix E is incomplete, in part because of the limited engagement of water supply utilities that has arisen as the Water Management Districts internalized the CFWI RWSP process, and in part because a five-year update cycle for CFWI does not mesh well with the project planning cycle that utilities use. The major influences that affect utility plans for selection of Water Supply and Water Resource Development Project Options are:

- Adoption/modification of water supply master plans and wastewater master plans (for reuse options);
- Modification of water use permits; and
- Annual CIP budget development.

Finding a way to link the gathering of water project option information for CFWI to those processes would likely yield a more complete and accurate project list for the RWSP.

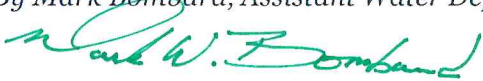
In the 2015 CFWI RWSP development cycle, the CFWI Steering Committee approved or endorsed annually a list of current water supply projects for funding. As part of the 2015 RWSP process, there was a Solutions Project Team that screened water supply projects within the plan for their feasibility, permitting, and costs. This process was not included in the 2020 RWSP. Following the 2015 RWSP adoption the CFWI Steering Committee for several years would approve a recommended list of water supply projects for funding based on their status at that time. A return to use of the CFWI project list as an influence factor in project funding would create a greater incentive for utility participation in keeping these lists current. Creating a process for submitting updates concurrently with utility adoption of water & wastewater master plans, water use permit

revisions and CIP approvals could also help to get utilities into the habit of submitting updates to CFWI as part of those processes instead of turning it into an out-of-cycle rapid response item as it tends to be currently.

Thank you for providing this opportunity to submit comments on the CFWI RWSP.

Sincerely,

*Gary M. Hubbard, P.E., Director
Water Department, City of Winter Haven
By Mark Bombard, Assistant Water Department Director*



CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 3:51 PM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 3:51 PM

Name: Alyson Byrne

Email: abyrneescribano@ouc.com

Date: May 16, 2025

Entity/Organization : Orlando Utilities Commission

Comments : 1. On PDF Page 69, an additional "eight of 30 criteria were characterized as not met for the 2016-2020 RC based on status assessments described in draft reports on proposed minimum flows for the Wekiva River at SR 46, the Little Wekiva River, Wekiwa Springs, Rock Springs, Palm Springs, Sanlando Springs, Starbuck Springs, and Miami Springs". To the extent that the status of MFLs may influence the determination of groundwater limits, OUC is awaiting responses on comments submitted in February 2024 as well as re-submitted comments from 2018 as part of the Public Workshop for the Wekiva Basin Minimum Flows and Levels. These comments included unaddressed concerns regarding the HSPF and HEC-RAS modeling and other elements of the

MFLs determination and assessment. (Please see the attached files.)

2. The groundwater modeling efforts (PDF Page 59), for all of the scenarios, use daily rainfall amounts that occurred between 2003 and 2014. Is this sufficient time to capture the range of expected variability? To the extent that longer term cycles may exist in rainfall such as the Atlantic Multidecadal Oscillation (AMO) that may be in a warm phase (higher rainfall) since 1995, how sensitive are the results to different rainfall regimes?

3. In the Acronyms and Abbreviations section "Florida-Friendly Landscaping" has a question mark after it which is likely a font-rendering problem.

4. Figure 2 "Natural Features in the Central Florida Water Initiative Planning Area" on PDF Page 32 includes I4 but is missing the newer interstates such as 528, 417, and 429. It may help with orientation to include all major interstates.

5. A space is needed in "A total of 47existing" Page 68.

6. On PDF Page 87 this text is a little unclear about brackish and saline water. It seems to suggest but not completely clarify that brackish/saline water is defined differently in the areas of the CFWI that fall within the SFWMD: "Brackish water, for AWS planning purposes in the CFWI Planning Area for the SJRWMD and SFWMD, is generally defined as water with a total dissolved solids (TDS) concentration of greater than 500 milligrams per liter (mg/L). The SFWMD defines saline water, which includes brackish water, as water with chloride concentrations greater than 250 mg/L." If a change is made here, it would be appropriate to update the glossary also on PDF Page 125 for the same issue.

