Lower Santa Fe and Ichetucknee River MFL Rulemaking Workshop

Regulatory Strategy

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April 5, 2022 @ SRWMD

April 6, 2022 @SJRWMD

Workshop Agenda

1. **Welcome**
2. **Draft Regulatory Strategy – Part 2**
   i. Agricultural Water Conservation
   ii. Public Supply Water Conservation
3. **Next Steps**
4. **Public Comment**

Link to LSFIR Rulemaking:
https://floridadep.gov/water-policy/water-policy/content/office-water-policy-rulemaking

Draft Regulatory Strategy Summary – Part 1

- **Previously workshopped draft regulatory language ("Part 1") included:**
  - **Required offsets for users' proportionate share based on 2014-2018 average water use**
  - **Required offsets for water use above the 2014-2018 average water use**
- **"Part 2" regulatory language is in addition to "Part 1" language previously workshopped.**

Draft Regulatory Strategy Summary – Part 2

- **Goal of Workshopping Part 2 of Draft Language:**
  - To introduce water conservation as one regulatory component of a larger strategy
  - To provide language for public review and comment
- **Goals of Future Workshops:**
  - To identify projects with which to offset impacts
  - To incorporate rule language to help facilitate project implementation


Agricultural Water
Conservation

Agricultural Water Conservation – Distribution Uniformity

➢ Requires users to maintain a minimum standard for Distribution Uniformity

- Distribution Uniformity is a measure of how effective an irrigation system is at delivering water over a field evenly.
- Increasing DU is one part of increasing irrigation efficiency
- Agricultural users will be required to submit an MIL evaluation every 5 years to ensure these minimums are met

Table XX. Irrigation Distribution Uniformity Minimums

Irrigation System Type	Minimum Distribution Uniformity (DU)
Micro-Drip	75-85
Micro-Spray	80-90
Low Pressure Center Pivot or Lateral Move	75-85
Standard Center Pivot with End Guns	65-75
In Place Overhead Sprinklers	70-75

Agricultural Water Conservation – BMP Implementation

- **Requires users to implement water saving BMPs**
  - Water saving BMPs are ranked based on their water saving capacity
  - Users can select what most applies to their field specific conditions
  - If the highest-level BMP is not selected, the user must select a combination of BMPs that are equivalent
  - Permittees would submit a report to verify the BMPs are in place.


Public Supply Water
Conservation

Public Supply Water Conservation

- **Makes changes to the Standard and Goal-Based Water Conservation Plans**
  - Requires permittees to evaluate the effectiveness of their plans on an annual basis and submit a report.
  - May require data analytics to be submitted as part of the annual report to demonstrate how the programs perform

Additions to the Water Conservation Plan

- **Water Conservation Plans must include:**
  - A landscape irrigation audit/evaluation program for the highest quartile of users among businesses and residents
    - Include education on relevant irrigation restrictions and rain sensor installation and replacement
  - An education component that focuses on outdoor irrigation

Water Loss Reduction Plan

- **If water loss is greater than 10% the applicant must:**
  - Perform a meter survey
  - Complete a leak detection survey
  - Replace meters that are not 95% accurate
  - Implement other water conservation measures based on audit findings

Reduction of Gross and Residential Per Capita

- **Part of the Water Conservation Plan**
  - If gross or residential per capita is higher than the average per capita in the NFRWSP Area the applicant would:
    - Submit an end-of-permit gross or residential per capita goal
    - A plan for reducing the per capita to at or below the average
  - Per capita goal will include reporting of progress every 5 years

Calculating Gross and Residential Per Capita

Gross Per Capita

$$\frac{(WD + IM - EX)}{RP}$$

WD = groundwater/surface water/ stormwater withdrawals
IM = water imported
EX = water exported
RP = residential population

Residential Per Capita

Total Residential Water Use divided by Service Area Residential Population

ERP Concurrency

- **Applications with a request for the following water uses that also require ERP must receive the ERP prior to CUP issuance**
  - Requests for golf course areas, cemeteries, nursery plants, agricultural crops, or landscaped areas that are part of an artificially-created surface water system
  - Requests to dewater

Other Water Conservation

Next Steps

- Review and consider all comments received through May 6, 2022
- Focus on project development
- Combine all regulatory language into a draft rule

Public Comment

Participants will be given 3 minutes to make their comments.

Written comments may be submitted to the email address below.

www.floridadep.gov/water-policy

OWP_rulemaking@floridadep.gov

Please submit public comments by May 6