



# Florida Department of Environmental Protection

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THROUGH: Herschel T. Vinyard Jr. *HTV*  
Secretary

FROM: Greg Munson *GM*  
Deputy Secretary for Water Policy and Ecosystem Restoration

DATE: March 23, 2012

SUBJECT: Permitting of Conjunctive Use and other Multiple Water Sources

The Department recently conducted stakeholder sessions around the state with water users and environmental interests seeking input on ways to improve the consistency and effectiveness of the consumptive use permitting program. One issue raised by the stakeholders was the need for consumptive use permits to allow more flexibility in the use of multiple sources to meet permitted demands.

As we work with utilities and stakeholders around the state to meet our water supply challenge, a common theme is that reliance on a sole water source to meet a region's water needs may not be sustainable. Generally, the best way to meet future demands (other than conservation) is to diversify the sources of the region and maximize the degree of interconnection among sources within that region. This includes "conjunctive use," such as utilizing and combining surface water and ground water supplies, or any other use of multiple sources such as fresh or brackish groundwater, surface water or desalination of sea water. The benefits of such an approach by a regional water supply authority or a utility include a better ability to manage and prevent environmental impacts, improved system reliability, operational flexibility and emergency backup capability. Thus, the purpose of this memorandum is to promote conjunctive use

permitting, and thereby encourage water users and suppliers to coordinate in this way to meet future demands.

The consumptive use permitting program should facilitate and encourage the use of multiple sources when appropriate to achieve the environmental and operational benefits that result. Currently, the Water Management Districts (Districts) can and do authorize withdrawals and the use of multiple sources in a single permit, and should continue to do so when requested by an applicant. The Districts should work with the applicant to establish operational protocols for incorporation into the permit that govern the use of the water sources to collectively meet the needs of the permittee. Such protocols should provide for the use of the permitted sources in a way that encourages flexibility of operation while also ensuring that the conditions of issuance are met for the permit duration. For example, in years of abundant rainfall, the use of excess wet weather surface water may be maximized to provide a larger percentage of the overall water supply need. In drought years, a permittee may rely more heavily on sources that will not exacerbate the environmental effects of the drought, such as water stored in reservoirs or aquifer storage and recovery facilities, or desalination. Such protocols should include limits on the total amount of water available to be withdrawn from each source, as needed, within the flexible operational protocols.

HTV/GM/as

cc: Ann B. Shortelle, Ph.D., Director, Office of Water Policy, FDEP