7. On PDF Page 127 East-Central Florida Transient Groundwater Expanded Model (ECFTX) is included in the glossary. It may be useful to add an entry for ECFTXv2.0 or clarify that two versions exist relevant to the CFWI RWSP work.

8. On PDF Page 127 "according to the National Geodetic Vertical Datum of 1929. National

Geodetic Vertical Datum of 1929. May also" appears to include a duplication of the text "National...1929".

9. On PDF Page 131 "Water quality usually concerning The physical, chemical, and" it is recommended to not capitalize "The".

10. In Appendix D, Figure D-7, PDF Page 261, the lowest category of yellow on the map indicates ">500" but presumably "<500" would be appropriate in this context.

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 4:04 PM

To cfwicommments@sfwmd.gov <cfwicommments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 4:04 PM

Name:	Brian Megic
Email:	bmegic@liquidsolutionsgroup.com
Date:	May 16, 2025
Entity/Organization :	SJR/TCR Project Partners

Comments :

The City of Cocoa, East Central Florida Services, Orange County Utilities, Orlando Utilities Commission and Toho Water Authority (Project Partners) comprise the regional utility collaborative that is implementing the St. Johns River/Taylor Creek Reservoir (SJRTCR) Water Supply Project. The Project Partners appreciate the opportunity to review and comment on the draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP).

The Project Partners submitted minor comments to the Districts on 4/28/25 and 5/14/25. The District has addressed those comments, and the Project Partners have no further comments.

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 5:06 PM

To cfwicommments@sfwmd.gov <cfwicommments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 5:05 PM

Name: Gary Hubbard

Email: ghubbard@mywinterhaven.com

Date: May 16, 2025

Entity/Organization
: City of Winter Haven Water Department

Comments : Please refer to the City's comments in a letter from Gary Hubbard to Clay Coarsey which was sent by e-mail today.

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 7:42 PM

To cfwicomments@sfwmd.gov <cfwicommments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 7:41 PM

Name: Michael Cliburn

Email: cliburn1947@gmail.com

Date: May 16, 2025

Entity/Organization
: Friends of the Wekiva River

Comments : May 16, 2025

Mr. Mike Register Director
St Johns River Water Management District
P.O. Box 1429
Palatka, FL 2178-1429

RE: Draft 2025 Central Florida Water Initiative
Regional Water Supply Plan

Dear Mr. Register,

The Friends of the Wekiva River (FOWR)
appreciates the opportunity to submit the
following comments and questions about the
draft Regional Water Supply Plan (RWSP) for the

Central Florida Water Initiative (CFWI).

Water Use:

1. Why has the projected 2045 public supply demand in the draft 2025 RWSP increased by 58% over the 2020 RWSP projected demand (642 mgd vs 407 mgd) when population is only projected to increase by 40%? Does this mean the overall average per capita use is increasing? Figure 5 shows that per capita use is declining. Please explain the apparent discrepancy.
2. Why has the conservation forecast in the draft 2025 RWSP declined to 45 - 52 mgd by 2045 from 53 - 56 mgd by 2040 in the 2020 RWSP?
3. How is the water resource benefit calculated for reclaimed water? How much will reclaimed water projects offset water pumped from Upper Floridan Aquifer wells in the Wekiva River basin?
4. The 2020 RWSP stated that permits had been issued to withdraw a total of 1,064 mgd of groundwater from the Floridan Aquifer. What is the total amount permitted as of 2025?

Project List:

1. Project 2015-126: Taylor Creek Reservoir: Regional Project to construct intake structure, reservoir, treatment, storage & transmission facilities for Taylor Creek Reservoir - who will be the lead agency for this project? Will the City of Cocoa build the water treatment facility that will provide water to the other participants? When will the plan for treatment and transmission of water to the participants be developed?
2. How much will the following projects offset the current negative freeboard in the flows of the Wekiva River, Wekiwa Springs and/or Rock Springs?
 - a. Project 2015-1: South Lake County's LFA Fresh Groundwater wellfield project (Groveland, Minneola, Clermont & Utilities Inc). Also, who is the lead agency on this project and why is completion date shown as TBD in the draft 2025 RWSP when the 2020 RWSP showed it being completed in 2022?
 - b. Project 2020-1: OUC's SE Brackish WTP & Wellfield. Also, will this project allow OUC to reduce pumping from their wellfield at the Pine

