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September 22, 2005

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**RE: GROUNDWATER PUMPING, DE-SAL USE AND OROP PROTOCOL**

Dear SWFWMD Board Member or TBW Board Member,

Soon representatives of SWFWMD and TBW will be involved in a dispute resolution. CoPOWR (Coalition to Preserve Our Water Resources) supports the original intent of the "Northern Tampa Bay New Water Supply and Groundwater Withdrawal Reduction Agreement" (aka: the Partnership Agreement) and asks that TBW be held to the agreement to maximize the use of alternative sources so as to continue to reduce reliance on ground water.

Per the Partnership Agreement, TBW was to identify a menu of water supply projects that would ensure source diversity and, upon construction "shall provide an annual average of at least 85 mgd of new water supply." CoPOWR supports the position that the 85mgd be "used first" to offset groundwater pumping and that the Desal plant be utilized as a base production plant to produce 25mgd, not a peaking facility to be used intermittently. CoPOWR is of the opinion that this represents the intent and spirit – and actual wording – of the Partnership Agreement.

During the past two years, TBW has maximized their use of surface water from their new treatment plant (paid for in part by our tax money through SWFWMD). Whenever water in the Tampa Bypass Canal, Hillsborough River, and Alafia River was sufficient, TBW used all they could and then used groundwater to meet demands. This action resulted in ground water pumping amounts of 90mgd or less during the past year – proving that the operating protocol of "alternatives first before ground water" is sound and can work. So, why stop now?

Recently TBW reduced their take from surface water and began to increase groundwater pumping. This is despite the fact that surface water is still abundant. Two spurious and incorrect assertions have been made as justification for this action. 1) that late August and early September had high temperatures and low rainfall and therefore surface water is not available. This ignores the fact that rivers continue to flow for some time after actual rainfall diminishes and; 2) that by increasing pumping one can expect a decrease in storm water flooding. This ignores the fact that surface water filters so slowly into the aquifer that induced drawdown does not react fast enough to relieve short term flooding. This also indicates that some have forgotten that prolonged drawdown was the cause of habitat destruction in the first place.

During all this time, TBW continued to assert that the desalination plant (also paid for in part by our tax money through SWFWMD) would be used at 25mgd. That is to say, they would use the desalination water to the maximum extent possible, then use surface water, and finally use ground water to meet demands.

But now TBW has made statements and attempted to change wording in the OROP report that represent a shift policy. TBW has indicated that rather than "this plant will provide 25 million gallons per day (mgd) and could be expanded in the future to 35 mgd",

it should be "this plant has a design *nominal* treatment capacity of 25 million gallons per day (mgd) and could be expanded in the future to 35 mgd *nominal* capacity."

**Webster's definition of nominal is: (adj) "in name only, not in fact."**

It is CoPOWR's opinion that this attempt to change policy is based solely on the desire to reduce the wholesale cost of water. We feel that TBW's concern about water rates is driving the increase in pumping. We see this as being in direct conflict with the intent of the Partnership Agreement. We have been through these issues so many times in the past. Our CoPOWR presentation to the TBW Board demonstrated that the expense of environmental restoration required due to groundwater pumping damage adds thousands of dollars to the cost of groundwater. *There is no such thing as cheap groundwater.*

Therefore, be it known that:

- 1) CoPOWR supports the SWFWMD position that their funding agreement for the desal plant does not allow TBW to operate the plant as a peaking facility and;
- 2) CoPOWR supports the development and use of alternative sources of water and strongly opposes the development of new ground water pumping or the increase of pumping in either Hillsborough or Pasco Counties.
- 3) CoPOWR feels that the OROP needs to reflect and include the protocol for using alternative sources of supply. We do not support TBW's last minute attempt to change OROP in relation to use of desal water. The Partnership Agreement and Consolidated Permit clearly require the OROP to include "the protocol under which the Authority (now TBW) will select available interconnected supply sources to meet demand" and "the protocol under which the Authority (TBW) will rotate among available interconnected supply sources to meet demands while avoiding or minimizing environmental stresses."

We strongly urge you all to keep to the original intent of the Partnership Plan.

Sincerely,  
Sharon Blanchard, Chair  
Pat Carver, Vice-Chair

Cc: CoPOWR steering committee  
William Bilenky, General Counsel SWFWMD  
David Moore, Executive Director SWFWMD  
Jerry Maxwell, Director TBW  
Don Conn, General Counsel TBW  
Water teams of Hillsborough County and Pasco County