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September 19, 2008

Steve Seibert, Executive Director
Century Commission
via email: info@centurycommission.org

Re: Water Congress Priorities

Dear Mr. Seibert:

The Sanibel Captiva Conservation Foundation submits the following water priorities for consideration by the delegates to the Century Commission Water Congress. SCCF has coordinated with a wide variety of groups on the development of these priorities and submit these as widely supported Statewide objectives and priorities.

What are the three most important short-term and three most important long-term actions the Water Congress should recommend that will lead to "a long-term water conservation, use and supply plan for environmental, agricultural and public consumption purposes."

Short Term Less than 5 year time frame

1. **Water Conservation and reuse.** Expand & incentivize conservation & appropriate reuse of water otherwise wasted as discharge.
 - a. Eliminate Landscape use of potable water
 - b. Change rate structure to incentivize conservation
 - c. Incentivize Low Impact Design
 - d. Mandate reuse in waste water permits for irrigation, golf courses
 - e. Mandate stormwater augmentation of reuse over surface and groundwater sources
 - f. Require low flow fixtures and new technologies for onsite water retention including cisterns and water walls in new and re development
 - g. Move agricultural irrigation pumping to reuse. Establish localized Reusable Water Containment Areas (RWCA) to avoid discharging water

2. **Protect Natural System Supply First - then allocate water supply.** Establish Statutory Reservations, Water Budgets & Optimum Flow and Levels for waterways and aquifers to avoid harm and provide right flows at right time of year.
 - a. Incorporate a comprehensive accounting in each ERP and consumptive use permit to reflect allocation of water relative to the Reservation and OFL

3. **Re establish lost natural system storage to address flow and timing.** Revise ERP rules to insure protection and rehydration of headwaters, floodplains and minor tributaries now lost to development.
 - a. Prevent the hardening of these flowways and buffers by impervious development or industrial process e.g. clay settling areas.

Long Term Greater than 5 year time frame

1. **Interdistrict Transfer of water.** Reaffirm Florida water policy of Local Sources First and expand to prohibit Interdistrict Transfer of water. Provide an exception for natural system hydrologic restoration
2. **Prioritize Capital Investment in new sources.** Invest and incentivize new source development of Indirect Potable Reuse/Groundwater Replenishment/Toilet to Tap.
3. **Standardize hydrologic modeling** within Water Management Districts and develop a hydrologic model for Florida that can be used across Water Management District boundaries.

On behalf of SCCF we appreciate your consideration of our comments to the Water Congress. The SCCF is a 40 year old nonprofit conservation organization dedicated to the preservation of natural resources and wildlife habitat.

Sincerely,



Rae Ann Wessel
Natural Resource Policy Director