Hills WTP? If not, how will OUC offset or reduce its impact to the Wekiva River & the springs?

c. Project 2020-2: Sanford's LFA Wellfield. Is this project currently included in Sanford's CUP, and if so, does the CUP require this project to be completed by a specific date? Why was substantial completion changed from 2026 in the 2020 RWSP to TBD in the draft 2025 RWSP?

3. The draft RWSP lists 3 options for taking water from the St Johns River at Yankee Lake with both Seminole County and the SJRWMD listed as responsible agencies. Who will be the lead agency for that project? When would it be constructed? How much does Seminole County's Markham WTP wellfield impact Wekiva River, or Wekiwa or Rock Springs? Do any other Seminole County wellfields affect the river & springs? Why is the County's proposed recharge well not listed in the draft 2025 RWSP? When will that project be completed??

4. What is the impact of Apopka groundwater pumping from the Upper Floridan Aquifer on the springs and river? How much will that be reduced when the city installs their water supply wells into the Lower Floridan Aquifer?

5. Given that 50-70% of GW pumped is for outdoor water use (page 54 of draft 2025 RWSP), why can't the SJRWMD impose more restrictions on irrigation in public supply CUPs, or require utilities to adopt more steeply tiered rate structures to help reduce use of public supplies for irrigation?

6. Given that the Wekiva River, a national Wild & Scenic River, and Wekiwa and Rock Springs, two Outstanding Florida Springs, are not currently meeting their MFLs, the Friends of the Wekiva River recommends that the SJRWMD issue a moratorium on all new and additional groundwater pumping from the Upper Floridan Aquifer until the MFLs for Wekiva River and its springs are achieved.

7. Also, the Friends of the Wekiva River recommends that the MFL Recovery Plan include criteria that would trigger a Water Shortage Order if the flows and/or levels in the springs or river drop below the minimum flows and/or levels

listed in the SJRWMD's "Reevaluation of Minimum Flows and Levels (MFLs) in the Wekiva River at State Road 46, Wekiwa Springs, Rock Springs, Palm Springs, Sanlando Springs, Starbuck Springs, and Miami Springs; and MFLs Determination for the Little Wekiva River, Lake, Orange, and Seminole Counties."

8. If additional groundwater withdrawals affecting Outstanding Florida Springs in Recovery must be shown to be in the public interest to qualify for a CUP, how can CUPs for new/additional groundwater withdrawals from the UFA in the Wekiwa/Rock Springs springshed be considered to be in the public interest if the springs and river are not meeting their MFLs?

Please do not hesitate to contact us if you have any questions, or would like further information.

Sincerely,

Mark Pafford. President
Friends of the Wekiva River, Inc.

Cc: Clay Coarsey
John Fitzgerald
Callie Register

CFWI Water Planning Comments Form

From noreply@formstack.com <noreply@formstack.com>

Date Fri 5/16/2025 8:01 PM

To cfwicomments@sfwmd.gov <cfwicomments@sfwmd.gov>; Callie Register <cregister@sjrwmd.com>



Formstack Submission For: CFWI Planning

Submitted at 05/16/25 8:01 PM

Name: Michael Cliburn

Email: cliburn1947@gmail.com

Date: May 16, 2025

Entity/Organization
: Friends of the Wekiva River

Comments : May 16, 2025

Mr. Mike Register Director
St Johns River Water Management District
P.O. Box 1429
Palatka, FL 2178-1429

RE: Draft 2025 Central Florida Water Initiative
Regional Water Supply Plan
Dear Mr. Register,
The Friends of the Wekiva River (FOWR)
appreciates the opportunity to submit the
following comments and questions about the
draft Regional Water Supply Plan (RWSP) for the
Central Florida Water Initiative (CFWI).
Water Use:

1. Why has the projected 2045 public supply demand in the draft 2025 RWSP increased by 58% over the 2020 RWSP projected demand (642 mgd vs 407 mgd) when population is only projected to increase by 40%? Does this mean the overall average per capita use is increasing? Figure 5 shows that per capita use is declining. Please explain the apparent discrepancy.
2. Why has the conservation forecast in the draft 2025 RWSP declined to 45 - 52 mgd by 2045 from 53 - 56 mgd by 2040 in the 2020 RWSP?
3. How is the water resource benefit calculated for reclaimed water? How much will reclaimed water projects offset water pumped from Upper Floridan Aquifer wells in the Wekiva River basin?
4. The 2020 RWSP stated that permits had been issued to withdraw a total of 1,064 mgd of groundwater from the Floridan Aquifer. What is the total amount permitted as of 2025?

Project List:

1. Project 2015-126: Taylor Creek Reservoir: Regional Project to construct intake structure, reservoir, treatment, storage & transmission facilities for Taylor Creek Reservoir - who will be the lead agency for this project? Will the City of Cocoa build the water treatment facility that will provide water to the other participants? When will the plan for treatment and transmission of water to the participants be developed?
2. How much will the following projects offset the current negative freeboard in the flows of the Wekiva River, Wekiwa Springs and/or Rock Springs?
 - a. Project 2015-1: South Lake County's LFA Fresh Groundwater wellfield project (Groveland, Minneola, Clermont & Utilities Inc). Also, who is the lead agency on this project and why is completion date shown as TBD in the draft 2025 RWSP when the 2020 RWSP showed it being completed in 2022?
 - b. Project 2020-1: OUC's SE Brackish WTP & Wellfield. Also, will this project allow OUC to reduce pumping from their wellfield at the Pine Hills WTP? If not, how will OUC offset or reduce its impact to the Wekiva River & the springs?

c. Project 2020-2: Sanford's LFA Wellfield. Is this project currently included in Sanford's CUP, and if so, does the CUP require this project to be completed by a specific date? Why was substantial completion changed from 2026 in the 2020 RWSP to TBD in the draft 2025 RWSP?

3. The draft RWSP lists 3 options for taking water from the St Johns River at Yankee Lake with both Seminole County and the SJRWMD listed as responsible agencies. Who will be the lead agency for that project? When would it be constructed? How much does Seminole County's Markham WTP wellfield impact Wekiva River, or Wekiwa or Rock Springs? Do any other Seminole County wellfields affect the river & springs? Why is the County's proposed recharge well not listed in the draft 2025 RWSP? When will that project be completed??

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River at State Road 46, Wekiwa Springs, Rock Springs, Palm Springs, Sanlando Springs, Starbuck Springs, and Miami Springs; and MFLs Determination for the Little Wekiva River, Lake, Orange, and Seminole Counties.”

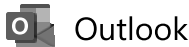
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Please do not hesitate to contact us if you have any questions, or would like further information.

Sincerely,

Mark Pafford. President
Friends of the Wekiva River, Inc.

Cc: Clay Coarsey
John Fitzgerald
Callie Register



FW: CFWI Water Planning Comments Form

From Payseno, Stacey <spayseno@sfwmd.gov>
Date Mon 5/19/2025 6:40 AM
To Callie Register <cregister@sjrwmd.com>

Stacey
561-682-2577

Please note my email address has changed to spayseno@sfwmd.gov.

From: noreply@formstack.com <noreply@formstack.com>
Sent: Friday, May 16, 2025 12:12 AM
To: cfwicommments <cfwicommments@sfwmd.gov>; cregister@sjrwmd.com
Subject: CFWI Water Planning Comments Form

[Please remember, this is an external email]



Formstack Submission For: CFWI Planning
Submitted at 05/16/25 12:11 AM

Name:	Brian Megic
Email:	bmegic@liquidsolutionsgroup.com
Date:	May 16, 2025
Entity/Organization :	STOPR Group
Comments :	The City of St. Cloud (whose utility is now managed and operated by Toho Water Authority), Toho Water Authority, Orange County, Polk County, and the Central Florida Tourism Oversight District (previously known as the Reedy Creek Improvement District), collectively referred to as the STOPR Group, appreciate the opportunity to review and comment on

the draft 2025 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 also provided our comments via the public comment webform on the CFWI website

(https://floridaswater.formstack.com/forms/cfw_i_planning).

These comments are also listed below.

a) Support for Decision to Continue Implementation of 2020 RWSP Conclusion. The STOPR Group has been actively involved in CFWI regional water supply planning since 2007 when the Central Florida Caution Area (predecessor of the CFWI) was established. The evaluations performed over the course of the development of the CFCA planning effort, the 2015 CFWI RWSP, and the 2020 CFWI RWSP culminated in the conclusion of the 2020 CFWI RWSP that traditional water resources alone cannot meet future water demands or currently permitted allocations without resulting in unacceptable impacts to water resources and related natural systems.

This conclusion resulted in the Districts and the Florida Department of Environmental Protection (Department) developing and promulgating the CFWI Rule in 2021, which limits Upper Floridan aquifer (UFA) groundwater users in the CFWI area to the quantities necessary to meet their needs in the year 2025, depending upon the type of use.

The 2025 CFWI RWSP generally maintains the conclusions from the 2020 CFWI RWSP that resulted in the CFWI Rule. The STOPR Group agrees with carrying forward these conclusions to allow the effects of the CFWI Rule and the increased beneficial reuse, conservation, and water supply options projects that stakeholders are implementing to take effect. These projects are complex and take a significant amount of time and capital expenditure to implement and the benefits of these efforts will take time to realize. This is demonstrated by the Southwest Florida Water Management District's Southwest Water Use Caution Area and the associated Saltwater Intrusion Minimum Aquifer Levels, Peace River area constraints, and Ridge Lakes area constraints, all of which are now being met.

The STOPR Group supports the Districts' efforts to continue to implement the critical successes the region has achieved as a result of the previous planning and regulatory efforts.

b) Support for Continued Manner of Review for New Projects and Clarification Request. The RWSP generally classifies groundwater from the Lower Floridan aquifer (LFA) as a "traditional", "non-traditional", or "brackish" supply source, depending on the project. Non-traditional and brackish LFA groundwater projects are presented as potential future water supply options in the RWSP. The distinction between a non-

traditional and brackish LFA project as set out in the RWSP is unclear. Please provide definitions for these various classifications.

Independent of these classifications, as the use of the LFA as a supply source increases in the future, we support the Districts' continued approach of evaluating each new project to develop groundwater from the LFA (or to convert existing UFA withdrawals to the LFA withdrawals).

c) Request for Renewed Participation in Working Groups. The RWSP includes a series of recommendations for moving forward. We especially appreciate the identification in your recommendations of this component:

“Continue Communication and Outreach

The CFWI is a collaborative process that depends on active engagement and participation of stakeholders. The Communications Working Group will continue their efforts to keep all stakeholders informed and engaged as programs and projects develop.”

However, we urge the Districts to expand the concept of stakeholder participation by going back to the participation model used at the outset of the CFWI through the 2020 CFWI RWSP. During that time, in addition to having stakeholder input in the Steering Committee as presently configured, there was representation by technical representatives of the stakeholders in your working groups such as the Data, Monitoring and Investigations Team, Regulatory Team, Environmental Measures Team, Hydrologic Analysis Team, Minimum Flows and Levels and Water Reservations Team, and Water Conservation Team.

With the passage of time, public suppliers and other stakeholders have lost that technical representation in the Working Groups and we would urge that it be reinstated. As then configured, technical representation in Working Groups allowed input by stakeholders on critical decisions, instead of learning what was decided later.

Participation by technical consultants served two key functions. First, it allowed the stakeholders to have a clearer understanding of science behind the decisions reached by agency decisionmakers. Second, it contributed scientific knowledge and experience from top level scientists at no cost to the agencies. For instance, the stakeholders' technical representatives contributed in the past and can contribute in the future, expertise and practical experience regarding the complexities and interdependencies involved in integrating multiple water sources – such as UFA groundwater, LFA groundwater, surface water, and reclaimed water – and the implications of their use on central Florida's natural systems,

including wetlands, surface waters, and springs. It was a win-win situation back before the current 5-year cycle and it can be again going forward.

To this end, we would request that you expand this component of your recommendations to include more than merely dissemination of information to the public. Please consider the following edit:

“Continue Collaboration, Communication and Outreach

The CFWI is a collaborative process that depends on active engagement and participation of stakeholders. The CFWI Working Groups will include meaningful opportunities for participation by stakeholder technical advisors who can contribute their skills and technical expertise to better understand CFWI initiatives and provide recommendations. Additionally, the Communications Working Group will continue their efforts to keep all stakeholders informed and engaged as programs and projects develop.”

d) Include a More Complete List of Contributing Factors. The last paragraph of the “Water Resources and Related Natural Systems” section on Page iii includes text that indicates “Some wetland impacts may be the result of multiple factors, including groundwater withdrawals, construction of drainage ditches, and other alterations to drainage basins.” We request the Districts expand this list of potential factors to include “changes in land use”. This comment is also applicable to the second paragraph on Page 42.

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f) Clarify Withdrawals Information. The withdrawals listed in Table 13 on Page 33 do not equal the total demands projected for the region. Though the table specifically states it is a summary of groundwater withdrawals, it would be beneficial to include a statement in the text that clarifies the total is different than the total projected demands for the region because other projected supply sources other than groundwater (e.g., surface water) are not represented in Table 13. This additional text will help provide clarity to the reader. We suggest this change also be made in Appendix D.

g) Editorial Clarification Suggested. We suggest the following changes to the fourth paragraph on Page 42,

“Approximately 25 percent of Ridge wetlands are currently

stressed under the 2016-2020 RC. The total probable acres of Stressed Ridge wetlands increased between 1 and 3 percent for the 2025 Withdrawals Condition; between 1.5 and 5 percent for the 2030 Withdrawals Condition; between 2 and 6 percent for the 2035 Withdrawals Condition; between 2 and 8 percent for the 2040 Withdrawals Condition; and by 2 to 9 percent for the 2045 Withdrawals Condition, compared to the 2016-2020 RC.”

h) Conform Susceptible Area Depiction to Modeling Results. On Figure 15, the dashed circle associated with East Osceola County is considerably larger than the potentially susceptible area predicted by the modeling in Figure 8 and over-emphasizes this area. Though the model predicts a small area that may be susceptible to groundwater withdrawals in Eastern Osceola County, the surficial aquifer in this area is generally not well connected to the underlying Floridan aquifer. We suggest this delineation of this area be brought more in line with the modeling results.

i) Add Clarifying Language Regarding Return Flow. In the “Future Potential Reuse” section, it is estimated that wastewater flows are projected to increase by 40 percent, which appears to be the increase in wastewater flow (85 MGD AADF) divided by the public supply demand increase (235.36 MGD AADF), which calculates to be 36 percent. It would be beneficial to add a sentence to clarify how 40 percent was calculated. In addition, much of central Florida is connecting outdoor demands to lower quality sources such as reclaimed water. As such, the percent return flow will likely increase in the future. We suggest adding a sentence after the first sentence of this paragraph that states the following:

“This is a conservative estimate, as wastewater return flow will likely increase into the future as a larger percentage of new developments are connected to lower quality sources such as reclaimed water.”

j) Correct Certain Information, Reiterating Request to Participate in Future Working Groups. The last sentence of the “Reclaimed Water” Section on Page 75 indicates that the Districts worked with utilities to develop an estimate of the potential future uses of reclaimed water in the CFWI Planning Area. While this occurred as part of the 2020 CFWI RWSP, this did not occur as part of the 2025 CFWI RWSP. We suggest removing this sentence. However, going forward, the Group requests the Districts expand stakeholder participation as part of the next CFWI RWSP (See comment c) above.

k) Clarify IPR Reference. Indirect potable reuse (IPR) projects have a specific definition in the new potable reuse rules. Not all aquifer recharge projects are considered IPR. Please change the first bullet on Page 95 as follows, “Conduct further investigation and maximize development of natural system

enhancement/recharge projects.”

l) Avoid Inconsistent Definitions. The Department’s classification of reuse is the deliberate application of reclaimed water for beneficial purposes and can include landscape irrigation, industrial processes, groundwater recharge, and wetland enhancement.

The “2045 Reclaimed Water Production” section on Page A-10 of the draft RWSP creates a separate classification for beneficial reuse for the RWSP that is different from the definition of beneficial reuse used by the Department. The classification in the RWSP defines beneficial reuse as only those uses in which reclaimed water takes the place of an existing or potential use of higher quality water for which reclaimed water is suitable, such as water used for landscape irrigation. This classification excludes aquifer recharge projects such as RIBs and wetland hydration as forms of beneficial reuse.

As resources become more limited, water suppliers are implementing alternative water supply projects, including impact offset and indirect potable reuse projects that could include RIBs and wetland hydration. Aquifer recharge and wetland hydration (among other reuse options) are forms of beneficial reuse and should be classified as such so that there is not ambiguity that creates uncertainty in the permitting and implementation of impact offset and indirect potable reuse projects. In addition, establishing separate classifications for beneficial reuse creates confusion and inconsistency. We suggest the following paragraph from Page A-10 be deleted or changed as follows:

“Reuse projects where reclaimed water takes the place of an existing or potential use of higher quality water for which reclaimed water is suitable, such as water used for landscape irrigation, were the focus of the RWSP. The delivery of reclaimed water to other types of reclaimed water facilities such as rapid infiltration basins (RIBs) located in recharge areas and wetland hydration projects is considered beneficial reuse by the FDEP. Except for impact offset, indirect potable reuse, and other similar projects, these types of beneficial reuse do not directly replace groundwater withdrawals and were therefore not the focus of this RWSP. Delivery of reclaimed water to spray fields and absorption fields has not been included as a beneficial reuse for the purposes of this RWSP.”

m) Clarification Regarding Return Flows. The “Spatial Distribution” section on Page A-12 indicates that “The Districts did not attempt to identify where future reclaimed water flows or beneficial reuse will occur.” Please clarify if return flows via irrigation were included in the RWSP evaluations, as Appendix D (first bullet on Page D-25) appears to indicate increases in return flow were included in the future simulations.

n) Editorial Correction Suggested. The lowest color gradation in the legend of Figure D-7 should indicate "<500 mg/L" in lieu of ">500 mg/L".

o) Address Discrepancy Between Data and Observed Conditions. Figure D-8 is showing less of the LFA with TDS concentrations <500 mg/L than the 2020 CFWI RWSP through the north central portion of the CFWI. Figure D-8 in the 2025 CFWI RWSP also appears to be based on notably less data points than Figure D-8 of the 2020 CFWI RWSP, particularly in the Orange County area. There are multiple utilities currently using LFA groundwater in central Orange County that are not experiencing TDS concentrations greater than 500 mg/L, and 1,000 mg/L, as Figure D-8 of the 2025 CFWI RWSP indicates. This discrepancy between Figure D-8 and observed conditions appears to be due to a lack of data. This uncertainty associated with this figure should be clarified in the text.

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Formstack, 11671 Lantern Road, Suite 300, Fishers, IN 46038

Callie Register, P.E.
Regional Water Supply Planning Coordinator
Bureau of Water Supply Planning
St. Johns River Water Management District
525 Community College Parkway SE
Palm Bay, FL 32309

May 15, 2025

via email: cregister@sjrwmd.com

**Re: Draft 2025 Central Florida Water Initiative Regional Water Supply Plan
STOPR Group Comments**

Dear Mrs. Register:

The City of St. Cloud (whose utility is now managed and operated by Toho Water Authority), Toho Water Authority, Orange County, Polk County, and the Central Florida Tourism Oversight District (previously known as the Reedy Creek Improvement District), collectively referred to as the STOPR Group, appreciate the opportunity to review and comment on the draft 2025 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 also provided our comments via the public comment webform on the CFWI website (https://floridaswater.formstack.com/forms/cfw_i_planning). These comments are also listed below.

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The STOPR Group supports the Districts' efforts to continue to implement the critical successes the region has achieved as a result of the previous planning and regulatory efforts.

b) **Support for Continued Manner of Review for New Projects and Clarification Request.**

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- k) **Clarify IPR Reference.** Indirect potable reuse (IPR) projects have a specific definition in the new potable reuse rules. Not all aquifer recharge projects are considered IPR. Please change the first bullet on Page 95 as follows, “Conduct further investigation and maximize development of natural system enhancement/recharge projects~~-(IPR)~~”
- l) **Avoid Inconsistent Definitions.** The Department’s classification of reuse is the deliberate application of reclaimed water for beneficial purposes and can include landscape irrigation, industrial processes, groundwater recharge, and wetland enhancement.

The “2045 Reclaimed Water Production” section on Page A-10 of the draft RWSP creates a separate classification for beneficial reuse for the RWSP that is different from the definition of beneficial reuse used by the Department. The classification in the RWSP defines beneficial reuse as only those uses in which reclaimed water takes the place of an existing or potential use of higher quality water for which reclaimed water is suitable, such as water used for landscape irrigation. This classification excludes aquifer recharge projects such as RIBs and wetland hydration as forms of beneficial reuse.

As resources become more limited, water suppliers are implementing alternative water supply projects, including impact offset and indirect potable reuse projects that could include RIBs and wetland hydration. Aquifer recharge and wetland hydration (among other reuse options) are forms of beneficial reuse and should be classified as such so that there is not ambiguity that creates uncertainty in the permitting and implementation of impact offset and indirect potable reuse projects. In addition, establishing separate classifications for beneficial reuse creates confusion and inconsistency. We suggest the following paragraph from Page A-10 be deleted or changed as follows:

~~“For this CFWI RWSP, beneficial reuse was considered only those uses in which reuse projects where reclaimed water takes the place of an existing or potential use of higher quality water for which reclaimed water is suitable, such as water used for landscape irrigation, were the focus of the RWSP. The delivery of reclaimed water to other types of reclaimed water facilities such as rapid infiltration basins (RIBs) located in recharge areas and wetland hydration projects is considered beneficial reuse by the FDEP. However, Except for impact offset, indirect potable reuse, and other similar projects, these types of beneficial reuse do not directly replace groundwater withdrawals and were therefore not the focus of this RWSP classified separately as part of this plan. Generally, dDelivery of reclaimed water to spray fields and absorption fields arehas not been included as aconsidered beneficial reuse for the purposes of this RWSP.”~~

- m) **Clarification Regarding Return Flows.** The “Spatial Distribution” section on Page A-12 indicates that “The Districts did not attempt to identify where future reclaimed water flows or beneficial reuse will occur.” Please clarify if return flows via irrigation were included in the RWSP evaluations, as Appendix D (first bullet on Page D-25) appears to indicate increases in return flow were included in the future simulations.
- n) **Editorial Correction Suggested.** The lowest color gradation in the legend of Figure D-7 should indicate “<500 mg/L” in lieu of “>500 mg/L”.
- o) **Address Discrepancy Between Data and Observed Conditions.** Figure D-8 is showing less of the LFA with TDS concentrations <500 mg/L than the 2020 CFWI RWSP through the north central portion of the CFWI. Figure D-8 in the 2025 CFWI RWSP also appears to be based on notably less data points than Figure D-8 of the 2020 CFWI RWSP, particularly in the Orange County area. There are multiple utilities currently using LFA groundwater in central Orange County that are not experiencing TDS concentrations greater than 500 mg/L, and 1,000 mg/L, as Figure D-8 of the 2025 CFWI RWSP indicates. This discrepancy between Figure D-8 and observed conditions appears to be due to a lack of data. This uncertainty associated with this figure should be clarified in the text.

Please note that the above comments represent the STOPR Group’s collective comments. The individual members of the STOPR Group may also comment separately on aspects of the RWSP that relate directly to their utility. In addition, the Water Cooperative of Central Florida is also commenting separately on aspects of the RWSP related to the Cypress Lake Wellfield Project.

We appreciate the Districts' consideration of these comments. The STOPR 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.

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